SIERRA CLUB
LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA,
SAN BENITO COUNTIES

April 13, 2020

Palo Alto City Hall
250 Hamilton Avenue
Palo Alto, CA

To: Mayor Fine and Palo Alto City Council,

RE: Action Items, Item 4: Review the 2020 Sustainability and Climate Action Plan (S/CAP) Update Process and Accept the 2020-2021 Sustainability Work Plan

We are living in the midst of a climate crisis which threatens the survival of organized human life on Earth. Meanwhile, the federal government is weakening environmental regulations and accelerating the construction of fossil fuel projects. As was noted in your presentation, our best opportunity for climate action is for cities to lead the way with strong local policies. Given that Palo Alto is a coastal city with billions of dollars of commercial and residential real estate subject to inundation from sea level rise as early as the 2050s, it is prudent for the City to swiftly enact bold climate policies. We encourage Palo Alto to be mindful of its responsibility not only to reduce emissions within its jurisdiction, but also to create a strong plan that will inspire action from other Bay Area cities and beyond.

We are disappointed to see that Palo Alto's natural gas emissions and overall emissions have remained relatively unchanged from 2013 to 2018 (without offsets). Going forward, we hope that Palo Alto shifts its emphasis towards real-world emissions reductions within City boundaries, rather than bridging strategies, such as offsets.

We are pleased that staff has adopted the philosophy of SMART goals (Specific, Measurable, Achievable, Relevant, Time-Bound). Given that we are early on in the S/CAP process, some lack of specificity is to be expected. As the S/CAP process moves forward, we look forward to an emphasis on measurable metrics for each of your key actions that include target dates for these actions. Please include feasible actions to show how emissions will be reduced to meet targets. An example is paid parking.

With regards to the specific S/CAP key actions, the Sierra Club Loma Prieta Chapter makes the following recommendations to the Potential Key Actions.

Energy:

Question: Given that furnaces last 30 years, and an estimated 800 gas furnaces are replaced in Palo Alto every year (currently almost entirely with gas furnaces), what is Palo Alto's plan to convert 40% of furnaces to heat pumps by 2030?

Edit Potential Key Action #2: Change "Explore electrification of city-owned facilities" to "Electrify City-owned facilities"

- Batteries and Geothermal energy should be added as resilience strategies that also allow for time coincident delivery of clean renewables.
- “Home to Grid” is also an essential resilience strategy: The home should be wired so that the EV can Run the house (Japanese EVs are already designed this way).

Edit to Potential Key Action #3: this item needs more specificity. Perhaps the components of this action should be separated into separate actions, with target dates set for the establishment of specific programs and mandates.

Reword Potential Key Action #8: “Shift the primary strategy to reduce NG emissions from carbon offsets to real-world infrastructure emission reductions within the City.”

Create new Potential Key Action #9: New homes should be wired so that the EV can run the house, known as “home to grid”. (Japanese EVs are already designed this way)

We strongly support an all-electric utility rate, as noted in Potential Key Action #5.

Mobility:

Add to Potential Key Action #1: [...] “Make 25% of the City Streets Pedestrian and bike friendly with a maximum speed limit of 15mph.

Add measurable goals to Potential Key Action Item #3: such as, "Expand and improve bicycle and pedestrian facilities, connectivity, convenience, and safety in a manner that increases the percentage of trips taken by walking or biking by 25% of 2019 levels by 2025 and 50% of 2019 levels by 2030.

- Example: Oakland has closed 10% of its streets to cars, a total of 74 miles.

Add to Potential Key Action #2: Public transit should be free. Pursue dense service walkable communities connected by micro mobility to other walk zones.

Create New Potential Key Action #9: "Recognize public street right-of-way as the largest public environmental asset and use more effectively"

Create New Potential Key Action #10: Enact a moratorium on building in the 2050 inundation zone.

- See flood map attached at the end of this letter, which assumes 2.5 feet of sea level rise.

Create New Potential Key Action #11: Add that walkable development should be prioritized within ¼ mile of transit with emphasis on service density. Delivery and a redesigned curb for e-shared-mobility should be included. The city should not build for services whose safe access cannot be enforced- infrastructure should be repurposed for safety.

- This would save mixed use and multifamily development from some of the costs of EV infrastructure.

Create New Potential Key Action #12: Update Palo Alto's street design guidelines to include shared micro mobility services and active transportation to create protected and safe spaces for users and riders. Micro mobility allows for safe social distancing.

Electric Vehicles:

Changes to Goal Dates in Potential Key Actions 2, 4, and 5:
Change #2 from 2022 to 2020
Change #4 from 2022 to 2021
Change #5 from 2021 to 2020

Add to Potential Key Action #5: "Palo Alto shall convert 50% of their fleet to EVs by 2025".

Create New Potential Key Action #6: "Shift 80% of car charging within the City to daytime hours: 8am-3pm, in order to take advantage of cheap, abundant solar energy."

- This would likely need to be done through strong incentives, such as lower electricity rates during these hours.

Create New Potential Key Action #8: Require electric construction equipment on municipal projects and large commercial projects.

Create New Potential Key Action #9: Require commercial fleet operators to convert 50% of their fleet to EVs by 2025.

Water:

Revise Potential Goal #1: Add a measurable target such as "Reduce per capita water use by x% (or to xx gal/day) by 202x compared to 2019"

Remove Potential Goal #3: "Reduce the total dissolved solids by 50% compared to 2019 base year." Does this goal affect greenhouse gas emissions? While worthy of work in improving sustainable water infrastructure, perhaps it is lower priority than the climate goals.

Remove Potential Key Action #4: This action "Design and build a salt removal facility for the Palo Alto Wastewater Treatment Plant" appears to support Potential Goal #3.

Revise Potential Key Action #5: "Establish quantifiable baseline, targets, **and incentives** for implementation of green stormwater infrastructure on private property, municipal…" By including incentives into the Key Action, it is more likely that private property owners will implement green stormwater infrastructure such as rainwater catchment, permeable hardscape, and bioswales.

Create New Potential Key Action #6: "Create streamlined design guidelines and permitting process with minimal fees for onsite potable and non-potable water reuse on private (residential and commercial) property."

Climate Adaptation and Sea Level Rise:

Create New Potential Key Action #5: notify property owners, both existing and prospective, that their property is located in an inundation zone and is expected to flood by years 20xx per data available using a mapping tool such as: http://data.pointblue.org/apps/ocof/cms/index.php?page=flood-map.

Create New Potential Key Action #6: Include specific vision language calling for the protection of wetlands from development, as they are both a source of carbon sequestration and sea level rise protection.

Create New Potential Key Action #7: Create a Managed Retreat plan using Transfer of Development Rights.

Natural Environment:

Edit Potential Key Action #3: Coordinate implementation of the Urban Forest Master Plan, Parks Master Plan, **and Sustainable Green Streets Network to create pathways to parks, safe active transportation connected network, Safe Routes to School,** and to encourage appreciation of natural ecosystems.

Add to Potential Key Action #4: Explore expanding the requirements of the Water Efficient Landscape Ordinance (WELO) to further the S/CAP goals **and to reduce wastewater going to sewage treatment by 30% (using diversion of washing machine water and tub/shower water)**

Create New Potential Key Action #11: "Ensure access to open space or a park within a 10-minute walk for every resident."

Create New Potential Key Action #12: Implement a Sustainable Green Streets network throughout the City that prioritizes implementing green stormwater infrastructure as the backbone of an integrated network for a connected active transportation master plan and green ecology network.

- Example: https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/loma-prieta-chapter/SLU/Policy%20-Green%20Streets%20-%20Sierra%20Club.pdf

We are very appreciative of the hard work that went into the S/CAP planning process, and we look forward to assisting Palo Alto in making the S/CAP as strong as possible.

Sincerely,

Gladwyn d'Souza, Co-Chair, Conservation Committee, Loma Prieta Chapter, Sierra Club.
Kristel Wickham, Volunteer, Loma Prieta Chapter, Sierra Club

Cc: James Eggers, Executive Director, Loma Prieta Chapter, Sierra Club

Reference from New Mobility Potential Key Action #10: 2.5 feet of sea level rise: