



November 4, 2024

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.

Here are our comments and recommendations:

1. Adopt the CAP Update with all Building Electrification Measures

In order to reduce pollution, we urge you to adopt the CAP Update that exceeds the 2045 greenhouse gas (GHG) reduction target by approximately 6,000 MT CO₂e including all of the building electrification measures. The alternative options presented remove important building electrification strategies that undermine public health and climate-safe outcomes.

All building electrification and clean energy measures, including the following, must remain in the CAP:

- E-3.2, Nonresidential Building Energy – Updated Reach Code
- E-3.3, Nonresidential Building Energy – Solar Carports
- E-4.2, Residential Building Energy – Updated Reach Code

Here's why this is critical:

- **Protect Freedom to Clean Air in Our Homes.** Adopting these reach codes will incentivize new construction to be built with electric appliances rather than appliances that emit dirty methane gas containing harmful pollutants that are dangerous for public health and the climate. Air pollution generated by burning fossil fuels indoors significantly

impacts residents and workers health leading to significant health disparities between those with electric appliances and those with gas appliances.

- **Flexibility.** Keeping the above mentioned strategies allows for implementation flexibility and sets the City up for success to reach the GHG reduction goals, protecting your community from climate pollution.

2. Upgrade Transportation Measures

The CAP does not incorporate enough measures to reduce pollution and reach your climate goals, specifically around transportation. By the City's own projections, transportation polluting emissions will be greater than any other type of emissions by the year 2045.

This plan can slash these emissions by investing in Safe Routes to School. This is one component to spur street safety throughout the city while reducing air pollution, GHGs, and vehicle miles traveled. Building Safe Routes to School also holistically addresses frustrating school pick-up/drop-off challenges by involving community dialogue to better plan safe transportation around school sites.

- **Measure T-3:** Safe Routes to School is a great strategy but the emphasis needs to be on engineering and redesigning streets with safe infrastructure is the only way to ensure 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 safety components for safe pedestrian crossings. Sidewalks are not enough. At some point folks need to cross fast and dangerous streets. Traffic calming strategies such as speed tables and flashing beacons for mid-block crossings should be integrated into Safe Routes to School & CAP framework.
- **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. 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.

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