August 2, 2021

City of San Carlos
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RE: Sierra Club Loma Prieta Chapter Comments on Draft CMAP

Dear Members of the San Carlos Planning Commission and San Carlos City Staff,

The Sierra Club Loma Prieta Chapter is pleased to see the inclusion of many robust measures in the CMAP, some of which we had asked for in our August 18th, 2020 letter.

We appreciate that San Carlos has done a Vulnerability Assessment Report, and that the City will look to integrate nature-based solutions (pdf pg. 138) in its adaptation efforts. The consideration of biodiversity should be crucial in all City processes, and especially those that could impact or restore Bay ecosystems.

We would also like to highlight Strategy 5 “Building Codes” (pdf page 154-155) as containing some particularly strong actions, such as the updating and re-adopting an all-electric reach code and exploring the electrification of existing buildings.

However, while many of the proposed strategies and actions are strong, the timeline of implementation may be too slow. We are concerned that the current GHG reduction targets may not drive the rapid action that is needed to avoid the worst effects of climate change.

Furthermore, we believe that a stronger GHG reduction target could be supported by the timely implementation of the strong measures already within the CMAP.

Please move to recommend a stronger GHG reduction target. We recommend 80% below 1990 levels by 2030.

San Carlos’ current targets seek to align with the state recommended targets. We believe that all California cities, including San Carlos, should demonstrate leadership by passing greenhouse gas reduction targets that exceed those of California. California’s targets are inadequate and are in desperate need of an update to meet the emissions reductions that scientists are calling for1. Governor Newsom has even stated that “across the entire spectrum,

1 https://www.nature.com/articles/s41586-019-1364-3
our goals are inadequate.” With the knowledge we have now, San Carlos should not commit itself to a GHG reduction target that will be outdated on day 1 of its adoption.

Examples of these stronger targets are Menlo Park’s Zero Carbon by 2030 goal and Palo Alto’s 80% (below 1990 levels) by 2030 goal. The City of Santa Clara has also recently directed staff to maintain an interim GHG reduction target of 80% (below 2016 baseline) by 2035 in their draft CAP update.

An 80% GHG reduction by the 2030 target will require accelerated action in San Carlos’ two largest emitting sectors: transportation and buildings. If the Planning Commission moves to recommend a strengthened GHG target, this could be paired with direction to staff to evaluate and update the timeframes for the CMAP actions.

Sincerely,

Gladwyn d’Souza
Chair, Sierra Club Loma Prieta Chapter San Carlos/Belmont Regional Group

cc: James Eggers
Director, Sierra Club Loma Prieta Chapter