



Mayor Dedina and Council
City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

June 6, 2019

Re: Recommendations for Imperial Beach’s Climate Action Plan (CAP)

Dear Mayor Dedina and Council,

Climate Action Campaign is a San Diego-based nonprofit organization with a simple mission: to stop the climate crisis. We recognize and thank you for your leadership on climate and environmental justice through actions such as filing suit against Big Oil for knowingly causing harm by accelerating the climate crisis, leading the effort to stop the sewage flows that have contaminated Imperial Beach’s beaches and wetlands, and recently, passing the most comprehensive plastics ban in the region.

The City’s Climate Action Plan is an opportunity to continue building on the City’s efforts, by developing a comprehensive climate solutions 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 other benefits to families and businesses in Imperial Beach.

We offer the following recommendations to help ensure that the CAP for Imperial Beach will deliver a safe and healthy future for families in Imperial Beach.

CEQA Requires Enforceable Measures 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 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.

Plan for Carbon Neutrality by 2045 In Line With State Targets



As a long-range planning document, we recommend that Imperial Beach’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.

Set a 100% Clean Energy Target By 2030 And Commit to Community Choice

Six cities in the San Diego region (San Diego, Del Mar, Solana Beach, Chula Vista, Encinitas, and La Mesa) have set 100% clean energy targets by either 2030 or 2035, with a commitment to pursue Community Choice as the means to that end.

Currently, measure E.1 reads, “Partner with neighboring jurisdictions to evaluate the potential to join a regional CCE program and increase the share of renewables of grid-supplied renewable power to 75% by 2030.”

We recommend making a firm commitment to 100% clean energy through Community Choice Energy by revising that language to read, “Establish a Community Choice Energy Program: Present to City Council for consideration a Community Choice Energy program that increases renewable electricity supply to 100% clean energy by 2030.”

Community Choice is the only viable pathway to reaching 100% clean energy at the local level, and nearly two dozen programs are operating successfully in over 140 cities across California. Therefore, while the Draft CAP includes actions committing to *exploring* Community Choice, we urge the city to go further and express the intent to join a Community Choice program to meet its renewable energy targets.

Eliminate Building Emissions by 2045 Through Building Electrification

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.

We urge Imperial Beach to include in its CAP targets and associated strategies to electrify municipal, commercial, and residential buildings. These targets and strategies should include:

- Reducing GHG emissions from buildings by 40 percent below 1990 levels by 2030 and eliminating building emissions by 2045 through widespread building electrification.
- Requiring or all newly constructed or renovated buildings to be all-electric.
- Adopting a plan to electrify municipal buildings.
- Streamlining permitting to make electrifying existing buildings easier.
- Developing financial incentives to lower purchase and installation costs for electric appliances.



- Creating public outreach and education campaigns to promote building electrification.
- Support workforce development and training programs that promote good-paying careers for technicians that install and service electric appliances.

In addition to reducing emissions, building electrification provides numerous co-benefits including lower energy bills and lower costs for new construction, improved indoor and outdoor air quality, safer energy infrastructure, and the creation of good-paying green jobs.

Energy Efficiency

The CAP should set targets for water conservation and energy efficiency for single-family, multifamily, commercial, and municipal buildings, as well as plan for ordinances to help reach those targets. These ordinances should include a Residential Energy Disclosure Ordinance similar to the one adopted in Portland, Oregon (and called for in the City of San Diego’s CAP), which requires sellers of single-family homes to obtain and disclose a Home Energy Report estimating the energy-related use, associated costs, and cost-effective solutions to improve the home’s efficiency.¹

In addition to reducing emissions, energy efficiency promotes lower energy bills and creates good-paying green jobs.²

Set Mode Share Targets for Biking, Walking, and Transit

In order to hit the state climate targets, Imperial Beach will need to continue shifting people away from driving and towards biking, walking, and transit, as the CAP acknowledges. We recommend setting ambitious targets for the percentage of commute trips that will be made by biking, walking, and transit (known as mode share targets) and identifying strategies to meet those targets.

Biking: The action in Measure T.4 is to add 11 miles of Class II or better bike facilities. 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 bike facilities, not painted bike lanes.

Transit: In addition to the actions listed in Strategy T.3 to support transit ridership, we recommend adding a third action that read, “Support planning and policy decisions at SANDAG to reduce GHG emissions and VMT and increase transit ridership.”

Include Strategies to Ensure Equitable Implementation of CAP

¹ City of Portland Home Energy Score, City of Portland, Bureau of Planning and Sustainability, <https://www.pdxhes.com/>

² Ettenson, Lara. “Good News for Good Jobs: Clean Energy Soars.” NRDC.org, NRDC, 30 May 2018, <https://www.nrdc.org/experts/lara-ettenson/good-news-good-jobs-clean-energy-outpaces-fossil-fuels>.



Environmental justice and social equity play an inherent role in protecting our environment and supporting healthy communities. This section would explicitly outline how the CAP will implement the Environmental Justice section of the General Plan. We also recommend the development and implementation of this section take place in consultation with a diverse set of stakeholders from the most impacted of the City’s communities.

Commit to Zero Waste

Waste decaying in landfills emits methane, a potent greenhouse gas. The CAP should achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas.

Currently, measure W.1 reads, “Adopt a Zero Waste by 2050 policy and work with the City’s waste service company (currently EDCO) to achieve 80% landfill diversion by 2030.” We recommend adopting a Zero Waste policy that commits to 100% waste diversion by 2035.

Fully Electrify the City’s Municipal Vehicle Fleet

The CAP should include strategies to promote zero emissions vehicles (ZEVs) and convert the municipal fleet to ZEVs. 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 hybrid vehicles. Currently, measure T.2 reads, “Replace fossil fuel vehicles with Plug-in Hybrid Electric Vehicles (PHEVs) and EVs by 2030, when feasible.” We recommend amending that language to read, “Replace fossil fuel vehicles with EVs by 2030.”

We also strongly support measure T.5, which commits to purchasing 10 electric bikes to reduce municipal employee VMT.

Commit to Annual Monitoring Reports and Specific Date for CAP Update

In order to ensure timely and transparent progress, we recommend amending the Implementation and Monitoring Section of the CAP to commit to the following:

- Require annual monitoring reports on implementation progress.
- Require a greenhouse gas inventory every three years.
- Commit to a specific year for the CAP update.

Conclusion

Thank you for the opportunity to weigh in on the development of this critically important document. Imperial Beach’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 incorporate the recommendations above to deliver economic, safety, and health benefits, and stave off the worst impacts of climate change.

Sincerely,



A handwritten signature in black ink that reads "Maleeka Marsden". The signature is fluid and cursive, with the first and last names being the most prominent.

Maleeka Marsden
Climate Justice Advocate and Organizer
Climate Action Campaign