



September 26, 2018

Mayor Minto and Council  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

**RE: Legal Requirements and Recommendations for Santee Climate Action Plan**

Dear Mayor Minto and Council:

Climate Action Campaign is a nonprofit organization whose mission is to stop climate change through advocacy and organizing at the local level. 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 Santee keep pace with the progress of cities across the region and the state as you develop your CAP. To facilitate your CAP development moving forward successfully, we are writing to clarify the legal requirements that the CAP must meet under CEQA, recommend strategies, and ensure implementation of the CAP benefits all residents.

**CAP Legal Requirements**

1. CAP Targets Must Align With State Targets

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.

2. 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.

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.



3. CAP Must Provide Substantial Evidence that CAP Strategies Will Achieve Target Levels

The CAP must provide substantial evidence for each strategy that its implementation will lead to the GHG reductions identified for that strategy, and that cumulatively the strategies will achieve the target GHG reductions.

CAC has been involved in the development of every CAP in the region since 2015 (Del Mar, San Diego, Solana Beach, San Diego Unified School District, Chula Vista, Encinitas, County of San Diego, La Mesa, Oceanside, Escondido, and Vista), so we have seen patterns emerge from one CAP to the next. There is currently a significant discrepancy between the projected emissions reductions from energy efficiency measures in Santee and the projections for similar measures in other cities. Santee projects over 46,000 MTCO<sub>2e</sub> reduction annually by 2035, whereas very similar programs in Encinitas, whose population is comparable to Santee’s, are projected to reduce emissions by just 4,355 MTCO<sub>2e</sub> annually by 2030. Similarly, San Diego’s energy efficiency measures are projected to achieve about 14,000 MTCO<sub>2e</sub> reduction by 2035, in a city many times the population of Santee. Santee’s figure is outside the norm, and the assumptions and calculations to arrive at this and every emissions reduction projection in the CAP must be thoroughly laid out in the Technical Appendix.

Similarly, Santee must provide detailed information about the assumptions, projections, and calculations used to develop the city’s GHG emissions inventory. According to Table 1 in the April 11, 2018 Staff Report for the Draft Sustainable Santee Plan, emissions from transportation accounted for just 35% of citywide emissions in 2005 and 32% in 2013. In contrast, the table below shows the percent of emissions accounted for by transportation in other cities in the county:

City	Inventory Year	% of Emissions from On-Road Transportation
Santee	2013	32
Encinitas	2012	54
San Diego	2010	55
Imperial Beach	2012	57
El Cajon	2012	52
La Mesa	2010	58
Del Mar	2012	57
Escondido	2012	53
Oceanside	2013	48
Vista	2012	49
Solana Beach	2010	63

The discrepancy between Santee’s transportation emissions as a percentage of the total and the calculations from every other city with a CAP is massive and points to a need to reevaluate the calculations in Santee’s GHG inventory. This is a crucial calculation, because if Santee’s current calculation underestimates transportation emissions, as it appears to do, the city’s overall emissions will be significantly higher than currently estimated and local reductions will need to be greater.



## **CAP Strategy Recommendations**

### 1. 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 Santee 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.

Solana Beach was the first city in the region to launch a program, in June of 2018, and the other cities listed above are all at varying stages of developing a program. After conducting a Feasibility Study, Santee would have the option to join an existing program as part of a Joint Powers Authority (JPA).

### 2. Set Walking, Biking, and Transit Mode Share Targets

Transitioning to 100% clean electricity will not be enough on its own to get Santee to the state climate targets. Santee, 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 Santee 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 Santee include mode share targets and VMT reduction 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 are also increasingly housing-rich. 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, often referred to as “mode share targets.” Santee’s Active Transportation Strategy should be incorporated into the CAP as a tool to help meet the city’s mode share targets.

In addition, the CAP should identify a vehicle miles traveled reduction target and accompanying strategies such as land use policies that encourage dense infill development and affordable housing near transit.

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

In addition to the previous strategies, we recommend that Santee 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 Santee’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**

### 1. 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 a 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 Strategy 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.

### 2. 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.

We recommend that the city include in the CAP a section on social equity and green jobs that addresses how Santee 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.

3. 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 Santee 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,

A handwritten signature in black ink that reads "Sophie Wolfram".

Sophie Wolfram  
Director of Programs  
Climate Action Campaign