



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

September 15th, 2021

City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

Via email to: Associate Planner Nimisha Agrawal at: nagrawal@santaclaraca.gov
Cc: mayorandcouncil@santaclaraca.gov

RE: Draft Climate Action Plan

Dear Associate Planner Agrawal and the Santa Clara City Council,

On August 9th, 2021, the UN Secretary-General António Guterres made this statement concerning the Intergovernmental Panel on Climate Change (IPCC) Working Group 1 report on the physical science basis of the sixth assessment:

"Today's IPCC Working Group 1 report is a code red for humanity. The alarm bells are deafening, and the evidence is irrefutable: greenhouse-gas emissions from fossil-fuel burning and deforestation are choking our planet and putting billions of people at immediate risk. Global heating is affecting every region on Earth, with many of the changes becoming irreversible.

*The internationally agreed threshold of 1.5°C is perilously close. We are at imminent risk of hitting 1.5°C in the near term. **The only way to prevent exceeding this threshold is by urgently stepping up our efforts and pursuing the most ambitious path.**"*

California cities are at the spearhead of climate policy. Cities such as Santa Clara have a catalytic role to play by inspiring other jurisdictions to take action. Strong city greenhouse gas reduction targets, in addition to being important in their own right, can also accelerate the climate policy discourse. Successful city actions can be replicated by other cities and scaled by larger jurisdictions.

Ambitious plans and actions are not enough; as UN Secretary-General António Guterres stated, we must urgently pursue "**the most ambitious path**". To this end, the Sierra Club, Loma Prieta Chapter, Climate Action Leadership Team submits the following comments on Santa Clara's draft Climate Action Plan (CAP). We are pleased that the City Council and Staff have already taken steps to strengthen the CAP and we hope that these suggestions will assist the City in moving closer to its most ambitious path.

Sincerely,



Kristel Wickham
Climate Action Leadership Team Chair
Loma Prieta Chapter Sierra Club



Gladwyn d'Souza
Conservation Committee Chair
Loma Prieta Chapter Sierra Club

3 Key Suggestions

We would like to highlight three suggested points that we believe are key to strengthening Santa Clara's Climate Action Plan.

1. **Strengthen the interim GHG reduction target of 80% by 2035 to 80% by 2030.** City Council's direction to staff to pursue an 80x2035 target is a significant step in the right direction, but it still does not match the ambition of Palo Alto and Menlo Park, which have 80x2030 and zero carbon by 2030 targets, respectively.

However, it is important that Santa Clara rapidly adopt its CAP and begin working on the actions as soon as possible. Therefore, we recommend improving the interim target only if doing so would not significantly delay the CAP adoption.

2. **Modify Action B-1-5: Reach Codes For New Construction (pg 36) to call for the adoption of a truly all-electric code, not a mixed fuel code.** As currently written, Action B-1-5 would not be considered an all-electric code. It would be classified as a mixed-fuel or differential reach code and would rank as one of the weakest reach codes passed in California since 2019. Nearly every jurisdiction that has passed a reach code in the 2019 code cycle has opted not to use the Energy Design Rating (EDR) approach. EDR reach codes complicate the permitting process and allow for the significant expansion of gas pipeline infrastructure in new buildings of all types, infrastructure that will become costly stranded assets if and when California decommissions the methane gas distribution system to achieve its 2045 climate goals.

Santa Clara should follow the well-established precedent of Cupertino, Mountain View, San Mateo County, Petaluma, and the dozens of other cities that have opted to require that new construction use electric appliances without a blanket mixed fuel option. Exemptions for gas would only be granted if the applicant applies to the City and demonstrates technical infeasibility.

It would be illogical for Santa Clara to allow someone to install gas infrastructure in new buildings at great expense to the occupant (who will suffer from the health hazards of indoor air pollution from gas appliances), and society at large (which will suffer from the impacts of increased emissions).

As one of the latest jurisdictions in Santa Clara County to consider a reach code, Santa Clara should learn from the successes of its peer cities and pass an equivalent or stronger all-electric reach code.

- 3. Accelerate decarbonization targets in Action B-3-1: SVP Integrated Resources Plan (IRP) For Renewable Electricity and consider equity programs to mitigate any potential cost increases for low-income residents.** Silicon Valley Power (SVP) should aim to provide 100% renewable energy to all customers by 2030, rather than the current goal of 60%. Although SVP is heavily invested in gas power plants, the need to transition to 100% carbon neutral is paramount. Neighboring Community Choice Energy entities are already on this path or have succeeded in decarbonizing their electricity supply (though they didn't own or have contracts with gas power plants to exit). The Loma Prieta Chapter, Climate Action Leadership Team recognizes the difficulty and cost of this transition, but we also recognize the necessity of decarbonizing SVP.

In adhering to its equity focus, the City should also explore methods to mitigate any increased burden that this could potentially place on low-income residents.

Further Comments

(pg 64) Appendix A: Implementation Matrix

The 1-3 leaf symbols as a measure of meeting CAP targets and addressing sustainability needs additional clarification. We recommend that the City present the GHG reduction potential of CAP actions as a separate symbol from the sustainability benefits. Otherwise, it is unclear to the reader whether an action has received 3 leaves as a result of its GHG potential, sustainability benefit, or both.

(Pg 16) Centering Equity

We support the draft CAP's focus on equity and believe that there is room to further explore specific equity ideas within the CAP actions. For example, within **Action B-1-6: Burnout Ordinance (pg 16)**, the City could consider exploring a turnkey electrification program for low-income households. Another possibility is for the City to plan to analyze heat islands in

low-income communities and integrate that analysis into **Strategy N-1: Increase Tree Canopy Cover (pg 53)**.

We recognize that equity cannot be fully explored without community workshops and feedback ideally facilitated by the Internal Sustainability and Climate Action Team (pg 63). There is still an opportunity for Santa Clara to begin brainstorming these ideas within the draft CAP. With more equity ideas already on the table, the Team could hit the ground running and arrive at public equity workshops with ideas ready for public feedback.

(pg 32) A Strategic Approach

Please add new text (in blue) to this existing language: “Meanwhile, significantly reduce emissions from energy by making buildings more energy efficient” *while electrifying appliances and infrastructure.*

(pg 34) Strategy: Decarbonize Buildings

Please add new text (in blue) to this existing language: “Decarbonize buildings by transitioning away from natural gas to electricity. Actions include developing incentive programs *and mandates* to support the electrification of *new and existing* residential and commercial buildings, transitioning all municipal buildings to electricity, and adopting construction requirements and building codes to electrify new buildings.”

(pg 36) Action B-1-4: Municipal Electrification Action Plan

Please add new text (in blue) to this existing language to improve clarity: “Work with regional energy partnerships to develop and implement an Electrification Action Plan for City facilities. This will include *fuel-switching* in new and existing buildings, incorporate strategies to address energy storage, focus on highlighting any hurdles or solutions that would be applicable to the broader community, and leverage existing rebates”

(pg 36) Action B-1-6: Burnout Ordinance

Please add the following new text (in blue): *The burnout ordinance should include equity protections for low-income residents.*

This could be accomplished through programs such as on-bill zero interest financing supported by a stable funding mechanism. It is key to ensure that low-income residents have the smoothest transition to electrification possible, as they disproportionately suffer from the negative health impacts of indoor air pollution from gas appliances.

(pg 37) Action B-1-7: Carbon Neutral Data Centers

Do not allow for data centers to use carbon offsets to achieve carbon neutrality.

(pg 37) Action B-2-1: Municipal Energy Retrofits

Replace “energy” with *energy and electrification*. Municipal energy retrofits should not only focus on energy efficiency but also on fuel switching. As the electricity grid becomes cleaner and eventually GHG free, electric appliances will cause fewer and fewer emissions. Gas systems will not become cleaner over time and will have a 15-to-30-year lifespan.

We also recommend [exploring Bird Safe Design and Dark Sky retrofits for municipal buildings in order](#) to prevent bird strikes and reduce light pollution. In addition to the ecological benefits of these policies, both can also lower energy use through minimizing the use of windows and reducing unnecessary light.

(pg 37) Action B-2-2 Free home-energy upgrades for qualifying residents

Consider shifting the focus of this program from “increasing energy efficiency” to [fuel switching](#). Additionally, the City could provide residents with home electrification action plans to help building owners initiate this process.

While energy efficiency is important, it should not be prioritized over decarbonization. Fuel switching is necessary to achieve the rapid reductions required to avoid the worst impacts of climate change.

(pg 39) Action B-3-4 Renewable Energy Generation And Storage on Private Property

Please add the following language in blue: “Expand financial assistance options to residents [and businesses in order](#) to increase...”

Businesses typically have larger roofs and would also benefit from streamlined permitting. If businesses were originally intended to be included in B-3-4, then this additional language in blue will provide clarity.

(pg 43) Action T-1-4: Commercial EV Chargers and Action T-1-5: Office EV Chargers

We believe the EV charging requirements in these actions could be stronger. The 7% level 2 charging requirement is not much of a reach beyond the 6% level 2 charging required by the state. Consider combining commercial and office EV charging requirements in the reach code (Actions T-1-4 and T-1-5) into standards that would require 100% of parking spots to have some sort of EV capability. We recommend referencing neighboring city EV reach codes in Sunnyvale, San Jose, and Mountain View.

(pg 43) Action T-1-6: Electrification of Municipal Fleet

Given that the text of this action seeks to comply with the targets established in Executive Order N-79-20 and by CARB and does not establish a specific City target, we recommend reconsidering this Action to include targets that exceed the state. Consider setting target percentages and timelines and include a stated commitment to purchase only zero emissions vehicles (ZEV) if ZEV options are available for that vehicle type. Consider delaying new vehicle purchases if a viable ZEV model is expected to become available within two years of the planned purchase.

(pg 51) Action M-3-3: Municipal Sustainable Procurement Policy

We recommend that this procurement policy be expanded to include City contracts and consulting.

(pg 54) Action N-1-4: Tree Maintenance, Replacement and Plantings

Consider setting a target for canopy coverage that increases every 5 years and establishing a policy to plant multiple native trees for every mature tree that is removed. Although the

sequestration of carbon by planting new trees is relatively small compared to other actions, the co-benefits of trees to community health and biodiversity are sufficient reasons to expand the urban forest.

(pg 63) Oversight & Accountability

We strongly support the proposed option to create an internal Sustainability and Climate Action Team led by the City's Sustainability Manager to assist with the CAP implementation.

In addition, we recommend that the city add a new option: [Create a Citizen's Advisory Committee](#) to assist the internal Sustainability and Climate Action Team with CAP implementation and advise the City Council on climate policy.