



SAN DIEGO  
COASTKEEPER



HAMMOND  
CLIMATE SOLUTIONS  
*Dynamic Action for a Sustainable Planet*

**SAN DIEGO 350**  
CLIMATE ACTION



November 3rd, 2021

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

**RE: Comments on the Climate Resilient SD Plan Draft**

Honorable Mayor and Councilmembers,

On behalf of the organizations signed below, we would like to thank the City's Planning Department for their effort in drafting the Climate Resilient SD Plan. The accelerating effects of climate change threaten every sector of our region, and protecting our residents will require a strong, coordinated effort from all levels of government and community stakeholders.

We applaud the City's plan to form an adaptation working group to coordinate on climate adaptation implementation efforts, and we appreciate the City's ongoing collaboration with community-based organizations to shape the resiliency plan.

However, we are also concerned and disappointed that the Climate Resilient SD Plan is not in fact a plan, but a framework that lacks the specificity necessary to implement projects and programs to protect San Diegans from the harmful effects of climate change.

To ensure the adoption and implementation of a successful Climate Resilient SD Plan, our organizations recommend that the City revise the framework to address the following:

**Develop a Detailed Implementation Plan with Associated Costs & Funding:**

- Identify projects, policies and programs that include specific, ambitious, and feasible target goals.
- Define how the target goals are achieved, and designate the lead agency, or the point person responsible for implementation.
- Include annual audits to ensure target goals are on track.
- Incorporate accountability measures as well as clear ways to modify the plans to adapt to changing conditions. While final implementation plans may follow the individual

framework plans, demonstration of feasible pathways to achieving all targets should be included in the framework plans.

- Develop a master timeline for the rollout of each policy, with specific target dates (down to month and year) for each proposed action.
- Determine costs and identify funding and/or financing sources for each proposed action.
- Commit to applying for the federal and state grants listed on page 61, rather than only listing them as potential application options.
- Prioritize projects for funding and include a business case for each project along with an estimated payback period (ROI) where feasible.
- Address legacies of discriminatory decision-making, by prioritizing investments in neighborhoods that have been historically underserved.

#### **Establish a Comprehensive Community Engagement Strategy:**

- Enforce a strong outreach strategy in Communities of Concern, that includes metrics such as goals for the number of people to be reached and the number of engagements per year in partnership with community and place-based organizations.
- Consider the creation of community advisory councils or task forces.
- Allow communities to participate in quick impact projects (QIPs) to cement support and catalyze local engagement.
- Ensure everyone has an equal chance to be heard and that no one's left out due to language barriers, accessibility issues, or other restrictions.

#### **Update the Vulnerability Assessment:**

- FEMA floodplains can be misleading because they are based on historic information and do not incorporate climate-change projections. As FEMA updates the NFIP's flood management standards, we recommend the City be prepared to immediately adopt the updates.
- Identify risks to City revenues, such as decreased property taxes from climate-driven property damage, economic changes (e.g. impacts to tourism and fossil fuels), and sales tax revenue should people relocate to areas outside of the city.
- Conduct an economic vulnerability assessment and diversification strategy.

Additionally, we encourage the City to consider the following recommendations pertaining to the plan's five main goals:

#### ***Goal 1: Ensure communities are connected and informed to be best prepared for climate change.***

- Policy CI-2: Utilize the best data, research, maps, models, and up-to-date climate science, including CalEnviroScreen 4.0, to have the most complete picture of what climate impacts our communities should prepare for.
- Policy CI-2: Develop a mobile phone and local radio or TV alert system to inform affected communities about dangerous air quality levels with advice on how to protect

from it, forecasted extreme heat conditions with heat stress signs to watch for along with locations of cooling centers, and other emergencies.

- Policy CI-3: Include partnerships with public health agencies, and specifically outline projects and/or programs on which the City will collaborate.

**Goal 2: Plan for and build a resilient and equitable city.**

- Policy RE-1: Employ [CalEnvironScreen 4.0](#) to identify communities disproportionately impacted by multiple sources of pollution, and prioritize actions to improve public health.
- Policy RE 2: Explore innovative resiliency projects, such as the [City of Phoenix's grey streets program](#) to reduce urban heat health impacts and prevent heat-related deaths.
- Policy RE-4: Identify potential partnerships and develop a plan to establish programs with school districts, community colleges, and universities.
- Policy RE-5: Change the adaptation strategy relating to batteries and microgrids from a "consideration" to determining feasibility and creating an implementation plan.

**Goal 3: Safeguard, preserve, and protect historic and tribal cultural resources from the effects of climate change.**

- Policy HTC-1: Incorporate Indigenous Knowledge/Traditional Ecological Knowledge (IK/TEK) into the preservation and protection of historic and tribal cultural resources.
- Policy HTC- 2: Replace “Coordinate resilience planning with tribal groups and representatives” with “engage in government-to-government consultation with tribal governments and intertribal organizations.”
- Policy HTC-3: Consider work carried out by the New Zealand Geographic Board (e.g., *He Korero Pūrākau Mo Ngāa Taunahanahatanga a Ngā Tūpuna—Place Names of the Ancestors: a Māori Oral History Atlas* and companion handbook).
- Policy HTC-4: Enter into co-management agreements with interested Tribal governments to carry out ongoing resiliency planning, monitoring, and protection of tribal cultural resources.

**Goal 4: Support and prioritize thriving natural environments and enhance adaptability.**

- Policy TNE-3: Collaborate with relevant stakeholders including tourism operators to ensure the effective implementation of nature-based solutions.
- Policy TNE-4: Integrate green infrastructure elements to streets, alleys and parking lots through permeable pavement, bioswales, urban planter boxes, rain gardens, and trees.
- Policy TNE-5: Employ an approved Local Coastal Program Update that will consider sea-level rise in coastal development and managed retreat decisions.
- Policy TNE-5: Examine holistic adaptation and resiliency plans that focus on coastal impacts such as [Louisiana's Strategic Adaptation for Future Environment \(LA SAFE\)](#) , and determine best practices for San Diego.

**Goal 5: Maintain and ensure minimal disruption to all critical City services in the face of climate change hazards.**

- Policy CCS- 1: Bring together emergency and community services to create interagency plans to protect public health and safety.
- Policy CCS- 4: Make workforce preparation training required rather than optional.
- Policy CCS-5: Consider climate change mitigation and adaptation strategies in all capital and operating budget decision-making.

**Finally, it was brought to our attention that the plan does not indicate specific adaptation and resiliency measures tailored to homeless individuals and the disabled. These populations are extremely vulnerable to, and suffer disproportionately from extreme weather events and must be included in the plan.**

We appreciate your thoughtful consideration and we look forward to partnering with the City on these and other climate adaptation and resiliency initiatives.

Sincerely,

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