



**SANTA CRUZ COUNTY GROUP**  
**of the Ventana Chapter**  
P.O. Box 604, Santa Cruz, CA 95061  
EMAIL: [sierraclubsantacruz@gmail.com](mailto:sierraclubsantacruz@gmail.com)  
WEB: [www.sierraclub.org/ventana/santa-cruz](http://www.sierraclub.org/ventana/santa-cruz)

September 7, 2022

Santa Cruz City Council  
809 Center Street  
Santa Cruz, CA 95060

**Re: City of Santa Cruz Climate Action Plan 2030**

Dear Councilmembers,

The Sierra Club appreciates the work the City of Santa Cruz has done to address the issue of climate change, as reflected in its most recent Climate Action Plan (CAP 2030). We would also like to express our appreciation for the document's interactive public review process. In our letter of April 12, 2021, on the initial Climate Action Plan, the Sierra Club stated that "regulations are called for when implementing policy direction", as that initial CAP did not recommend a regulatory implementation. The Sierra Club appreciates that the CAP 2030 does now include some regulatory focus.

It is critical that the CAP be clear in its goals, but the extended timelines given for accomplishing those stated goals and benchmarks are of concern. Measures to address climate change should begin as early as is feasible; following the present timeline, it will be 16 years (2028) from the first CAP's introduction in 2012 before any ordinance is enacted. Regarding the document as a whole, we urge the city to shorten its timelines on proposed measures as much as possible and to begin implementation of proposed action items significantly sooner.

**Sustainable Transportation and Land Use Planning**

We recognize that the city has included greater specification of ordinances here, in comparison to the current CAP (2012). Encouraging use of alternative transportation such as bicycling and walking is an important step, but despite an increase in these alternative modes, there has not been a corresponding decrease in vehicle-miles traveled (VMT); therefore there is no reduction in transportation sector GHGs. These constitute nearly 69% of the city of Santa Cruz's GHG emissions and 50.8% countywide, and are of immediate concern. The CAP should identify precisely how to reduce automotive VMT and apply measures to accomplish that. Factors motivating continued automobile use in the city, thereby reducing the overall effectiveness of any gain in bicycle and pedestrian transit, should be correctly identified and addressed. Because the city is not an isolated unit but a central point in the county's economic activity, further study of the links between countywide and in-city travel patterns and transit modes, particularly travel induced by tourism and employment in the tourism and agriculture industries, would provide valuable targeted data to the CAP.

Measure T-3.5 specifies possible limitations of single-passenger vehicle parking options, as follows: "*Consider limiting parking options for single-passenger vehicles in downtown and other commercial areas of the city.*" We appreciate this proven approach and suggest that the word "consider" be eliminated. We

recommend that the following additional language be added: *“So as to incrementally reduce per capita provision of public parking, the city shall adopt a policy of building no additional public parking, whether surface or structure.”*

Although we support requiring greater accommodations for secure bicycle parking (T-1.3) in new commercial developments, a far shorter timeline for implementation of this would further incentivize the use of active transportation modes. We are already in the tenth year beyond release of the initial Climate Action Plan (2012), and we therefore urge that this measure be deployed in the first period of implementation, not the second. Further, 8% public transportation mode share by 2030 (T-2) is fairly modest for a county seat, particularly given the city’s ambitious downtown development plans.

In light of the recent defeat of Measure D, we are very surprised that the CAP document does not reflect the documented support for countywide rail transit repeatedly reiterated by the City Council. The Climate Action Plan should include a policy wherein the City works with County agencies to provide both a rail and a trail system along the rail corridor.

### **Sea Level Rise and Related Environmental Impacts**

We value the CAP’s focus on equity and inclusion, and support the city’s efforts to ensure that frontline communities are not overlooked. However, we would like to see greater attention to the issue of sea level rise, which will have a direct and significant effect in coming decades on residents of the lower Ocean Street, Boardwalk, Beach Flats and adjacent neighborhoods. These communities have historically been underserved and are especially vulnerable to the impacts of environmental health hazards and resident displacement.

As a densely populated coastal city in a relatively small number of square miles, Santa Cruz faces greater and more immediate impacts of sea level rise than municipalities further inland. Impacts such as saltwater intrusion into drinking water supplies and reduction in aquifer groundwater storage are already being observed on the Central Coast, and further effects on water treatment, drainage and waste systems should be anticipated. Loss of housing stock, displacement of local industry and business sites and facilities, and decline in the productivity and area of adjacent agricultural land are probable consequences, and all will require adaptations and mitigations. Sierra Club recognizes that some of these concerns fall under federal or county regulations and are not within the city’s purview, but we wish to draw consideration to these issues in the broader context of the CAP and encourage the city to examine adaptation strategies wherever possible for the benefit of residents.

### **Community Solar Policies**

The CAP advocates the reform of solar policies (Measure BE-5). In Santa Cruz we have optimal weather to take advantage of solar energy. According to a new analysis by the US Department of Energy, if all available roof space were utilized nationally, it could provide the equivalent of 39% of the nation’s electricity. The CAP should identify city buildings and parking lots where solar could be installed.

The CAP should also include a program to develop building codes requiring passive solar heating in both residential and non-residential structures. Passive solar heating is a cost-effective means of reducing energy consumption in space heating and cutting emissions associated with fossil fuel-powered heating systems. The codes could initially apply to buildings greater than a certain floor area.

The National Renewable Energy Laboratory (NREL) used light detection and ranging (LiDAR) data to calculate the suitability of rooftops for hosting solar panels. They found that 26% of the buildings analyzed would have the capacity to hold solar. We would like to see a program to subsidize rooftop solar installations city wide.

### **CAP Appendix I, Monitoring + Implementation Plan, Appendix H**

We note that Appendix I contains specifications to “mitigate potential equity impacts of existing commercial building electrification”, (Action BE-3.2). Although this appendix does include language referring to residential electrification (Actions BE-2.2 and BE-2.5), we suggest that more detail be included on the impacts of required electrification on residents, as well as more specific information on city outreach regarding accessing any offered rebates and mitigation mechanisms. We look forward to seeing community engagement with the BrightAction activation platform (Appendix H) providing online links to rebate programs and incentives for members of the public, and urge the city to provide offline resources and outreach as well to community members who are not aware of or are unable to access online tools.

### **Climate Restoration**

The city’s urban forestry and tree planting and replacement programs are valuable mitigation strategies, particularly the reforestation and afforestation of mown areas as noted in the CAP (CR-3.5). However, the cited 2% gain in urban canopy could be significantly increased, and more narrow and in-depth focus paid to the question of adaptation vs. mitigation, as they overlap but are not precisely analogous. Further, Sierra Club urges development and implementation of the Urban Forest Master Plan on a shorter timeline than currently stated (2030).

As the city moves forward with approved and pending commercial and high-density residential developments on current low-density lots, increasing green space in the city will be an important mitigation. Preservation of the existing urban canopy, including heritage trees, should be a priority, as although we recognize that the city has mitigations already in place, saplings and immature plantings cannot adequately replace the carbon sequestration of felled mature trees, even with a well-enforced replacement policy. Tree and vegetation cover also plays an important role in preserving moisture, managing storm runoff, providing urban wildlife habitat, area cooling, increasing infiltration and recharging of groundwater supply, and lessening of water evaporation.

Thank you for the opportunity to comment on the CAP 2030 document. We look forward to continuing to engage in productive ways with the City of Santa Cruz regarding this critical issue.

Sincerely,



Kristen Sandel  
Climate Committee



Magi Amma  
Climate Committee Chair



Michael Guth  
Executive Committee Chair