



September 14, 2023

Mayor Morrison, Vice Molina, 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

Mayor Morrison, Vice Mayor Molina, and Council,

Climate Action Campaign (CAC) is a San Diego and Orange County based nonprofit organization with a simple mission: create a zero carbon future through effective and equitable policy action. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015.

Councilmember Marcus Bush reached out to us to ask that we provide comments on your draft CAP. Here are our recommendations:

CEQA-Qualifying CAP:

National City is updating the Land Use, Transportation, and Safety Elements of the General Plan. The November 2022 draft CAP also states that “The CAP Update will also be utilized for tiering and streamlining future development in National City pursuant to California Environmental Quality Act (CEQA) Guidelines 15152 and 15183.5.”¹ Therefore, the CAP is both mitigation for your updated General Plan and CEQA-qualified, which means the measures in the plan must be enforceable—specific, unambiguous, and contain clear requirements.

Commit to Carbon Neutrality in Alignment with State Law:

National City must align its CAP with evolving climate science and best practices and commit, at the least, to achieving carbon neutrality by 2045, in line with state climate law. Thus, overall emissions reductions target, strategies, and measures must align with:

- SB 32, which established a mid-term target of reducing statewide GHG levels to 40 percent below 1990 levels by 2030; and
- AB 1279, which codifies, and establishes a clear and legally binding goal to achieve statewide carbon neutrality no later than 2045. More specifically, AB 1279 established a target of reducing GHG levels 85% below 1990 levels by 2045.

¹ <https://pub-nationalcity.escribemeetings.com/filestream.ashx?DocumentId=4120> (pg. 168)

Center Equity in the CAP:

- Create a Climate Equity Index (CEI) that 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 centered in the implementation of GHG reduction strategies.
- Actively prioritize social equity measures, actions, and goals that are identified by environmental justice communities. This includes developing tracking and reporting metrics to determine progress and success, and making necessary updates based on the results and community feedback.
- Operationalize equity in CAP policies with dedicated implementation funding for environmental justice communities. Improve this process through yearly analysis and updates, community outreach, feedback, education, and increased staffing for implementation.

In reviewing key strategies for reducing your GHG to net-zero emissions, we recommend the following actions:

Transportation and Land Use Strategies:

- Implement a city-wide mode shift target. National City can replicate the City of San Diego's target to meet or exceed 50% biking, walking, and transit by 2035, or adopt a target in line with National City's goals. This includes specified mode shift goals for biking, walking, and transit, as opposed to an aggregate mode shift goal.
- Commit to a Mobility Action Plan which will outline a roadmap to achieving your mode shift goals.
- Commit to developing a Bicycle Master Plan, a Pedestrian Master Plan, an Active Transportation Plan, or updating an existing biking and walking plans with robust measures and goals (if these plans have not already been adopted).
- Electrify 100% of National City's municipal fleet, including all city-heavy duty and emergency response vehicles, by 2035.
- Implement a city-wide electric vehicle strategy to accelerate EV adoption, including electric bicycles, that focuses on the barriers to ownership and charging for residents within low income communities.

Residential and Commercial/Industrial Building Efficiency:

- Commit to passing an ordinance or reach code to ban new methane gas infrastructure in buildings.
- Commit to passing a resolution requiring all new and renovated affordable housing financed/funded/operated by the National City Housing Authority to be all-electric.
- Develop and implement a plan to electrify all existing buildings by 2035. This plan should include scope, scale, estimated costs, specific planning and implementation timelines, and an outline for community and stakeholder engagement. A building and housing stock analysis must be conducted to inform the plan.

- Develop and implement a plan to electrify all municipal infrastructure. This strategy must outline estimated costs and timelines for electrification, as well as include a target date to complete the decarbonization of municipal operations.

Renewable Energy Production Strategies:

- The CAP should include a 100% clean energy target by 2030 through San Diego Community Power.
- Set energy efficiency targets for all residential, non-residential, and municipal buildings.
- Set targets and an ordinance for water conservation for all residential, non-residential, and municipal buildings.
- Set increased energy efficiency & renewable energy generation targets at National City facilities within the implementation of a municipal energy plan.
- Expand local Distributed Energy Resources (DERs) throughout National City, specifically in low income communities. Local DERs are the most climate resilient renewable energy systems that exist as extreme weather and fires threaten the reliability of large scale transmission lines and power plants. Advocating for specific DER programs and projects at San Diego Community Power is important, including virtual power plants, microgrids, community solar, and other equitable DER projects and programs.

Solid Waste Efficiency Strategies:

- Set a target of 90% waste diversion or more by 2035.
- Commit to diverting organic and food waste through best use strategies (prevention, donation, recycling, etc.), ensuring that edible food currently landfilled will be recovered for human consumption in line with SB 1383.
- Include actions to eliminate or significantly reduce the use and generation of single use plastics in the City.

Water & Wastewater Management Strategies:

- Commit to a green infrastructure plan that promotes green streets, clean water, and stormwater capture. The green infrastructure plan can be coupled with a commitment to adopt a Green Street Ordinance requiring systemic transformation of city roads into green streets, triggered by capital improvement projects. This includes:
 - Committing to a tree canopy coverage percentage target. National City can replicate the City of San Diego's 35% tree canopy coverage target, or adopt a target in line with National City's goals.
 - Commit to conserving and restoring natural lands, such as canyons, open spaces, and wetlands/marshlands to sequester carbon, support biodiversity, and promote clean water.

Implementation & Monitoring:

- Commit to the development of a detailed Implementation Plan coupled with the CAP. The implementation plan must include:
 - Clearly identified viable funding sources for each measure, and the City actions required to secure that funding for the CAP.

- A cost analysis for each measure that describes costs to the public and private sectors, including estimated dollar amounts for the implementation of CAP strategies, measures, and actions.
- A consistently updated multi-year outlook of the costs of implementation of CAP measures and actions to inform City budget allocations.
- Include 5 year benchmarks for GHG reductions and implementation of CAP goals.
- Commit to an Annual Monitoring Report.
- Commit to a GHG inventory every three years.
- Commit to CAP Updates every five years.

Historic Funding Opportunities

Finally, and perhaps most importantly, we encourage National City to track unprecedented climate funding opportunities from state and federal sources. [Gavin Newsom's Climate Measures](#) and [Revised Budget Plan](#), the [Bipartisan Infrastructure Law](#), and the [Inflation Reduction Act \(IRA\)](#), all include significant funding opportunities to build green, sustainable, and resilient communities. As more federal and state grants become available, National City will need to demonstrate existing plans for specific projects and programs, as well as strategies for allocating expected funding. Without an implementing plan and monitoring criteria, the City may be unable to qualify or be competitive for resources needed to achieve its CAP targets.

SANDAG recently committed to creating a Regional Climate Readiness Table that will foster needed collaboration between local governments, businesses, frontline communities, and community-based organizations. This will position the region to be competitive for unprecedented state and federal climate funds. Joining this table will give National City the opportunity to work jointly with neighboring cities and increase resources to implement the CAP, slash GHG emissions, protect public health, center equity, and uplift the well-being of its communities.

Thank you for the opportunity to weigh in on the development of this critically important document.

Sincerely,

Madison Coleman

Madison Coleman
Policy Advocate
Climate Action Campaign

