

## Mike Strong

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**From:** Mike Strong  
**Sent:** Wednesday, October 28, 2020 11:40 AM  
**Subject:** CAP update follow-up from last night.

Good morning blind copied Planning Commissioners.

As we setting in from last night I wanted to share some important information with you.

1) The current version of the CAP Update that the Commission is working from (and potentially taking action on) is very clearly posted on the Project website. This is the same version that is linked from exhibit A to the draft resolution.

<https://www.escondido.org/climate-action-plan-documents.aspx>

2) After reviewing the discussion from last night (re-watching parts), I realize that I missed the mark on Commissioner Paul's inquiry to the landfill gas capture rate. I would like to respond fully here. The technical data that is used to make assumptions about GHG emissions are based on the best available data. The EPA, state, and local regulators use an assumed gas collection efficiencies to calculate landfill emissions in regulating and setting policies for landfills. These assumed efficiencies, usually 75%, are much lower than what many gas system operators believe is typically achieved. The industry position supports a landfill gas collection efficiency greater than the 75% default value and could be as high as 99%, depending on the type of landfill and gas collection system.

CalRecycle helps coordinate state government efforts that address global warming reduction programs. One program is called the Landfill Methane Capture Strategy. The goal is to maximize landfill methane capture efficiencies by optimizing landfill design, operation, and closure/post closure practices an increase recovery of landfill gas.

From Appendix B of the CAP Update: "Landfills in the San Diego region are in the process of upgrading gas collection systems. It is assumed the landfill gas capture rate in 2030 will be 85 percent, an increase from the default 75 percent used in the BAU emissions projection." Most of this is from grant funding or general system upgrades which optimizes the capture rate efficiencies.

The regulations that govern landfill gas requirements are found in Title 27, California Code of Regulations (27, CCR), § 20921, as follows in part:

To provide for the protection of public health and safety and the environment, the operator shall ensure that landfill gas generated at a disposal site is controlled in such a manner as to satisfy the following requirements:

- (1) The concentration of methane gas must not exceed 1.25% by volume in air within any portion of any on-site structures.
- (2) The concentration of methane gas migrating from the disposal site must not exceed 5% by volume in air at the disposal site permitted facility boundary or an alternative boundary approved in accordance with §20925.
- (3) Trace gases shall be controlled to prevent adverse acute and chronic exposure to toxic and/or carcinogenic compounds.

As upgrades are made to existing facilities, the capture rate will increase. 85%, i.e. the new value, is an assumption of its efficacy based on the upgrades, but likely it could be higher. However, this is a defensible estimate.

Thanks for the great discussion last night. Looking forward to more with the continuance.



Mike Strong  
Director of Community Development  
Community Development Department | City of Escondido  
Direct: 760-839-4556  
[www.escondido.org](http://www.escondido.org)

## **Mike Strong**

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**From:** Rick Paul <rickpaul01@yahoo.com>  
**Sent:** Friday, October 30, 2020 10:27 AM  
**To:** Mike Strong  
**Subject:** Re: [EXT] 10%

Thanks Mike,  
I was sure you were working on it.  
I also was pretty sure the answer was going in this direction. Can I get more detail on these 55,500 jobs? If they know that 5,626 were in Escondido hopefully they have the number for each community?  
  
This is a bigger ask: Maybe you will say no. You brought up dollar value of building permits. That seems like a much better measure of construction activity. Can we get that data for the region, broken down by community. Pick any time period.

Thanks  
Rick

On Friday, October 30, 2020, 09:46:24 AM PDT, Mike Strong <mstrong@escondido.org> wrote:

Sorry for the delay. But I just received an answer. See the following from our consultant:

*Here's the response from our technical analyst:*

The construction scaling factor was calculated based on the ratio of construction jobs in Escondido and the San Diego region. The number of construction job in the region was 55,500 and the number of construction job in Escondido was 5,626 in 2012, based on SANDAG Forecast 13 Forecast base year 2012. The ratio is about 10%.

Attached is the SANDAG Series 13 Growth Forecast data we downloaded in 2017 when we developed the 2012 GHG inventory.

Mike

Sent from my iPhone

On Oct 28, 2020, at 8:46 AM, Rick Paul <rickpaul01@yahoo.com> wrote:

Sorry, the underlying study that resulted in Escondido being apportioned 10% of construction and mining activities.

On Wednesday, October 28, 2020, 08:37:25 AM PDT, Mike Strong <mstrong@escondido.org> wrote:

I don't know what this means.

Happy to provide with more direction

Mike

Sent from my iPhone

On Oct 28, 2020, at 8:06 AM, Rick Paul <rickpaul01@yahoo.com> wrote:

**CAUTION :** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Hi Mike,  
Can I have the underlying study?  
Thanks  
Rick

For local information and daily updates on COVID-19,  
please visit [San Diego County Coronavirus](#). To  
receive updates via text, send COSD COVID19 to  
**468-311**.

Coronavirus Disease 2019  
**COVID-19**

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please visit [San Diego County Coronavirus](#). To  
receive updates via text, send COSD COVID19 to  
**468-311**.

Coronavirus Disease 2019  
**COVID-19**

## **Mike Strong**

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**From:** Matthew Vasilakis <matthew@climateactioncampaign.org>  
**Sent:** Tuesday, October 27, 2020 1:07 PM  
**To:** Mike Strong  
**Cc:** Maleeka Marsden  
**Subject:** [EXT] Updated CAC Letter r.e. Escondido Climate Action Plan  
**Attachments:** 2020-10-27 CAC Escondido CAP Letter.pdf

**CAUTION :** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Hello Mike, hope you have been well. Apologies on the delay, attached is our updated letter for the Climate Action Plan Update. Can you please forward this email and letter to the commissioners? Highlights in our letter include:

- Request Escondido commit to carbon neutrality by 2045, not 2088, to meet state targets, and extend the planning horizon to 2045
- Request Escondido commit to a 35% citywide tree canopy target by 2035
- Continued concern that mode shift and VMT reduction strategies do not have high enough targets and are not city-wide
- Continued stress on the importance of committing to Community Choice Energy, the only viable pathway to 100 percent renewable energy
- Appreciation for the inclusion of Priority Investment Neighborhoods (PINs)
- Appreciation for committing to 90% waste diversion by 2035
- Appreciation for the inclusion youth opportunity transit passes
- Appreciation for telecommuting and work from home strategies
- Appreciation for the "Clean Energy Equity Plan" and microgrid feasibility study
- Appreciation for further housing and land use strategies to reduce VMT, including potential density increases and parking reductions

We look forward to this evening's discussion. Thank you, Mike.

--  
Matthew Vasilakis (he/him)

Co-Director of Policy

*Climate Action Campaign*

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[www.climateactioncampaign.org](http://www.climateactioncampaign.org)

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*Our Mission is Simple: Stop the Climate Crisis*



October 27, 2020

Mike Strong  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

**RE: Updated Comments on Escondido Climate Action Plan Update**

Dear Mike Strong,

Climate Action Campaign is a nonprofit organization with a simple mission: to stop the climate crisis. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual [Report Card](#) evaluating the strength of cities' CAPs and best practices to implement those strategies. Throughout the process of Escondido's CAP Update, we have engaged the City with recommendations for key strategies to prioritize; those letters are included here as attachments.

We would like to thank City staff for the latest round of updates in response to community input to make this key document even stronger for Escondido. We offer the following recommendations to make the Escondido CAP gold standard:

***Amend Planning Horizon from 2030-2035 to 2045 In Line With State Targets***

We appreciate City staff including a new carbon neutrality goal, however we ask the City to amend the planning horizon from 2030-2035 to 2045, and adjust the timeline for carbon neutrality from 2088 to 2045 to meet state targets and align with climate science.

Escondido's CAP should amend its target from 2088 to at least 2045 to align with Executive Order B-55-18, which aims to achieve carbon neutrality by 2045. Other cities in California, including Los Angeles and Santa Monica, are already planning for this goal, showing that planning for carbon neutrality is not only necessary, but achievable today.

The UN IPCC Special Report on Global Warming of 1.5°C and other recent climate science findings show that, at every level of government, we must plan for and fully execute a total transition away from fossil fuels. To achieve that transition, we need all of our cities to establish the roadmap and begin deep decarbonization today.

### ***Include Smart Land Use Policies with Affordable Housing Near Transit***

Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.<sup>1</sup> We are encouraged that the draft CAP calls for Escondido to encourage more mixed use, high density housing with flexible parking and other incentives to reduce car use. However, the CAP does not currently include strategies that advance the development of affordable housing in Escondido, especially near the City's transit centers and high-frequency bus lines.

We still recommend that the CAP include the following measures to increase the supply of affordable housing near transit:

- Pursue State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit.
- Pursue opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families—something Escondido is familiar with doing.
- Present to Council for consideration an inclusionary housing ordinance that would require a portion of all multi-family housing to be set aside for families earning less than 80% of the Area Median Income. Inclusionary housing ordinances help boost affordable housing production and support racial and economic integration.

The CAP should also add a measure specifying where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the city so there is clarity for the public and City Staff. The City of San Diego's ongoing struggle to ensure that community plan updates in urban, transit-priority communities are aligned with CAP targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both a neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

The CAP must also recognize the harmful role sprawl development plays in exasperating the climate crisis, air pollution, wildfire danger, and other negative environmental, economic and social impacts. Projects like Harvest Hills/Safari Highlands will make hitting Escondido's CAP targets much harder, undermining even the most effective climate plan.

### ***Commit to Community Choice Energy, and specifically consider Joining San Diego Community Power***

We applaud Measure E-5.3 "Increase Grid-Supply Renewable and Zero Carbon Electricity", and the City's commitment to reaching 100% clean energy by 2030. We support the inclusion of the "Clean Energy Equity Plan" and the "Microgrid Feasibility Study" in the measure to advance greater equity and

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<sup>1</sup> Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). Location Matters: Affordable Housing and VMT Reduction in San Diego County. Retrieved from:  
<https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action++Affordable+Housing+And+VMT+Reduction.pdf>

inclusion. And we also applaud the City for conducting a feasibility study with neighboring cities to join or establish a Community Choice Energy (CCE) program—the only viable pathway to reaching the target.

However, we reinforce our recommendation that the CAP must fully commit to CCE and should consider joining an existing program, preferably San Diego Community Power (SDCP), rather than establishing a new one. There are numerous reasons for this:

- Scale is becoming an increasingly important factor in the success of CCE programs in the state. Larger programs are able to generate more revenue to provide more affordable rates, more local green energy jobs and steel in the ground projects, and more clean energy programs and incentives.
- Establishing new CCE programs takes up significant staff time and City resources. Whether establishing a stand alone CCE program or negotiating a Joint Powers Authority agreement with other cities, starting a new CCE program takes significant staff time and financial resources. Escondido does not need to reinvent the wheel when there are already state-certified CCE programs now operating in the same energy service territory, which the City can join and benefit from.
- Regional unity in the face of the climate crisis is desperately needed. If we are going to work together to solve the most existential crisis of our lifetimes, cities must work together collaboratively to support one another. Partnering with cities with a shared goal of reaching 100% clean energy also ensures we are moving lock step to meeting all of our local CAP targets.
- SDCP best exemplifies and embodies the full potential of what CCE has to offer communities. Of the existing CCE programs in the region, SDCP is the only one that embraces strong environmental, equity, local economic development, and worker provisions, and is capable of achieving the many benefits of CCE with its scalable revenue projections. We urge City leadership and staff to have proactive conversations with SDCP to explore joining their JPA and the regional movement to 100% clean energy.

Escondido has a unique opportunity to lead North County inland cities toward an inclusive clean energy future, and we hope to be an enthusiastic partner in helping the City reach its 100% clean energy goals.

Additionally, with regards to Measure 5.2 “Require New Commercial Developments to Achieve Zero Net Energy”, the City should adopt the enforcing ordinance sooner than 2023, and Measure 5.4 “Increase Renewable Electricity Generated at School Sites” must include an enforceable strategy—collaborations are not considered enforceable under CEQA guidelines.

#### ***Set Higher and Citywide Mode Share Targets for Biking, Walking, and Transit***

In the Draft CAP, Strategy 3 addresses the broad goal of reducing vehicle miles traveled (VMT) by increasing the share of trips taken using walking, biking, and public transit. While the steps enumerated are worthwhile actions to take, the CAP still does not commit to mode share targets for the entire city, and we recommend Escondido commits to overall mode share targets for biking, walking, and transit.

We also still recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares. 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.” Escondido’s CAP should set more aggressive mode share targets tailored to the City’s local context.

#### Walking and Biking:

- Measure T 3.2: “Improve Pedestrian Infrastructure in Priority Areas” aims to develop a holistic Active Transportation Master Plan to increase the number of safe routes for pedestrians, students, and transit users. This goal should be updated to include other specific improvements. We recommend not only developing a complete pedestrian network with comfortable, safe sidewalks, but also commit to innovative strategies that make walking as safe and convenient as possible. Examples of strategies to increase pedestrian mode share include piloting left-turn traffic calming to reduce turn speeds, restricting right turns at red lights, updating walk signals to extend time for pedestrians to cross the street, introducing leading pedestrian intervals, and adding new diagonal pedestrian crossings at busy intersections. We recommend referring to the Mayor of San Francisco, London Breed’s Vision Zero announcement, August 2019.
- Measure T 3.3 “Implement the Safe Routes to School Program at Escondido Union School District” sets specific targets of increasing the percentage of students walking and biking to school by 30% and 2.5%, respectively, by 2035. There is a serious disparity between those targets, and, perhaps, should be looked at closely again.
  - We appreciate the inclusion of Youth Opportunity Passes (YOP) in Measure T-3.3. Providing accessible transit to youth is an important social equity policy that pays significant dividends in environmental, economic, racial, and transportation justice.
- Measure T 3.5 “Update Bicycle Master Plan” commits to installing new or improving existing Class II or better bicycle lanes. However, evidence shows that to increase ridership and promote safer streets, cities must prioritize protected bike lanes when planning for biking infrastructure. Safe, separated bikeways and bike lanes allow significantly more community members to participate in bicycling, increasing bike mode share and reducing VMT/GHG emissions. Anything less does not provide the same level of comfort or ease in travel. We recommend Class I and Class IV be included in the measure language.

#### Transit:

- Measure T 3.6 “Increase Transit Commuters Among New Downtown Residents” includes specific mode share targets for the downtown Transit Priority Area (TPA). Unfortunately, these targets are significantly lower than in TPAs in other jurisdictions. Again, we recommend Escondido’s CAP set more aggressive mode share targets tailored to the City’s local context.
- Measure T 3.8 “Increase Transit Ridership” also includes low mode share targets, which do not take advantage of the number of transit options in Escondido that exist or are planned to exist in the coming decade. We recommend amending this measure to commit to more ambitious targets.

**TDM:**

- Measure T 3.4 “Develop a Citywide Transportation Demand Management Plan” is an excellent measure to identify and reduce VMT, though the bike mode share targets are also low compared to other commitments in the region. We recommend the City reevaluate the City’s current bike infrastructure and potential to expand and commit to more ambitious targets.
- We appreciate the inclusion of work from home and telecommuting programs in the TDM.

***Commit to Zero Waste***

We applaud Escondido for setting a 90 percent citywide waste diversion rate by 2035. The Escondido CAP should achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas.

***Commit to Fully Electrifying the City’s Municipal Vehicle Fleet***

While we support that the Draft CAP commits to a fleet conversion plan, we recommend that the CAP exclusively commit to ZEV’s, and not to alternative fuel vehicles.

Currently, measure T 1.1 reads, “Increase the number of PHEVs in the City’s municipal vehicle fleet”. We recommend amending that language to read: “Develop a Fleet Management Program to guide the replacement of vehicles to zero emission vehicles by 2030.”

***Adopt Green Infrastructure Strategies***

The CAP includes some good green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to the City. Green infrastructure is an approach to stormwater management that mimics or protects natural water systems.

Under Strategy 9: “Carbon Sequestration and Land Conservation,” multiple measures set goals of planting new trees per year in City-owned landscaped areas and in new developments. New amendments call for specific tree planting targets. However, the CAP should commit to a quantifiable target of 35% citywide tree canopy coverage tied to investments in Priority Investment Neighborhoods first.

The CAP should additionally adopt green infrastructure strategies such as preserving or restoring natural lands, implementing green streets using techniques such as street trees, permeable pavements, bioretention, and swales, and adopting retrofit policies for public and private properties that promote projects such as permeable pavement and green roofs. We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target.

***Include an Equity Section***

Climate change hits hardest in communities of concern that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of environmental justice in those places.

In Escondido, one census tract falls in the top 30 percent of CalEnviroScreen's statewide rankings. We recommend that Escondido's CAP include a Social Equity section that utilizes CalEnviroScreen to explicitly define how Escondido will ensure that these communities are prioritized in the implementation of GHG reduction strategies, including strategies to implement affordable housing development, investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

We applaud Escondido for working to identify Priority Investment Neighborhoods (PINs) throughout the city for targeted, early CAP implementation. Other cities like San Diego and Chula Vista have or are in the process of developing Climate Equity Indices. As Escondido goes through this process, we recommend studying the [City of Oakland's Equitable Climate Action Plan](#) for ideas on how best to identify communities of concern for PINs designation that can truly promote greater economic, racial, and social justice.

Of course, the development and implementation of this section and the identification of PINs should take place in consultation with a diverse set of stakeholders from the most impacted of the City's communities.

#### ***Hire a CAP Administrator and Commit to Annual Monitoring Reports***

In order to ensure timely and transparent progress, we recommend amending the Implementation and Monitoring Section of the CAP to commit to the following:

- Hire a CAP administrator or identify a task force to coordinate and oversee CAP implementation strategies.
- Require annual monitoring reports on implementation progress.
- Require a greenhouse gas inventory every three years.

#### ***Conclusion***

Thank you for the opportunity to weigh in on the development of this critically important document. Escondido's CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change, and set the bar for climate action policy in inland North County. We urge you to direct staff to incorporate the recommendations above to comply with legal requirements, maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

Matthew Vasilakis

A handwritten signature in black ink, appearing to read "Matthew Vasilakis".

Co-Director of Policy  
Climate Action Campaign  
March 26, 2020

Attachment A: Letter: [Comments on Escondido Climate Action Plan Update - March 26, 2020](#)

Mike Strong  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

**RE: Comments on Escondido Climate Action Plan Update**

Dear Mike Strong,

Climate Action Campaign is a nonprofit organization with a simple mission: to stop the climate crisis. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual [Report Card](#) evaluating the strength of cities' CAPs and best practices to implement those strategies. Throughout the process of Escondido's CAP Update, we have engaged with the City with recommendations for key strategies to prioritize; those letters are included here as an attachment.

After careful review of the Draft CAP, we would like to thank City staff and the community for their hard work in helping shape this key document to make Escondido climate-safe and climate-ready. We offer the following recommendations to further strengthen the CAP:

***The CAP Must Comply With CEQA Guidelines for Qualified Plans***

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines.

In California Riverwatch v. County of Sonoma et al. (2017), the court stated that in CAPs used for tiering, “any measures or requirements imposed [must] be sufficiently defined to be enforceable.” This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The decision further states that measures that fall into the category of “wishful thinking, good intentions, and an intent to ‘work’ with others” violate CEQA (26). The measures within the CAP must be specific, evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

***Amend Planning Horizon from 2030 to 2045 In Line With State Targets***

As a long-range planning document, Escondido's CAP should amend the planning horizon from 2035 until at least 2045, and the target for that year should align with Executive Order B-55-18, which aims to achieve carbon neutrality by 2045. Other cities in California, including Los Angeles and Santa Monica, are

already planning for this goal, showing that planning for carbon neutrality is not only necessary, but achievable today.

The UN IPCC Special Report on Global Warming of 1.5°C and other recent climate science findings show that, at every level of government, we must plan for and fully execute a total transition away from fossil fuels. To achieve that transition, we need all of our cities to establish the roadmap and begin deep decarbonization today.

### ***Include Smart Land Use Policies with Affordable Housing Near Transit***

Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.<sup>2</sup> However, the CAP does not currently include strategies that advance the development of affordable housing in Escondido, especially near the City's transit centers and high-frequency bus lines.

We recommend that the CAP include the following measures to increase the supply of affordable housing near transit:

- Pursue State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit.
- Pursue other opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families—something Escondido is familiar with doing.
- Present to Council for consideration an inclusionary housing ordinance that would require a portion of all multi-family housing to be set aside for families earning less than 80% of the Area Median Income. Inclusionary housing ordinances help boost affordable housing production and support racial and economic integration.

The CAP should also add a measure specifying where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the city so there is clarity for the public and City Staff. The City of San Diego's ongoing struggle to ensure that community plan updates in urban, transit-priority communities are aligned with CAP targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both a neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

The CAP must also recognize the harmful role sprawl development plays in exasperating the climate crisis, air pollution, wildfire danger, and other negative environmental, economic and social impacts. Projects like Harvest Hills/Safari Highlands will make hitting Escondido's CAP targets much harder, undermining even the most effective climate plan.

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<sup>2</sup> Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). Location Matters: Affordable Housing and VMT Reduction in San Diego County. Retrieved from:  
<https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action++Affordable+Housing+And+VMT+Reduction.pdf>

### ***Commit to Community Choice Energy, and specifically consider Joining San Diego Community Power***

We applaud Measure E-5.3 “Increase Grid-Supply Renewable and Zero Carbon Electricity”, and the City’s commitment to reaching 100% clean energy by 2030. We also applaud the City for conducting a feasibility study with neighboring cities to join or establish a Community Choice Energy (CCE) program—the only viable pathway to reaching the target. However, the CAP must fully commit to CCE and should consider joining an existing program, preferably San Diego Community Power (SDCP), rather than establishing a new one. There are numerous reasons for this:

- Scale is becoming an increasingly important factor in the success of CCE programs in the state. Larger programs are able to generate more revenue to provide more affordable rates, more local green energy jobs and steel in the ground projects, and more clean energy programs and incentives.
- Establishing new CCE programs takes up significant staff time and City resources. Whether establishing a stand alone CCE program or negotiating a Joint Powers Authority agreement with other cities, starting a new CCE program takes significant staff time and financial resources. Escondido does not need to reinvent the wheel when there are already state-certified CCE programs now operating in the same energy service territory, which the City can join and benefit from.
- Regional unity in the face of the climate crisis is desperately needed. If we are going to work together to solve the most existential crisis of our lifetimes, cities must work together collaboratively to support one another. Partnering with cities with a shared goal of reaching 100% clean energy also ensures we are moving lock step to meeting all of our local CAP targets.
- SDCP best exemplifies and embodies the full potential of what CCE has to offer communities. Of the existing CCE programs in the region, SDCP is the only one that embraces strong environmental, equity, local economic development, and worker provisions, and is capable of achieving the many benefits of CCE with its scalable revenue projections. We urge City leadership and staff to have proactive conversations with SDCP to explore joining their JPA and the regional movement to 100% clean energy.

Escondido has a unique opportunity to lead North County inland cities toward an inclusive clean energy future, and we hope to be an enthusiastic partner in helping the City reach its 100% clean energy goals.

Additionally, with regards to Measure 5.2 “Require New Commercial Developments to Achieve Zero Net Energy”, the City should adopt the enforcing ordinance sooner than 2023, and Measure 5.4 “Increase Renewable Electricity Generated at School Sites” must include an enforceable strategy—collaborations are not considered enforceable under CEQA guidelines.

### ***Include a Residential Energy Disclosure Ordinance to Increase Energy Efficiency***

We are pleased to see Escondido include multiple measures identifying water conservation and energy efficiency ordinances for residential and non-residential buildings, and are specifically pleased to see commitments to building electrification.

In addition to Measures E-4.1 through E-4.4, we recommend a Residential Energy Disclosure Ordinance similar to the one adopted in Portland, Oregon (and called for in the City of San Diego's CAP), which requires sellers of homes to obtain and disclose a Home Energy Report estimating the energy-related use, associated costs, and cost-effective solutions to improve the home's efficiency.<sup>3</sup>

In addition to reducing emissions, energy efficiency promotes lower energy bills and creates good-paying green jobs.<sup>4</sup>

With regards to Measure E 4.2: "Require New Multifamily Residential Developments to Install Electric Cooking Appliances", we applaud the City for this commitment, but recommend expanding upon this measure to include all new residential construction, not just multifamily. Numerous cities are moving towards ending all new natural gas infrastructure<sup>5</sup>, and Escondido should join them to meet GHG reduction targets, and achieve Zero Carbon.

The CAP should also explore opportunities to retrofit existing homes and businesses. Energy and water conservation efforts should not be limited to only new construction, all buildings will need to be made climate-safe and climate-ready.

#### ***Set Higher Overall Mode Share Targets for Biking, Walking, and Transit***

In the Draft CAP, Strategy 3 addresses the broad goal of reducing vehicle miles traveled (VMT) by increasing the share of trips taken using walking, biking, and public transit. While the steps enumerated are worthwhile actions to take, and the CAP does commit to mode share targets for specific areas of the city, we strongly recommend the City commit to overall mode share targets for biking, walking, and transit.

We also recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares. 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." Escondido's CAP should set more aggressive mode share targets tailored to the City's local context.

#### **Walking and Biking:**

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<sup>3</sup> City of Portland Home Energy Score, City of Portland, Bureau of Planning and Sustainability, <https://www.pdxhes.com/>

<sup>4</sup> Ettenson, Lara. "Good News for Good Jobs: Clean Energy Soars." NRDC.org, NRDC, 30 May 2018, <https://www.nrdc.org/experts/lara-ettenson/good-news-good-jobs-clean-energy-outpaces-fossil-fuels>

<sup>5</sup> Forward Looking Cities Lead the Way to a Gas-Free Future, <https://www.sierraclub.org/articles/2020/02/forward-looking-cities-lead-way-gas-free-future>

- Measure T 3.2: “Improve Pedestrian Infrastructure in Priority Areas” aims to develop a holistic Active Transportation Master Plan to increase the number of safe routes for pedestrians, students, and transit users. This goal should be updated to include other specific improvements. We recommend not only developing a complete pedestrian network with comfortable, safe sidewalks, but also commit to innovative strategies that make walking as safe and convenient as possible. Examples of strategies to increase pedestrian mode share include piloting left-turn traffic calming to reduce turn speeds, restricting right turns at red lights, updating walk signals to extend time for pedestrians to cross the street, introducing leading pedestrian intervals, and adding new diagonal pedestrian crossings at busy intersections. We recommend referring to the Mayor of San Francisco, London Breed’s Vision Zero announcement, August 2019.
- Measure T 3.3 “Implement the Safe Routes to School Program at Escondido Union School District” sets specific targets of increasing the percentage of students walking and biking to school by 30% and 2.5%, respectively, by 2035. There is a serious disparity between those targets, and, perhaps, should be looked at closely again.
- Measure T 3.5 “Update Bicycle Master Plan” commits to installing new or improving existing Class II or better bicycle lanes. However, evidence shows that to increase ridership and promote safer streets, cities must prioritize protected bike lanes when planning for biking infrastructure. Safe, separated bikeways and bike lanes allow significantly more community members to participate in bicycling, increasing bike mode share and reducing VMT/GHG emissions. Anything less does not provide the same level of comfort or ease in travel. We recommend Class I and Class IV be included in the measure language.

Transit:

- Measure T 3.6 “Increase Transit Commuters Among New Downtown Residents” includes specific mode share targets for the downtown Transit Priority Area (TPA). Unfortunately, these targets are significantly lower than in TPAs in other jurisdictions. Again, we recommend Escondido’s CAP set more aggressive mode share targets tailored to the City’s local context.
- Measure T 3.8 “Increase Transit Ridership” also includes low mode share targets, which do not take advantage of the number of transit options in Escondido that exist or are planned to exist in the coming decade. We recommend amending this measure to commit to more ambitious targets.

TDM:

- Measure T 3.4 “Develop a Citywide Transportation Demand Management Plan” is an excellent measure to identify and reduce VMT, though the bike mode share targets are also low compared to other commitments in the region. We recommend the City reevaluate the City’s current bike infrastructure and potential to expand and commit to more ambitious targets.

***Commit to Zero Waste***

The Escondido CAP should achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas.

Currently, Measure S 8-1 reads, “Achieve 80 percent citywide waste diversion by 2030.” We recommend adopting a Zero Waste policy that commits to 100% waste diversion by 2030.

#### ***Commit to Fully Electrifying the City’s Municipal Vehicle Fleet***

While we support that the Draft CAP commits to a fleet conversion plan, we strongly recommend that the CAP exclusively commit to ZEV’s, and not to alternative fuel vehicles.

Currently, measure T 1.1 reads, “Increase the number of PHEVs in the City’s municipal vehicle fleet”. We recommend amending that language to read: “Develop a Fleet Management Program to guide the replacement of vehicles to zero emission vehicles by 2030.”

#### ***Adopt Green Infrastructure Strategies***

The CAP includes some good green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to the City. Green infrastructure is an approach to stormwater management that mimics or protects natural water systems.

Under Strategy 9: “Carbon Sequestration and Land Conservation,” multiple measures set goals of planting new trees per year in City-owned landscaped areas and in new developments. The CAP should also commit to a quantifiable target for an increase in tree canopy coverage by planting and caring for drought-tolerant trees.

The CAP should additionally adopt green infrastructure strategies such as preserving or restoring natural lands, implementing green streets using techniques such as street trees, permeable pavements, bioretention, and swales, and adopting retrofit policies for public and private properties that promote projects such as permeable pavement and green roofs. We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target.

#### ***Include an Equity Section***

Climate change hits hardest in communities that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California’s Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of environmental justice in those places.

In Escondido, one census tract falls in the top 30 percent of CalEnviroScreen’s statewide rankings. We recommend that Escondido’s CAP include a Social Equity section that utilizes CalEnviroScreen to explicitly define how Escondido will ensure that these communities are prioritized in the implementation of GHG reduction strategies, including strategies to implement affordable housing development, investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

The development and implementation of this section should take place in consultation with a diverse set of stakeholders from the most impacted of the City's communities.

***Hire a CAP Administrator and Commit to Annual Monitoring Reports***

In order to ensure timely and transparent progress, we recommend amending the Implementation and Monitoring Section of the CAP to commit to the following:

- Hire a CAP administrator or identify a task force to coordinate and oversee CAP implementation strategies.
- Require annual monitoring reports on implementation progress.
- Require a greenhouse gas inventory every three years.

***Recommend Inclusion of Best Practices As Described in 2019 CAP Report Card***

In addition to the previous strategies, we recommend that Escondido include the following best practices adopted by numerous cities across the San Diego region. For more detail on the strategies and which cities have incorporated each into their CAPs, please consult CAC's [2019 CAP Report Card](#).

Thank you for the opportunity to weigh in on the development of this critically important document. Escondido's CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change, and set the bar for climate action policy in inland North County. We urge you to direct staff to incorporate the recommendations above to comply with legal requirements, maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

Matthew Vasilakis



Co-Director of Policy  
Climate Action Campaign

Attachment B: Letter: [Key Priorities for Escondido Climate Action Plan Update - January 15, 2019](#)

Mayor McNamara and Council  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

**RE: Key Priorities for Escondido Climate Action Plan Update**

Dear Mayor McNamara and Council:

Climate Action Campaign is a nonprofit organization with a mission to stop climate change. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an [annual Report Card](#) evaluating the strength of cities' CAPs and how effective their implementation has been. Earlier in the process of Escondido's CAP Update, we sent a letter with recommendations for key strategies to prioritize; that letter is included here as an attachment.

We urge you to ensure that the following are included in Escondido's CAP Update, to fulfill legal requirements, maximize emissions reductions, and improve quality of life:

- Enforceable, measurable strategies with detailed deadlines
- Specific, actionable strategies to ensure Environmental Justice communities are prioritized to receive the benefits of implementation.
- A 100% clean energy target with Community Choice Energy as the key strategy to get there
- Targets and associated strategies to reduce Vehicle Miles Traveled (VMT) and increase the share of trips made by biking, walking, and transit.

Finally, we cannot emphasize enough that smart growth development and emissions reductions must work hand in hand, and that the simultaneous pursuit of both meaningful climate action and sprawling development far from public transit is a contradiction in terms. The CAP must chart a clear path forward to accommodate future growth through infill development, not sprawl.

We are counting on your courageous leadership to deliver bold solutions that deliver cleaner air, safer streets, good-paying green jobs, and emissions reductions at the speed and scale that justice demands.

Climate Action Campaign is ready as a resource and partner to this Council as you develop and implement your plan to fight climate change and improve quality of life in Escondido.

Sincerely,



Sophie Wolfram  
Director of Programs, Climate Action Campaign

Attachment C: Letter: Recommendations for Escondido Climate Action Plan Update - June 4, 2018

June 4, 2018

Mayor Abed and Council  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

**RE: Recommendations for Escondido Climate Action Plan Update**

Dear Mayor Abed and Council:

Climate Action Campaign is a nonprofit organization with a simple mission: stop climate change and improve our quality of life. We are committed to helping cities throughout Southern California adopt and implement policies that help prevent the worst impacts of climate change while providing lasting economic, public health, and community benefits.

We wish to see the City of Escondido keep pace with the progress of cities across the region and the state as you update your CAP. To facilitate your CAP update moving forward successfully, we are writing both to recommend strategies to help the city meet the requirements for a CEQA qualified plan, as well as develop a plan that benefits all residents.

**CAP Development Recommendations**

Adopt a CEQA Qualified Plan Aligned With State Targets

We recommend that Escondido make its CAP update CEQA qualified, as the previous iteration of the CAP was. As a CEQA qualified plan, the CAP must be consistent with state targets, namely SB 32 (2016), which requires statewide emissions to decrease 40% below 1990 levels by 2030 and, for planning horizons beyond 2030, with EO S-3-05, which requires an 80% reduction below 1990 levels by 2050.

The CAP Must Have Enforceable and Measurable Strategies with Detailed Deadlines

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines. The CAP must also provide substantial evidence for each strategy that implementation of the strategy will lead to the GHG reductions identified for that strategy.

In *California Riverwatch v. County of Sonoma et. al* (2017), the court stated that in CAPs used for tiering, “any measures or requirements imposed [must] be sufficiently defined to be enforceable.” This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The decision further states that measures that fall into the category of “wishful thinking, good intentions, and an intent to ‘work’ with others” violate CEQA (26). The measures within the CAP must be specific,

evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

#### Set 100% Clean Energy Target with Community Choice to be in Alignment with Region

Every CAP adopted by cities in the San Diego since 2015 -- San Diego, Del Mar, Solana Beach, Chula Vista, Encinitas, and La Mesa -- has included a 100% clean energy target with a commitment to pursue Community Choice.

There are three primary reasons for this: 1) achieving 100% clean energy is the most powerful single strategy a city can adopt to reduce GHG emissions, 2) Community Choice is the only feasible strategy to achieve 100% clean energy, since cities do not have control or jurisdiction over our monopoly utilities; and 2) Community Choice delivers myriad benefits to cities, including choice, lower rates for families, local decision-making, and the opportunity to keep revenues in the community.

We recommend that Escondido include a 100% clean energy target in its CAP with a commitment to Community Choice in order to achieve significant emissions reductions and community benefits and to keep stride with other cities across the region. It would be challenging, if not impossible, to reach state climate targets without a commitment to 100% renewables.

#### Set Walking, Biking, and Transit Mode Share Targets

Even 100% clean electricity won't get Escondido to the state climate targets. Escondido, like many other cities in California, must change the way the city grows and how people move around the city.

There are two main strategies available to Escondido to reduce drive-alone trips: 1) pursue dense, infill development — including affordable housing near transit — so that more residents live closer to their destinations and average trip distance decreases (and adopt policies that limit or eliminate new sprawl development), and 2) invest in supportive infrastructure and policies that encourage walking, biking, and transit. We recommend that Escondido include in its CAP targets and related strategies that support both of these approaches to vehicle emissions reductions.

These two approaches are mutually supportive and should be pursued concurrently to maximize GHG reductions and co-benefits, such as reduced congestion and improved air quality. Designing and building walkable, bikeable streets near transit will deliver the greatest results if those neighborhoods also benefit from transit-oriented development. Further, concentrating affordable housing near transit has a well-documented effect of decreasing driving, and all the more when transit is accessible on foot. Conversely, new sprawl development will cause emissions from transportation to continue to rise, even if the city emphasizes walkability and bikeability. Land use and transportation strategies must work hand in glove to reduce vehicle emissions.

We recommend setting ambitious targets for the percentage of trips that will be made by biking, walking, and transit and planning accompanying strategies, as well as identifying a vehicle miles traveled reduction target from land use policies that encourage dense infill development and affordable housing near transit.

### Include Best Practices As Described in 2017 CAP Report Card

In addition to the previous strategies, we recommend that Escondido include the following best practices adopted by numerous cities across the San Diego region. For more detail on the strategies and which cities have incorporated each into their CAPs, please consult CAC's [2017 CAP Report Card](#).

Additional strategies recommended for inclusion in Escondido's CAP:

- Energy efficiency and water conservation targets and accompanying ordinances
- Strategies to promote zero emissions vehicles (ZEVs) and convert the municipal fleet to ZEVs
- A commitment to zero waste by a specified date
- Quantifiable target for an increase in tree canopy coverage by planting and caring for drought-tolerant trees.

### **CAP Implementation & Monitoring Recommendations**

#### Commit to Annual Monitoring Reports and GHG Inventories At Least Every Three Years

Annual monitoring allows local governments and the public to gauge progress toward implementing CAP strategies and determine if a the City is on track to meet GHG targets. The monitoring report should be presented at a noticed public meeting each year. It should state clearly the progress made toward the performance measures set for each measure, as well as the actions taken that have contributed to that progress. For example, if the performance measure for implementation of an Active Transportation Plan is bicycle mode share, the metric that should be reported on annually is bicycle mode share. A GHG inventory, performed regularly and at least every three years, will help the city track progress toward its overall targets.

#### Include an Environmental Justice/Social Equity Section

Climate change hits hardest in low-income and communities of color that face a disproportionate pollution burden and have been left behind economically. The CAP should use CalEnviroScreen to identify and prioritize populations hit first and worst by climate change to be the first to benefit from implementation of CAP strategies.

CalEnviroScreen, the state of California's Environmental Justice screening tool, helps identify the communities most at risk of suffering the impacts of multiple sources of pollution and of climate change. These high-risk communities are frequently low-income communities of color that lack amenities such as safe pedestrian and bicycle infrastructure, parks, and street trees. There are several census tracts in Escondido that rank in the top 20% on CalEnviroScreen for poverty, housing burden, linguistic isolation, and lack of education.

We recommend that the city include in the CAP a section on social equity and green jobs that addresses how Escondido will ensure that the communities that are most at risk currently are the first to benefit from the implementation of CAP strategies. The development and implementation of this section should take place in consultation with a diverse set of stakeholders from the most impacted of the city's communities.

#### Establish a Public Implementation Taskforce

A public implementation taskforce allows for stakeholder involvement in an open, transparent process. The implementation taskforce should meet regularly and in public.

**Conclusion**

We hope to see Escondido emerge as a regional climate leader and strongly urge you to incorporate the recommendations enumerated above. We look forward to working with you to help you achieve the City's climate planning goals. Please do not hesitate to reach out to us as a resource. Thank you for the opportunity to weigh in on this critically important planning document.

Sincerely,

A handwritten signature in black ink that reads "Sophie Wolfram". The signature is fluid and cursive, with "Sophie" on top and "Wolfram" below it.

Sophie Wolfram  
Director of Programs  
Climate Action Campaign

## **Mike Strong**

---

**From:** Rick Paul <rickpaul01@yahoo.com>  
**Sent:** Tuesday, November 10, 2020 1:28 PM  
**To:** Mike Strong  
**Subject:** [EXT] Commissioner comments  
**Attachments:** Parking-Construction-Cost-Outlook.pdf

**CAUTION :** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Hi Mike,  
New document to share.  
Thanks  
Rick



THE STRONG MUSEUM OF PLAY PARKING STRUCTURE, ROCHESTER, NY

## PARKING STRUCTURE COST OUTLOOK FOR 2020

RAYMOND SMITH, PE, VICE PRESIDENT, WGI

**WGI** has specialized in parking structure planning and design since 1983, and our annual parking structure construction cost report provides an important planning tool for owners, contractors, and design teams.

WGI maintains a database of completed parking structure projects and developed a methodology to analyze the historical cost information to assist our clients and the industry. Our construction cost database contains hundreds of completed parking structure projects of varying size, scope, and geographic location. For this forecast, we only omit the cost of parking structures that are completely or significantly below grade, since their cost is much higher. The cost data is assigned factors based on the time of bidding and location of the parking structure. The time factor is based on the Building Cost Index (BCI), published by *Engineering News-Record (ENR)*. The location factor is taken from the yearly edition of the *RS Means Building Construction Cost Data*. Applying these two factors to actual construction cost data adjusts the cost to a current national basis and from that we determine the national median. The national median can then be re-adjusted to reflect a median construction cost in almost every city in America.

As of May 25, 2020, our statistical data indicates that the **median** construction cost for a new parking structure is **\$22,200 per space, or \$66.34 per square foot**; a 3.3% increase from 2019 when the median cost was \$21,500 per space. The table below lists the 2020 **median** parking structure construction costs in various U.S. cities with

the lowest cost shared by Charlotte, Dallas, and Miami, the highest in New York, and Kansas City, MO at the national median of 100.0.

It should be noted that the construction cost data **does not include costs** for items such as land acquisition, architectural and engineering fees, environmental evaluations, materials testing, special inspections, geotechnical borings and recommendations, financing, owner administrative and legal, or other project soft costs. Soft costs are typically about 15% to 20% of construction costs, but can be higher for owners who allocate their internal costs directly to the project.



Four-level parking structure constructed entirely of precast concrete with integrally colored precast and face brick.

## FOR COMPARISON, A MEDIAN-COST PARKING STRUCTURE TODAY TYPICALLY INCLUDES:

- 8'-6" to 8'-9" wide parking spaces
- Precast concrete superstructure
- Precast concrete façade with a basic reveal pattern
- Glass-backed elevators and unenclosed stairs clad with exterior glass curtain wall
- Standard wayfinding and signage
- Shallow-spread footing foundations

- All above-grade construction
- Open parking structure with natural ventilation; without mechanical ventilation or fire sprinklers
- Minimal or no grade-level commercial space
- Standard parking access and revenue-control system
- Standard energy efficient LED lighting

## TODAY'S PARKING STRUCTURE CONSTRUCTION COST WOULD BE HIGHER THAN THE MEDIAN IF IT INCLUDES THESE ENHANCED FEATURES:

- 9'-0" wide parking spaces for improved user comfort
- Cast-in-place post-tensioned concrete superstructure for lower maintenance costs
- Attractive façade with adorned precast, brick, metal panels, and other materials
- Storm-water management including on-site retention / detention
- Deep foundations such as caissons or piling
- Below-grade construction
- Enclosed stair towers due to local code requirements
- Enclosed parking structure without natural ventilation where mechanical ventilation and fire sprinklers are required
- Flexibility for future parking / building expansion, or incorporation of roof-level solar panels
- Service life in northern / coastal regions beyond a standard 50 to 60 years
- Grade-level commercial space
- Mixed-use development where the parking is integrated with office, retail, residential, or other uses
- Custom wayfinding and signage system
- ParkSmart® Certification following the Green Business Certification, Inc. (GBCI) program
- Energy efficient LED lighting with occupancy and photocell computer-control system
- Enhanced parking technology
  - License plate recognition
  - Parking-guidance system
  - Car-count system with variable-message LED signs
  - WiFi and cellular services
  - Solar-energy collection
  - Building Management System



384-space parking structure with brick and stone façade that complements the main building on the medical campus. The project is part of a multi-year, multi-phase expansion which includes a five-story medical office. Additional surgical areas will also be developed with the main hospital to better serve patients.



*Building Management Systems are often used to help manage technology*

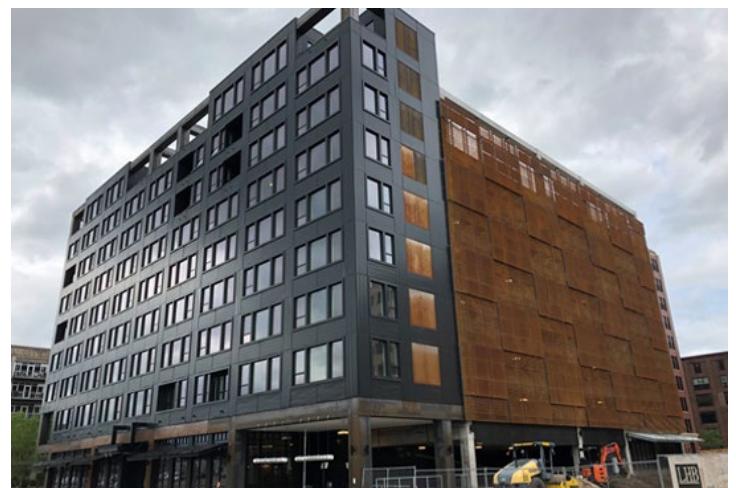
2020		▲ 3.3% FROM 2019	
City	Index	Cost/Space	Cost/SF
Atlanta	88.0	\$19,536	\$58.38
Baltimore	94.0	\$20,868	\$62.36
Boston	116.0	\$25,752	\$76.95
Charlotte - Lowest	85.0	\$18,870	\$56.39
Chicago	119.0	\$26,418	\$78.94
Cleveland	96.0	\$21,312	\$63.68
Denver	91.0	\$20,202	\$60.37
Dallas - Lowest	85.0	\$18,870	\$56.39
Detroit	101.0	\$22,422	\$67.00
Houston	87.0	\$19,314	\$57.71
Indianapolis	92.0	\$20,424	\$61.03
Kansas City, MO - Median	100.0	\$22,200	\$66.34
Los Angeles	112.0	\$24,864	\$74.30
Miami - Lowest	85.0	\$18,870	\$56.39
Minneapolis	106.0	\$23,532	\$70.32
Nashville	87.0	\$19,314	\$57.71
New York - Highest	132.0	\$29,304	\$87.57
Philadelphia	117.0	\$25,974	\$77.61
Phoenix	89.0	\$19,758	\$59.04
Pittsburgh	102.0	\$22,644	\$67.66
Portland	102.0	\$22,644	\$67.66
Richmond	88.0	\$19,536	\$58.38
St. Louis	101.0	\$22,422	\$67.00
San Diego	109.0	\$24,198	\$72.31
San Francisco	129.0	\$28,638	\$85.58
Seattle	109.0	\$24,198	\$72.31
Washington, D.C.	95.0	\$21,090	\$63.02
National Median	100	\$22,200	\$66.34

## PARKING INDUSTRY 2020 CONSTRUCTION ECONOMIC FORECAST

### FIRST QUARTER (PRE-PANDEMIC)

Heading into 2020 and prior to the Coronavirus (COVID) pandemic, the key concerns were still labor shortages in construction trades, tariffs, and trade relationships. The construction market showed signs of slowing down, but growth was expected to continue into 2020. Likewise, construction of mixed-use and stand-alone parking structures was to remain steady. Prior to the COVID pandemic industry experts reported the following regarding construction activity:

- The American Institute of Architects (AIA) chief economist Kermit Baker, PhD stated that, "design activity at architecture firms, historically a very accurate leading indicator of future construction activity, showed unexpected weakness earlier in 2019. However, design billings improved during the fourth quarter, and new projects coming into architecture firms saw strong growth toward the end of the year. So, while 2020 and 2021 are expected to see only very modest gains in construction spending nationally, the prospects of a more significant downturn over this period have dimmed recently." The article also reported that, "The American Institute of Architect's Consensus Construction Forecast Panel is projecting just a 1.5% increase in spending on nonresidential buildings this year and less than 1% increase in 2021, according to recently released results."<sup>1</sup>
- Turner Construction's *Turner Building Cost Index*, which tracks construction costs, indicated 1.29% increase in the fourth quarter of 2019 and a 4.84% increase during 2019. Its 2019 Fourth Quarter Forecast states that, "We continue to see the construction market fairly busy with several large projects starting in the fourth quarter of 2019."<sup>2</sup>



Eight-level, 400-space CIP PT parking structure. The development includes street-level retail, a nine-story residential building, and a 10-story office building.

- ENR reported in its 2019 Fourth Quarter Cost Report a forecasted 1.6% increase in the Building Cost Index for 2020.<sup>3</sup>
- ENR reported in its 2020 First Quarter Cost Report that, "The concern about the emergence of COVID-19, as the disease caused by the virus is known, has had surprisingly little impact on industry executives' views of the construction market in the near term, at least as seen in the latest results of ENR's latest Construction Industry Confidence Index (CICI) survey. It rose four points to 56 in the first quarter of 2020 from the fourth quarter of 2019 – an especially surprising result given that 44% of the surveys came in after the media began heavy coverage of the health crisis."<sup>4</sup>

### SECOND QUARTER (PANDEMIC)

During the pandemic shutdown, the AIA Architecture Billings Index (ABI) score plummeted to 29.5 in April, a new all-time low. Any number below 50 indicates a decrease in billing. The ABI serves as a leading economic indicator that leads non-residential construction activity by approximately 9-12 months. The northeast region was hit the hardest followed by the south region. Firms in the west region reported somewhat less dramatic losses than the other regions in April, but overall, all the regions had significant declines in billings.<sup>5</sup> This decrease in billings resulted in approximately 11,000 positions, or approximately 5.5%, lost in architectural firms in April. The construction industry also lost 995,000 jobs in April, 13% of the workforce.

The AIA published an April 6 update to its 2020 projections for the non-residential construction industry. The article stated, "The American Institute of Architect's Consensus Construction forecast panel is now projecting an 11% decline, with the sharpest decline predicted to occur in the commercial construction sector. While a slight 0.6% growth was originally forecast for 2020, it has now been revised down to a loss of 14%. Institutional construction spending will also be hard hit, although not quite as seriously as commercial with losses of 7% now projected versus 2.9% growth predicted in December."<sup>6</sup>

An article published by *For Construction Pros* on April 10, 2020, noted, "Dodge forecasts the square footage of parking garage starts this year falling 29%, office starts dropping 13%, retail space down 33%, and hotels and motels down 31%. The biggest commercial building sector — warehouses — however, is only expected to slip 1%."<sup>7</sup>

As the world tries to recover from this global pandemic and the economy here in the United States starts to open up, there remains uncertainty in the design and construction industry. AIA Chief Economist Kermit Baker, PhD noted, "A large portion of the design and construction industry remains mired in steep cutbacks as many businesses and organizations are still trying to figure out what actions make sense in this uncertain economic environment." He went on to add, "There are growing signs of activity beginning to pick up in some areas, but others are seeing a pause as pandemic concerns continue to grow."<sup>8</sup>

However, there are some positive signs out there. The housing sector seems to be quickly recovering. The AIA Architecture Billings Index (ABI), which plummeted to 29.5 in April, rose to 32.0 in May. Construction employment in May increased by 464,000 jobs.

## SUMMARY

What does all this mean for the construction of new parking structures and the median construction cost for these facilities in 2020? Before the COVID pandemic hit, the *American Institute of Architect's Consensus Construction Forecast Panel* was projecting just a 1.5% increase in spending on non-residential buildings and the *Engineering News-Record* forecasts a 1.6% increase in the Building Cost Index. As the economy starts to reopen, there is just too much ambiguity and not enough data yet to fully understand the complete impacts of the pandemic, but early indications point to a significant decline in the institutional (14% loss) and commercial (7% loss) sectors that traditionally build parking structures. With the potential reduction in material costs, the reduced labor shortages, and increased competition, parking structure costs in 2020 may actually decrease in some regions.

The parking professionals at **WGI** are happy to assist with the budgeting of your next parking structure. If you have any questions or would like specific cost information for your area, contact Raymond Smith at [Raymond.Smith@WGInc.com](mailto:Raymond.Smith@WGInc.com) or call us at 800.FYI.PARK (800.394.7275).

WGI is an ENR Top 500 engineering and consulting firm specializing in Land Development and Municipal Engineering, Traffic and Transportation Engineering, Parking Solutions, Geospatial Services, Subsurface Utility Engineering, Structural Engineering, Landscape Architecture, Environmental Sciences, Architecture, Land Planning, MEP Engineering, New Mobility Services, and Water Resources. The WGI Parking Solutions group specializes in parking structure design; structural engineering; parking studies; parking operations consulting; and restoration of parking structures, plazas, facades, and other buildings just as Carl Walker did for 33 years.

## REFERENCES

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## **Mike Strong**

---

**From:** Swift, Timothy <TimothyS@phenomenex.com>  
**Sent:** Monday, October 26, 2020 9:37 AM  
**To:** Mike Strong  
**Cc:** Laura Hunter  
**Subject:** [EXT] RE: Letter to Planning Commission - ECAG comments & final requests for ECAP inclusion  
**Attachments:** ECAG Comments Requests for ECAP\_Oct\_26\_2020 (004).pdf

**CAUTION :** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Mike-

I've reattached the commentary, this time in PDF format. Please pass along this one instead!

Tim

Timothy Swift  
Executive Account Manager

Phenomenex  
411 Madrid Avenue  
Torrance, CA 90501  
Cell: 358.784.1684  
Email: [TimothyS@phenomenex.com](mailto:TimothyS@phenomenex.com)  
Website: <http://www.phenomenex.com>

Follow us:    

**From:** Swift, Timothy  
**Sent:** Monday, October 26, 2020 9:04 AM  
**To:** Mike Strong <mstrong@escondido.org>  
**Cc:** Laura Hunter <earthlover@sbcglobal.net>  
**Subject:** Letter to Planning Commission - ECAG comments & final requests for ECAP inclusion

Good Morning Mike-

Please find attached an ECAG commentary letter for review and forwarding to City Staff & Planning Commission. In the letter we acknowledge the many significant improvements that have been made since the initial CAP draft release, and we also are requesting a few additional changes for PC/Staff consideration. The ECAG feels strongly that these final inclusions not only strengthen various ECAP adaptation & mitigation initiatives, but more importantly they will greatly enhance our ability to implement various measures (i.e. action & sustainment) to their fullest, and on appropriate & impactful timetable(s).

On a personal note and as stated at the bottom of the letter, Laura and I (on behalf of the full CAG) want to iterate our sincere thanks for the considerable time you've invested into listening/brainstorming/working with us (for the better part of a year now!) on such a noteworthy endeavor. We recognize the magnitude of the project, & we look forward to continuing to work with you and City Staff/Planning as we see this through to adoption and implementation.

Thank you!

Tim

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Escondido Community Advisory Group on Climate and Environmental Action  
Subcommittee on Equitable and Effective Measures for the ECAP



October 26, 2020

Escondido Planning Commission

City of Escondido

Via Email

**RE: ECAG comments on current draft Climate Action Plan**

Dear Planning Commissioners,

The Escondido Community Advisory Group on Environmental and Climate Action (ECAG) expresses our appreciation to City Staff for putting forth the revised draft Climate Action Plan (ECAP). We would like to acknowledge the many significant improvements made since the initial draft release, as well as request a few additional changes for your consideration as the plan continues to move forward.

**1. Areas of Significant Improvement in the latest draft ECAP**

The ECAG **strongly supports** the changes made on the following topics:

- Elevation of social equity and use of Cal Enviroscreen data to designate Priority Investment Neighborhoods. (PIN's)
- Inclusion of Climate Ambassadors program
- Clean Energy Equity Plan
- Commitment to evaluate & develop an existing home retrofit program
- Clean energy and clean transportation priority for PINs
- 90% waste diversion goal & plan for Zero Waste
- Improvements in urban forestry actions, and one tree per resident 2088
- Recommendation to avoid siting development in high risk & fire-prone areas
- Achievement of 100% renewables and zero-carbon energy by 2030
- Inclusion of Multiple Species Habitat Conservation actions
- Focus on riparian zones by improving the JRUMP and calling out partnerships for restoring riparian and habitat areas
- Adaptation focus on local food sourcing and community garden support

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- Commitment to coordinate on free Youth Passes and Electric Busses
- Inclusion of CAL Fire funding application
- And many other aspects!!

## **2. Areas Still in Need of Improvement**

There are still a few areas that we would like to see bolstered and improved. As staff responses noted, there are several areas and initiative proposals where the decision was deferred to the Council, and where a few important recommendations were not accepted.

***Here are some changes that we request in the document you forward to the City Council:***

### **A. Include at least 1 FTE Staffing along with creation of a Climate Commission for ongoing implementation**

A plan without a commitment to resources for sustainment will ultimately fail. Successful implementation of this new CAP will involve the City Council, Planning Commission, a full time Sustainability or Climate Coordinator to lead planning and coordination across City departments, the establishment of a new Climate Commission, and coordination with other current boards and commissions.

Therefore, to ensure successful & timely implementation of ECAP plans & initiatives, we STRONGLY request that a commitment be made to install a full-time equivalent staff member to serve in a Climate Plan coordinator capacity, alongside the creation of a community-based Climate Commission.

The ECAG recommends the Climate Commission include representative stakeholders and experts to provide ongoing program support and guidance, identification of potential funding sources, partnerships. The commission will also be responsible for the monitoring of implementation, and will serve as a clearing house for information about the ECAP.

The Climate Commission should be required to meet quarterly (at a minimum) to discuss and review progress in implementing the ECAP initiatives, including, but not limited to:

1. Developing recommendations to Planning Commission and City council about future actions that have a nexus with climate issues.
2. Assisting with identification and support of grant and program funds
3. Advising on the Community Choice Energy Feasibility Study findings and proposals

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4. Advising city on legislative positions
5. Providing a public forum for climate-interested residents to interact, learn, and share information.

Finally, significant staff resources are requisite to pursue cross collaboration with the San Diego Association of Governments (“SANDAG”), the County of San Diego, other public and private agencies, and adjacent cities to implement strategies and measures requiring cohesive regional partnership. The limited resources available annually to the City does not allow every strategy and measure to be funded and implemented simultaneously.

**B. Move up many target dates for action**

We want to reiterate and repeat our request to request that many actions/measures be achieved on an earlier time schedule than is currently specified, and in instances where it makes sense, also include iterative timetables and objective milestones. All of these recommendations are included in our earlier commentary submittal. Many of the ECAP initiatives are of critical value/importance, but when the timelines are set too far out, it nullifies the opportunity for progress. For example, we believe it is important to achieve 90% diversion of solid waste by 2030 and to synchronization traffic signals over the new few years (not 2030). And in some cases, an initiative is simply a “consideration” or an “evaluation” line item, and not a measure itself. We recognize the importance of capturing these in the ECAP (for example, feasibility studies), however our stance is that they should not have timelines set 4-5 years+ down the line.

**C. Add all SANDAG Smart Growth areas to Measure T-3.6 Increase Transit Commuters Among New Downtown Residents**

The plan to reduce vehicle miles traveled is still very weak. We concur with staff that this is a difficult nut to crack, but it is one of the most critically important areas of focus for a northeast county city of commuters. We request the following be included In Measure T-3.6:

*Increase proportion of community using transit in all Smart Growth areas designated by SANDAG.*

**D. Include actions related to plastic in Solid Waste action and improve performance date.**

We request the following edits (in yellow) in the Performance metrics under Measure S-8.1

- Work with the franchise waste hauler and other partners to assess the infrastructure needed to support composting and waste diversion goals.

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- Develop a Zero Waste Plan that includes **plastics reduction** to support zero waste programs. Without a plastics focus, 90% diversion is virtually impossible.
- Prioritize community education to **PIN's** (priority investment neighborhoods) and **local businesses**
- Start building the necessary infrastructure for waste diversion and anaerobic digester processing.
- Move up the citywide **diversion rate goal for 90%** to 2030

**Supporting Actions Edits:**

- Explore opportunities with franchise waste hauler and other local business organizations to develop and encourage participation in commercial food scrap collection and **plastics reduction** programs.
- Explore partnership with the Escondido School Districts to work on **Zero Waste Schools Initiative**.

**E. Add water conservation actions for existing residential and commercial properties.**

Water use, especially in our region, is a huge contributor to GHG emissions. The current actions in the ECAP unfortunately apply only to city properties and new projects, and so we request that the following additions be made for existing properties as well. Please note that a program is not the same as a mandate or regulation. It can also consist of education, soliciting funding assistance, and voluntary. Water conservation and building retrofits make so much sense, and we are confident that these programs will be successful if they are in place. This can also be easily be dovetailed into the home retrofit program:

1. Develop program to reduce residential and commercial landscape water consumption
2. Measure to make water efficiency inspections free upon request, as well as required for home plumbing & irrigation after home sale or new rental occupancy

**F. Add removal of development potential on habitat lands to increase carbon sequestration in Chapter 3, Measure C-9.3**

We strongly support the intent expressed in the adaptation chapter to avoid density in high-risk areas. However, this action can also contribute to climate improvements as well. We request that a commitment to remove the development potential for at least **500 residential units** on chaparral open

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space by 2020 and ensure its preservation as carbon sequestration. Such an action could be responsible for hundreds of tons of carbon sequestration per year.

#### G. Bring carbon neutrality in alignment with State goal of 2045

We appreciate the inclusion of an intention to bring the city to carbon neutrality. The ECAG requests that this goal be consistent and in alignment with the State of California goal of achieving it by 2045.

#### H. Remove increase of fire modification zones and refocus fuel breaks in A 2-3.

In order to **reduce resource costs** and to **prevent more flammable conditions**, we wish to modify the "implementation of brush clearing and fuel breaks" to contain the following:

- Focus on maintaining current fuel breaks from being overtaken by exotic, flammable grasses.
  - As ecological disturbance in chaparral contributes to more flammable conditions with the influx of weeds, research has shown that *fewer, more strategically placed and maintained* fuel breaks have a greater impact on fire management.
- Limit fuel breaks to areas along the wildland–urban interface, instead of remote or backcountry areas, where firefighters will have better access to the fuel breaks.
  - It's been demonstrated that fuel breaks will typically not stop fires without firefighter presence.

In order to protect homes from wind-driven embers, we request **deletion of the intent to expand the fire modification zone to 150ft or 200 ft.**

- A CalFire EIR acknowledged that these kind of modification zones are not effective in the wind-driven fires we have locally. Creating a 200- foot zone instead of a 100-foot zone will, in too many cases, just mean larger weedy and flammable areas around vulnerable homes.
- Wind-blown embers, which can travel one mile or more, were the biggest threat to homes in the [2007] Witch Creek Wildfire [San Diego County, CA]. There were few, if any, reports of homes burned as a result of direct contact with flames" from wildland fuels. Removing vegetation past 100 ft leaves homes more vulnerable to traveling embers, especially since bare areas are known to proliferate embers.

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*Syphard, A.D., J.E. Keeley, T.J. Brennan. 2011. Comparing fuel breaks across southern California national forests. Forest Ecology and Management 261: 2038-2048.*

*Koo, E, R.R. Linn, P.J. Pagni, and C.B. Edminster. 2012. Modeling firebrand transportin wildfires using HIGRAD/FIRETC. International Journal of Wildland Fire 21: 396-417.*

In closing, we would like to iterate our sincere thanks and gratitude to Community Development Director Mike Strong, as he has spent considerable time listening, brainstorming, and working with us closely towards the positive goal of addressing the climate crisis. We truly hope this has been both an educational and rewarding experience/process for all involved, and the ECAG feels that if we can work towards making the above noted changes and inclusions, we indeed will succeed in securing (& implementing!) the best Climate Action Plan in the County!

Sincerely,

Tim Swift