

2 October 2025

Irvine City Council  
1 Civic Center Plaza  
Irvine, CA  
via Email



SUBJECT: Comments on the Irvine Final Draft CAAP

Dear Irvine City Council,

On behalf of Climate Action Campaign (CAC), thank you for the opportunity to provide comments on the City of Irvine's Final Draft Climate Action and Adaptation Plan (CAAP).

As outlined in our [Orange County CAP Report Card Update](#), local action is essential to protect residents from climate risk and to secure state and federal funding for clean energy, safe streets, and climate resilience. Irvine faces great risk from climate disasters, making bold, enforceable action urgent.

We support the City setting ambitious goals – 44% below 2019 emissions by 2030 and 90% below 2019 emissions by 2040 – targets that exceed state requirements and support Irvine's long-stated climate aspirations. We are deeply concerned, however, that Irvine does not intend to make these goals binding, and are not yet supported by substantial evidence or enforceable commitments. Instead, the CAAP is merely an exercise in hoping, wishing, and dreaming with no accountability, funding, or enforcement to achieve its goals. Having an aspirational CAAP that is subject to the whims of elected officials leaves Irvine families vulnerable and at risk for suffering from dangerous air pollution and poor health outcomes, let alone unprepared and unprotected as extreme heat, fires, and floods intensify.

We respectfully recommend the following:

### **1. Adopt a CEQA-qualified CAAP**

The Draft CAAP explicitly states that it does not approve or authorize projects. Without CEQA qualification, the CAAP cannot be relied upon to streamline development or guarantee implementation of its strategies. A CEQA-qualified GHG Reduction Plan is the only path to ensure Irvine's climate commitments are binding, enforceable, and set up for funding opportunities. Maybe most importantly, having a CEQA-qualified CAAP gives assurance to Irvine families that their local officials are protecting their health and their future.

### **2. Clarify and commit to energy sector strategies**

- **OCPA Enrollment (BE-3.1):** Thirty percent of 2030 reductions rely on all Irvine accounts opting into OCPA's 100% renewable product, but does not include a

requirement or similar action by the city in order to achieve this goal. The CAAP must include a clear implementation plan or Council action to achieve universal enrollment.

- **Building Retrofits (BE-1.2, BE-1.3):** The plan assumes major retrofit programs beginning January 2026, yet there is no roadmap for program design, funding, or incentives, especially critical given uncertainty about federal rebates. We urge the City to establish a retrofit ordinance or program timeline with clear equity protections for renters and low-income households.
- **All-Electric New Construction (BE-2.1):** The plan assumes nearly all new buildings will be electric starting in 2026, without a Reach Code or ordinance. Adoption of an all-electric building ordinance is needed to ensure this outcome.

### **3. Provide transparency on transportation measures**

- **EV Charging Infrastructure (TR-2.1):** Over 20% of 2030 reductions depend on EV adoption supported by charging station buildout. Yet the CAAP does not specify how many chargers, what types (fast vs. Level 2), or on what timeline. This data is essential for credibility and public accountability.
- **Active Transportation (TR-4 series):** The CAAP estimates 8% of 2030 reductions from bikeways and walkability measures, but provides no quantification of miles of protected bike lanes or timing for bikeshare adoption. We recommend setting measurable, trackable infrastructure targets.

### **4. Solid Waste Diversion (SW-1.1)**

Another 26% of 2030 reductions rely on eliminating disposal of organic waste in landfills. The City must detail how it will achieve those drastic reductions – whether it will provide new organic waste bins, increase collection frequency, or build local processing capacity. Without such commitments, these reductions remain speculative.

### **5. Ensure accountability and transparency**

To move beyond intention, Irvine should commit to annual progress reports to Council and the public, as well as a public-facing dashboard to track implementation.

### **Conclusion**

There is no greater threat to humanity's health, safety and future than an overheated planet. Climate Action Campaign sent our first letter to the City with Climate Action Plan recommendations in 2016 – almost a decade ago. In addition to enduring extraordinary delays, Irvine taxpayers have paid hundreds of thousands of dollars on plan development and funded untold hours of personnel time on this effort. It is well past time for the Council to adopt a CEQA-qualified GHG Reduction Plan, establish enforceable policies on building electrification and retrofits, clarify assumptions for transportation and waste measures, and ensure transparency through regular progress reporting.

We look forward to working with you to strengthen this plan.

Sincerely,

David Martinez  
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Climate Action Campaign