



June 9, 2021

Mayor Gloria and Council
San Diego City Hall
202 C Street
San Diego, CA 92102
Via Email

RE: Recommendations for an Equitable Climate Adaptation and Resilience Plan

Honorable Mayor and Councilmembers,

Climate Action Campaign is a non-profit organization based in San Diego and Orange County dedicated to a simple mission: stopping the worst impacts of the climate crisis through effective policy action.

We are pleased that the City is developing a Plan for Climate Adaptation and Resilience, and recommend the following priorities for its development and implementation:

- Create a Detailed Implementation Plan
- Promote Procedural Equity
- Prioritize Equity-Centered Adaptation and Resilience Solutions
- Identify and Employ Diverse Funding Sources

Detailed Implementation Plan

The City's Climate Adaptation and Resilience Plan cannot be a mere declaration of values; it must be grounded in science and data, be pragmatic, and financially, legally, and logistically feasible. To ensure a successful implementation we urge the City to:

- Clearly express each objective, initiative, and supporting action item under the plan; explain how the City will carry out each of the intended benefits, and whether those benefits are small or large, short-term or lasting.
- Provide a timetable to draft, review, approve and implement each objective and initiative within the plan.
- Ensure that the plan is structured in a way that its overall benefits will be equitably distributed, and responsive to the unique needs of each community.

- Identify needed legal instruments to ensure the plan’s immediate implementation. Ensure each action item undergoes—during the drafting stage—a legal analysis by the City Attorney for legal implications, in addition to a fiscal and budgetary analysis.
- Establish meaningful performance measures and plan to track outcomes and make course corrections as needed.
- Ensure the plan is comprehensive, ambitious, and original, so that it does not simply rely on existing programs, policies, and plans.
- Design an annual reporting mechanism that provides transparency and accountability to ensure the City remains committed to actually carrying out the plan on schedule.
- Center climate-preparedness as an important and explicit criterion in the City’s planning.

Procedural Equity

The City must center equity when planning and implementing climate adaptation and resilience strategies. This includes designing engagement mechanisms to involve communities most affected by climate change and structuring processes to identify community goals and solutions that will provide environmental co-benefits (e.g., reducing air pollution and urban heat islands).

We recommend the City takes the following points of action to ensure procedural equity:

- Enforce a robust outreach mechanism in Communities of Concern (COCs) so policymakers 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 adaptation plan.
- Compensate COCs 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 potential adaptation solutions.
- Consult and employ available and reputable data sources (conducting research where key data is currently unavailable) to minimize unwanted externalities of climate adaptation actions.

Equity-Centered Solutions

Climate change is a threat multiplier for COCs already struggling with hardships like housing insecurity, food insecurity, poverty, chronic health conditions, racism, and discrimination.

Residents in COCs are already exposed to the impacts of a warming climate and have fewer resources, capability, safety nets, or political power to confront those risks.

To respond to current stresses while planning for potential impacts, any approach to improve climate resilience must prioritize equity and create solutions that center on COCs. We urge the City to include the following approaches:

- Adopt solutions that will maximize environmental, social, and health benefits for COCs in their own neighborhoods. Examples include:
 - **Clean Air Adaptation Strategies.** The City must reduce vehicle emissions by encouraging smart growth development where all residents can work, live, and play within a walkable area.
 - **Water Management Adaptation Strategies.** The City must promote the use of green infrastructure to reduce stormwater runoff and preservation of wetlands to mitigate flooding and erosion.
 - **Chemical and Waste Management Adaptation Strategies.** The City must develop crisis management plans to anticipate and prepare for future extreme weather events such as flooding and heat waves that may cause chemical and waste spills.
 - **Transportation Adaptation Strategies.** The City must consider future extreme weather events during land-use planning (e.g. zoning ordinances) in order to protect infrastructure and encourage climate-resilient development.
- Reduce greenspace gaps by directing the planning, initiatives, and investments to COCs.
- Minimize the disruption that climate impacts have on businesses owned and operated by members in COCs.

Funding and Paying for Equitable Adaptation and Resilience

The City must pursue multiple sources of funding and financing to fund equitable adaptation and resilience planning and projects. We recommend the City to:

- Employ federal grant programs, funding tools, and partnership opportunities to implement adaptation and resilience solutions. Examples of federal programs that can be used as funding tools:
 - EPA Building Blocks for Sustainable Communities;
 - EPA Greening America's Communities;
 - EPA Urban Waters Small Grant Program;
 - US DOT Transportation Alternatives Set-Aside Program;
 - US DOT Congestion Mitigation and Air Quality Program;
 - FEMA Hazard Mitigation Assistance (HMA) grant programs;
 - FEMA Building Resilient Infrastructure and Communities (BRIC) program.

- Pursue financing from key players including philanthropic organizations, impact investors, green banks, etc.
- Ensure emergency assistance programs and policies are equitably distributed among COCs that experience disproportionate impacts of natural disasters.

Ultimately, the City Plan for Climate Adaptation and Resilience will be crucial to ensure all San Diegans — regardless of income status, language or race — are prepared to confront the devastating effects of climate change.

We appreciate the consideration and look forward to partnering with the City on these and other climate adaptation and resilience efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Bmmf." with a stylized flourish.

Brenda Garcia Millan
Research and Policy Analyst
Climate Action Campaign