



April 14, 2017

Sustainability Commission Members Jaime, Kappes, Mora, Rahimzadeh, Romo, and Valen
276 4th Ave
Chula Vista, CA 91910

RE: Recommendations for City of Chula Vista Climate Action Plan (CAP) Update

Dear Members of the Sustainability Commission,

Climate Action Campaign is an environmental nonprofit organization with a simple mission: to stop climate change and protect our quality of life. We are committed to helping cities in San Diego pass and implement successful Climate Action Plans that achieve 100% clean energy and protect the people and places we love for generations to come. We are pleased to submit our comments on the Draft Update of the City of Chula Vista's Climate Action Plan (CAP).

First, we thank you for pioneering climate action in San Diego County with your CO2 Reduction Plan in the year 2000, Climate Mitigation Plans (2008), and Climate Adaptation Plans (2011). In the CAP Update, we commend you for the inclusion of a 90% waste reduction goal and of extensive water conservation and reuse measures.

In recent years, we have seen a huge momentum shift in the region toward proactive planning for climate change, and many cities in San Diego County and across the country have made great strides to join the modern era of climate action planning. For example, 25 American cities, including Del Mar, San Diego, San Francisco, and San Jose, have committed to 100% Clean Energy. In San Diego County, two cities are pursuing CCA, six have legally binding CAPs, and San Diego and Carlsbad have ambitious Mode Shift Goals of 50% and 32%, respectively, using alternative transportation by 2035. In fact, there is legislation at the state by Senate Pro Tem Kevin de León to transition all of California to 100% renewable energy by 2045.

We wish to see Chula Vista keep stride with the progress of cities across the region, as well as the state. To that end, we offer the following recommendations to strengthen the CAP Update.

Renewable and Efficient Energy

Recommendation 1: Include a 100% Clean Energy Goal



The CAPs of the cities of San Diego and Del Mar commit to 100% clean energy by the year 2035. In addition, as noted previously, California Senate Leader Kevin de León has introduced legislation to transition the entire state to 100% clean energy by 2045. By contrast, Objective REE-2 states, “Provide 53% of electricity from clean sources by 2020 (70% by 2035).” We recommend instead a 100% clean energy goal, which closely aligns with California Executive Orders B-30-15 and S-3-05 (in fact, for cities that tie their Climate Plans to their General Plan updates it is often the only way to hit long-term state GHG targets).

By embracing a 100% clean energy future, all families of Chula Vista will benefit from a greener grid because renewable energy helps clean the air, builds healthy communities, and spurs local investment and well-paying jobs from clean energy technologies. In addition, adding a 100% clean energy goal in Chula Vista would signal a region-wide commitment to the shift to renewables. It is increasingly clear that 100% clean energy is the future in California and across the nation: the City of Chula Vista’s CAP Update should reflect a commitment to keep pace with the region and the state, and position Chula Vista as one of the state and country’s clean energy leaders

Recommendation 2: Prioritize Community Choice Aggregation (CCA)

We commend Chula Vista for considering CCA as a strategy to achieve the Renewable & Efficient Energy goals. CCA brings local control and freedom of energy choice to families while having the potential to drastically reduce GHG emissions. It is quickly becoming standard practice in Northern California and has gained traction in Southern California as well, with operational programs in Marin, Napa, Sonoma, San Francisco, and San Mateo Counties as well as in select cities in Los Angeles, Contra Costa, and Santa Clara Counties -- representing 63 cities and 8 counties, and more coming online soon.

CCA is the single most effective tool we have to reduce emissions at the local level. In the City of San Diego, for example, a CCA program will be responsible for 42% of GHG emissions reductions from local actions by 2030, and 63% by 2035. According to the Draft Update, the figures are similar in Chula Vista. Given the significance of CCA’s contribution to meeting cities’ climate goals, Chula Vista should take decisive and immediate action to move forward with a Technical/Feasibility Study. We recommend funding a Technical/Feasibility Study by Q1 of 2018 at the latest, instead of Q1 of 2019 as stated in the Draft Update. Because it is the most powerful strategy to meet climate goals at the local level, CCE should be among the highest priority programs in the CAP Update.



Smart Growth & Transportation

Recommendation 3: Clarify Mode Share Targets for Walking, Biking, and Transit

Currently the performance metric for SG&T-2 - Transportation Demand Management, states the intention to “[i]ncrease citywide alternative commute rates by 7% by 2020 (30% by 2035).” The language of this metric is unclear because it does not state the baseline on which growth will be measured, nor does it articulate mode share targets for walking, biking, and transit. We recommend you clarify this performance metric 1) by stating the percent *to* which the alternative commute rate will increase, and 2) specifying mode share targets that would enable the city to meet its overall alternative transportation targets. For example, the City of San Diego states its goal as, “Achieve mass transit mode share of 12% by 2020 and 25% by 2035 in Transit Priority Areas,” “Achieve walking commuter mode share of 4% by 2020 and 7% by 2035 in Transit Priority Areas,” and, “Achieve 6% bicycle commuter mode share by 2020 and 18% mode share by 2035 in Transit Priority Areas.” Articulating those goals clearly allows the development of aligned strategies to ensure goals are met. Mode share goals also help municipalities plan and budget to facilitate a shift away from car-centric growth, as well as advocate for assistance for better transit infrastructure. Finally, they can also help communities plan for anticipated or desired health outcomes.

Environmental Justice/Social Equity

Recommendation 4: Include an Environmental Justice/Social Equity Section in Updated CAP

While climate change impacts everyone, it hits hardest in low-income and communities of color that face a disproportionate pollution burden. The State of California has recognized the challenges facing Environmental Justice communities and prioritized those areas for allocation of Cap and Trade funds. San Diego is the first city in California to adopt a CAP that utilizes a statewide monitoring tool called CalEnviroScreen, which identifies vulnerable communities and can be used to direct investment and benefits to these neighborhoods. According to this tool, four of Chula Vista’s census tracts rank among the 25% most disadvantaged communities in the state based on population characteristics and pollution burden. This presents Chula Vista with the opportunity to obtain funding for programs in these communities. We recommend that Chula Vista’s updated plan include an Environmental Justice section that utilizes CalEnviroScreen to prioritize populations hit first and worst by climate change. Programs in EJ communities might include ensuring all populations in the City have access to solar energy, home energy efficiency upgrades, and green spaces. Lastly, the city should address how CAP strategies can create good-paying jobs for residents and improve quality of life in neighborhoods throughout the City.



Binding Commitment

Recommendation 5: Make the CAP Legally Binding

A legally binding plan is not subject to the vagaries of political whim or will. Rather, it is a stated commitment to the public that the City will do everything in its power to protect and preserve the future for Chula Vista families. Currently, six cities in San Diego County have legally binding CAPs: the City of San Diego, San Marcos, Carlsbad, National City, Vista, and Escondido. In addition, La Mesa and the County of San Diego must tie their emissions targets to measurable and enforceable strategies in their revised CAPs. Climate Action Planning throughout the region has shifted to favor legally binding plans that signal bold leadership on climate change. We urge The City of Chula Vista to make a similarly strong statement of support for current and future generations of Chula Vista families by making the updated CAP legally binding.

Conclusion

Once again, we applaud the City of Chula Vista for your efforts to update and strengthen the CAP. We believe this update presents an exciting opportunity for the City of Chula Vista to show leadership and bolster the resiliency of residents and infrastructure against the impacts of climate change, and fill in gaps in the City's environmental policies since the 2010 update of its CAP.

In this modern era of climate action planning, cities across the region are moving aggressively toward 100% Clean Energy, CCE, significant commuter mode shift goals, and environmental justice. We hope to see Chula Vista re-emerge as a regional climate leader and strongly urge you to incorporate the recommendations enumerated above.

Thank you for the opportunity to weigh in on this critically important planning document. According to the most recently available data and climate scientists, there is no greater threat to the future of humanity than climate change.

Sincerely

Sophie Wolfram, Policy Advocate

sophie@climateactioncampaign.org

(914) 715-2451