



Serving San Mateo, Santa Clara, and San Benito Counties

February 22, 2021

To: City of Santa Clara Mayor Gilmore, Vice Mayor Chahal, and City Councilmembers Watanabe, Hardy, Park, Jain, and Becker
(via email to: MayorandCouncil@santaclaraca.gov)

Cc: City Manager Santana (Manager@santaclaraca.gov) and Associate Planner Agrawal (NAgrawal@SantaClaraCA.gov)

RE: Santa Clara's Climate Action Plan Update

We live in a climate crisis which threatens the survival of organized human life on Earth. Meanwhile, the federal government has weakened environmental regulations and accelerated the construction of fossil fuel projects. However, strong climate policies from Bay Area cities are already influencing state level policy. Time is running out, and our best opportunity for climate action is for cities to lead the way with strong local policies.

According to the [Risk Finder tool by ClimateCentral.org](https://riskfinder.climatecentral.org), the City of Santa Clara has property at risk during a 3 ft flooding event combined with sea level rise. The probability of a 3 ft flood event by 2030 is estimated at 35% – 68%, and by 2050 the probability range is 76 % – 100%¹. In addition, the Silicon Valley 2.0 Climate Change Vulnerability Assessment tool² shows that by mid-century 27 million sq ft of buildings, 490 acres of land and 29 miles of roadway in the City of Santa Clara are classified as having High or Moderate Vulnerability to riverine flooding. By 2050, economic impact in the City of Santa Clara from replacement costs, interruption of economic activity, and loss of fiscal revenue is predicted at \$4.5 billion mostly due to buildings and roadways affected by riverine flooding.

The only certain way to mitigate climate change and delay and minimize sea level rise and flooding is to dramatically reduce greenhouse gas emissions (GHG).

¹ ClimateCentral.org Risk Finder Assessment for City of Santa Clara: https://riskfinder.climatecentral.org/place/santa-clara.ca.us?comparisonType=place&forecastType=NOAA2017_int_p50&impact=Property&impactGroup=Buildings&level=3&unit=ft&zillowPlaceType=place

² Silicon Valley 2.0 Climate Change Vulnerability Assessment Tool using inputs of: Geography: City of Santa Clara / Climate Variables: Sea Level Rise, Riverine Flooding, Wildfire and Extreme Heat / Horizon Year: Mid-century- 2050 / Emissions Scenario: B1-Low / Sea Level Rise Scenario: zero cm and no storm surge / Assets: All assets selected (parcels, buildings, transportation, energy, wastewater, communications, hazardous materials and coastal protection). <http://siliconvalleytwopointzero.org/vulnerability>

To this end, we recommend that Santa Clara set GHG reduction goals well beyond the current state targets and focus its Climate Action Plan (CAP) on feasible mitigation policies that are, as advised by the UN's Intergovernmental Panel on Climate Change (IPCC), "rapid, far-reaching and unprecedented."

In addition, Santa Clara must strengthen itself against climate impacts by including a vulnerability and adaptation plan for relevant risks such as riverine flooding, extreme heat and wildfire impacts.

In order to support your development of a strong CAP, we invite you to complete the attached **Climate Action Plan Assessment Form**, which lists the elements of a CAP that we consider most critical. We recommend that Santa Clara streamline its CAP to focus on the measures that will achieve the largest reductions in greenhouse gas emissions and also consider adopting an abbreviated format,³ so that the document is more accessible to all readers, including decision makers and members of the public. The "Multi-Criteria Analysis" in the Cascadia Consulting Group "Initial Actions List" only weights 'Impact' (like GHG emissions reduction) at 30% of the priority ranking which could end with leaving out actions that are necessary to achieve 2030 and 2050 targets.

We recognize the unique position of the city with respect to Silicon Valley Power (SVP). Community Choice Energy entities are accelerating the transition to renewable and greenhouse gas free electricity and SVCE (for example) already provides greenhouse gas free electricity to all customers - residential and commercial. Although there are complexities for SVP to transition completely from fossil fuels, it is likely the single biggest step the city can take to reduce greenhouse gas emissions. It is a critical and necessary step to take as soon as possible to leverage the gains in shifting residential and commercial new construction and existing buildings to all-electric.

We appreciate the opportunity to present you with recommendations for climate action and are available for any further clarification. We look forward to working with Santa Clara staff and City Council to create the strongest Climate Action Plan possible.

Respectfully submitted,



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

³ For an example of an abbreviated Climate Action Plan, see City of Menlo Park 2030 Climate Action Plan, July 2020, <https://menlopark.org/ArchiveCenter/ViewFile/Item/11486>

Handwritten signature of Gita Dev in black ink.

Gita Dev, Co-Chair, Sustainable Land Use Committee, Loma Prieta Chapter, Sierra Club

Handwritten signature of Kristel Wickham in black ink.

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

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

Climate Action Plan Assessment Form

Please use the form below as suggestions for Santa Clara's Climate Action Plan Update and send it to the Sierra Club Loma Prieta Chapter's Climate Action Leadership Team at dashiell.leeds@sierraclub.org.

Action #	Description	Included in CAP?	Comments
1	Adopt a bold goal to reduce community wide GHGs by at least 80% by 2030, given that scientific findings now show California's goal of a 40% reduction is no longer sufficient to address the severity of the crisis. ⁴ <u>Select Option 3 from Raimi + Associates memo from 11/3/20 Re: Recommend and Forecast GHG Targets</u>	<input type="checkbox"/>	
2	Specify all resources required to implement each action in the plan, including dollar amounts, staff hours and task owners.	<input type="checkbox"/>	
3	Identify approximately 10 easy-to-track metrics to help Council members and the public gauge success of the plan and define a quarterly reporting frequency for those metrics.	<input type="checkbox"/>	
4	New buildings: plan to immediately stop the expansion of natural gas fueled infrastructure by enacting a strong All Electric Reach Code ⁵ requiring all new buildings to be 100% electric. Mixed fuel options, even if highly efficient, will 'lock-in' natural gas usage for decades. Especially for residential where SVP provides GHG free electricity, all-electric is especially important.	<input type="checkbox"/>	
5	Existing buildings: create a plan to reduce 80% of GHG emissions from existing buildings by 2030, which can be accomplished with a "Burnout Ordinance" paired with rebates and financing that together aim to phase out the burning of natural gas in existing buildings, as was proposed in Menlo Park's CAP. ⁶ The Cascadia Consulting Group's "Initial Actions List for City of Santa Clara Climate Action Plan Update" for Buildings and Energy Strategy 1 notes an action for "Electrification incentives & financing". As a first effort, we applaud the specific action to encourage fuel switching in existing buildings through "options for low- or zero-interest financing", specifically if payments are paid through the utility bill.	<input type="checkbox"/>	
6	Create a plan for reducing vehicle miles traveled by 25% , which can be accomplished by a) rezoning to encourage higher density near transit and b) creating a Green Streets network ⁷ that makes the City easier and safer to navigate without a car. ⁸	<input type="checkbox"/>	

⁴ Palo Alto has adopted a goal of 80% GHG reduction by 2030. Menlo Park's adopted goal is 90% GHG reduction by 2030.

⁵ See pages 23 – 30 of Mountain View's Chapter 8 Building Code Modifications effective January 1, 2020.

<https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=31140>. See also Sunnyvale's all-electric reach code for residential and non-residential new construction effective January 26, 2021.

<https://sunnyvale.ca.gov/news/displaynews.htm?NewsID=645&TargetID=49>

⁶ City of Menlo Park 2030 Climate Action Plan, July 2020, <https://www.menlopark.org/ArchiveCenter/ViewFile/Item/11486>

⁷ Sierra Club Guidelines for a Green Streets Network:

<https://www.sierraclub.org/sites/www.sierraclub.org/files/sceauthors/u4142/Sierra%20Club%20Loma%20Prieta%20Open%20Streets%205-1-20.pdf>

⁸ For an example of a City that has implemented Green Streets, see Oakland's Slow Streets Program,

<https://www.oaklandca.gov/projects/oakland-slow-streets>

7	<p>Create a plan to further increase access to electric vehicle (EV) charging, especially for those living in multi-family housing and where charging can be done during the day, when clean solar energy is increasingly abundant on the electric grid. Please incorporate the proposed action for “Multifamily EV Chargers” when adopting the Reach Code.</p>	<input type="checkbox"/>	
8	<p>Create a plan to replace 100% of the City’s municipal assets that currently use fossil fuels with efficient electric alternatives, including but not limited to: gas pool heating equipment, gasoline and diesel municipal fleet vehicles, gas furnaces, gas water heaters and gasoline-powered landscaping equipment. These three suggested actions by Cascadia Consulting Group are a good start: “Municipal Electrification Action Plan”, “Electrification of municipal fleet”, and “Municipal Sustainable Procurement Policy></p>	<input type="checkbox"/>	
9	<p>Create a climate adaptation plan focused on protecting areas of the community vulnerable to riverine flooding and extreme heat events, as forecasted by the National Oceanic and Atmospheric Administration (NOAA) and Silicon Valley 2.0 Climate Change Preparedness Decision Support Tool.</p>	<input type="checkbox"/>	
10	<p>Create a Citizen’s Advisory Commission or Sustainability/Environmental Commission to support the development of the updated CAP, and then to review progress on the implementation.</p>	<input type="checkbox"/>	