



August 5, 2024

Russ Cunningham
Principal Planner
Development Services - Planning

RE: SUPPORT and RECOMMENDATIONS for the City of Oceanside Draft Climate Action Plan Update

Dear Mr. Cunningham,

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves, and beaches, for all people, through a powerful activist network. Surfrider recognizes that climate change poses an existential threat to San Diego County's coastal communities and economy. Extreme weather events, sea level rise, and ocean acidification are putting our coastline at risk, impacting everything from beach-going to ocean recreation.

These impacts are already being felt in Oceanside. Rising sea levels along the city's highly eroded coastline, left unabated, could exact a devastating toll on beach access, surfing resources, marine life, coastal infrastructure, and the robust local economy built upon these treasured community assets. For these reasons, Surfrider urges the City of Oceanside to take its climate commitments seriously and vigorously pursue them. We appreciate the effort that went into the City's Draft Climate Action Plan (CAP) Update and thank you for the opportunity to provide comments.

Surfrider generally **SUPPORTS** all the greenhouse gas (GHG) reduction measures and implementing actions in the CAP Update. Please accept the following comments, suggestions, and recommendations aimed at strengthening the CAP Update to further reduce GHG emissions and improve overall sustainability in Oceanside. We've organized our comments by CAP Update Section. If a CAP *Measure* or associated *Implementing Action* is unmentioned, please assume it has our full support.

Section 1.3, 2024 Climate Action Plan Update: *Scope of the CAP Update*

Surfrider understands that the CAP's main focus is on efforts the City can take to reduce emissions within its geographic boundaries, and that some emissions are therefore left out of



the CAP. However, we disagree with the statement that “agriculture and use of consumer products... are outside of the City’s authority to regulate” and suggest that the CAP include multiple actions that contradict such a statement.

The City *can* regulate the use of consumer products to a certain extent, as evidenced by the 2023 Marine Debris Reduction Ordinance which regulates the distribution of polystyrene foam and single-use plastic bags within city limits. Recommendations from staff in this document could foster eventual City Council approval of additional regulations that would lead to GHG reductions, including additional regulations on single-use plastics, gas-powered gardening equipment, synthetic turf, and more. We will detail these recommendations in our line-item comments on Transportation and Solid Waste.

Section 2.2, Local Climate Change Impacts

We applaud the inclusion of local impacts in this update, including those that rising seas will continue to inflict upon Oceanside’s eroded coastline. The CAP Update states that in response to the threat of rising seas, “the City is currently updating its Local Coastal Program and has developed this CAP Update to reduce its contribution to climate change and establish a long-range vision for the community.”

Surfrider is highly supportive of an Oceanside LCP Update. However, our correspondence with both City Planning staff and Coastal Commission staff has led us to conclude that efforts to update the City’s LCP have been largely paused since 2020. We encourage the City to refocus on an LCP Update and to include a target date for such an update in this CAP Update (or the larger GPU). While an LCP Update may not qualify as a GHG-reducing action (i.e. mitigation), it will certainly include important climate change adaptation. Similar to many of the General Plan elements being updated concurrently with the CAP, Oceanside’s current LCP is from the 1980s and no longer reflects current realities in the Coastal Zone.

Section 4.4, Detailed GHG Reduction Measures and Implementing Actions

Energy

Surfrider supports all five Energy measures and their respective implementing actions, especially *E-3: Launch an “Energy Upgrade Oceanside Program,”* which shows the highest potential for GHG reductions according to the CAP Update. We applaud and encourage the City



to adopt a reach code that requires not only retrofits *but also new builds*, to meet “an efficiency level based on a scoring criterion.” Since all-electric reach codes were recently struck down in California courts, setting efficiency standards that encourage, and essentially mandate, electrification is currently one of the best tools the City can use to cut emissions in its existing and future building stock.

Such a reach code was already considered by City staff, but added to the *Future Measures and Actions for Consideration* section of this CAP Update. Our climate crisis demands action today, therefore we ask that the goal of enacting such a high-performance reach code be added to this update rather than logged as a potential future action.

We would also like to see stronger language regarding the City’s transition away from natural gas in its own buildings. This is an area that is completely under City control and must be prioritized.

Transportation

We support all six Transportation measures and their respective implementing actions, but urge the City to set more ambitious goals for reducing VMT since road transportation is the leading contributor to local GHG emissions by a wide margin. Surfrider urges the City to harmonize its VMT reduction goals with the 2022 CARB Scoping Plan, which sets out to reduce VMT by 25% in urban areas by 2030 (from 2019 levels). This is far more ambitious than the CAP Update’s current goal of a 6% VMT reduction by 2045.

Please consider the inclusion of the following implementing actions, which could aid in achieving a higher VMT reduction in the City of Oceanside:

- Recommend an ordinance/land use change to prohibit the construction of new drive-thrus citywide to counter the additional VMT, idling, and traffic on our public roads that drive-thrus encourage. Because they encourage additional VMT and associated GHG emissions, the addition of more drive-thrus in Oceanside conflicts with the VMT and GHG reduction goals in the CAP Update. And yet, these developments are still being approved, as evidenced by the recent opening of a Better Buzz drive-thru on Coast Hwy and the 2023 approval of four drive-thrus within the commercial area of El Corazon Park.



- Focus Action TR-2.7's "transit-supportive treatments on 25% of transit routes by 2045" along the Smart & Sustainable Corridors and adjacent roadways to increase connectivity between the corridors and Coast Hwy. The potential lack of connectivity between the corridors is one of our biggest concerns with the SSCSP as written. There must be North-South active transportation and transit connectivity between all three corridors at various points along them.
- In addition to adding Transit-Signal Priority bus service (Action TR-2.5), consider the implementation of transit-only lanes along major corridors and arterials where feasible. We do not support adding a lane on College Blvd. because it runs contrary to the VMT and GHG reduction goals in this CAP Update. However, if that plan is already in motion and too late to prevent, please consider making it a transit-only lane.
- Add restrictions on new gas stations in the City, ideally banning them altogether if staff agrees that Oceanside already has enough to service its current population. A less assertive idea would be to allow a maximum number of allowable stations within a certain radius. While reducing new gas stations may not decrease GHG emissions on its own, Oceanside should not be doubling down on fossil fuel infrastructure when California has made strong commitments to move away from fossil fuel automobiles. Indeed, the Adjusted Business as Usual (ABAU) calculation that forms the basis of this CAP Updates' emission reduction goals relies heavily upon statewide climate commitments. Chief among those statewide commitments is moving away from gas-powered vehicles.
- Surfrider supports the addition of a bikeshare program in Oceanside (TR-4.2), but encourages City staff to include consideration of dockless programs as well, especially in areas where they would be easier to implement. The docked bike-share company that Encinitas uses, BCycle, recently went out of business. Meanwhile, several dockless companies now offer fleet options for riders of all ages and abilities (see [VEQ](#)), including those with disabilities who cannot operate traditional pedal bikes/e-bikes. Dockless programs, when managed effectively and limited to specific areas, can offer more flexibility than their docked counterparts.
- To further reduce VMT and make alternative transportation more attractive, implement quick-build projects that transform congested roadways into [Slow Streets](#), as defined by NACTA. Offering residents and visitors attractive opportunities to get out of their cars is an important VMT reduction consideration that should be written into the CAP Update



(such a strategy is hinted at in the SSCSP, for example, as a way to bring life into the large strip mall parking lots along Vista Way). We offer two coastal/downtown locations to consider, but encourage staff to add other locations based on where Slow Streets would be feasible and benefit local communities.

- The Strand South between 1st St. and Wisconsin St. This is an incredibly popular stretch for active transportation uses that is currently dominated by slow-moving cars that “cruise” The Strand with nowhere to go - there is no parking or stopping along this one-way stretch. Shockingly, cars are the slowest moving form of transportation along The Strand, where traffic resembles a drive-thru line during peak hours. City staff should recommend a pilot project to eliminate thru traffic on The Strand South, perhaps starting on weekends. Residents and short-term renters could be issued dashboard placards allowing them legal access to and from their places of lodging.
- N Tremont Ave. between Mission and Civic Center Dr. is another prime candidate for a Slow Street pilot project. The popularity of the weekly Sunset Farmer’s Market at this location has proven, without a doubt, that pedestrians will flock to downtown Oceanside when a combination of space and attractions is provided to them.
- In addition to the Safe Routes to Schools program (TR-4.5), work with OUSD to leverage federal funding opportunities for implementing all-electric school buses, and think creatively about strategies to minimize single-occupant car trips by parents to drop off and pick up their children from school (bus vouchers, carpool incentives, digital options to assist parents in carpooling, etc.). Daily school commutes factor into Oceanside’s VMT, and are likely easier for the City to reduce than daily work commutes to other cities.
- Continue to prioritize the completion of an Oceanside Inland Rail Trail (IRT) along with continued improvements to the Coastal Rail Trail (CRT). Cities along the Sprinter route passed a resolution in support of the IRT in 1995; 30 years later, construction of the IRT in Oceanside has not yet begun.
We’re thankful that an IRT feasibility study has recently been funded and approved, but future steps cannot take another 30 years.



- Surfrider urges the City to implement stronger language for the conversion of non-road equipment to all-electric (TR-5). We support efforts to encourage trade-in of gas-powered lawn equipment, but to ensure maximum GHG reductions, please suggest an ordinance similar to the gas-powered leaf blower ban passed in the City of Encinitas and over 100 other municipalities in the US (this is an implementing action in Carlsbad's Draft CAP Update as well). Re: Action TR-5.5, the *preference* for contractors that utilize electric and/or renewable diesel-fueled equipment should be changed to a *requirement* (unless no bidding contractor qualifies). Such an action would incentivize local contractors to upgrade their equipment to low/zero emission technologies.

- We support the full suite actions within TR-6 regarding the implementation of smart growth policies within the Smart & Sustainable Corridors Specific Plan (SSCSP) & Coast Hwy Incentive District (CHID), with the following suggested modifications:
 - Action TR-6.3: support an ordinance to *eliminate* minimum parking requirements rather than reduce them; *require* shared or unbundled parking for development in the SSCSP and CHID plan areas for developers to take advantage of "by-right" approval.

 - Action TR-6.5: we are highly supportive of creating a Complete Streets criteria checklist for CIP roadway construction and maintenance projects, however, this action seems to lack teeth outside of requiring a "review" of CIP projects for opportunities to incorporate complete street improvements. Is there an avenue to mandate complete street improvements for CIP projects, unless Public Works can specifically warrant an exception?

 - Lastly, we're concerned that the SSCSP may not sufficiently earmark developer fees to pay for active transportation and transit infrastructure improvements along the corridors. Such improvements are necessary to realize the VMT reduction potential of concentrating growth and additional density along the corridors. Please do everything in your power to ensure that funding is specifically allocated to active transportation and transit infrastructure improvements along the corridors, and that such improvements incorporate a holistic, networked approach to ensure connectivity between the corridors, to and from transit stops, and to and from the existing San Luis Rey bike trail and future IRT.

Water



Surfrider supports the Measures and Implementing Actions laid out for GHG reductions in the Water sector, however, we urge the City to formulate more ambitious goals than a 6% reduction in citywide water usage by 2045. Per capita water consumption has gone down nearly 40% in San Diego County since the 1990s. While impressive, this reduction in water usage represents only a fraction of what is possible. We encourage the City to propose additional incentives and/or requirements for native and drought-tolerant landscaping and greywater installation for both residential and nonresidential development and remodels.

Solid Waste

Surfrider supports and applauds the entire suite of solid waste Solid Waste Measures and Implementing Actions.

- We recommend adding a Measure SW-2 implementing action (along with a recommendation for a concurrent Zero Waste Plan update) for the City to approve additional Marine Debris Reduction Ordinances focused on ending the distribution of common single-use plastic items that are either highly susceptible to becoming litter in our environment, and/or are not currently recyclable by Waste Management North County. The simplest and most effective way to achieve such a goal could entail an ordinance that requires all foodware and accessories to be reusable or compostable, with few exceptions. Certified compostable and reusable replacements currently exist for the entire suite of common single-use plastic items used by restaurants, markets, convenience stores, and other businesses. The City of Carlsbad passed a similar ordinance that is currently in effect citywide. GHG emissions related to disposable plastics are not fully or adequately represented in this CAP Update, because Oceanside neither produces nor landfills these products. But that does not mean these emissions are not significant. Equity considerations in passing a similar ordinance in Oceanside could include the following actions:
 - A County Community Enhancement Grant (or similar) to fund a voucher program for qualifying small businesses to receive free or reduced-cost compostable replacement items
 - A bulk buying program to lower costs for businesses, administered by either/both the Oceanside Chamber of Commerce, Mainstreet Oceanside, Green Oceanside, or other location-based business improvement districts in the city.



- An additional stipulation requiring food-service businesses to accept reusable and refillable cups and containers for takeout items, with certain exemptions if necessary for businesses with space constraints or other hardships. Current California health code already has legal carve-outs for customers who wish to bring their own cups or takeout containers, but does not *specifically require* businesses to accept them.
- We also encourage the CAP Update (and Zero Waste Plan) to support the prohibition of synthetic turf, or at the very least, to recommend a study to preface supporting such a recommendation. City action to ban synthetic turf is specifically allowed via [SB 676](#), which removed turf from being included as “drought-tolerant landscaping” that cities cannot prohibit. Synthetic turf is often touted by cities and developers as environmentally beneficial because it requires less water. However, synthetic turf is made from plastic and includes PFAS and other harmful chemicals known to have negative health consequences on those who use them (often children). Furthermore, plastic turf deteriorates over time and brings plastics and harmful chemicals into our waterways.

Carbon Sequestration

Surfrider supports and applauds the entire suite of solid waste Carbon Sequestration Measures and Implementing Actions. Please see our suggestions below.

- In addition to Action CS-1.2 which only deals with replacing trees removed by development, we support requiring native and/or drought-tolerant trees that provide shade canopy whenever and wherever possible to a maximum extent. The City has enough palm trees and Eucalyptus trees, both of which are considered invasive by the California Invasive Plants Council. If Oceanside’s urban forestry standards are not yet harmonized with the CA Invasive Plant Council and CA Native Plant Society’s standards and recommendations, we would ask that such action take place as soon as possible.
- We encourage the City to include wetland restoration goals in addition to tree planting and habitat/farmland restoration. Coastal wetlands sequester and store more carbon than terrestrial forests, but only 10% of California’s historic wetlands remain. The planned Loma Alta Creek wetland restoration is an example of a city-led effort with carbon sequestration potential. Additional opportunities likely exist along the San Luis Rey and Buena Vista Lagoons, as well as potential restoration opportunities within the Harbor waters.



Section 5: Implementation and Monitoring

Similar to the 2019 CAP, this CAP Update stresses the importance of involving the public in the CAP process, as well as regularly monitoring both implementation actions and their effect on reducing GHG emissions in Oceanside. Surfrider supports these goals and encourages the City to make good on them, especially by implementing a CAP Annual Report that is publicly available, easily accessible via the City's website, and presented to the City Council and relevant City boards & commissions.

The 2019 CAP stated a similar goal of presenting an "annual progress report" to the City Council. However, these annual progress reports either do not exist, or are difficult to find on the City website. A detailed search only yielded one such City Council [CAP Implementation Progress Report](#) from September 28, 2022. This document was not findable via a basic search on the City website; instead, it required a search of the City Council archives. Additionally, the introduction to the report includes the following admission (abridged):

"To track and share implementation progress with the public, the CAP calls for annual monitoring and reporting... Because of staffing challenges, the City has not consistently reported CAP progress, however, steps are being taken to develop a more consistent reporting system."

Surfrider urges the City to reprioritize annual CAP implementation monitoring and reporting once this CAP Update is finalized. We applaud the creation of an Oceanside Sustainability Program Administrator position to ensure that ongoing CAP Updates will occur moving forward. We highly recommend the creation of a dedicated webpage on the City's website, similar to those of [Carlsbad](#), [Encinitas](#), [San Diego](#), [La Mesa](#), [Imperial Beach](#), and most other cities within San Diego County. Most, if not all, of these CAP web pages are easily accessible for residents and include annual CAP reports. If Oceanside truly means to involve the public in its efforts to reduce GHGs and reach state-mandated goals, then these documents should be easily accessible via the City website.

Thank you for the opportunity to comment on this critical document, which will guide Oceanside toward a more sustainable future. Please consider our comments and recommendations to increase the GHG reduction goals outlined in the CAP Update, along with any necessary



changes to the other Draft General Plan Update documents that inform this CAP Update. Surfrider thanks City staff for their commitment to climate action.

Sincerely,

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