



March 9, 2021

Mayor and Council  
201 N. Broadway  
Escondido, CA 92025  
Via Email

**RE: Climate Action Campaign comments on the City of Escondido's Climate Action Plan Update**

Honorable Mayor and City Councilmembers,

Climate Action Campaign is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual [Report Card](#) evaluating the strength of cities' CAPs and their implementation .

Throughout the process of Escondido's CAP Update, we have shared best practices and our recommendations for this critical planning document,, and provide an additional letter today with our final recommendations. **We also echo our support for the amendments proposed by the Escondido Community Advisory Group (ECAG) to strengthen the City's CAP.** We thank City staff for their hard work on this important effort.

***Commit to Zero Carbon by 2045 or Sooner***

While we appreciate City Staff envisioning carbon neutrality by 2045, Escondido must commit to carbon neutrality to meet today's climate science. Recent announcements to commit to zero carbon CAPs from County Supervisor Terra Lawson Remer and City of San Diego Mayor Todd Gloria underscore the importance of local governments making this commitment to protect their residents. **To align with state targets and the latest climate science, we urge the city to align the CAP with EO-B-55-18, and commit to zero carbon as soon as possible, and by 2045 at the latest.**

***Commit to Community Choice Energy, and Specifically Consider Joining San Diego Community Power***

**We applaud "Measure E-5.3 Increase Grid-Supply Renewable and Zero Carbon Electricity", and the City's commitment to reaching 100% clean energy by 2030.** We also applaud the City for conducting a feasibility study with neighboring cities to join a Community Choice Energy (CCE) program—the only viable pathway to reaching the target.

However, **the CAP must fully commit to CCE as the only pathway to reaching 100% clean energy, and the City should commit to joining an existing Community Choice Energy program.** Joining an existing program will ensure scale to generate more revenue to provide more affordable rates, more local green energy jobs and steel in the ground projects, and more clean energy programs and incentives, protect city staff time and coffer, and offer the opportunity partner with cities with a shared goal of reaching 100% clean energy also ensures Escondido can meet its CAP targets.

From our perspective, San Diego Community Power (SDCP) best exemplifies and embodies the full potential of what CCE has to offer communities. SDCP is the only CCE program that embraces strong environmental, equity, local economic development and worker provisions, and is capable of achieving the many benefits of CCE with its scalable size. **We urge City leadership and staff to have proactive conversations with SDCP to explore joining their JPA and the regional movement to 100% clean energy.**

### ***Expand all-electric measures to include single family homes***

We applaud “*Measure E-4.1: Require New Residential Developments to Install Alternatively-Fueled Water Heaters*”, and recommend the subsequent “*Measure E-4.2: Require New Multi-Family Residential Developments to Install Electric Cooking Appliances*” be amended to include all new residential developments. Over 42 cities in California are adopting more stringent building decarbonization ordinances to end the proliferation of methane gas infrastructure, which not only damages our climate but is a proven, dangerous indoor air pollutant. **We recommend the City adopt more robust CAP measures, and City ordinances, to require all new construction be all-electric.**

### ***Set Higher and Citywide Mode Share Targets for Biking, Walking, and Transit***

In the Draft CAP, Strategy 3 addresses the broad goal of reducing vehicle miles traveled (VMT) by increasing the share of trips taken using walking, biking, and public transit. While the steps enumerated are worthwhile actions to take, the CAP still does not commit to mode share targets for the entire city, and **we recommend Escondido commits to overall mode share targets for biking, walking, and transit.**

**We also still recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares.** Escondido’s CAP should set more aggressive mode share targets tailored to the City’s local context.

### ***Include Smart Land Use Policies with Affordable Housing Near Transit***

Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.<sup>1</sup> We are encouraged that the draft CAP calls for Escondido to encourage more mixed use,

---

<sup>1</sup> Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). Location Matters: Affordable Housing and VMT Reduction in San Diego County. Retrieved from: <https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action+-+Affordable+Housing+And+VMT+Reduction.pdf>

high density housing with flexible parking, and other incentives to reduce car use. However, the CAP does not currently include strategies that advance the development of affordable housing in Escondido, especially near the City's transit centers and high-frequency bus lines.

**We still recommend that the CAP include the following measures to increase the supply of affordable housing near transit** by pursuing State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit, explore opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families, and develop an inclusionary housing ordinance that would require a portion of all housing to be set aside for families earning less than 80% of the Area Median Income to boost affordable housing production and support racial and economic integration.

The CAP must also recognize the harmful role sprawl development plays in exasperating the climate crisis, air pollution, wildfire danger, and other negative environmental, economic and social impacts.

**Projects like Harvest Hills will make hitting Escondido's CAP targets much harder, undermining even a gold standard CAP.**

#### ***Commit to Zero Waste***

We applaud Escondido for setting a 90 percent citywide waste diversion rate by 2035. The Escondido CAP can achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas. **We recommend the city develop a plastics reduction ordinance.**

#### ***Adopt an Adaptation Measure to Develop a Green Infrastructure Plan***

The CAP includes some good green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits, and **the City should adopt an adaptation measure to develop a holistic green infrastructure plan.** A Green Infrastructure Plan can include strategies that preserve or restore natural lands, implement green streets using techniques such as street trees, permeable pavements, bioretention, and swales, and retrofit policies for public and private properties that promote projects such as green roofs. We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target.

#### ***Center and Strengthen Equity in the CAP and Establish a Climate Commission***

Climate change hits hardest in communities of concern that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of economic, environmental, and racial justice in those places.

We applaud Escondido for working to identify Priority Investment Neighborhoods (PINs) throughout the city for targeted, early CAP implementation. Other cities like San Diego and Chula Vista have or are in

the process of developing Climate Equity Indices. As Escondido goes through this process, we recommend studying the King County 2020 Strategic Climate Action Plan, Oakland Equitable Climate Action Plan, the “Planning for a Boston Green New Deal and Just Recovery” Plan, and the Los Angeles’s Sustainability Plan “LA’s Green New Deal.” for ideas on how best to identify communities of concern for PINs designation that can truly promote greater economic, racial, and social justice.

Of course, the development and implementation of this section and the identification of PINs should take place in consultation with a diverse set of stakeholders from the most impacted of the City’s communities.

We also echo the Planning Commission’s recommendation that the City establish a Climate Commission to enhance, track and support CAP implementation. The Commission should be composed of subject matter experts, business, residents, and community stakeholders. We oppose assigning CAP oversight to the Planning Commission without significant changes to membership and operations given the body’s lack of understanding and focus on climate issues.

***Conclusion***

Thank you for the opportunity to weigh in on the development of this critically important document. Escondido’s CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change, and set the bar for climate action policy in inland North County. We urge you to direct Staff to incorporate the recommendations above to comply with legal requirements, maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Vasilakis', with a long horizontal flourish extending to the right.

Matthew Vasilakis  
Co-Director of Policy  
Climate Action Campaign