



March 26, 2020

Mike Strong
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Comments on Escondido Climate Action Plan Update

Dear Mike Strong,

Climate Action Campaign is a nonprofit organization with a simple mission: to stop the climate crisis. 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 best practices to implement those strategies. Throughout the process of Escondido's CAP Update, we have engaged with the City with recommendations for key strategies to prioritize; those letters are included here as an attachment.

After careful review of the Draft CAP, we would like to thank City staff and the community for their hard work in helping shape this key document to make Escondido climate-safe and climate-ready. We offer the following recommendations to further strengthen the CAP:

The CAP Must Comply With CEQA Guidelines for Qualified Plans

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines.

In *California Riverwatch v. County of Sonoma et al.* (2017), the court stated that in CAPs used for tiering, “any measures or requirements imposed [must] be sufficiently defined to be enforceable.” This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The decision further states that measures that fall into the category of “wishful thinking, good intentions, and an intent to ‘work’ with others” violate CEQA (26). The measures within the CAP must be specific, evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

Amend Planning Horizon from 2030 to 2045 In Line With State Targets

As a long-range planning document, Escondido's CAP should amend the planning horizon from 2035 until at least 2045, and the target for that year should align with Executive Order B-55-18, which aims to achieve carbon neutrality by 2045. Other cities in California, including Los Angeles and Santa Monica, are

already planning for this goal, showing that planning for carbon neutrality is not only necessary, but achievable today.

The UN IPCC Special Report on Global Warming of 1.5°C and other recent climate science findings show that, at every level of government, we must plan for and fully execute a total transition away from fossil fuels. To achieve that transition, we need all of our cities to establish the roadmap and begin deep decarbonization today.

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.¹ 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 recommend that the CAP include the following measures to increase the supply of affordable housing near transit:

- Pursue State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit.
- Pursue other opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families—something Escondido is familiar with doing.
- Present to Council for consideration an inclusionary housing ordinance that would require a portion of all multi-family housing to be set aside for families earning less than 80% of the Area Median Income. Inclusionary housing ordinances help boost affordable housing production and support racial and economic integration.

The CAP should also add a measure specifying where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the city so there is clarity for the public and City Staff. The City of San Diego's ongoing struggle to ensure that community plan updates in urban, transit-priority communities are aligned with CAP targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both a neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

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/Safari Highlands will make hitting Escondido's CAP targets much harder, undermining even the most effective climate plan.

¹ 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>

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 or establish a Community Choice Energy (CCE) program—the only viable pathway to reaching the target. However, the CAP must fully commit to CCE and should consider joining an existing program, preferably San Diego Community Power (SDCP), rather than establishing a new one. There are numerous reasons for this:

- Scale is becoming an increasingly important factor in the success of CCE programs in the state. Larger programs are able 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.
- Establishing new CCE programs takes up significant staff time and City resources. Whether establishing a stand alone CCE program or negotiating a Joint Powers Authority agreement with other cities, starting a new CCE program takes significant staff time and financial resources. Escondido does not need to reinvent the wheel when there are already state-certified CCE programs now operating in the same energy service territory, which the City can join and benefit from.
- Regional unity in the face of the climate crisis is desperately needed. If we are going to work together to solve the most existential crisis of our lifetimes, cities must work together collaboratively to support one another. Partnering with cities with a shared goal of reaching 100% clean energy also ensures we are moving lock step to meeting all of our local CAP targets.
- SDCP best exemplifies and embodies the full potential of what CCE has to offer communities. Of the existing CCE programs in the region, SDCP is the only one that embraces strong environmental, equity, local economic development, and worker provisions, and is capable of achieving the many benefits of CCE with its scalable revenue projections. 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.

Escondido has a unique opportunity to lead North County inland cities toward an inclusive clean energy future, and we hope to be an enthusiastic partner in helping the City reach its 100% clean energy goals.

Additionally, with regards to Measure 5.2 “Require New Commercial Developments to Achieve Zero Net Energy”, the City should adopt the enforcing ordinance sooner than 2023, and Measure 5.4 “Increase Renewable Electricity Generated at School Sites” must include an enforceable strategy—collaborations are not considered enforceable under CEQA guidelines.

Include a Residential Energy Disclosure Ordinance to Increase Energy Efficiency

We are pleased to see Escondido include multiple measures identifying water conservation and energy efficiency ordinances for residential and non-residential buildings, and are specifically pleased to see commitments to building electrification.

In addition to Measures E-4.1 through E-4.4, we recommend a Residential Energy Disclosure Ordinance similar to the one adopted in Portland, Oregon (and called for in the City of San Diego's CAP), which requires sellers of homes to obtain and disclose a Home Energy Report estimating the energy-related use, associated costs, and cost-effective solutions to improve the home's efficiency.²

In addition to reducing emissions, energy efficiency promotes lower energy bills and creates good-paying green jobs.³

With regards to Measure E 4.2: "Require New Multifamily Residential Developments to Install Electric Cooking Appliances", we applaud the City for this commitment, but recommend expanding upon this measure to include all new residential construction, not just multifamily. Numerous cities are moving towards ending all new natural gas infrastructure⁴, and Escondido should join them to meet GHG reduction targets, and achieve Zero Carbon.

The CAP should also explore opportunities to retrofit existing homes and businesses. Energy and water conservation efforts should not be limited to only new construction, all buildings will need to be made climate-safe and climate-ready.

Set Higher Overall 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, and the CAP does commit to mode share targets for specific areas of the city, we strongly recommend the City commit to overall mode share targets for biking, walking, and transit.

We also recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares. For example, the City of San Diego states its goal as, "Achieve mass transit mode share of 12% by 2020 and 25% by 2035 in Transit Priority Areas," "Achieve walking commuter mode share of 4% by 2020 and 7% by 2035 in Transit Priority Areas," and, "Achieve 6% bicycle commuter mode share by 2020 and 18% mode share by 2035 in Transit Priority Areas." Escondido's CAP should set more aggressive mode share targets tailored to the City's local context.

Walking and Biking:

² City of Portland Home Energy Score, City of Portland, Bureau of Planning and Sustainability, <https://www.pdxhes.com/>

³ Ettenson, Lara. "Good News for Good Jobs: Clean Energy Soars." NRDC.org, NRDC, 30 May 2018, <https://www.nrdc.org/experts/lara-ettenson/good-news-good-jobs-clean-energy-outpaces-fossil-fuels>

⁴ Forward Looking Cities Lead the Way to a Gas-Free Future, <https://www.sierraclub.org/articles/2020/02/forward-looking-cities-lead-way-gas-free-future>

- Measure T 3.2: “Improve Pedestrian Infrastructure in Priority Areas” aims to develop a holistic Active Transportation Master Plan to increase the number of safe routes for pedestrians, students, and transit users. This goal should be updated to include other specific improvements. We recommend not only developing a complete pedestrian network with comfortable, safe sidewalks, but also commit to innovative strategies that make walking as safe and convenient as possible. Examples of strategies to increase pedestrian mode share include piloting left-turn traffic calming to reduce turn speeds, restricting right turns at red lights, updating walk signals to extend time for pedestrians to cross the street, introducing leading pedestrian intervals, and adding new diagonal pedestrian crossings at busy intersections. We recommend referring to the Mayor of San Francisco, London Breed’s Vision Zero announcement, August 2019.
- Measure T 3.3 “Implement the Safe Routes to School Program at Escondido Union School District” sets specific targets of increasing the percentage of students walking and biking to school by 30% and 2.5%, respectively, by 2035. There is a serious disparity between those targets, and, perhaps, should be looked at closely again.
- Measure T 3.5 “Update Bicycle Master Plan” commits to installing new or improving existing Class II or better bicycle lanes. However, evidence shows that to increase ridership and promote safer streets, cities must prioritize protected bike lanes when planning for biking infrastructure. Safe, separated bikeways and bike lanes allow significantly more community members to participate in bicycling, increasing bike mode share and reducing VMT/GHG emissions. Anything less does not provide the same level of comfort or ease in travel. We recommend Class I and Class IV be included in the measure language.

Transit:

- Measure T 3.6 “Increase Transit Commuters Among New Downtown Residents” includes specific mode share targets for the downtown Transit Priority Area (TPA). Unfortunately, these targets are significantly lower than in TPAs in other jurisdictions. Again, we recommend Escondido’s CAP set more aggressive mode share targets tailored to the City’s local context.
- Measure T 3.8 “Increase Transit Ridership” also includes low mode share targets, which do not take advantage of the number of transit options in Escondido that exist or are planned to exist in the coming decade. We recommend amending this measure to commit to more ambitious targets.

TDM:

- Measure T 3.4 “Develop a Citywide Transportation Demand Management Plan” is an excellent measure to identify and reduce VMT, though the bike mode share targets are also low compared to other commitments in the region. We recommend the City reevaluate the City’s current bike infrastructure and potential to expand and commit to more ambitious targets.

Commit to Zero Waste

The Escondido CAP should achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas.

Currently, Measure S 8-1 reads, “Achieve 80 percent citywide waste diversion by 2030.” We recommend adopting a Zero Waste policy that commits to 100% waste diversion by 2030.

Commit to Fully Electrifying the City’s Municipal Vehicle Fleet

While we support that the Draft CAP commits to a fleet conversion plan, we strongly recommend that the CAP exclusively commit to ZEV’s, and not to alternative fuel vehicles.

Currently, measure T 1.1 reads, “Increase the number of PHEVs in the City’s municipal vehicle fleet”. We recommend amending that language to read: “Develop a Fleet Management Program to guide the replacement of vehicles to zero emission vehicles by 2030.”

Adopt Green Infrastructure Strategies

The CAP includes some good green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to the City. Green infrastructure is an approach to stormwater management that mimics or protects natural water systems.

Under Strategy 9: “Carbon Sequestration and Land Conservation,” multiple measures set goals of planting new trees per year in City-owned landscaped areas and in new developments. The CAP should also commit to a quantifiable target for an increase in tree canopy coverage by planting and caring for drought-tolerant trees.

The CAP should additionally adopt green infrastructure strategies such as preserving or restoring natural lands, implementing green streets using techniques such as street trees, permeable pavements, bioretention, and swales, and adopting retrofit policies for public and private properties that promote projects such as permeable pavement and green roofs. We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target.

Include an Equity Section

Climate change hits hardest in communities 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 environmental justice in those places.

In Escondido, one census tract falls in the top 30 percent of CalEnviroScreen’s statewide rankings. We recommend that Escondido’s CAP include a Social Equity section that utilizes CalEnviroScreen to explicitly define how Escondido will ensure that these communities are prioritized in the implementation of GHG reduction strategies, including strategies to implement affordable housing development, investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

The development and implementation of this section should take place in consultation with a diverse set of stakeholders from the most impacted of the City's communities.

Hire a CAP Administrator and Commit to Annual Monitoring Reports

In order to ensure timely and transparent progress, we recommend amending the Implementation and Monitoring Section of the CAP to commit to the following:

- Hire a CAP administrator or identify a task force to coordinate and oversee CAP implementation strategies.
- Require annual monitoring reports on implementation progress.
- Require a greenhouse gas inventory every three years.

Recommend Inclusion of Best Practices As Described in 2019 CAP Report Card

In addition to the previous strategies, we recommend that Escondido include the following best practices adopted by numerous cities across the San Diego region. For more detail on the strategies and which cities have incorporated each into their CAPs, please consult CAC's [2019 CAP Report Card](#).

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,

Matthew Vasilakis

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

Co-Director of Policy
Climate Action Campaign

Attachment A: Letter: [Key Priorities for Escondido Climate Action Plan Update - January 15, 2019](#)

Mayor McNamara and Council
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Key Priorities for Escondido Climate Action Plan Update

Dear Mayor McNamara and Council:

Climate Action Campaign is a nonprofit organization with a mission to stop climate change. 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 how effective their implementation has been. Earlier in the process of Escondido's CAP Update, we sent a letter with recommendations for key strategies to prioritize; that letter is included here as an attachment.

We urge you to ensure that the following are included in Escondido's CAP Update, to fulfill legal requirements, maximize emissions reductions, and improve quality of life:

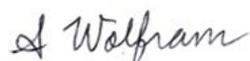
- Enforceable, measurable strategies with detailed deadlines
- Specific, actionable strategies to ensure Environmental Justice communities are prioritized to receive the benefits of implementation.
- A 100% clean energy target with Community Choice Energy as the key strategy to get there
- Targets and associated strategies to reduce Vehicle Miles Traveled (VMT) and increase the share of trips made by biking, walking, and transit.

Finally, we cannot emphasize enough that smart growth development and emissions reductions must work hand in hand, and that the simultaneous pursuit of both meaningful climate action and sprawling development far from public transit is a contradiction in terms. The CAP must chart a clear path forward to accommodate future growth through infill development, not sprawl.

We are counting on your courageous leadership to deliver bold solutions that deliver cleaner air, safer streets, good-paying green jobs, and emissions reductions at the speed and scale that justice demands.

Climate Action Campaign is ready as a resource and partner to this Council as you develop and implement your plan to fight climate change and improve quality of life in Escondido.

Sincerely,



Sophie Wolfram

Director of Programs, Climate Action Campaign

Attachment B: Letter: Recommendations for Escondido Climate Action Plan Update - June 4, 2018

June 4, 2018

Mayor Abed and Council
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Recommendations for Escondido Climate Action Plan Update

Dear Mayor Abed and Council:

Climate Action Campaign is a nonprofit organization with a simple mission: stop climate change and improve our quality of life. We are committed to helping cities throughout Southern California adopt and implement policies that help prevent the worst impacts of climate change while providing lasting economic, public health, and community benefits.

We wish to see the City of Escondido keep pace with the progress of cities across the region and the state as you update your CAP. To facilitate your CAP update moving forward successfully, we are writing both to recommend strategies to help the city meet the requirements for a CEQA qualified plan, as well as develop a plan that benefits all residents.

CAP Development Recommendations

Adopt a CEQA Qualified Plan Aligned With State Targets

We recommend that Escondido make its CAP update CEQA qualified, as the previous iteration of the CAP was. As a CEQA qualified plan, the CAP must be consistent with state targets, namely SB 32 (2016), which requires statewide emissions to decrease 40% below 1990 levels by 2030 and, for planning horizons beyond 2030, with EO S-3-05, which requires an 80% reduction below 1990 levels by 2050.

The CAP Must Have Enforceable and Measurable Strategies with Detailed Deadlines

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines. The CAP must also provide substantial evidence for each strategy that implementation of the strategy will lead to the GHG reductions identified for that strategy.

In *California Riverwatch v. County of Sonoma et. al* (2017), the court stated that in CAPs used for tiering, “any measures or requirements imposed [must] be sufficiently defined to be enforceable.” This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The decision further states that measures that fall into the category of “wishful thinking, good

intentions, and an intent to ‘work’ with others” violate CEQA (26). The measures within the CAP must be specific, evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

Set 100% Clean Energy Target with Community Choice to be in Alignment with Region

Every CAP adopted by cities in the San Diego since 2015 -- San Diego, Del Mar, Solana Beach, Chula Vista, Encinitas, and La Mesa -- has included a 100% clean energy target with a commitment to pursue Community Choice.

There are three primary reasons for this: 1) achieving 100% clean energy is the most powerful single strategy a city can adopt to reduce GHG emissions, 2) Community Choice is the only feasible strategy to achieve 100% clean energy, since cities do not have control or jurisdiction over our monopoly utilities; and 2) Community Choice delivers myriad benefits to cities, including choice, lower rates for families, local decision-making, and the opportunity to keep revenues in the community.

We recommend that Escondido include a 100% clean energy target in its CAP with a commitment to Community Choice in order to achieve significant emissions reductions and community benefits and to keep stride with other cities across the region. It would be challenging, if not impossible, to reach state climate targets without a commitment to 100% renewables.

Set Walking, Biking, and Transit Mode Share Targets

Even 100% clean electricity won't get Escondido to the state climate targets. Escondido, like many other cities in California, must change the way the city grows and how people move around the city.

There are two main strategies available to Escondido to reduce drive-alone trips: 1) pursue dense, infill development — including affordable housing near transit — so that more residents live closer to their destinations and average trip distance decreases (and adopt policies that limit or eliminate new sprawl development), and 2) invest in supportive infrastructure and policies that encourage walking, biking, and transit. We recommend that Escondido include in its CAP targets and related strategies that support both of these approaches to vehicle emissions reductions.

These two approaches are mutually supportive and should be pursued concurrently to maximize GHG reductions and co-benefits, such as reduced congestion and improved air quality. Designing and building walkable, bikeable streets near transit will deliver the greatest results if those neighborhoods also benefit from transit-oriented development. Further, concentrating affordable housing near transit has a well-documented effect of decreasing driving, and all the more when transit is accessible on foot. Conversely, new sprawl development will cause emissions from transportation to continue to rise, even if the city emphasizes walkability and bikeability. Land use and transportation strategies must work hand in glove to reduce vehicle emissions.

We recommend setting ambitious targets for the percentage of trips that will be made by biking, walking, and transit and planning accompanying strategies, as well as identifying a vehicle miles traveled

reduction target from land use policies that encourage dense infill development and affordable housing near transit.

Include Best Practices As Described in 2017 CAP Report Card

In addition to the previous strategies, we recommend that Escondido include the following best practices adopted by numerous cities across the San Diego region. For more detail on the strategies and which cities have incorporated each into their CAPs, please consult CAC's [2017 CAP Report Card](#).

Additional strategies recommended for inclusion in Escondido's CAP:

- Energy efficiency and water conservation targets and accompanying ordinances
- Strategies to promote zero emissions vehicles (ZEVs) and convert the municipal fleet to ZEVs
- A commitment to zero waste by a specified date
- Quantifiable target for an increase in tree canopy coverage by planting and caring for drought-tolerant trees.

CAP Implementation & Monitoring Recommendations

Commit to Annual Monitoring Reports and GHG Inventories At Least Every Three Years

Annual monitoring allows local governments and the public to gauge progress toward implementing CAP strategies and determine if a the City is on track to meet GHG targets. The monitoring report should be presented at a noticed public meeting each year. It should state clearly the progress made toward the performance measures set for each measure, as well as the actions taken that have contributed to that progress. For example, if the performance measure for implementation of an Active Transportation Plan is bicycle mode share, the metric that should be reported on annually is bicycle mode share. A GHG inventory, performed regularly and at least every three years, will help the city track progress toward its overall targets.

Include an Environmental Justice/Social Equity Section

Climate change hits hardest in low-income and communities of color that face a disproportionate pollution burden and have been left behind economically. The CAP should use CalEnviroScreen to identify and prioritize populations hit first and worst by climate change to be the first to benefit from implementation of CAP strategies.

CalEnviroScreen, the state of California's Environmental Justice screening tool, helps identify the communities most at risk of suffering the impacts of multiple sources of pollution and of climate change. These high-risk communities are frequently low-income communities of color that lack amenities such as safe pedestrian and bicycle infrastructure, parks, and street trees. There are several census tracts in Escondido that rank in the top 20% on CalEnviroScreen for poverty, housing burden, linguistic isolation, and lack of education.

We recommend that the city include in the CAP a section on social equity and green jobs that addresses how Escondido will ensure that the communities that are most at risk currently are the first to benefit from the implementation of CAP strategies. The development and implementation of this section should take place in consultation with a diverse set of stakeholders from the most impacted of the city's communities.

Establish a Public Implementation Taskforce

A public implementation taskforce allows for stakeholder involvement in an open, transparent process. The implementation taskforce should meet regularly and in public.

Conclusion

We hope to see Escondido emerge as a regional climate leader and strongly urge you to incorporate the recommendations enumerated above. We look forward to working with you to help you achieve the City's climate planning goals. Please do not hesitate to reach out to us as a resource. Thank you for the opportunity to weigh in on this critically important planning document.

Sincerely,

A handwritten signature in black ink that reads "Sophie Wolfram". The signature is written in a cursive, flowing style.

Sophie Wolfram
Director of Programs
Climate Action Campaign