



October 26, 2021

Mayor Gloria and City Council  
San Diego City Hall  
202 C Street  
San Diego, CA 92101  
Via Email

**Re: Recommendations in anticipation of the release of the draft City of San Diego Climate Action Plan Update**

Honorable Mayor Gloria and City Councilmembers,

Climate Action Campaign is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

We applaud the City’s dedication to update the existing Climate Action Plan (CAP) to align with climate science and commit to Zero Carbon, and include best practices that have evolved since the 2015 CAP. In this way, we hope San Diego will continue to lead the region, the state, and the nation in climate planning.

In anticipation of the draft CAP Update release, we present seven key recommendations to ensure that the City approves a robust CAP Update with key documents, procedures, and strategies to ensure its success:

- Fund and adopt an Implementation Plan with associate costs and funding sources
- Comprehensively fund the CAP in the upcoming FY 23 Budget Cycle
- Implement procedural equity
- Center equity and public health in CAP Update
- Fund and adopt the Mobility Action Plan 2.0
- Adopt all-electric building policies
- Include recommendations for a “San Diego Green New Deal CAP”

***Implementation Plan with Associate Costs and Funding Sources***

While we celebrate the City’s commitment to a CAP that aligns with the urgency of the crisis, we are concerned that without detailed specifics around implementation and funding, the CAP 2.0 will suffer the same fate of the 2015 CAP, which has largely gone unimplemented and underfunded.

In order to plan for success for CAP 2.0, the City should **fund and adopt** Recommendation #5 of the 2021 CAP Performance Audit, which states: “Once CAP 2.0 is developed, Sustainability should develop an implementation plan, including an estimate of associated costs, information on funding sources, and identification of funding gaps. Sustainability should consider seeking assistance, such as from the Department of Finance, Department of Performance and Analytics, or a consultant, if necessary.”

Due to the urgency of the climate crisis and the fact that the City is behind on its legal commitments to reduce emissions as mitigation for continued project development, we urge the City to **fund the Implementation Plan in the Mid-Year Budget** and to **approve the plan within six months of adopting the CAP Update**.

More specifically, we recommend the Implementation Plan include:

- **Detailed** associated cost estimates for each measure and strategy.
- Specific funding sources for each measure and strategy, including local, state, federal, non-governmental and private sector opportunities.
- Clearly identify implementation funding gaps and challenges for the City to prioritize and problem solve.
- A strong commitment to prioritizing Communities of Concern, as identified in the City’s Climate Equity Index, and Climate Equity Fund projects and programs.

### ***Comprehensively Fund the CAP in the FY 23 Budget***

Since the adoption of the CAP, funding allocations for CAP-related projects, consultant work, and staffing needs has been piecemeal and grossly insufficient. While the CAP Implementation Plan with associated costs and funding sources recommended above serves to address this problem in future years, the City needs to start comprehensively funding the CAP now to meet its current and future climate goals, starting in the upcoming FY 23 budget cycle.

We recommend the City review the City of Pittsburgh's "[Budgeting for Climate: The City of Pittsburgh Repurposes Resources for a Sustainable Future](#)" as a resource for best practices and modeling purposes.

### ***Implement Procedural Equity***

We thank the City for collaborating with Community Based Organizations (CBOs) to conduct outreach on the CAP Update in our most vulnerable communities. We think this is a critical step to advancing procedural equity not only for the Climate Action Plan, but for other City projects and plans. To ensure success, the City should aim to create a partnership between the CBOs, communities, and the City is collaborative, transparent, and communicative.

At a high level, we recommend the City take the following points of action to ensure procedural equity:

- Fund and enforce a robust outreach mechanism in Communities of Concern in all stages of the process so the City can incorporate community insights into project objectives and outcomes. This involves ensuring that feedback is considered, responded to, and meaningfully integrated into all stages of the CAP.
- Compensate community members for their time to encourage and make possible continuous participation in decision-making processes.
- Implement education initiatives to build capacity and knowledge about climate impacts and possible solutions.

### ***Center Equity and Public Health in the CAP Update***

The climate crisis is a public health crisis that demands an equitable response. Integrating the feedback from Communities of Concern outreach, the CAP Update must identify how every CAP measure will prioritize vulnerable populations, with specific benchmarks for success, such as improved air quality and lower asthma rates to elevate and center equity and public health. We recommend [Oakland's 2030 Equitable Climate Action Plan](#) as a strong model. The [City of Los Angeles' Green New Sustainability Plan](#) also serves as an example with specific benchmarks of success in Communities of Concern.

### ***Mobility Action Plan (MAP) 2.0***

Transportation accounts for more greenhouse gas emissions than any other sector. Accordingly, the 2015 CAP called for 50% of commutes in Transit Priority Areas to be taken by bike, walk, and transit by 2035. However, annual monitoring shows that the City has made little progress towards these mode shift targets, which are key to the CAP's overall emissions reductions.

The CAP update proposes even more aggressive mode shift targets. We urge the City to fully fund and finish MAP 2.0, to provide the needed roadmap to achieve the CAP’s legally-binding mode shift targets. MAP 2.0 should demonstrate through mode shift modelling (similar to the Downtown Mobility Plan) how the City’s proposed network of sustainable transportation projects will close the gap between SANDAG’s 2021 Regional Plan and the CAP’s requirements for mode shift. MAP 2.0 should include specific projects, costs, and implementation timelines. See our latest report—[Missing the Mark](#)—for further analysis.

### ***All Electric Building Policies***

All communities must reach a zero carbon future by 2035 or earlier to have any chance at stopping the climate crisis—building any new fossil fuel infrastructure today prevents us from achieving that goal. Fossil fuels such as natural (methane) gas are also dangerous indoor air pollutants harming families in their homes. The City must include specific measures to decarbonize buildings to reduce emissions and improve public health. Specifically, the City should:

- Adopt a new construction all-electric reach code with limited to no exemptions; the City of Encinitas “Green Building Ordinance” may serve as a model for the City to catch up to.
- Develop a Municipal Retrofit Plan to transition to all-electric city facilities, starting in Communities of Concern; electrification should be paired with additional energy efficiency and healthy building (lead-free, asbestos-free, mold-free, etc.) efforts to improve public health.
- Set specific targets for decarbonizing private buildings, coupled with equitable and inclusive outreach, plans, and programs to ensure all communities are able to transition to climate-friendly, healthy homes and buildings.

All-electric policies must be carefully crafted in collaboration with Communities of Concern and other vulnerable populations to incorporate their specific needs. They must also be monitored and updated as necessary to ensure successful implementation. Additionally, we recommend the City complete a worker impact analysis in partnership with workers and labor unions to highlight opportunities and mitigate impacts of building decarbonization. Workers must lead the Just Transition conversation.

### ***Include Recommendations for a San Diego Green New Deal CAP***

In advance of the release of the Climate Action Plan, we want to echo the recommendations for the CAP Update made by the San Diego Green New Deal Alliance in the [coalition's letter](#) dated May 17, 2021, which emphasize the importance of committing to Zero Carbon in a way that centers Communities of Concern and workers.

**Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. We look forward to working with you on this important initiative.

Sincerely,



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