



March 17, 2021

Mayor Gloria and Council  
City of San Diego  
202 C St.  
San Diego, CA 92101  
Via Email

**Re: Comments on the Performance Audit of the City's Climate Action Plan & Recommendations**

Dear Mayor Gloria and Council,

We were pleased to see the Performance Audit for the City's Climate Action Plan (CAP), a landmark document passed in 2015 to help the City slash its carbon footprint in half and help make the city climate safe and climate ready.

Upon review of the audit, **we agree with all the findings and recommendations** made in the report. We also appreciate that our annual Climate Action Report Card was referenced to help evaluate the successes and failures of the CAP's implementation.

However, we are concerned that the audit does not go far enough or deep enough into the specific areas where the city is falling short in implementing the CAP. We are not told which CAP strategies the City is behind on, how far behind, and what needs to be done to get back on track. As a legally binding document created to protect residents from the worst impacts of the climate emergency, the lack of specificity is problematic.

Along with the audit recommendations, we want to provide these additional recommendations:

- **Request an Accelerated Timeline for Implementation:** In the Sustainability Department's Response to the Audit, "Management Response to Performance Audit" dated 02/17/2021, the Sustainability Department identifies implementation and

completion dates for the recommendations in the audit, some extending as far as December 2022. Unfortunately, the City's legal GHG reduction commitments and the rapidly accelerating climate crisis do not afford the City these lengthy timelines. **We urge the Sustainability Department and Mayor's Office to revise these timelines to be significantly more ambitious, and commit to implementing as much as possible this year.**

- **The Mayor's Office and/or Chief Operating Officer Should Lead & Coordinate Implementation of Recommendations:** In order for the City to effectively implement these recommendations requiring changes to multiple departments and City procedures, the Mayor's office and/or the COO should lead the coordination and implementation of the recommendations. Citywide CAP implementation meetings used to be led by the COO, but the priorities changed in the last Administration and attendance/attention to the CAP dropped. We see the negative results in the Audit report.
- **Correct the Vehicle Miles Travelled (VMT) baseline:** As reported in the Union Tribune, the CAP's baseline data for VMT is based on flawed modeling projections that inaccurately inflate the City's progress towards GHG emissions reductions. The CAP 2.0 must use accurate data for the VMT baseline, especially as the COVID pandemic may again disrupt normal accounting practices. The City must convey to SANDAG that they must account for the pandemic when developing their algorithms.
- **Detailed Roadmap to Transportation Goals:** The CAP requires that 50% of urban residents in Transit Priority Areas (TPA's) commute by bike, walk, and transit by 2035, but the City still has no comprehensive plan to meet this commitment. The Mobility Action Plan, which was promised as a roadmap to meet the City's mode share targets, fails to provide this critical information. In order to meet its legal commitments, the Mayor must revise the Mobility Action Plan to establish a clear roadmap for how San Diego will meet its transportation goals.
- **5-Year CAP Outlook:** Shortly after the development of CAP 2.0, the City must release a CAP Five-Year Outlook as an addendum to the Five-Year Financial Outlook. That outlook, a five-year CAP implementation plan with associated costs that has been completed but not released, would offer the Mayor and Council a clear understanding of the actions and investments needed to hit CAP targets. The City must take a holistic, programmatic approach to CAP implementation, rather than continuing a piecemeal approach through the annual budget cycle.
- **Climate Grant Writer:** As a hire that will many times over "pay for itself," we recommend the City fund a grant writer to secure funds to achieve the goals of the CAP and the Climate Adaptation and Resiliency Plan without impact to the general fund. Multiple programs and projects critical to implementing the CAP, including the Urban Forestry Program, have identified staffing and funding shortfalls.

- **Increase Funding for the Sustainability Department:** In order for the Sustainability Department to implement the recommendations in the audit as well as implement the numerous strategies of the current CAP and CAP 2.0, the City must increase funding for the Sustainability Department.
- **Regional Climate Authority:** The City of San Diego and other cities would benefit from enhanced coordination, collaboration, and funding. We encourage the City to support the creation of a Regional Climate Authority. Several bills, including Ward-AB 11, propose regional collaboration on climate, and we urge the Mayor and Council to support the establishment of a Regional Climate Authority.

Thank you for the opportunity to weigh in on this critical document. We look forward to partnering with the City to navigate these challenges and secure a climate-safe future for San Diego residents.

Sincerely,

J.P. Bruner  
Climate Change Committee Co-Lead  
Surfrider Foundation San Diego

Safia Haidari  
Youth Organizer  
Youth Will

Tara Hammond  
Founder & Chief Environmental Officer  
Hammond Climate Solutions

David Harris  
CAP Committee Chair  
SanDiego350

Maleeka Marsden  
Co-Director of Policy  
Climate Action Campaign

Lucero Sanchez  
Community Policy Coordinator  
San Diego Coastkeeper

cc: Paola Avila, Chief of Staff, Office of the Mayor  
Nick Serrano, Deputy Chief of Staff, Office of the Mayor  
Jessica Lawrence, Director of Policy, Office of the Mayor  
Javier Gomez, Senior Advisor of Policy and Council Affairs, Office of the Mayor  
Randy Wilde, Policy Advisor, Office of the Mayor  
Erik Caldwell, Director/Chief Sustainability Officer, Sustainability Department  
Heather Werner, Deputy Director, Sustainability Department  
Ashley Rosia-Tremonti, Program Manager, Sustainability Department