



Mayor Ritter and Council  
City of Vista  
200 Civic Center Drive  
Vista, CA 92084

May 19, 2021

**Re: Climate Action Campaign's recommendations for Vista's Climate Action Plan (CAP)**

Dear Mayor Ritter and Council,

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

Vista's Climate Action Plan is an opportunity to develop a comprehensive climate strategy and implementation plan that meets the scale of the challenge the climate crisis poses and helps bring clean air, safe streets, affordable clean energy, and economic benefits to families and businesses in Vista.

Since 2018, Climate Action Campaign has offered recommendations and best practices in letters and at workshops to help ensure that Vista's CAP will deliver a safe and healthy future for families in Vista. In May 2020, we sent a joint letter summarizing our recommendations for Vista's CAP update. However, the Draft CAP does not incorporate these recommendations, and as it stands, does not take full advantage of the potential that a CAP has to make a city more equitable and prosperous, and it does not make the kind of aggressive commitments that science tells us are necessary to secure a safe and livable future.

This letter summarizes our additional comments on the Draft CAP:

***Ensure the CAP Complies 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—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**” **violates 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.

One of the City Actions within the CAP is not enforceable, and thus does not comply with CEQA:

- Measure E-3: The city will support the Vista Unified School District's (VUSD) plans to install photovoltaic solar panels at 21 public school sites, reducing emissions associated with electricity consumption (energy category) by approximately 1,900 MTCO<sub>2e</sub>.

We strongly urge the City to revise this measure so that it is enforceable and legally defensible.

### ***Commit to Zero Carbon by 2045 or Sooner in Line With State Targets***

As a long-range planning document, we recommend that Vista's CAP planning horizon extend until at least 2045, and the target for that year should align with Executive Order B-55-18 to achieve carbon neutrality by 2045. 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. For strong examples of plans to achieve net zero emissions, we recommend referring to the [City of Santa Monica](#), the [City of Los Angeles](#), and the [County of Los Angeles](#) sustainability plans.

### ***Commit to Community Choice Energy, and Join San Diego Community Power***

We have serious concerns about *"Measure E-4: The city will join a program (e.g. community choice energy [CCE] program) to increase the renewable or zero-carbon electricity supplied to the city to 90 percent, reducing citywide emissions by approximately 28,300 MTCO<sub>2e</sub> in 2030"*

The fastest and easiest way for any community to reduce emissions is by committing to 1) 100 percent clean electricity by 2030 or 2035 and 2) joining a Community Choice Energy (CCE) program to meet that target. Countless cities across the region have already done just that, and Vista should be no exception. A 90 percent clean energy target is not acceptable when there is a viable CCE program providing higher rates of renewable energy at lower cost to ratepayers today.

We recommend Vista commit to 100 percent clean energy by 2030 or 2035, and join San Diego Community Power (SDCP).

### ***Eliminate Building Emissions by 2045 Through Building Electrification***

Currently, measure T-7 reads *"All new development projects within the city will require that at least 30 percent of construction equipment be electric-powered or alternatively fueled. This measure will reduce emissions associated with off-road transportation approximately 3,200 MTCO<sub>2e</sub>."* However, even as our cities achieve 100% clean electricity, natural gas remains the

third most significant source of emissions in our cities, so to fully transition away from fossil fuels, we must identify strategies to reduce and ultimately eliminate natural gas consumption.

Nearly 50 cities in California are already transitioning from gas to all electric buildings, with San José, Santa Monica, Carlsbad, Berkeley, Windsor, San Luis Obispo, San Mateo, and Menlo Park passing building electrification ordinances. We recommend the City adopt more robust CAP measures, and City ordinances, to require that all new construction or renovated municipal, commercial, and residential buildings be 100 percent all electric.

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

Strategy 2 of this CAP, addresses the broad goal of reducing vehicle miles traveled by increasing alternative modes of travel, reducing single-occupancy vehicle travel, and encouraging smart growth strategies. While the steps enumerated are worthwhile actions to take, the CAP still does not commit to mode share targets for the entire city.

For example, measure T-5, has a goal to “*install an additional 12 miles of two-way bicycle lanes (Class II or better) by 2030.*” However, research and experience have shown that Class II bike facilities, which are striped bike lanes without a physical barrier, do not increase ridership as much as physically protected bike lanes. To increase bike ridership and secure safer streets for all, we recommend prioritizing protected and/or separated bike infrastructure, not painted bike lanes. That means only installing Class I or Class IV bike facilities.

We strongly recommend setting overall mode share targets for biking, walking, and transit. We also recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares. Vista’s CAP should set aggressive mode share targets tailored to the City’s local context, and include strategies to meet them.

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

We applaud “Measure T-6: Increase Density and Mixed-Use Development”. However, the draft CAP does not currently include strategies that advance the development of affordable housing in Vista, especially near the City’s transit priority areas and high-frequency bus lines. Building affordable housing near transit is a key equity strategy to reduce VMT and reduce GHG emissions. We recommend that Vista include strategies to increase affordable housing development.

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

We applaud the Vista City Council for voting unanimously to move forward with staff recommendations for developing a single-use plastics ordinance. Going forward in enacting a single-use plastics ordinance is an extremely important step in achieving a zero waste goal. This ordinance also has the potential to positively impact other cities along the 78 corridor.

Currently, measure W-1 reads, “The city will work with waste haulers to achieve an 85 percent waste diversion target by 2030, which would reduce citywide emissions generated from the waste category by approximately 13,900 MTCO<sub>2e</sub>.” However, we recommend adopting a Zero Waste policy that sets a goal for 90-100 percent waste diversion citywide by 2030.

### ***Commit to Fully Electrifying the City’s Municipal Vehicle Fleet (look at Escondido)***

Under Strategy 1 of the Draft CAP: “Increase Use of Zero-Emission/Alternative Fuel Vehicles” Measures T-1, T-2, and T-3 set goals to reduce the use of gasoline or diesel powered vehicles and equipment and increase the use of zero emission or alternative fuel vehicles citywide.

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.

### ***Adopt More Robust Carbon Sequestration Measures and Green Infrastructure Strategies***

The CAP should include more robust green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to the City.

Under Strategy 7 of the Draft CAP: “Carbon Sequestration,” Measures C-1 and C-2 set goals regarding planting new trees each year in City-owned landscaped areas and in new developments. However, Vista should commit to a quantifiable tree canopy coverage target by planting and caring for drought-tolerant shade trees. The City of San Diego commits to 35% urban tree canopy cover by 2035, and is working to boost tree canopy coverage in communities of concern first as a key equity strategy. We recommend Vista do the same.

The City should also 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. The City of Escondido has developed some good examples of such efforts.

### ***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 to coordinate and oversee CAP implementation strategies.
- Require annual monitoring reports on implementation progress to ensure goals are achieved and progress is transparent for the public.

### ***Center and Strengthen Equity by Developing a Climate Equity Index***

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 make the following recommendations of how Vista can improve upon centering equity in the CAP:

- Create a Climate Equity Index (CEI) with the CAP that a) explicitly defines which communities in Vista are most vulnerable and impacted by the climate crisis, and b) prioritizes said communities to ensure those most impacted by climate change and environmental pollution are prioritized in the implementation of GHG reduction strategies (i.e. investments in urban forestry, active transportation, renewable energy, and energy efficiency measures, etc.)
- Ensure that the development and implementation of the CEI takes place in consultation with a diverse set of stakeholders from the most impacted of the Vista's communities;
- The City work with key stakeholders and utilize CalEnviroScreen and other indicators to incorporate equity considerations into implementation of the CAP. The City should actively prioritize actions and measures that include consideration of social equity. In preparing a holistic approach to equity, the City should develop tracking and reporting metrics to determine progress and success, and make necessary updates based on the results and community feedback.

### **Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. Vista'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,

*Madison Coleman*

Madison Coleman  
Policy Advocate  
Climate Action Campaign