



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 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,

Sophie Wolfram
Director of Programs
Climate Action Campaign