



August 16, 2014

Mayor Blackburn and Council,
City of Carlsbad
1635 Faraday Ave, Carlsbad, CA 92008

[Via Email](#)

Re: Climate Action Campaign recommendations for Carlsbad's Climate Action Plan Update

Dear Mayor Blackburn and Council,

Climate Action Campaign (CAC) is a San Diego 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 Climate Action Plan's (CAP) throughout the region since 2015.

Climate Action Plan Administrator Katie Hentrich reached out to us to ask that we provide comments on your draft CAP. Here are our comments and recommendations:

What we Applaud in the CAP Update:

- Ensuring the City reaches 100% clean energy is crucial for reducing emissions and ensuring a just, climate-safe future. The draft CAP update has strong goals in Measure E-2 to set 100% renewable electricity as the default option for Clean Energy Alliance customers in the City. This is a critical step towards the clean energy future we need and are pleased to see Carlsbad incorporating this as a priority in the CAP.

Upgrade Clean Energy Measures

With natural gas being responsible for 14% of Carlsbad's greenhouse gas (GHG) emissions, electrifying new and existing buildings are essential actions for reducing pollution and improving air quality.

- **Measures E-3 and E-4:** Measures E-3 and E-4 address methane gas in new construction and identify ways to update existing reach codes to further reduce the impacts of gas in residential and nonresidential buildings, though stronger and more detailed timelines for implementation are needed. Once the new state building code is

adopted next year, Carlsbad can choose the voluntary option to ensure new buildings are safe, healthy, and climate resilient.

- **Measure E-5:** The current draft CAP update includes an important foundational step to modernize and make existing buildings safe and energy-efficient in Building Energy Benchmarking in Measure E-5, but benchmarking only supports critical information-gathering and analysis. The CAP update is missing a Building Performance Standard which is necessary to regulate pollution from existing buildings. Without a standard, Carlsbad will not be protecting their residents from dangerous exposure to fossil fuel pollution.
- **Add this Missing Measure:** A measure should be established for developing and implementing a Building Performance Standard and should include scope, scale, estimated costs, specific planning and implementation timelines, and an outline for community and stakeholder engagement. It is also essential that equitable electrification for Communities of Concern and new job opportunities for fossil fuel workers be key elements in all building electrification strategies.

Upgrading Transportation Measures

The CAP's cumulative measures to address GHG emissions from transportation are woefully insufficient. By the City's own projections, transportation emissions will still be the highest sector for GHGs by 2045.

On August 23, 2023, the City of Carlsbad declared a local state of emergency regarding a 233% increase in collisions involving bikes and ebikes between 2019 and August 2022. As the use of e-bikes increases it necessitates the adoption of safe transportation infrastructure to help facilitate safe streets for everyone, especially near and around schools.

- **Measure T-3:** We commend the City of Carlsbad on their initiative to address Safe Routes to Schools to help promote safe walking and biking. However, the emphasis needs to be on engineering and redesigning streets with safe infrastructure since education and enforcement are not elements that address the lack of safety in the built environment where streets are built for high speed and cut through traffic.
- **Measure T-1, T-3 and T-5:** The CAP's Safe Routes to School is missing important pedestrian safety components for safe crossing such as speed tables and flashing beacons for mid-block crossings. Sidewalks are not enough because at some point folks need to cross fast and dangerous streets.
- **Measure T-4:** Paint is not enough. The City of Carlsbad needs to take a Class IV approach where biking is secure, safe and separated from fast, free flowing traffic. We commend the City on their plans for Class I bike lanes, but the need for a network of safe and protected bike lanes requires a Class IV approach in addition to multiuse bike trails.

- **Measure T-3, T-6 and T9:** The reduction of speed is a missing tool in the CAP. Utilizing [AB 43](#) to slow streets will be essential to ensuring Safe Routes to School. AB 43 is also a powerful tool to create a network of streets that are 35 MPH or less for NEV/LSV for residents, staff and tourists alike. Carlsbad is the perfect city for street-legal golf carts and neighborhood electric vehicles. In fact, the City's fleet conversion to all electric can include NEVs.

Centering Equity and Green Jobs

Overall, equity has been thoughtfully and clearly integrated throughout the CAP update. We acknowledge and appreciate the effort Carlsbad has made with reaching out to communities, especially tribes, as well as the efforts put into engaging communities through workshops, listening sessions, and events. Here are some recommendations for improvements.

- The City of Carlsbad needs to prioritize Communities of Concern, who are first and foremost impacted by the climate crisis, by identifying funding to create tools such as the Climate Equity Index that cities like [Chula Vista](#) and [San Diego](#) have.
- The City of Carlsbad should partner with universities, schools, and labor unions to ensure access to apprenticeship programs and other pipelines for high-paying jobs within renewable energy or circular economy sectors.
- Finally, we encourage the City of Carlsbad to consider community residents who may not be residents due to lack of affordability, but are still vital members of the community as workers or are tribal members who have been displaced from their ancestral coastal homelands.
 - Examples include ensuring that workers have access to rebates or home-owner purchased electric leaf blowers (to account for bans on gas-powered leaf blowers) as well as access to affordable and accessible renewable energy-based transportation options. This access should include education about alternatives to gas-powered appliances, as well as potential travel vouchers or rebates for electric vehicles or bicycles.
 - Other examples include working with tribes to ensure renewable energy-based transportation from the reservations to the coast through electric shuttles or vouchers for public transportation options.

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

Sincerely,

Anthony Dang
Policy and Community Outreach Manager
Climate Action Campaign