



Partnership for the
Advancement of
New Americans



April 1, 2019

Melissa Devine and Lorena Cordova (MDevine@cityofelcajon.us and lcordova@cityofelcajon.us)

Re: Comments on California Environmental Quality Act (CEQA) Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the City of El Cajon Climate Action Plan

Dear Ms. Devine and Ms. Cordova,

Climate Action Campaign, the Partnership for the Advancement of New Americans, and San Diego 350 have reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of El Cajon Climate Action Plan, and submit the following comments:

Climate Action Campaign (CAC) is an environmental nonprofit organization with a simple mission: to stop climate change and protect our quality of life.

The Partnership for the Advancement of New Americans (PANA) is a research, public policy, and community organizing hub dedicated to advancing the full economic, social, and civic inclusion of refugees.

San Diego 350 is an inclusive volunteer organization devoted to inspiring a movement to prevent the worst impacts of climate change and climate injustice. We represent approximately 10,000 local volunteers and supporters in the San Diego area.

The UN Intergovernmental Panel on Climate Change (IPCC) report, *Global Warming of Degrees Celsius*, released in fall 2018 warns that in order to limit climate catastrophe, we must limit global warming to 1.5°C above pre-industrial levels, citing drought, floods, extreme heat and poverty for hundreds of millions of people if temperatures rise above 1.5°C. The report states that to achieve 1.5°C, we must cut global emissions by 45% by 2030 and achieve net-zero emissions by 2050. This critical moment in history demands that every level of government, including the local level, take unprecedented action to significantly reduce greenhouse gas emissions and ensure a safe, livable, and dignified future for all.



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In order for the City of El Cajon to do its part to slash greenhouse gas emissions and create sustainable, equitable, and prosperous communities, we recommend that the Draft EIR consider the following project alternative and following recommendations regarding GHG significance thresholds:

CEQA Requires Enforceable Measures 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.

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 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.

Significance Thresholds In Line With State Targets

The thresholds of significance for GHGs should be any level of emissions that will cause a violation of the state’s GHG emission targets, which include:

- SB 32, which mandates statewide GHG emissions reductions of 40 percent below 1990 levels by 2030.
- Executive Order S-3-05, which mandates statewide GHG emissions reductions of 80 percent below 1990 levels by 2050. Compliance with S-3-05 should be of particular legal concern given the precedent set in the SANDAG RTP lawsuit.
- Executive Order B-55-18, which mandates statewide carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.

Local targets that would contribute to emissions above these levels should be considered to have a significant impact.



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Recommend Development of Deep Decarbonization and Equity Alternative

In the EIR, the City of El Cajon should evaluate an alternative that would plan for emissions reductions in line with Executive Orders S-3-05 and B-55-18, which require long-term commitments to decarbonization, and that would reduce emissions in a way that maximizes housing affordability and access to a safe, convenient, and affordable biking, walking, and transit network.

In order to meet state greenhouse gas goals, avoid the worst impacts of climate change, and prepare residents for a changing climate, the City should include the following policies and strategies in the Deep Decarbonization and Equity Alternative:

- **100% Clean Energy:** Not only is 100% Clean Energy the nation-leading standard, it is also necessary to meet California GHG targets. Accordingly, Chula Vista, Del Mar, Encinitas, La Mesa, the City of San Diego, and Solana Beach have committed to 100% clean and renewable electricity by 2030 or 2035. Shifting to clean and renewable energy not only reduces greenhouse gas emissions, but it also spurs local investment and family-sustaining jobs from clean energy technologies. A 100% clean energy goal would be consistent with the goals of other Climate Action Plans in the region.
- **Community Choice Energy (CCE):** Community Choice is the single most powerful emissions reductions strategy at the local level, and it is the only viable pathway to 100% clean energy. El Cajon should integrate Community Choice Energy into the Deep Decarbonization and Equity alternative as a way to help steeply reduce carbon emissions, and provide choice and competitive energy rates.
- **Energy and Water Efficiency:** This alternative should set targets for water conservation and energy efficiency for single-family, multifamily, commercial, and municipal buildings, as well as plan for ordinances to help reach those targets.
- **Zero Emissions Vehicles:** The City should include in this alternative a strategy to transition to a fully electric municipal fleet.
- **Transit, Walking, Biking:** This alternative should include mode share targets that define the percent of commuters who will walk, bike, and take transit to work by the plan's horizon year. Mode share goals help municipalities plan and budget to facilitate a shift away from car-centric growth, advocate for assistance for better transit infrastructure,



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and help communities plan for anticipated or desired health outcomes. The alternative should define specific and actionable strategies to meet the mode share targets by fostering safe and convenient biking, walking, and transit opportunities.

- **Smart Land Use Policies with Affordable Housing Near Transit:** The alternative should include a goal to reduce Vehicle Miles Travelled (VMT) to be achieved through smart growth policies that increase mixed-use density and affordable housing near job centers and transit. Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.¹

The alternative should further specify 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 neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

- **Urban Tree Canopy and Climate Resilience:** With proper management and appropriate choice in tree variety, trees help sequester carbon, filter the air, and provide much needed shade in a warming environment. The alternative should commit to a specific urban tree canopy coverage goal.
- **Zero Waste:** Waste decaying in landfills emits methane, a potent greenhouse gas. The alternative should analyze the impact of achieving zero waste through strategies such as eliminating single-use materials, composting and capturing landfill gas.
- **Social Equity & Environmental Justice:** 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.

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>



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In El Cajon, two census tracts fall in the top 15 percent of CalEnviroScreen's statewide rankings. The alternative should explicitly define how El Cajon 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.

Conclusion

We appreciate the opportunity to provide comments on the NOP of the Draft Environmental Impact Report for the City of El Cajon Climate Action Plan, and we are available as a resource throughout the process of CAP development.

Sincerely,

A handwritten signature in black ink that reads "Maleeka Marsden".

Maleeka Marsden
Climate Justice Advocate and Organizer
Climate Action Campaign

A handwritten signature in black ink that reads "Ramla Sahid".

Ramla Sahid
Executive Director
Partnership for the Advancement of New Americans

Ryan O'Connor
Policy Organizer
San Diego 350