

PLANNING COMMISSION

Meeting Date: 11/02/20

ADDITIONAL ITEM ADDED AFTER DISTRIBUTION OF PACKET (# 2)

AGENDA ITEM # 2

Applicant/Project Name: Climate Action Plan Update
Project Number: PA18-0003 / ND20-004

Brief Description: Public Comment received by email with response.

Date 11/02/20
Time 12:15 p.m.



Memorandum

TO: Planning Commission
FROM: Planning Division
DATE: November 2, 2020
SUBJECT: Public Comments - PA18-0003/ND20-004

Climate Action Plan Update

Response to North County Group of the Sierra Club

The email received from Laura Hunter-NCG Conservation Committee/Sierra Club North County Group has three letters attached. The attached letter from CARE Law Group/Alan Geraci was previously received by the City during the Initial Study/Negative Declaration public comment period. The letter and City's response to the letter are included in the PC Packet in Attachment C of the Staff Report and in Chapter 2 of the Final IS/ND.

The second attached letter is addressed to the Mayor and City Council and has comments specific to the General Plan update project.

The third letter dated October 30, 2020, contains comments specific to the Climate Action Plan and identifies several strategies and issues that the North County Group (NCG) of the Sierra Club would like included in the CAP. The comment letter also requests postponement of the November 2, 2020, Planning Commission hearing. The comment letter characterizes the following issues as "deficiencies" in the CAP, but does not provide any basis or explanation of why the issues raised constitute "deficiencies."

Issues raised in the comment letter include social equity discussion in the CAP, participation in a Community Choice Aggregation (CCA) program; establishing a goal of 100% clean energy; an electric intra-city shuttle; social equity analysis; city fleet with zero emission vehicles (ZEVs) by 2030; actions to improve energy efficiency of existing residential and commercial buildings; a carbon neutrality target by 2045; 90% solid waste diversion by 2030; transportation demand management (TDM) for existing development; transportation mode share targets; support for free "Youth" transit passes; requirements to "fully electrify" new development; policies that "decentralize deployment" of photovoltaics and address micro-grids and other pilot projects; a "path to 100% clean energy" for renters; access to broadband for all residents; an urban forestry initiative and a goal of "at least 35%" tree cover; community garden locations; carbon sequestration measures for native habitat; completion of a Multiple Habitat Conservation Program (MHCP) subarea plan; commitment to green jobs; adaptation measures and equity actions; and lack of a Climate Commission or community involvement board.



Consistent with CEQA Guidelines Section 15183.5(b), the measures of the CAP have been quantified and are sufficient to achieve the targets established for the 2030 horizon year. The CAP contains the necessary plan elements to be considered a qualified GHG reduction plan based on CEQA Guidelines Section 151583.5(b). Future updates to the CAP may incorporate new or suggested measures and approaches that could assist the City in meeting future reduction targets for horizon years beyond 2030. As a part of CAP implementation, each strategy and measure will be continually assessed and monitored. Reporting on the status of implementation of these strategies, periodic updates to the GHG emissions inventory, and other monitoring activities will ensure that the CAP is making progress towards its reduction targets. If monitoring indicates that the CAP is not making progress toward achieving the reduction targets, amendments to the plan will be required. The City's 2013 CAP includes five Climate Adaptation measures that also address social equity. Updates to these measures are not included within the CAP as these will be addressed with future updates to the City's General Plan. As included in the CAP's Chapter 3-Greenhouse Gas Reduction Strategies and Measures, the City will continue to implement the Adaptation measures included in the 2013 CAP.

The City Council at its September 22, 2020 meeting approved a resolution to establish a Climate Action Plan Implementation working group, which will be comprised of residents of the City, as appointed by the City Council, to assist in the implementation of the CAP, after its adoption.



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

October 30, 2020

Planning Commission
City of San Marcos
Via Email

RE: Sierra Club NCG comments on San Marcos draft Climate Action Plan Update

Dear Planning Commission:

The North County Group (NCG) of the Sierra Club represents over 270 members in San Marcos and over 2,600 in North County. The Climate Action Plans are critically important if we are to address and arrest the worst aspects of the climate crisis.

NCG filed a comment letter on May 5, 2020 that included several important initiatives that we believe should be included in the Draft Climate Action Plan. (Attached) Further, the city is in receipt of an excellent set of proposals by San Marcos resident Alan Geraci (attached) outlining a visionary and effective set of actions for true climate action.

There are some GHG reduction strategies we strongly support including:

- Participation in a CCA, however we urge the city to establish a goal of 100% clean energy.
- The deployment of an intra-city electric shuttle which will assist significantly with VMT reduction.

However, there are serious deficiencies in the CAP. We have listed several below, but due to the number of missing actions and the timing of the hearing the night before a major election, we request that this item be postponed.

Deficiencies of the draft Climate Action Plan Update (CAP)

As it is drafted, the Draft CAP should be significantly amended prior to consideration by the Commission. Some of our concerns are as follows:

1. CAP fails to include social equity in the implementation of the CAP and should designate priority investment areas for early action to address existing inequities and disproportionate pollution burdens. We encourage the city to examine the approach Escondido has taken to incorporate social equity into both emission reduction and adaptation actions. Their proposed focus on priority investment neighborhoods would be relevant in San Marcos as well.
2. CAP should require conversion of the city fleet to ZEV by 2030.

3. CAP does not include any actions to improve energy efficiency of existing residential and commercial buildings. Given the high energy embedded in our water supply, water conservation should be included in this effort. A building energy and water conservation retrofit program should be committed to and a goal set for 2 metric tons of reduction per home.
4. CAP should align with the state target to achieve carbon neutrality by 2045.
5. CAP should set a goal of 90% solid waste diversion by 2030. CAP should propose a phased ban on single-use plastics as a part of achieving this goal. CAP should require separation of organic waste and implement a compost program like San Francisco's Recology.
6. The Transportation Demand Management (TDM) plan should include existing development as well as new development.
7. Transportation mode share targets should include existing development as well as new development and cover walk, bike, transit.
8. Support free Youth transportation passes to help young people gain mobility and to develop habits of transit use.
9. The CAP should require policies to fully electrify all new development, promote decentralization deployment of PV, develop a policy on micro-grids and other pilot projects that reduce fossil fuel use and provide increased energy security.
10. CAP should require that new building construction be 100% electric by 2023 and that 20% of existing buildings be retrofitted by 2035. Jobs created should be family supporting and preference given to low-income workers. City should work with employers and local schools to ensure workers have required skills.
11. As 39% of San Marcos residents are renters, the CAP should develop a plan to provide renters a path to 100% clean energy. These should be provided at no upfront cost to tenants and could be incentivized with funds from the CCE. Further, when electricity is sold to the grid, tenant power bills should be reduced and/or income should be shared with tenants.
12. All residents should have access to broadband for work, school and to manage energy efficiency in their homes.
13. CAP should set a goal for tree cover of, at least 35%, for GHG reduction and co-benefits.
14. CAP should commit to proposing an urban forestry initiative and require all shade trees planted to be native or non-invasive.
15. CAP should identify locations for several community gardens.
16. Measures that maintain carbon sequestration capacity of native habitat should be included.
17. Completion of a subarea plan under the MHCP to ensure protection should be done.
18. A commitment to creating and supporting green jobs should be included in the CAP. Many options for doing this are outlined in the September 3, 2020 letter from Mr. Geraci.

Process and Implementation

- The CAP does not include any adaptation measures or equity actions. It seems to refer to the General Plan update for these. However, these should be included in the Climate Action

Plan as they related either to GHG reduction or adapting to the climate change impacts. Otherwise, it cannot be known whether the draft CAP is adequate or not.

- The draft CAP does not include community or citizen oversight. We strongly recommend that the city establish a Climate Commission or other community involvement board to work with staff, residents, and officials to help guide and implement the plan. Our San Marcos members would be interested in serving on such a committee.
- All CAP goals should be monitored, measured, reported on publicly and adjusted as needed, at least annually.
- Actions in the CAP should be measurable and enforceable.

Climate Action is Critical.

Now is not the time to do the minimum. The state's 2018 CA 4th Climate Change Assessment: San Diego Regional Report¹ found that San Diego County will be increasingly affected by climate change in future decades and will be confronted with, among others, increasingly warmer average temperatures, more frequent and likely more intense heat waves, more intense droughts, occasionally increased heavy rainfall events and floods, continuing Santa Ana winds and wildfire threats. It is imperative that the CAPs outline and commit to comprehensive action to mobilize against this threat.

Sierra Club North County Group recently adopted [a resolution declaring a climate emergency](#). We urge the city to do the same. A visionary, far-reaching, and effective Climate Action Plan will serve the city and the future well.

Thank you for your consideration

Sincerely,



Laura Hunter
Chair, NCG Conservation Committee

Atch:

Sierra Club NCG May 5, 2020 comment letter
Letter from Alan Geraci, September 3, 2020 on Climate Action Plan

¹ <https://www.energy.ca.gov/sites/default/files/2019-07/Reg%20Report-%20SUM-CCCA4-2018-009%20SanDiego.pdf>

CARE LAW GROUP PC

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Public Comment

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September 3, 2020

Saima Qureshy, Principal Planner
Development Services Department
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Dear Ms. Qureshy:

Please accept this letter as my public comment concerning the Draft Climate Action Plan.

Overall, I appreciate the CAP and its ultimate recommendation to reduce the 2012 baseline of MTCO₂e from 599,000 MTCO₂e to 346,800 MTCO₂e by 2030. I write this letter during a heat wave and while wildfires are burning our state. Although the incremental approach is almost always acceptable, the existential threat of climate change requires immediate and bolder actions. The draft CAP correctly states that climate change is a global issue and that local and regional solutions must be replicated for greater impact. By all measures, scientists conject that this is the last decade to have an impact on climate change and 100% renewable, sustainable energy programs are the only real path. It is with that level of concern that I make the following broader proposals for our CAP.

“Act like your house is on fire....because it is.” - Greta Thunberg

A San Marcos Green New Deal...

A San Marcos Green New Deal (SMGND) calls for the swift and complete conversion to a 100 percent renewable energy system for both electricity and transport by 2030, partnered with the full de-carbonization of the economy by 2040. We recognize that as a municipality, mandates from the County of San Diego and State of California can preempt SMGND unless the restrictions exceed such mandates. When discussing certain policy objectives for the “region,” we include North San Diego County and San Diego County at large. With focused investments on the city and county level, San Marcos will pioneer the economy of the future. SMGND can lead our region out of the economic crisis as well as the climate crisis.

SMGND is our local civic commitment to a Green economic recovery as we emerge

stronger after the Covid-19 Pandemic. Preparing San Marcos workforce for the Green era is essential to maintaining San Marcos's leadership in innovation and prosperity. We must all call upon all local elected leaders to correctly recognize the urgency of climate change, which demands a re-imagining of public works and market incentives. SMGND aims to help build a foundation for a healthier, more equitable clean-energy future for all of us.

San Marcos must and will be climate neutral by 2045. To achieve this, we need to surpass the state's Greenhouse Gas Reduction targets. We must plan and prepare for the threats of climate change within our own communities -- the threats that are already here and the threats science predicts we will be facing. Bold action must be taken to reduce greenhouse gas emissions, sequester carbon, and transition to a carbon-free economy. SMGND contains ten critical policy areas. This plan is designed to evolve over time with community input and participation. It lies in the hands of San Marcos communities to support the policies that come from this document, and to strengthen it with our own creativity and expertise.

Declare a regional climate emergency. There is a climate emergency which demands a massive-scale mobilization to halt, reverse, and address its consequences and causes. This is an existential threat and San Marcos must do whatever it takes to confront it.

1. **Clean energy and zero-carbon economy:** The climate crisis demands energy democracy – the transition from a centralized corporate fossil fuel economy to a clean energy system governed by local communities. Transitioning to a 100% clean energy supply by 2030 is the backbone of San Marcos's strategy to go carbon neutral. It is essential to build sufficient clean energy generation capacity for San Marcos's growing needs by investing in solar and wind energy opportunities. San Marcos is ideal for solar and wind power, which offer opportunities for our local economies.
 - **Focus resources on transitioning to a 100 percent clean energy economy.** All applicable departments must immediately prepare for the clean energy economy by transitioning resources and offices historically used to facilitate fossil fuel extraction, transportation, or refining. Instead, San Marcos and affiliated agencies will lead a centralized taskforce to phase out fossil fuels by expediting research, development, deployment, and technical support for polluting industries to ensure a smooth transition for workers and communities who have historically relied on fossil fuel production. This taskforce will be responsible not only for phasing out fossil fuel production on public lands and waters but will also support the end of fossil fuel production on private property as well.
 - **San Marcos needs Public Banking.** The fight for a SMGND is also the fight for public banks. Optimally, we must advocate for a State Public Bank. With

public banks operating for the people instead of private shareholders, the flow of capital better reflects the values of our local communities. This can be ensured by creating public banking charters based on a framework of responsibility, transparency and accountability. Through locally controlled public banks, chartered with socially and environmentally responsible mandates, we can build a public banking model to become a nationwide network of public banks, responsive to the needs of local communities. Public banks would provide credit to fund public infrastructure projects and reinvest in local communities, while simultaneously reducing expenses previously incurred from extractive private banks.

- **Forward an advocacy campaign for Municipal Clean Energy** (MCEs) non-profit agencies into every region around San Marcos to foster more renewable and locally controlled energy services. Real estate companies and landlords owning dwellings with multiple occupants should be encouraged to install solar panels and should receive a tax credit for doing so, while escalating tax hikes over time for not providing the service.
- **Support State and County tax credits and other incentives to accelerate installation of solar and where viable, wind technologies.** The mix of solar and sustainable installations will prioritize neighborhood and community microgrids to build flexibility and resilience into the energy infrastructure. Microgrid cooperatives should be able to disconnect from the main power grid during or after climate events or cyberattacks to share locally generated solar and wind power within their neighborhoods.
- **Install new types of wind and solar farms on underutilized land.** Regional leadership will collaborate closely with county and city leadership as well as the agricultural community to implement solar and wind opportunities in underutilized spaces. In addition to putting land to new use, these projects create a new source of income for farmers and ranchers that will be spent locally. Land that is not viable for development or agriculture should be home to solar development throughout San Marcos and neighboring communities. Utilize parking lots, city land, airport, and other unused spaces for solar arrays.
- **San Marcos must encourage state tax credits and other incentives for the installation of energy storage technology including Community Source Aggregation** for homes, commercial buildings, institutional buildings, and industrial facilities to provide backup power. Both to manage intermittent power grid energy loss and to provide on-site supplies of emergency power should the grid be compromised by climate events or cyberterrorist attack.
- **Weatherize homes and businesses to perform energy efficiency upgrades to**

make buildings more efficient and lower energy bills. San Marcos must provide sliding-scale grants for low and moderate income families and small businesses to invest in weatherizing and retrofitting homes and businesses. Deep weatherization retrofits will reduce residential energy consumption by 30 percent. As San Marcos moves forward with energy efficiency efforts, the oldest, leakiest and least energy efficient homes, and the homes of seniors, people with disabilities, and low-income families will be prioritized.

- **Require fossil fuel corporations to repair leaking infrastructure**, including natural gas, oil pipelines, and drilling sites. Methane from fracked natural gas is 86 times more powerful than carbon dioxide at trapping heat in our atmosphere. Hydrofluorocarbons (HFCs) can be more than a thousand times more potent than carbon dioxide. Methane leaked by the oil and gas industry each year is roughly equivalent to the amount of carbon pollution emitted each year by the US coal industry.
- **Require implementation of a baseline greenhouse gas (GHG) emissions inventory** for both community wide and county operations, that is reviewed and adjusted on an annual basis to ensure GHG reduction goals are met or exceeded. The Inventory shall provide a GHG emissions forecast of 2020 and 2030, and beyond if needed. The GHG emissions reduction target will align with Executive Order B55 80, committing to net zero carbon by 2045 and will include commitment to SB100, 100% zero carbon energy by 2045. I recognize the draft CAP incorporates 2012 as the baseline for GHG analyses.
- **Regulate all dangerous greenhouse gases.** Carbon dioxide is a very dangerous greenhouse gas, but it is not the only one we must address. Methane is 86 times more powerful than carbon dioxide at trapping heat in the atmosphere, and hydrofluorocarbons (HFCs) can be more than a thousand times more powerful.
- **Collaboration will be needed to create proactive education campaigns** for residents and businesses about the importance of meeting or exceeding state requirements for reductions in greenhouse gas emissions.
- **Call for California to divest pensions from fossil fuels.** State employees' pensions are currently invested in fossil fuels, which put their pensions at risk. California's state government must protect and grow those pension funds by instead investing in the clean energy economy.
- **Pressure financial institutions, universities, insurance corporations, and large institutional investors** still invested or insure fossil fuels to transition those investments to clean energy bonds. We have seen a movement of activists force divestment from fossil fuel corporations, they must be supported by local

governments.

- **To achieve these goals, San Marcos must promote new initiatives and innovative strategies** that meet and exceed state requirements. San Marcos will participate with other jurisdictions and organizations to develop effective regional solutions and regulation at local and state levels.

2. Green jobs creation and a just transition for workers

As of May 2020, there are 14 million people between the ages of 25 and 64 who are officially unemployed. In addition, there are 39 million people who are not part of that 25-64 year old labor force. Now that the pandemic surge is upon us and unemployment benefits will soon run out, it's a crucial time to create millions of new Green jobs.

- **Allocate the expenditure of city funds to programs, businesses, organizations, agencies, and institutions that provide greatest opportunities for green jobs** with labor provisions, and climate-based solutions consistent with the urgency of the climate crisis and the need to make rapid and sustained reduction in greenhouse gases consistent with targets from the Intergovernmental Panel on Climate Change.
- **San Marcos must direct actions in their general plan to transition from toxic industries to clean industries that offer good-wage jobs** accessible by biking, walking and public transportation. The counties must promote a local hiring incentive or requirement.
- **The region will create thousands of green jobs by 2035, and even more green jobs by 2050.** Increase private sector green investment in the region.
- **San Marcos must leverage existing partnerships to make Green industries a central priority**, partnering with local job training programs and collaborating with regional colleges to train and build a green workforce.
- **New Green jobs require strong labor standards.** That means all jobs created under SMGND will have family-sustaining fair wages, local hiring preferences, project labor and community agreements, including buying clean, American construction materials and paying workers a living wage to the greatest extent possible. We will improve worker and fence-line community safety standards at manufacturing and industrial plants.
- **Ensure a just transition for energy workers.** Thousands of union, family-wage jobs will be created through SMGND. Steel and auto manufacturing, construction, energy efficiency retrofitting, coding and server farms, renewable

power plants will all be booming in the Green economy. Workers transitioning into new job sectors should be guaranteed job placement assistance, relocation assistance, and pensions based on their previous salary. Workers requiring training for a different career path will receive vocational job training with certain expenses provided.

- **Protect the right of all workers to form a union without threats or intimidation from management.** We will work with the trade union movement to establish a sectoral collective bargaining system that will work to set wages, benefits, and hours across entire industries, not just employer-by-employer. Unions not only ensure that workers receive fair pay and benefits, they fight to ensure that workers, first responders, and fence-line communities are safe and healthy.
- **Invest in workers and de-industrialized communities' economic development.** San Marcos should be eligible for targeted economic development funding to ensure job creation that will feel the impact of the transition most. Other eligible projects include drinking and waste water infrastructure, broadband, and electric grid infrastructure investments.
- **San Marcos must call upon the philanthropic community's participation --** doubling the federal mandate in which private philanthropies give away 10% annually of their endowments instead of 5%. Doing so for just three years would pump an additional money into the economy. This will be used to create green entrepreneur accelerators to support workers who want to start new businesses and create green jobs.

3. Clean transportation

San Marcos will grow by a factor of 2 by 2035. As populations grow, rising housing costs push lower income families to the suburbs, creating sprawl that puts pressure on our open spaces and increases commuting by automobiles. Transportation is the largest single source of air pollution in San Marcos. Without transforming our transportation system, San Marcos cannot become climate neutral. Transforming this system requires strategic implementation of accessible alternatives to driving cars. A goal of SMGND is to transition to 100% electric vehicles by 2030 and to build public transit that is affordable, accessible, fast, resilient, and that fits communities' needs. San Marcos will endorse the 5 Bold Moves program by SANDAG (San Diego Association of Governments).

- **Expand the green transportation network** by encouraging the use of climate friendly technology, planning growth around multiple modes of travel and reducing automobile reliance. In addition to promoting improved public transit, partner with private developers to undertake region-wide improvements that make

active modes of travel, such as walking and bicycling, more comfortable and preferable options. Establish an energy efficient fleet management and operation practices.

- **Enhance regional transportation systems to reduce the impacts of single occupancy vehicle travel.** Our region must ensure transit-oriented development, focus economic development near housing or transit, reduce vehicle miles traveled and promote equitable access to jobs and services, especially for disadvantaged communities. It is also essential to strengthen the urban limit line and preserve lands along the line.
- **Increase public transit ridership by 2030.** We will ensure that reliable, affordable public transit is accessible for seniors, people with disabilities, and rural communities. In addition to expanding transit service to communities, we will promote transit-oriented development to link this service to popular destinations and vital community services. We will help discourage long car commutes, congestion, and dangerous emissions. SMGND will reverse these trends and create more livable, connected, and vibrant communities.
- **Increase the percentage of all trips made in the region by walking, biking, and micro-mobility or matched rides** to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. Reduce Vehicle Miles Travelled (VMT) per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050.
- **Vehicle trade-in program.** Families with conventional cars will be able to access an additional incentive for trading-in for an electric vehicle. We will expand on the program and make it stronger by requiring even higher efficiency and make it available predominately to cars manufactured in the U.S.
- **Tax credits provided for the purchase of electric vehicles,** and graduated tax hikes should be imposed on the purchase of internal combustion vehicles. Vouchers should exceed the trade-in value of the internal combustion vehicles. The goal is to eliminate the sale and registration of all new internal combustion vehicles – cars, trucks, buses by 2035.
- **Electric vehicle charging infrastructure.** In order to ensure that no one is ever stranded without the ability to charge their vehicle, San Marcos will ensure that new EV stations are open access and interoperable between all payment systems. Under our plan, drivers will no longer need to worry about where to charge their car or if they can pay for it.
- **Tax credits provided for installing electric charging stations** in and around

residential, commercial, and industrial building sites to power electric vehicles. Real estate companies and landlords owning dwellings with multiple occupants should be encouraged to install sufficient charging stations and should receive a tax credit for doing so, while escalating tax hikes over time for not providing the service.

- **San Diego County must help school districts and transit agencies replace all school and transit buses with electric buses.** The EPA classifies diesel exhaust as a human carcinogen, and this exhaust contains over 40 different chemicals and air pollutants that are classified as hazardous air pollutants under the Clean Air Act. Children on buses are exposed to concentrations of these substances that can be 5-15 times higher than background levels negatively impacting their health and performance in school. Once older buses are replaced with clean electric buses, school districts will save in fuel and maintenance costs over the life cycle of the bus.
- **Encourage telecommuting options through public outreach** with new or existing employers, as appropriate and modeled by County policies that encourage telecommuting whenever feasible. Work with existing shuttle service providers to coordinate services with other forms of transit, special events and work centers. Encourage home offices, live work sites and satellite work centers in appropriate locations.
- **Coordinate ride-sharing programs to provide up-to-date lists** of potential riders and to educate the public on commuting options. Encourage the development of employer-funded vanpool and shuttle bus services to new employment centers. Encourage employer provision of information on alternative modes of transit. Encourage employers to offer flex-time arrangements to their employees in order to reduce travel during peak hours.
- **Promote the development of a regional high-speed rail.** Many other developed nations have advanced high speed rail systems to give travelers a meaningful affordable alternative to car travel between cities and counties. High-speed rail has not been embraced in the United States because we have not built the political mobilization needed to demand the funding needed to complete this clean transportation vision. Together, we will create the movement needed to push for the development of a high-speed rail system, regionally and beyond.

4. Clean Air, Water and Waste

Water is life. Clean water is a human right.

Water pollution comes in the form of dredge spoil, solid waste, incinerator residue,

sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water. Water quality standards are not met in over half of California's 3 million acres of lakes, bays, wetlands and estuaries. Under SMGND, we aim to replace lead pipes, clean up hazardous waste sites, and reduce toxic air and water pollution from oil, gas, and coal. Those benefiting the most will be communities of color and low-income families in the region who today endure disproportionate exposure to toxins.

Clean air is a human right.

A combination of three factors are the cause of unhealthy levels of air pollution in our region: the activities of over 3 million people, mountainous terrain that traps pollution, and a climate that helps form ozone and other pollutants. We must be tenacious about improving the quality of air our communities breathe.

- **San Marcos must upgrade all water systems, sewage systems, and storm water drains by 2030** to be resilient to climate-induced storms and floods that threaten public health. In preparation for drought and other climate events, water storage systems (e.g. cisterns) must be established across the region to provide emergency backup access to water.
- **Support a Clean Water Revolving Fund program**, along with a new grant program to help households install, repair, replace, and upgrade septic and drainage fields. Where necessary, counties and school districts will refurbish public schools water systems during Covid19 quarantine and summer recess.
- Where applicable, **we should ensure public oversight and local control by re-municipalization of all water-related systems** that have been privatized over the years.
- **Better groundwater management for urban, rural, and agricultural areas** is needed in the region. More than 40 percent of Californians rely on groundwater for part of their water supply, creating dangerous water overdrafts. We must encourage the transition from groundwater wells to surface water use and extend mandatory groundwater monitoring and reporting plans.
- **Reuse water, adapt to water scarcity**: Recycle 100% of waste water for beneficial reuse by 2035. Source 70% of all water locally by 2035. Source 70% of San Marcos's water locally and capture 250,000 acre ft/yr (AFY) of stormwater by 2035. Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. Reduce potable water use per capita by 22.5% by 2025; 25% by 2035; and maintain or reduce 2035 per capita water use through

2050. Install or refurbish hydration stations, prioritizing municipally-owned buildings and public properties such as parks, by 2035.

- **Require new development and significant remodels to reduce the waste of potable water** through the use of efficient technology, recycled water plumbing (purple pipe), and conservation efforts that minimize the region's dependence on imported water and conserve groundwater resources.
- **The region must eliminate legacy pollution** from toxic waste sites, remediating lead in paint and pipelines, ensuring safe wastewater and water systems in low income communities and communities of color.
- **Cleaning up existing hazardous waste and abandoned sites.** Develop funding for point source (i.e. any single identifiable source of pollution from which pollutants are discharged, such as a pipe, ditch, ship or factory smokestack) and nonpoint source management programs (i.e. nonpoint source pollution includes excess fertilizers, herbicides and insecticides from agricultural lands and residential areas; Oil, grease and toxic chemicals from urban runoff and energy production, sediment from improperly managed construction sites).
- **Reduce waste:** Increase landfill diversion rate to 90% by 2027; 95% by 2035; and 100% by 2050. Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028. Eliminate organic waste going to landfill by 2028. Increase proportion of waste products and recyclables productively reused and/or repurposed in San Marcos to at least 25% by 2025; and 50% by 2035. Find feasible alternatives to plastic packaging and single-use food containers.
- **Clean air is a human right:** San Marcos will have zero days of unhealthy air quality by 2028. Reduce industrial emissions by 38% by 2035; and 82% by 2050. Reduce methane leak emissions by 54% by 2035; and 80% by 2050.
- **Enforce the Clear Air and Water Acts on large factory farms** and ensure all farmers have access to the tools and resources they need to address pollution. Industrial animal feeding operations, and the millions of pounds of untreated waste they create, are a major source of air pollution and driver of climate change. The region will end the weak oversight of factory farms.

5. Sustainable agriculture

Sustainable agriculture is farming in sustainable ways, which means meeting society's present needs, without compromising the ability for current or future generations to meet their needs. It is based on an understanding of ecosystem services. SMGND strives to support a safe and sustainable local food supply, and to connect consumers with local

farms and healthy foods. We aim to invest in family farms and rural communities -- not corporate ownership. We also aim to expand and incentivize community gardens and community supported agriculture.

- **San Marcos will move towards 100% organic certification by 2035.** The region will deploy plans to phase out petro-chemical agriculture and introduce organic and renewable ecological practices, while boosting regional agricultural production for local markets over a 15-year period. San Marcos should support subsidies and incentives to encourage a speedy transformation.
- **Transition to organic farming.** Create a grant program to help farmers transition their land to new organic farmers. As Conservation Reserve Program (CRP) contracts end, we will help connect these farmers with new organic farmers who want to continue rigorous conservation practices on a working landscape.
- **Preserve and expand farmers' markets, and explore opportunities to expand access to fresh, healthy, local foods within our region.** Ensure the long-term stability of our existing farmers markets to allow communities in the region to depend on fresh, local foods and places to purchase them. Support job creation by expanding opportunities for small farmers and ranchers to reach local markets more often and in broader geographical areas.
- **Increase efforts to process agricultural products locally, addressing gaps in the agricultural supply chain.** When products are shipped away to be stored and processed, our economy loses out on revenue, additional greenhouse gasses are emitted and our region is less likely to benefit from keeping good, wholesome foods local.
- **Preserve the region's limited agricultural lands for local food production,** ensuring the long-term viability of these lands for local and sustainable food production. Develop collaborative marketing with local organizations to create funding streams for projects to support local food production. Also encourage community gardens in empty lots and new developments in order to maximize both local food production and community engagement.
- **Incentivize community ownership of farmland.** One of the barriers to being able to choose a career in ecologically regenerative farming is the cost of acquiring farmland. We want communities to be able to join together to own farmland to help people grow our local, ecologically regeneratively produced food and help solve the climate crisis.

- **Incentivize farmers to develop ecologically regenerative farming systems** that sharply reduce emissions; sequester carbon; and heal our region's soils, forests, and prairie lands. Pay farmers to keep carbon in the soil. We must provide incentives and subsidies to farmers for soil health improvements they make and for the carbon they sequester, which both mitigates climate change and helps farmers adapt to it.
- **Adopt farmland mitigation programs aimed at preserving farmland** while giving agricultural landowners the opportunity to recover equity in their property without developing it. These should be coordinated among localities so as to create a level playing field and prevent developers from playing one jurisdiction against its neighbors. Local Agency Formation Commissions (LAFCOs) can help do this by adopting their own policy of requiring cities to mitigate farmland loss as a condition of annexation.
- **End exclusions for agricultural workers in labor laws.** We must ensure farmworkers have the right to overtime pay, strong safety protections, and the right to collectively bargain. Currently, farm workers are exempt from many labor laws that other workers have benefitted from for years. Farming is a dangerous and demanding profession. We need to protect these workers as we do others.
- **Establish a victory lawns and gardens initiative to help urban, rural, and suburban communities transform their lawns** into food-producing or reforested spaces that sequester carbon and save water.
- **Incentivize schools to procure locally produced foods.** Institutional purchasing can be a huge boost to local producers and build local farm economies. San Diego County should give a meal incentive for schools that acquire at least 30 percent of their food from local sources.

6. Affordable sustainable housing

Like most of California, San Marcos is facing an enormous housing crisis. Working and middle-income families can no longer afford to own a home, renters face rising costs that force them to move further from their jobs and communities, and growing numbers of unhoused people live on our streets. This crisis has been building for decades and has spread to moderate-income households. The largest impacts are felt by communities of color, people with disabilities, formerly incarcerated people, low-wage immigrants, transgender and gender-non-conforming people, and those with the lowest incomes. The fight for housing justice is inextricably linked to the fight for racial, economic and environmental justice. A focus of SMGND will be on expanding affordable and sustainable housing opportunities for low-income frontline communities, and developing housing that people and the planet can afford. Under SMGND, we will end homelessness by 2028.

- **Housing is affordable if it costs no more than 30% of one's income.** People who pay more than this are considered “cost burdened”. Those who pay more than 50% are “severely cost burdened.” Affordable housing generally means affordable to lower-income people with incomes at or below 80% of area median income (AMI). Affordable rental housing programs target lower-income people, while affordable homeownership programs target people making up to 120% of AMI.
- **Prioritize efficient land use and house every resident ethically and affordably** through new housing production, existing housing preservation, and tenant protection: (1) producing new market-rate and affordable homes; (2) preserving existing housing that’s currently affordable; and (3) protecting tenants from unaffordable rent increases and unfair evictions. The region will lead and support campaigns to address these three targets.
- **All new development will uphold the principle that people must be able to live where they work.** Increase cumulative new housing unit construction to 150% of state mandate by 2025, and 200% by 2035. Ensure 57% of new housing units are built within 1,500 feet of transit by 2025, and 75% by 2035. Create or preserve income-restricted affordable housing units by 2035 and increase stability for renters. Creation of a sustainable carbon-neutral public housing index.
- **Reduce environmental impacts of housing development by promoting infill, mixed use development, and alternative housing.** Infill housing involves the insertion of additional housing units into already-approved subdivisions or neighborhoods, provided as additional units built on the same lot or as new residential lots by further subdivision or lot line adjustments. Mixed-use zoning or planning blends residential, commercial, cultural, institutional, and entertainment uses into one space, where those functions are integrated while providing pedestrian connections. Alternative housing will involve, for example, townhomes, apartments, tiny homes, abandoned buildings.
- **Reduce energy consumption by promoting sustainable land uses and development patterns.** Pursue infill development opportunities and encourage the construction of higher-density, mixed-use projects around existing public transit infrastructure, schools, parks, neighborhood-serving retail and other critical services. Incorporate ecologically sustainable practices and materials into new development, building retrofits and streetscape improvements. In areas that are already built-up include affordable and deeply affordable housing, as a means to reduce vehicle miles traveled and greenhouse gas emissions, and facilitate walking, bicycling, and transit use, including through mixed-use corridors and activity centers.

- **Retrofitting public and commercial buildings.** All public buildings must meet new standards by 2025. All existing residential and commercial buildings reduce greenhouse gas emissions by 40 percent below 1990 levels by 2030 and be zero net energy before 2040. All new residential buildings must be at zero net energy by 2025 and new commercial buildings be zero net energy by 2030. Local municipal governments will mandate and finance the transition of all public and commercial property to green zero-emission assets and infrastructure by 2027, using procurement to boost green businesses.
- **Introducing generous tax credits and deductions, grants, and low interest loans to encourage the retrofitting** of the region's residential, commercial, industrial, and institutional building stock. The conversion from gas and oil heating to electric heating by renewable energy from the grid will bolster resilience to climate-related disruptions. Additional supplementary tax credits, deductions, grants, and low interest loans should be extended to low and middle income rental properties and homeowners to encourage retrofits.

7. Social justice for frontline communities

SMGND calls upon county and city officials to engage and provide technical assistance to populations and communities most impacted by pollution to promote meaningful involvement of these communities in environmental and land use decision making. It is an unfortunate reality that institutional racism also impacts environmental health, and thus the public health and safety of millions of low-income families, people of color, and tribal communities. African American and Latinx communities deal with 56 percent and 63 percent more air pollution, respectively, than they create. We will abide by the United Nations Declaration on the Rights of Indigenous Peoples and ensure the free, prior and informed consent by Indigenous Peoples. SMGND must serve to address modern and historical inequities, environmental racism, and will follow Environmental Justice principles.

- **Respect indigenous sovereignty.** Commit to upholding regulations in a way that strengthens tribal sovereignty and ensures tribal consent on projects involving land in which tribes own even a fractional interest. Commit to early and ongoing consultation with tribes to identify and work to appropriately mitigate or address concerns regarding infrastructure projects.
- **Protect cultural and sacred sites.** Work with local Native American tribes to protect recorded and unrecorded cultural and sacred sites and to educate developers and the community at large about the connections between Native American history and the environmental features of our local landscape.

- **Invest in organization partnerships with a green focus on low income neighborhoods.** The fewer resources people in our communities have, the more vulnerable they are to the impacts of climate change. As the region transitions to greener solutions and a greener economy, we must work to create opportunities for low income communities to participate from the start. San Marcos must step up to support and bolster existing efforts that invest in low income communities and create more economic stability for low income families.
- **Prioritizing disadvantaged communities.** The region will prioritize Green business opportunities in the most disadvantaged communities and provide appropriate training for new employment opportunities that come with scaling-up green infrastructure. Generous tax credits, grants, low-interest loans, and other incentives to upgrade all public health services should be prioritized to the poorest communities facing public health risks brought on by climate change. Update permitting rules that currently allow polluters to target poor communities for polluting infrastructure. Cumulative environmental impacts will be measured and we will require polluters to remediate them. Precaution for the health and safety of our children and planet should be valued above profit.
- **Enact equitable tax laws.** To ensure a more fair and just society, more equitable tax laws should be enacted that reduce the vast disparity between the super-rich and the rest of the population, with the revenues accrued being used to advance the transition categories that make up the new Green economy.
- **California state recovery resources will fund environmental equity** in a manner that prioritizes reversing the factors creating disproportionate health suffering in low income communities, immigrant communities, and communities of color that have historically faced underinvestment and discriminatory policies.
- **Focus job training and local hiring to reflect the racial and gender diversity** of the community receiving investments. Procurement will prioritize minority and women-owned businesses, cooperatives and employee-owned firms, and community-owned and municipal enterprises.
- **Follow the Principles of Environmental Justice** adopted at the First National People of Color Environmental Leadership Summit. The goals and outcomes of SMGND should continue to be developed under the Jemez Principles for Democratic Organizing with strong and consistent consultation with the communities most affected by the current unequal enforcement of environmental laws.

8. Ecosystem restoration and conservation

Ecosystem restoration is the process of assisting in the recovery of ecosystems that have been degraded, damaged, or destroyed and focused on establishing the ecological processes necessary to make terrestrial and aquatic ecosystems sustainable, resilient, and healthy under current and future conditions. Restoration will help to control erosion, improve water quality, repair habitats, and provide other benefits to people and the environment. Under SMGND, the region will focus on restoring ecosystems through land preservation, afforestation, and (citizen) science-based projects.

- **Integrating Traditional Ecological Knowledge of Indigenous Tribes and native communities into emerging ecosystem management models.** A primary goal of ecosystem restoration under SMGND will be to develop and use tools of ecological restoration to enhance the survival of indigenous people and their cultures, and to incorporate the traditional ecological knowledge of indigenous tribes and native communities into newly emerging models of sustainable (agro-) ecosystem management.
- **Protect, restore and preserve our wetland, riparian, and aquatic systems.** Identify and create an inventory of riparian habitats, vernal pools, waterways, shorelines, wetlands, sloughs, and green infrastructure, and promote conservation, preservation and stewardship of these aquatic systems. Monitoring aquatic systems and preparing reports on findings to government authorities, to improve decision-making.
- **Promote a Community Restoration Network for the region** to provide practical knowledge, scientific understanding, and proven expertise to communities, while meeting restoration goals through volunteer-driven, community and science-based ecological restoration projects.
- **Require all new construction to protect and restore natural features** such as waterways, creeks & wetlands in urban areas as a means of connecting residents with nature and reversing damage to natural systems. Where feasible, restore creek corridors in urban areas. Creeks currently diverted in culverts or hardened channels should be restored to their natural state.
- **Protect, restore and preserve our natural spaces, hillsides and vistas.** Identify and create an inventory of areas in the region with significant natural habitat, open space and recreation resources and promote conservation, preservation and environmental rehabilitation of these lands. Work with property owners to acquire or dedicate those lands that could be preserved as open space.

- **Develop hillside development guidelines** that will ensure construction activities retain natural vegetation and topography and minimize grading of hillside. Minimize soil depletion and prevent erosion.
- **Prohibit and eradicate the use of invasive plant species such as broom and ivies**, especially adjacent to wetlands, riparian areas, or other sensitive habitat. Require landscaping that replaces turf grass with native species, incorporating drought-tolerant plants and sustainable maintenance practices and standards. Plant rain gardens to absorb rainwater running off roofs or asphalt.
- **Restoring ecosystems through afforestation.** Provide trees on residential and mixed-use neighborhoods. Ensure a 3 to 1 replacement of all trees removed. Plant trees to shade county buildings, businesses and residential homes to reduce energy use and sequester carbon.
- **San Marcos must support tax credits and other incentives to reforest and rewild marginal land** to capture and sequester CO₂ from the atmosphere and serve as carbon capture sinks.
- **Require green infrastructure** such as impervious surfaces to reduce stormwater runoff and provide swales and retention basins.

9. Climate adaptation and emergency planning

In San Marcos, we must become a collective of Climate-Resilient Communities, for our own economic and material survival. Under SMGND, we will strengthen community and natural environment resilience through climate adaptation and emergency planning efforts. Each county will name and address climate action explicitly and will incorporate Climate Action Plan goals and strategies within their General Plans. The region will incorporate climate adaptation and resilience strategies into all relevant policies to protect environmental quality, as well as public health and safety, with a focus on disadvantaged communities.

- **Identify all infrastructure, particularly industrial infrastructure at risk** of floods, seismic and/ or liquefaction risk, and enhanced wildfire risk due to climate change. Require needed safety upgrades identified in hazard mitigation assessment and emergency preparedness policies and procedures and hold public meetings to discuss these plans and ensure widespread understanding and confidence in these plans.
- **Rebuild the region's crumbling infrastructure.** In order to remain resilient to the climate impacts we know are coming, we must repair our crumbling infrastructure. Dangerously outdated infrastructure is not ready to withstand

impacts like floods, hurricanes, or wildfires. Under SMGND, the region will also promote legislation and campaigns to rebuild any aging infrastructure.

- **Retrofit our public infrastructure to withstand climate impacts.** Beyond repairing our existing crumbling infrastructure, we must ensure that our public highways, bridges and water systems are ready for climate impacts we know are coming. The region will invest in our roads, bridges, and water infrastructure to ensure it is resilient to climate impacts, and to ensure that all new infrastructure built over the next 10 years is also resilient.
- **Create a regional jurisdiction-wide program for mitigating greenhouse gas emissions and vehicle miles traveled** that incentivizes carbon sequestration, zero-emission buildings and vehicles, soil building agricultural activities, and natural based shoreline adaptation measures and social resilience.
- **Promote additional State or County tax credits and other incentives must be provided for the installation of energy storage technology** in homes, commercial buildings, institutional buildings, and industrial facilities to provide backup power – both to manage intermittent power grid energy across and to provide on-site supplies of emergency power should the grid be compromised by climate events or cyberterrorist attack.
- **Build resilient, affordable, publicly owned broadband infrastructure.** Internet access and communications are key in the wake of a disaster. In order to ensure that communities get the help they need, the region will provide infrastructure grants and technical assistance for municipalities and counties to build publicly owned and democratically controlled, co-operative, or open access broadband networks. This communications infrastructure will ensure first responders and communities are ready to deal with the worst climate emergencies.
- **Repair and modernize public housing** including making all public housing accessible, conducting deep energy retrofits of all public housing, and providing access to high-speed broadband. We will also ensure that public housing has quality, shared community spaces to ensure every public housing complex has the capacity to serve as a community resiliency center.
- **Increase funding for firefighting to deal with more frequent and severe wildfires.** In order to be able to quickly and effectively respond to wildfires, the region will expand the wildfire restoration and disaster preparedness workforce. The region will increase funding for firefighting to deal with the increased severity and frequency of wildfires. Under SMGND, we will facilitate community evacuation plans that include people experiencing homelessness and increase

social cohesion for rapid and resilient recovery from climate impacts to avoid the use of martial law and increased policing in disaster response.

- **Protect community cohesion.** Our disaster response should ensure that to the extent possible, families are able to return to their home communities. The region will ensure that recovery and rebuilding efforts make affected communities stronger than they were before any disasters so they are more resilient to deal with a potential next disaster.

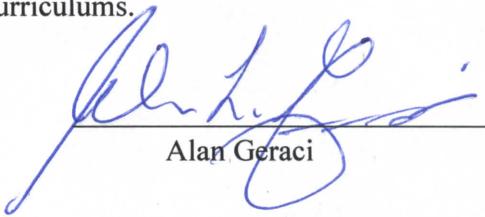
10. Research and development

San Marcos must substantially increase research and development in all of the areas that accompany the transformation into green technologies of the Green Industrial Revolution. The science is clear that the entire global economy must decarbonize by 2050 at latest if we hope to stave off the worst impacts of climate change. We must be extremely careful to ensure that as we do this, we make sure that domestic manufacturing and clean economy industries thrive. The state, the County, and San Marcos region have an obligation and an economic opportunity to be a leader in developing and deploying the clean technological solutions that will solve climate change.

- **Every level of governance should give particular attention to funding research, development, and deployment** to accelerate the transition from fossil fuel-based markets to renewable energy processes and products.
- **Explore the expansion of potential technologies built around renewable energy production**, for example, Wave Energy (power generated by ocean waves), Tidal Energy, and Geo-Thermal.
- **Explore technological development and research to dramatically decrease the cost of energy storage** and meet daily and long-term reliability needs. The aim is also to decrease the cost of daily cycling storage resources in order to reliably and affordably replace all coal and natural gas plants that serve as backup on the grid.
- In order to ensure an affordable and complete transition away from fossil fuels in the transportation sector, the region will invest in **research and development to decrease the cost of electric vehicles**.
- **Invest in decarbonizing the shipping and aviation industries as soon as possible.** The region must identify and commercialize technologies to ensure the region is able to fully decarbonize as soon as possible, but by no later than 2050. The region will collaboratively fund an effort to research technologies to fully decarbonize industry, aviation, maritime shipping and transportation.

- **To prevent an outsized impact on the environment from harvesting raw materials**, the region will build wind turbines, solar panels, new cars, and batteries with as many recycled materials as possible. Our region will establish a “take back” program to require large corporations that produce goods with the materials needed for this clean energy transition to pay to take those goods back from consumers who no longer want them to establish a region-wide materials recycling program.
- **The region will invest in research to develop new, region-appropriate farming techniques** and seeds. In order to respond to climate change and heal the environment, we will need to invest in non-chemical intensive practices and seed varieties that are tailored to each region's climate and soil.
- **Provisions to fund and promote programs in our state and U.C. universities and colleges** towards environmental sustainable research and development, including educational and vocational curriculums.

Dated: August 31, 2020


Alan Geraci



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

May 5, 2020

Mayor Jones and City Council
City of San Marcos

San Marcos, CA

Via Email

RE: Sierra Club NCG comments on San Marcos General Plan Update

Dear Mayor and City Council:

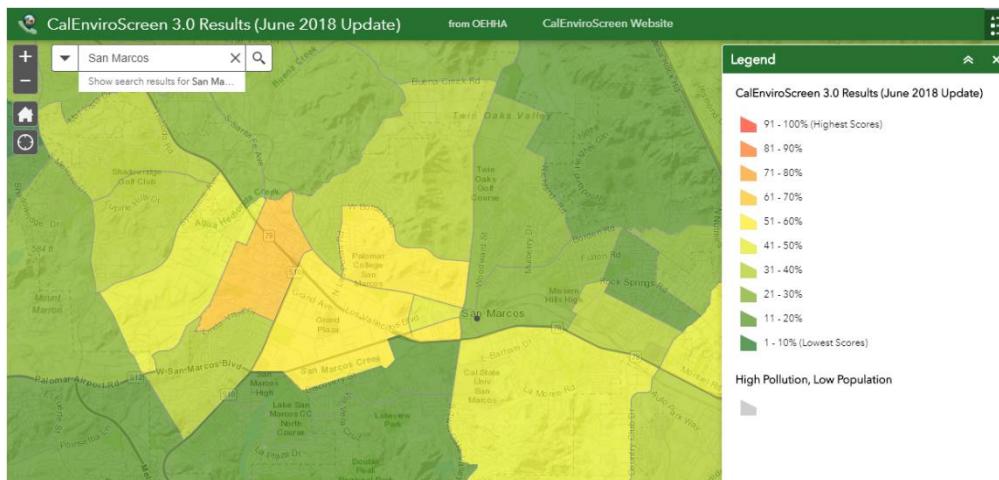
The North County Group (NCG) of the Sierra Club represents over 270 members in San Marcos and over 2,500 in North County. The General Plans in cities where our members live are critically important documents for creating a sustainable future for the region.

We understand that San Marcos is underway in its process of the General Plan Update (GPU) so we would like to offer some general comments while it is under development.

A. Required Environmental Justice Element should build on data in the state CalEnviroScreen

Fortunately, due to the hard work of the California Environmental Justice Alliance (CEJA) and their member organizations, environmental justice is a required element of general plans. Sierra Club NCG encourages the city to build on the information already included in the CalEnviroScreen 3.0, the results of which are shown below.

In particular, data for census tract 6073020018 (below in orange) ranked as 65-70% with high pollution burdens and high in health and community characteristics such as low-birth weights, linguistic isolation, and poverty.



An example of an excellent Environmental Justice Element can be found in the National City General Plan.¹

B. General Plan is excellent opportunity to update and adopt a SubArea Habitat Conservation Plan under the MHCP.

While the city was part of the earlier Multiple Habitat Conservation Plan, it never completed or adopted its required SubArea Plan. This has been very concerning as the city has often relied on the plan as if it had been reviewed and adopted, but it has not. This has caused a lot of conflicts for the city and residents in the past and subjected the city to litigation. We request that the city take this opportunity to improve, revise, and adopt its SubArea plan. In addition, it is very important the wildlife corridors are preserved and protected in the GPU.

C. Climate Action is Critical.

We understand the city is working to update its Climate Action Plan (CAP). The state's 2018 CA 4th Climate Change Assessment: San Diego Regional Report² found that San Diego County will be increasingly affected by climate change in future decades and will be confronted with, among others, increasingly warmer average temperatures, more frequent and likely more intense heat waves, more intense droughts, occasionally increased heavy rainfall events and floods, continuing Santa Ana winds and wildfire threats.

It is timely that cities intensify their actions to address the climate crisis on multiple fronts for the panoply of climate change related impacts on residents, development, infrastructure, and ecosystems.

We support recommendations made in the most recent Climate Action Campaign Report Card be implements in the CAP and adopted into the General Plan and enforceable measures. The CAP should include a mode share target for transit and for biking and walking. The CAP should continue and improve its vehicle miles travelled (VMT) reduction target.

To comply with the state's carbon neutrality goal, Executive Order B-55-18, we recommend the CAP update establish a Zero Carbon target and adopt a 100% clean energy target with Community Choice Energy (CCE) as a key strategy to achieve it.

Further, we recommend that the city adopt policies to fully electrify all new development and develop a policy on micro-grids and other pilot projects that reduce fossil fuel use and provide increased energy security.

The CAP should also include a zero-waste target, mode share targets for biking, walking, and transit, an urban tree canopy target, and a commitment to social equity.

D. Support a new vision for a world-class transit system and supporting Land Use policies

¹ <http://www.nationalcityca.gov/Home>ShowDocument?id=5019>

² <https://www.energy.ca.gov/sites/default/files/2019-07/Reg%20Report-%20SUM-CCCA4-2018-009%20SanDiego.pdf>

Sierra Club is strongly supportive of the visionary work that is going on at SANDAG to develop an effective transit system for the region. The General Plan update is a perfect place for San Marcos to support and facilitate that effort.

In addition, policies in the General Plan that reject sprawl development and focus on housing near job centers and transportation corridors and transit should be developed and committed to in the GPU.

E. Housing policies should focus on urban infill with higher density projects located near transit

In addition to lowering climate-altering carbon emissions, higher-density housing near transportation corridors has a benefit of reducing transportation costs which are the second highest expenditure and financial burden to households. In addition to the considerable environmental benefits, putting housing closer to jobs also lowers the transportation burden for lower and middle-income households.

In San Marcos this is significant. Transportation costs are 24% of the household budget with the average household spending close to \$1,300 a month on transportation.³ In California, sprawl patterns have created a higher transportation burden due to longer commutes such that, for anything over a twelve mile commute, the transportation costs outweigh any savings in housing.⁴

National Sierra Club has a strong urban infill⁵ policy. Development should be dense, inclusive, and located within or connected to existing communities and neighborhoods. New development should be designed to make neighborhoods walkable, and neighborhoods in the city and metropolitan contexts should be linked together by convenient high-quality transit prioritized in regional, state, and national transportation expenditure plans

F. Critical General Plan Elements must be fully updated.

1. Safety Element: Per SB379, codified in Government Code section 65302 (g) (4), climate change adaptation and resilience must be addressed in the safety element of all general plans in California. Most critical is the updating of hazard maps to incorporate the latest scientific evidence regarding the effects of climate change. In particular, those which must be updated are risks from wildfire, terrestrial flooding, landslide and unstable slopes.

2. Water Quality, Water Resources, Adaptation, and Integrated Regional Water Management Planning: The GPU should consult the American Planning Association Regional and Intergovernmental Planning Division Policy Handbook on Regional Water Planning for Climate Resilience which outlines the importance of habitat conservation plan and their implications of water resource planning. This handbook identifies best practices to guide local and regional practitioners in community planning and development, specifically related to promoting resilience of water infrastructure.

³ https://htaindex.cnt.org/fact-sheets/#_https://htaindex.cnt.org/fact-sheets/?focus=place&gid=2281

⁴ <http://www.reconnectingamerica.org/assets/Uploads/pubheavyload1006.pdf>

⁵ <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u19041/SClub%20Infill%20Policy%202019-05-18.pdf>

Though examples range from across the country, chapter seven details innovative case studies from San Diego County. The GPU should reflect San Diego's planning efforts and include regional water resource planning, regional water quality planning, regional habitat conservation planning, integrated regional water management planning, regional and local planning for hazard mitigation and climate change adaptation, and the [San Diego Region Report](#) that was produced in conjunction with [California's Fourth Climate Change Assessment](#).

3. Support preservation of agriculture and regenerative farming as a high priority.

An emerging effort to address the climate crisis is the idea of regenerative or 'carbon' farming. Carbon farming or regenerative agriculture can reverse climate change within our lifetime. The data show that if implemented on a larger scale than currently practiced, regenerative agriculture — from home gardens to increased permaculture practices could draw millions or billions of tons of carbon into the soil worldwide. As an area with significant agricultural use, San Marcos would be an excellent location for promotion of these kinds of agricultural practices.

Not only can carbon farming sequester great quantities of carbon currently in the atmosphere, it also offers resilience in the face of drought and flooding. Bringing carbon into soil builds soil organic matter, which improves the soil's ability to capture water. This can help prevent runoff during floods and increase water retention during times of drought. For every 21 tons of carbon sequestered per hectare (2.5 acres), soil organic matter goes up about one percent, which in turn increases the soil's ability to hold water by 25,000 gallons.

Because it involves high levels of on-farm biodiversity, regenerative carbon farming produces lucrative combinations of food, fiber, building materials and biofuel. It also protects water resources, pollinators and wildlife habitat, and improves soil quality and productivity.

4. Parks and open spaces for recreation should be a high priority.

In its [2010 Parks for Everyone report](#), the San Diego Foundation evaluated green and park spaces throughout San Diego County and identified areas needing significant improvement in the amount and type of public parks spaces for communities. San Marcos had several areas found to be under-served. Sierra Club urges San Marcos to use the opportunity of the General Plan Update to improve upon this situation.

Now is the time to plan for a very different future for the city.

The current shutdown of our 'normal' functions can also provide an opportunity to city leaders and planners. We think now is the time to begin to plan what can be done both to get people back to work once any normalcy returns and to plan for a better, more equitable, more just, more resilient future.

Our membership has been looking into what the COVID-19 crisis and the climate crisis have in common and what they both can tell us about what needs to be done in the future. Although different, it does provide a unique perspective and opportunity to consider the number of parallels regarding climate change and in the way our society thinks about and copes with global problems of this magnitude.

For example, climate change, like the COVID-19, is major threats that will take serious effort and behavioral and economic shifts to achieve. Both of these will ultimately require “all hands-on-deck” participation to resolve, and there is a necessity for strong governmental measures and leaderships at all levels, along with a high degree of participation at the residents, government, and private sector.

The pandemic has also underscored a general lack of emergency preparedness plans and resources overall, and these first couple months we've been witness to challenges to get even stopgap measures in place. Here planning for adaptation and resiliency will make future events like this one less painful.

Most importantly, this pandemic is laying bare the reality of inequity and injustice (in many forms) in our country. While some communities have resources to be somewhat insulated from the acute fallout, more residents in our most vulnerable populations are bearing the brunt of the impact—health, economic, and environmental. It is these communities that need to be prioritized. As climate change is a much slower moving yet irreversible disaster of high-levels of complexity, it is now even more visible that a reordering of priorities and social structures will be needed to address it. We need to collectively realize just how important it is to initiate proactive and meaningful plans and actions now if we are to create a sustainable community that will achieve long-term health and safety for all.

If nothing else, COVID-19 has demonstrated in clear terms, we are all one community- interconnected and dependent on each other for our health, safety, and wellbeing. If we can learn these lessons, we know we can create more liveable, sustainable communities in the future.

Sierra Club NCG appreciates the opportunity to comment on this important planning issue and we look forward to working with you. We can be contacted at conservation@sierraclubnrg.org.

Sincerely,

Laura Hunter
Chair
NCG Conservation Committee

Kathy Steel
San Marcos resident and member
NCG Conservation Committee