



May 17, 2016

City of Oceanside Mayor and City Council
Oceanside City Hall
300 North Coast Highway
Oceanside, CA 92054

RE: Climate Action Campaign Recommendations for a Climate Action Plan (CAP) in the City of Oceanside that Protects Quality of Life for Future Generations

Dear Mayor Wood and Oceanside City Council,

Climate Action Campaign is a 501(c)(3) 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 County 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 commend the City of Oceanside for working to create a Climate Action Plan (CAP) to protect quality of life for its residents. The development of the City's CAP presents an exciting opportunity to show leadership on climate change and fill in gaps in the City's environmental policies since the publishing of its 1975 Environmental Resource Management Element.

Our organization is available as a resource to the City in any ways we can be helpful, including assisting with research, policy analysis and drafting, and educational outreach surrounding the CAP. Please accept the following comments on the City's anticipated plan. Below are our initial recommendations for ways the City can leverage its CAP to become a regional leader on climate policy and clean energy, as the City of San Diego has done with the unanimous bi-partisan passage of its CAP in December of 2015.

The Draft CAP Will Likely Trigger CEQA Review and Track State Climate Goals

We recommend evaluating the connection of the Draft CAP to CEQA. Based on our analysis, Oceanside's update to the Economic Development Element of its General Plan will likely trigger the CEQA environmental review process. The review will ascertain whether updates to the General Plan meet necessary GHG emission reductions for the planning horizon of those updates.

In assessing whether Oceanside's CAP meets CEQA requirements, California's GHG reduction targets can serve as a helpful guide. California Executive Order S-3-05, issued in 2005, committed the State to reducing its GHG emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Consistent with the objective of the Executive Order, the Legislature followed with the Global Warming Solutions Act of 2006, commonly known as AB 32. (Health & Saf. Code, §§ 38500, et seq.). AB 32 requires emission levels be reduced to 1990 levels by

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2020. (Health & Saf. Code, § 38550). Recently adopted Executive Order B-30-15 also sets an interim reduction goal of 40 percent below 1990 levels by 2030. (See, EIR, p. 4.6-7). Thus, between 2020 and 2030, GHG emissions must be reduced an additional 40 percent and these EOs will likely be tied to the reductions necessary to mitigate for the impacts of the Oceanside GPU.

Please note that the AB 32 Scoping Plan itself acknowledges the 2020 goal is an interim step towards the further reductions set out in the Executive Order. As noted in the First Update to the Scoping Plan:

Progressing toward California's long-term climate goals will require that GHG reduction rates be significantly accelerated. Emissions from 2020 to 2050 will have to decline at more than twice the rate of that which is needed to reach the 2020 statewide emissions limit. (First Update Scoping Plan, May 2015, p. 5, emphasis added).

From a policy standpoint, the City can take advantage of the CEQA review process to achieve its strategic planning goals. The purpose of CEQA review is to ensure the City is protecting the quality of life of Oceanside residents and preventing adverse impacts from climate change and other harm. Not only will this process ensure legal sufficiency of the City's CAP Draft, but it will allow for a transparent public process that will serve to strengthen the plan and create opportunities for education and buy-in from community stakeholders.

GHG Reduction Target Should Extend Through 2030 and Meet State Targets

We support the stated goal at Oceanside's January 20, 2016 RFP meeting for the CAP to establish a "unifying theme or set of themes" that are consistent with other elements of the City's General Plan. Consistency will be especially important between the City's CAP and its September 2012 Oceanside Circulation Plan Element, which maps out the City's goals, objectives, and policies to maintain and improve its transportation system.

The Master Transportation Roadway Plan contained in the Circulation Element is based on a 2030 timeline. Therefore, we believe Oceanside's CAP GHG Reduction Targets should extend until at least 2030 and meet the California Executive Order B-30-15 target of 40 percent below 1990 levels by 2030. As a basis of comparison, the City of San Diego based its reductions on a target date of 2035 in order to mirror the planning horizon of its General Plan and achieve emissions reductions consistent with California Executive Orders B-30-15 and S-3-05.

Additionally, from a practical perspective, it makes sense for the City of Oceanside to create long ranging goals in its CAP since it may not have the resources to update the CAP in the near term future. As of early this year, the majority of Oceanside's General Plan elements, including policy language required under the Coastal Act, had not been updated in 25 or more years. In order for the Climate Action Plan to have the most impact, it should evaluate how the City will meet ambitious, long-ranging emissions reductions targets well into the future.

Combining science, policy and law, in addition to what is in the best interest of the public health and safety of Oceanside residents, we believe the City should scope of the draft CAP to at least year 2030.

Recommend Enforceable Measures with Detailed Deadlines

We suggest tying emissions targets in Oceanside's CAP to enforceable and measurable strategies, as the City of San Diego has done in its 2005 CAP and the County of San Diego must do in their revised CAP. Because the CAP is mitigation for activities in the planning horizon of the City's General Plan Update, enforceable, evidence-based standards with detailed deadlines will create a roadmap to achieve the GHG reduction numbers assigned to each strategy.

We recommend that the City not only set at least a 2030 target date, but also craft enforceable mitigation measures with substantial evidence and detailed deadlines for years 2020 and 2030.

Recommend Inclusion of 100% Clean Energy Goal

The City of San Diego CAP includes a 100% clean energy goal for the year 2035. In order to ensure all residents of San Diego County benefit from a green grid--and not just the residents of the City of San Diego--as well as help to drive local investment and well-paying jobs from clean energy technologies such as solar, wind, geothermal and modernizing our electrical grid. we encourage the City of Oceanside to adopt a similar clean energy goal.

A 100% clean energy goal closely aligns with the state's executive orders described above (in fact, it's often the only way to hit long-term state targets), and it would allow the City to market itself as a statewide and nationwide clean energy leader. Further, if the entire San Diego region embraces a 100% clean energy future, we will be able to coordinate and collaborate together to plan the best pathway to that clean energy future.

Recommend Inclusion of Community Choice Aggregation

Community Choice Aggregation is one of the most effective mitigation measures to reach GHG reductions from electricity sources as well as meet robust clean energy targets, allowing municipalities to purchase clean energy for their residents and businesses often at a lower or competitive cost. This innovative public-private-partnership would give the City control over its energy decision-making and enhance its energy options by injecting competition and choice into a monopoly marketplace. The incumbent utility would still deliver reliable power to all residents/businesses in partnership with the Community Choice provider.

Community Choice is becoming popular throughout the state of California. Three municipalities--Marin County, Sonoma County and the City of Lancaster--have implemented Community Choice, and it has provided lower rates with higher clean energy content to all customer classes. The Counties of San Francisco launched this month. Additionally, the City of San Diego included Community Choice in its CAP as the key mechanism to achieve its clean

energy goals, and the City has set aside funding in the budget for a feasibility study to explore this option.

We encourage the City to consider integrating Community Choice Aggregation in the CAP as a way to help steeply reduce carbon emissions.

Conclusion

We support the goal expressed at Oceanside's January 20, 2016 meeting on the CAP RFP that the City would like to brand itself as a "Green City." We look forward to working to help the City achieve this goal. Please do not hesitate to reach out to us as a resource if we can help in the drafting, research and/or educational outreach for Oceanside's CAP.

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. We commend the City of Oceanside for its efforts to protect our kids and grandkids and create a more sustainable future.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole", with a stylized flourish extending from the end.

Nicole Capretz
Executive Director