



July 26, 2021

Mayor Sotelo-Solis and Council  
National City  
1243 National City Blvd.  
National City, CA 91950

**Re: Climate Action Campaign recommendations for National City's Climate Action Plan Update**

Honorable Mayor Sotelo-Solis and City Councilmembers,

Climate Action Campaign (CAC) is a San Diego and Orange County based nonprofit organization with a simple mission: stop the climate crisis through effective policy action.

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 their implementation.

National City's CAP 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 National City.

This letter summarizes our initial recommendations for the National City CAP update:

***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.

We strongly urge the City to ensure all CAP measures are 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 National City's CAP planning horizon extend until at least 2045, and the target for that year aligns 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.

Also note that Governor Newsom recently directed the California Public Utilities Commission (CPUC), California Air Resources Board (CARB), and other state agencies and officials to accelerate plans to reach carbon neutrality by 2035, making the 2045 deadline the furthest possible date for communities to achieve zero carbon and protect themselves from the worst impacts of the climate emergency.

### ***Set a 100% Clean Energy Goal, Commit to Community Choice Energy, and Join San Diego Community Power***

The second largest source of emissions in the San Diego region is from energy. To reduce emissions from energy, cities have adopted 100% clean energy targets by 2030 or 2035 as part of their CAPs. We recommend National City join its peers in adopting a 100% clean energy target by 2030 or 2035.

In the San Diego region, Community Choice Energy (CCE) is the only identifiable pathway to reaching 100% clean energy. CCE is also the single most effective, efficient and equitable way to reduce a community's emissions quickly. Numerous cities across the region have committed to CCE and paired their 100% clean energy target with CCE. We recommend the National City CAP include a commitment to CCE.

San Diego Community Power (SDCP) is our regional CCE program, and best embodies the full potential of what CCE has to offer communities. SDCP is the only CCE program that embraces strong environmental, equity, local economic development and worker provisions, and is capable of achieving the many benefits of CCE with its economies of scale. Joining an existing CCE program will also protect city staff time and coffers. We recommend City staff to have proactive conversations with SDCP to explore joining their program.

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

Even as our cities achieve 100% clean electricity, methane (natural) gas remains the third largest source of emissions in our communities, and is a widely recognized dangerous indoor air pollutant. To fully transition away from fossil fuels and protect public health, we must identify strategies to reduce and eliminate methane gas from our homes and businesses. We recommend the CAP include measures and strategies to reduce methane gas emissions.

These measures may include all-electric reach codes and ordinances, municipal building retrofits, and other opportunities to remove this dangerous fossil fuel infrastructure from our communities.

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

The largest source of emissions in our region is from the transportation sector. In order to reduce vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions, the CAP must commit to specific mode share targets for biking, walking and transit. We recommend the CAP include those targets and build in measures and strategies to achieve them.

Those measures may include the expansion of separated and protected bikeways (Class I and IV), developing a complete streets policy and smart growth strategies, optimizing transit options in partnership with MTS and SANDAG, and other efforts to create bikeable, walkable neighborhoods. We look forward to sharing more information and collaborating on this effort as the CAP update continues.

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

National City is a regional leader on smart growth policies and building affordable housing near transit. This is a key equity strategy to reduce VMT and reduce GHG emissions. 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;
- Further explore infill opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families; and
- Develop a robust inclusionary housing ordinance to boost affordable housing production and support inclusive communities.

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

The National City CAP can achieve zero waste through strategies such as developing a plastic reduction ordinance, eliminating single-use materials, composting, and capturing landfill gas.

We recommend adopting a Zero Waste policy that sets a goal for 90-100 percent waste diversion citywide by 2030.

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

The CAP should include robust green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to the City, as well as work to boost tree canopy coverage in communities of concern first as a key equity strategy.

The City should adopt a measure to develop a holistic green infrastructure plan. A Green Infrastructure Plan can include strategies that preserve or restore natural lands, and implement green streets using techniques such as street trees, permeable pavements, bioretention, swales, and retrofit policies for public and private properties that promote projects such as green roofs.

We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target. The City of Escondido has developed some good examples of such efforts, and the City of San Diego commits to 35% urban tree canopy cover by 2035. We recommend National City explore these policy opportunities.

### ***Hire a CAP Administrator and Commit to Annual Monitoring Reports***

In order to ensure timely and transparent progress, we recommend that the CAP commit to hiring a CAP administrator to coordinate and oversee CAP implementation strategies, and 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 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 National City can improve upon centering equity in the CAP:

- Create a Climate Equity Index (CEI) with the CAP that a) explicitly defines which communities in National City are most vulnerable and impacted by the climate crisis, and 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 National City's Communities; and
- 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. National City's CAP update 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