



July 7, 2017

Jennifer Villaseñor, Planning Manager
City of Huntington Beach Community Development Department
2000 Main Street, Huntington Beach, CA 92648
jvillaseñor@surfcity-hb.org

Re: Comments on EIR for the City of Huntington Beach General Plan Update

Dear Ms. Villaseñor,

Climate Action Campaign (CAC) is a San Diego-based environmental nonprofit organization with a simple mission: to stop climate change and protect our quality of life. Orange County for Climate Action (OCCA) is a grassroots activist network striving to address the threat of global climate change and mitigate its harmful effects through local action in Orange County. We are committed to helping local governments in southern California develop and implement policies, plans, and regulations that will stop climate change and protect the people and places we love for generations to come.

CAC and OCCA appreciate the opportunity to provide comments on the EIR for the City of Huntington Beach's General Plan Update. The comments below focus on Appendix G, the Greenhouse Gas Reduction Plan (GGRP). Please accept the comments below, which address the shifts necessary in the GGRP to meet those criteria.

1. The GGRP Tracks State Targets Using Mass Emissions To Measure Citywide Reductions.

We are pleased to see that the GGRP intends to reduce citywide emissions in line with state targets by implementing General Plan Policy ERC-5A, which calls for reduction of emissions 15% below 2005 levels by 2020 and 53.33% below that target by 2040. Achieving these reductions will put Huntington Beach on track to meet state goals, summarized below:

- In 2016, SB 32 was signed into law, codifying Governor Brown's Executive Order B-30-15 setting a GHG reduction goal of 40 percent below 1990 levels by 2030. These targets are in line with what is needed to protect our quality of life using best available science and are consistent with the Executive Order S-3-05, which calls for an 80 percent statewide GHG reduction by 2050.



2. GGRPs Serving as CEQA Mitigation for a General Plan Must Include Enforceable & Measurable Strategies

Since the GGRP will serve as mitigation for the General Plan Update, its reduction targets must be enforceable and measurable as mitigation under CEQA. Mitigation measures must be enforceable and once adopted, cannot be defeated by ignoring them. (Cal. Pub. Res. Code § 21081.6(b); *Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152, 1167 (2014).)

In addition, CEQA itself requires enforceable mitigation measures. (CEQA Guideline §15126.4(a)(2) ["Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments."]. "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." (Pub. Res. Code §21081.6(b)). Because the GGRP is a mitigation measure, it must be enforceable.

Finally, where a GGRP is mitigation for the activities in the planning horizon of a GP, there must be enforceable standards with detailed deadlines, *as well as substantial evidence that each mitigation measure will achieve the GHG reduction numbers assigned to each strategy*. By including enforceable, detailed measures in a GGRP, the city can help ensure that the plan meets legal muster and fulfills its requirements under CEQA.

Unfortunately, the GGRP for Huntington Beach contains primarily both unmeasurable and voluntary strategies and actions to reach its GHG reduction targets. In the Executive Summary, the GGRP states it will reach targets by "emphasizing actions that are voluntary, economically viable, consistent with community character, and advance the priorities of Huntington Beach residents, businesses, and visitors." That preference for voluntary actions holds throughout the plan. For example:

- T-4 - Carsharing: Attract carshare services to Huntington Beach and promote them as a supplemental transportation service.
- CA-2 - Green building awareness: Raise community awareness of green building strategies for new and significantly renovated buildings.

Most strategies are not measurable, which makes them unenforceable. For example:

- RE-6 - Community Choice Aggregation: Explore the feasibility of launching a community choice aggregation program to increase local control of energy sources.
- EE-2 - Rental unit retrofits: Improve energy efficiency in residential rental units.



- WW-1 - Indoor water efficiency: Reduce indoor water use in the community.

These strategies should be rewritten to include measurable targets. For example, the City of San Diego’s Climate Action Plan contains goals, associated actions, and measurable targets that allow the city to evaluate whether the goals have been met.¹

3. Implementation and Monitoring Should Include Timeline and Cost Analysis

We commend Huntington Beach for planning for annual monitoring of progress toward emissions reductions targets and the publication of annual progress reports. The city should additionally commit to completing a full GHG inventory at least every three years, to allow the city and the public to gauge progress made toward implementing GGRP strategies, determine whether the local government is on track to meet GHG targets, and assess if adjustments are needed.

The final GGRP should include a system to help city officials effectively prioritize strategies for implementation, and it should include a cost analysis for each strategy. These components allow the public to track whether the city is on track to meet its targets and help local governments set sufficient budgeting and staff levels at the appropriate time.

4. The GGRP Should Include Established Best Practices for Climate Planning

We further urge the GGRP for Huntington Beach to include best practices for climate planning established by cities throughout California, including 100 percent renewable energy, significant transportation mode share targets, and jobs and social equity measures.

100 Percent Renewable Energy

The Climate Action Plans of the cities of San Diego and Del Mar commit to 100 percent clean energy by the year 2035, and several other cities across the region are expected to make similar commitments this year. In addition, as noted previously, California Senate Leader Kevin de León has introduced legislation to transition the entire state to 100 percent clean energy by 2045. We recommend that Huntington Beach include a 100 percent clean energy goal, which closely aligns with California Executive Orders B-30-15 and S-3-05 (in fact, for cities that tie their Climate Plans to their General Plan updates it is often the only way to hit long-term state GHG targets).

By embracing a 100 percent clean energy future, all families of Huntington Beach will benefit because renewable energy helps clean the air, builds healthy communities, and spurs local

¹ https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf



investment and well-paying jobs from clean energy technologies. In addition, adding a 100 percent clean energy goal in Huntington Beach would signal a region-wide commitment to the shift to renewables. It is increasingly clear that 100 percent clean energy is the future in California and across the nation: the City of Huntington Beach’s GGRP should reflect a commitment to keep pace with the region and the state.

Transportation Mode Share Targets

Currently, the GGRP identifies the following mode share performance measures: bicycle mode share at 2.65% in 2020 and 3.45% in 2040, and bus ridership at 2% in 2020 and 5% in 2040. The plan should also identify pedestrian mode share in both 2020 and 2040. Further, the plan should specify whether the mode share targets identified are for all trips or for commutes only.

Finally, the city should consider adopting more ambitious mode share targets. For example, the City of San Diego states its goal as, “Achieve mass transit mode share of 12% by 2020 and 25% by 2035 in Transit Priority Areas, achieve walking commuter mode share of 4% by 2020 and 7% by 2035 in Transit Priority Areas, and, achieve 6% bicycle commuter mode share by 2020 and 18% mode share by 2035 in Transit Priority Areas.” These ambitious goals were adopted because transportation remains a significant source of GHG emissions. Shifting away from reliance on cars as the primary mode of transportation reduces GHG emissions and has the co-benefits of improved public health, safety, and air quality. Ambitious mode share goals also help municipalities plan and budget to facilitate a shift away from car-centric growth, as well as advocate for assistance for better transit infrastructure. Improvements to bicycle infrastructure should focus on separated bikeways, which recent research has demonstrated are far more effective at increasing ridership than painted bike lanes.²

Jobs and Social Equity

While climate change impacts everyone, it hits hardest in low-income and communities of color that face a disproportionate pollution burden. The State of California has recognized the challenges facing Environmental Justice communities and prioritized those areas for allocation of Cap and Trade funds. San Diego was the first city in California to adopt a CAP that utilizes a statewide monitoring tool called CalEnviroScreen, which identifies vulnerable communities and can be used to direct investment and benefits to these neighborhoods. We recommend that Huntington Beach’s GGRP include an Environmental Justice section that utilizes CalEnviroScreen to prioritize populations hit first and worst by climate change. Programs in EJ

² Pucher, John, and Ralph Buehler. 2016. “Safer Cycling Through Improved Infrastructure.” *American Journal of Public Health* 106(12): 2090-1.



communities might include ensuring all populations in the city have access to solar energy, home energy efficiency upgrades, and green spaces. Lastly, the city should address how GGRP strategies can create good-paying jobs for residents and improve quality of life in neighborhoods throughout the Huntington Beach.

Conclusion

Thank you again for the opportunity to weigh in on this critically important planning document. According to the most recently available data and climate science, there is no greater threat to the future of humanity than climate change. It is incumbent on us to protect our kids and grandkids from the adverse impacts of a heated planet. Therefore, we must employ public policy that facilitates new ways to power our lives and move through our cities while sharply reducing our GHG emissions.

We also encourage Huntington Beach to embrace the economic opportunities embedded in a clean energy economy. California has proven that improving our environment and improving our economy go hand in hand. The most successful cities are those which are planning for a 21st century economy powered by renewable energy and clean energy jobs.

We look forward to continued participation in the public review process for the Greenhouse Gas Reduction Plan and would be happy to provide additional information or clarification in order to ensure that this planning document preserves public health and enhances quality of life for all Huntington Beach families.

Sincerely,
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