



Mayor Vasquez and Council
City of Lemon Grove
3232 Main Street
Lemon Grove, CA 91945

March 2, 2020

Re: Recommendations for Lemon Grove's Climate Action Plan (CAP)

Dear Mayor Vasquez and Council,

Climate Action Campaign is a San Diego-based nonprofit organization with a simple mission: to stop the climate crisis.

Lemon Grove's Climate Action Plan is an opportunity to develop a comprehensive plan to secure a safe and livable future for Lemon Grove residents in the face of the climate crisis, as well as bring clean air, safe streets, affordable clean energy, and economic benefits to families and businesses in Lemon Grove.

We offer the following recommendations to help ensure that the CAP for Lemon Grove will deliver a safe and healthy future for families in Lemon Grove.

COMMENTS ON THE CAP:

Adopt a Legally Binding Plan

A legally binding plan is not subject to the vagaries of political whim or will. Rather, it is a stated commitment to the public that the City of Lemon Grove will do everything in its power to protect and preserve the future for Lemon Grove residents. Currently, eight cities in San Diego County have legally binding CAPs: the City of San Diego, San Marcos, Carlsbad, National City, La Mesa, Vista, Encinitas, and Escondido. Climate Action Planning throughout the region has shifted to favor legally binding plans that signal bold leadership on climate change. We urge the City of Lemon Grove to make a similarly strong statement of support for current and future generations of Lemon Grove residents by making the updated CAP legally binding.

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

As a long-range planning document, Lemon Grove's CAP should amend the planning horizon from 2030 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 Lemon Grove, 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:

- Although we support Measure T-11, which requires development of 763 multi-family units near trolley stations with 50% fewer parking spaces than standard requirements, we strongly recommend the CAP requiring that those be dedicated to affordable housing for very low-income and low-income families.
- 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.
- 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 supports racial and economic integration.
- Present to Council for consideration an ordinance prohibiting the practice of landlords’ denying rental applications because they hold housing vouchers, known as Source of Income Discrimination. Allowing this practice reinforces segregation, and cities that are highly segregated are far more likely to experience the impacts of environmental injustice, such as failing infrastructure as a result of inequitable investment, poor air quality, high lead levels, toxic wastes that contaminate soils and sicken children, and other hazards. Fair housing and environmental justice go hand in hand; for all families to be able to enjoy a high quality of life, cities must proactively dismantle segregationist systems.

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>

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.

Amend the Renewable Energy Target to 100% by 2030 and Commit to Community Choice Energy

We recommend amending Measure E-7 to be: "Establish a Community Choice Energy Program. Present to City Council for consideration a Community Choice Energy program in 2020 that increases renewable electricity supply. Achieve 100 percent renewable electricity supply by 2030."

Seven cities in the San Diego region (San Diego, Del Mar, Solana Beach, Chula Vista, Encinitas, Imperial Beach, and La Mesa) have set 100% clean energy targets by either 2030 or 2035, with a commitment to pursue Community Choice as the means to that end. In 2019, all seven cities also joined a Community Choice Energy program and will begin providing clean energy to residents in 2021.

Community Choice is the only viable pathway to reaching 100% clean energy at the local level, and nearly two dozen programs are operating successfully in over 160 cities across California. Therefore, we strongly urge the City to avoid wasting time and resources by exploring "similar programs", and instead express the intent to join a Community Choice program to meet its renewable energy targets.

Include a Residential Energy Disclosure Ordinance to Increase Energy Efficiency

We were pleased to see multiple measures identifying water conservation and energy efficiency ordinances for residential and non-residential buildings, and especially the ordinance requiring all new residential developments to be all-electric and install PV systems.

In addition to Measure E-2: "Reduce Non-Residential Energy Use" and Measure E-3: "Reduce Residential Energy Use," 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

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>.

Set Overall Mode Share Targets for Biking, Walking, and Transit

In the Draft CAP, Strategy 3 addresses the broad goal of reducing vehicle miles traveled by increasing the share of trips taken using walking, biking, and public transit. While the steps enumerated are worthwhile actions to take, they do not provide a clear roadmap to reduce emissions by a specified amount.

We strongly recommend setting 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.” Lemon Grove’s CAP should set aggressive mode share targets tailored to the City’s local context, and include strategies to meet them.

Articulating those goals allows the development of aligned strategies to ensure goals are met, resulting in an evidence-based roadmap toward ambitious, feasible targets. Mode share goals also help municipalities plan and budget to facilitate a shift away from car-centric growth, as well as advocate for assistance for better transit infrastructure. Finally, they can also help communities plan for anticipated or desired health outcomes.

Walking and Biking: Measure T-10 “Increase Commute by Bicycle” aims to increase the number of commuters using bicycles, including adding two miles of a Class I bicycle path along Lemon Grove Avenue. This goal should be updated to include a specific, trackable mode share target for biking. Measure T-9 “Implement the Safe Routes to School Program” sets specific targets of increasing the percentage of students walking and biking to school by 30% and 2.5%, respectively, by 2030. Similarly, specific mode share targets should be set for walking and biking for all commuters.

Transit: Measure T-13 “Increase Commute by Transit” does set a specific mode share target of 8% by 2030. However, we highly recommend setting a more aggressive target to more effectively reduce transportation emissions. We also recommend adding a supporting measure, “Support planning and policy decisions at SANDAG that would reduce both GHG emissions and VMT and would increase transit ridership.”

TDM: Measure T-8 commits to increasing the alternative mode share for new developments and businesses in employment centers for 8% by 2030, but does not indicate what proportion are due to biking, walking, and transit.

Commit to Zero Waste

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

Currently, measure S-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 reads, "Replace light-duty municipal vehicles with EVs or other types of ZEVs and replace diesel vehicles with AFVs" 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 should include 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 8: "Carbon Sequestration," Measure C-1 sets a goal of planting 50 new trees per year in City-owned landscaped areas. 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.⁴ 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 Lemon Grove, one census tract falls in the top 30 percent of CalEnviroScreen's statewide rankings. We recommend that Lemon Grove's CAP include a Social Equity section that utilizes CalEnviroScreen to explicitly define how Lemon Grove will ensure that these communities are prioritized in the implementation of GHG reduction strategies, including affordable housing development and investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

⁴ "Green Infrastructure Municipal Handbook." *Green Infrastructure*, United State Environmental Protection Agency, December 2018, https://www.epa.gov/sites/production/files/2015-10/documents/gi_munichandbook_retrofits.pdf.

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.

Outstanding Questions

- 1) What role does the City have in working with GUHSD and LGSD to convert the school bus fleet to electric buses (Measure T-4)?
- 2) How does the City plan to enforce Measure T-6, which requires at least 30% of construction equipment in new developments to be electric-powered or alternatively fueled?

Recommend Inclusion of Best Practices As Described in 2018 CAP Report Card

In addition to the previous strategies, we recommend that Lemon Grove 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 [2018 CAP Report Card](#).

Thank you for the opportunity to weigh in on the development of this critically important document. Lemon Grove's CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change. 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,



Galena Robertson-Geibel
Climate Action Campaign