



Partnership for the  
Advancement of  
New Americans



Mayor and Council  
City of El Cajon  
200 Civic Center Way  
El Cajon, CA 92020

November 19, 2018

**Re: Recommendations and Legal Requirements for El Cajon's Climate Action Plan (CAP)**

Dear Mayor Wells and Council,

Climate Action Campaign is a nonprofit organization with a mission to stop climate change and improve quality of life through policy and planning at the local level.

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.

We are writing to ensure that the City of El Cajon's Climate Action Plan (CAP) maximizes opportunities to improve quality of life for all residents, and in particular newcomer residents who face multiple challenges including high housing costs and low income, limited access to economic opportunity, and disproportionately high levels of exposure to multiple sources of pollution. The development of El Cajon's CAP presents the opportunity not only to reduce emissions in line with targets set out in state law, but also to respond to local needs such as affordable housing, improved transit access, safe and attractive pedestrian and bike networks, affordable energy rates, and an expanded tree canopy to reduce the urban heat island effect.

We strongly recommend that the City of El Cajon heed the following recommendations to ensure the CAP maximizes emissions reductions, benefits all residents equitably, and complies with CEQA requirements. We are eager to partner with you in advancing a CAP that protects our future and advances health and prosperity for all.

**1. The CAP Must Include Strategies to Advance Affordable Housing Near Transit**

The CAP offers the opportunity to tackle both the housing crisis and climate change by including strategies that advance the development of affordable housing in El Cajon, especially near the city's transit centers and high-frequency bus lines.

Supporting the development and preservation of affordable housing near transit can bring much-needed relief to low-income families paying more than half their income in rent, and it is one of the most powerful strategies to reduce tailpipe emissions. Low-income households living within ¼ mile of transit drive 50% less than those living further away, and those within a ½ mile drive 25-30% less, according to research by the nationally recognized Center for Neighborhood Technology. In contrast, higher income households near transit drive twice as much and own twice as many cars, underscoring the need to ensure low-income families have access to housing near transit.

We recommend that El Cajon include in its CAP the following measures to increase the supply of affordable housing, especially near transit:

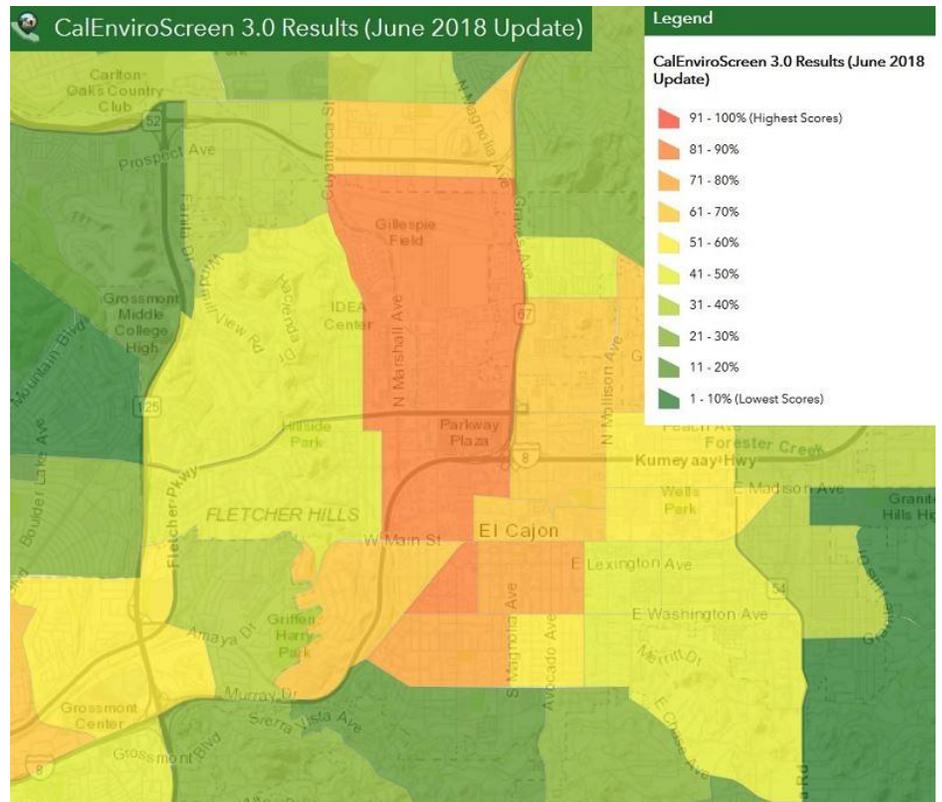
- Pursue opportunities to utilize existing properties adjacent to transit and employment centers, including the El Cajon Transit Center, Arnel Trolley Station, and Parkway Plaza Mall, to develop housing affordable to very low income and low income families.
- Present to Council for consideration an inclusionary 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 helps stave off the segregation
- 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.

**2. The CAP Must Include Specific and Thorough Strategies to Ensure Equitable Implementation**

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 El Cajon, two census tracts fall in the top 15 percent of CalEnviroScreen’s statewide rankings.

The CAP should explicitly define how the city will ensure that these communities are prioritized in the implementation of GHG reduction strategies. One way to implement the CAP equitably is to emphasize strategies to reduce the cost of housing as a percent of income (Recommendation #1, above). An Equity and Environmental Justice section of the CAP should detail how El Cajon will prioritize high-scoring



CalEnviroScreen communities for affordable housing development and investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

### 3. The CAP Must Set a Target of 100% Clean Energy with Community Choice

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 target of 100% clean energy by either 2030 or 2035, with a commitment to pursue Community Choice as the means to that end.

There are three clear 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 El Cajon include a 100% clean energy target by 2035 at the latest 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.

### 4. Include Best Practices As Described in the 2017 CAP Report Card

In addition to the previous strategies, we recommend that Imperial Beach 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 Climate Action Campaign's [2017 CAP Report Card](#).

Additional strategies recommended for inclusion in El Cajon's CAP:

- Set walking, biking, and transit commuter mode share targets with accompanying strategies built around retrofitting city streets to prioritize biking, walking, and transit
- Set a Vehicle Miles Traveled (VMT) reduction target with accompanying land use strategies focused on dense, infill development
- 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.

### 5. The CAP Must Comply 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 — 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

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.

**Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. El Cajon 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 improve the health and well-being of families, comply with legal requirements, and maximize emissions reductions.

We look forward to working with you to develop a CAP that will establish El Cajon as a regional leader in equitable climate change mitigation that meets the needs of families today while protecting the futures of our kids and grandkids.

Sincerely,



Ramla Sahid  
Executive Director  
Partnership for the Advancement of New Americans



Sophie Wolfram  
Director of Programs  
Climate Action Campaign