



HAMMOND
CLIMATE SOLUTIONS
Dynamic Action for a Sustainable Planet



SAN DIEGO 350
CLIMATE ACTION



SAN DIEGO
COASTKEEPER

July 12, 2021

Board of Supervisors
County of San Diego
1600 Pacific Highway
San Diego, CA 92101

Re: Recommendations for the County of San Diego's Climate Action Plan (CAP)

Dear Chair Fletcher, Vice Chair Vargas, and Supervisors,

Extreme heat, fires, flooding, record temperatures—this summer confirms our worst fears: the Climate Emergency is here and now, and people are dying.

Our organizations have engaged in the County's CAP development and implementation process. Despite multiple fatally-flawed and legally-indefensible attempts, we believe this Board can achieve a bold, world-class CAP.

Climate science and best practices have evolved, and we urge the County to use the CAP as an opportunity to adopt strategies that meet the scale and scope of the climate crisis and put San Diego back on the map as a national climate leader.

A Climate Action Plan with strong jobs and equity components with a commitment to a zero carbon future will require numerous strategies, but we have seven high-level recommendations for the County to prioritize at this stage:

- Align the CAP emissions reduction target with climate science by committing to achieving **zero carbon by 2045 or ideally sooner** in line with state goals (Executive Order B-55-18) and with the forthcoming Regional Sustainability Plan.
- Set a **100% clean energy target**, and commit to joining a **Community Choice Energy** program, specifically San Diego Community Power by the end of this calendar year.
- Commit to eliminating building methane emissions through **building electrification**; All-electric homes are a critical strategy to achieving zero carbon and safeguard public health from dangerous indoor air pollutants.

- Create a **detailed roadmap** to achieve vehicle miles traveled (VMT) **reduction and mode shift targets** for commuters using sustainable modes.
- Commit to **equitable development** of housing near jobs and transit.
- Center and integrate **equity and good union jobs** by including key strategies, benchmarks and best practices in consultation with key stakeholders to advance racial and worker justice.
- Help establish and participate in a **Regional Climate Network** to facilitate regional collaboration towards climate goals.

Plan for Zero Carbon by 2045 in Line with State Targets & Climate Science

The UN IPCC *Special Report on Global Warming of 1.5°C* and other recent scientific reports warn that we must achieve net zero emissions by mid-century and negative emissions thereafter if we are to avoid the most devastating impacts of the climate crisis, including extreme drought, floods, heatwaves, and poverty for hundreds of millions of people.

In recognition of the importance of planning for these goals, the Board of Supervisors directed staff to (1) develop a Regional Sustainability Plan, which will outline the strategies needed to guide the region to Zero Carbon by 2035, and (2) align the Climate Action Plan with Executive Order B-55-18, which calls for carbon neutrality as soon as possible, and no later than 2045.

The CAP presents a critical opportunity for you to realign our climate planning efforts with the targets identified by climate science, as well as statewide goals.

We urge you to **ensure the CAP will eliminate unincorporated County greenhouse gas emissions by 2045 or sooner, in alignment with the forthcoming Regional Sustainability Plan**. The CAP should focus on direct emissions reduction measures that are quantifiable, measurable, and enforceable, not the “Local Direct Investment Program” or other offset schemes that allow for continued local pollution.

For strong examples of plans committed to zero carbon, we recommend referring to the [City of Los Angeles](#), the [County of Los Angeles](#), and City of [San Luis Obispo](#) sustainability plans.

Set a 100% Clean Energy Target By 2030 and Commit to Community Choice Energy

We recommend that the County join the seven cities in the San Diego region that have set 100% clean energy targets by either 2030 or 2035, with a commitment to pursue Community Choice Energy (CCE).

There are three clear reasons for this: 1) Achieving 100% clean energy is the single most powerful strategy a city can adopt to reduce GHG emissions, 2) CCE is the only feasible strategy to achieve 100% clean energy, since cities do not have control or jurisdiction over our incumbent monopoly utility; and 3) CCE delivers a myriad of benefits to cities, including choice,

lower rates for families, local decision-making, and the opportunity to keep revenues in the community.

In the San Diego region, the most cost competitive program that is already building steel in the ground clean energy projects with good union jobs is San Diego Community Power (SDCP). The climate crisis demands regional unity, and the County can exemplify that leadership by joining SDCP, the only program that centers climate, equity, sustainability, and workers, and has values that align with the Board's vision for a 100% clean energy future.

Eliminate Building Emissions Through Building Electrification

Even as our jurisdictions work to achieve 100% clean electricity, methane gas remains a top source of emissions. To fully transition away from fossil fuels, we must reduce and ultimately eliminate methane gas consumption. Because appliances and infrastructure can last several decades, it is critical that we start transitioning to all-electric homes and buildings today by incorporating key building electrification measures in the CAP.

[Cities in California](#) are leading the transition from gas to clean-energy buildings, with San José, San Francisco, and over 40 other cities in California passing building electrification ordinances, and other cities such as Encinitas and Lemon Grove committing to building electrification in their CAPs.

To start, we urge the County to **require all newly constructed or renovated buildings to be all electric** in the CAP.

Other key strategies we recommend to decarbonize buildings include: adopting a plan to electrify municipal buildings, streamlining permitting to make electrifying existing buildings easier, developing financial incentives to lower purchase and installation costs for electric appliances, creating public outreach and education campaigns to promote building electrification in communities of concern, and supporting workforce development and training programs that promote good-paying careers for technicians that install and service electric appliances paired with a just transition for fossil fuel workers to good union jobs in the green economy.

In addition to reducing emissions, building electrification provides numerous co-benefits including lower energy bills and lower costs for new construction, healthier indoor and outdoor air quality, safer energy infrastructure, and the creation of good-paying green jobs.

The County also has a unique opportunity to support rural residents in transitioning to resilient and wildfire safe energy independence by exploring ways to incentivize rooftop solar and energy storage. Giving rural residents the ability to keep the lights on during ever more frequent power safety shut offs while reducing pollution from propane and other fossil fuel generators will not only help reduce emissions and indoor air pollution, but better protect residents and businesses from wildfires and power shut offs, giving them full control over their clean energy future. We

recommend the County explore creating a local distributed energy resource incentive program for rural households.

Create a Detailed Plan to Achieve Mode Shift and VMT Reduction Targets

According to the 2018 CAP, on-road transportation accounts for 45% of unincorporated County emissions—more than any other sector—but only 13% of projected reductions were set to come from the “Built Environment and Transportation” sector. This massive discrepancy between emissions and associated reductions is unacceptable, and must be addressed in the new CAP.

First, CAP should set aggressive VMT reduction targets as well as mode shift targets for commuters taking sustainable modes. The only way to slash emissions from transportation is to shift commuters out of their fossil fuel cars and into more sustainable modes such as: electric vehicles (including shared rides to job centers), transit, and even biking and walking for shorter trips in village centers. The CAP should also pursue community-specific telecommuting policies in collaboration with local employers, accompanied with efforts to increase broadband access for historically disinvested communities.

Next, the County should develop a Mobility Action Plan, outlining all of the strategies needed to achieve mode shift targets. For example, the City of San Diego’s CAP set the target of 50% of commuters using sustainable modes in Transit Priority Areas by 2035, and is in the process of developing the accompanying Mobility Action Plan.

Equitable Development of Housing Near Jobs and Transit

Building affordable housing near jobs and transit is a necessary strategy to reduce VMT and GHG emissions, while also alleviating environmental, health, and economic disparities in low-income communities of color. Sprawl developments far away from job centers, infrastructure, and amenities remains one of the region’s greatest threats concerning increasing VMT and GHG emissions. We recommend including strategies that advance the development of affordable housing near current and future transit centers and high-frequency bus lines, in alignment with SANDAG’s 2021 Regional Plan. All housing plans should include strategies to prevent displacement and be developed in consultation with the community.

The CAP should also specify where smart growth and density should be targeted and what transportation mode share, VMT reduction, and land use goals should be set for specific communities throughout the unincorporated areas, so there is clarity for the public and staff. The County’s struggle to ensure that Community Plan Updates are aligned with emissions reduction targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both a neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

Include Strategies and Benchmarks to Ensure Equitable Implementation & the Creation of Good Jobs

In 2020, the City of San Diego, in collaboration with key stakeholders, created a first-of-its-kind Climate Equity Index (CEI) to identify communities on the frontlines of the climate crisis and environmental injustices, which should be prioritized in CAP investments. We urge the County to develop a similar, localized tool, whether through the forthcoming Environmental Justice Element or a separate effort.

Once the tool is developed, the County should integrate the CEI into an Equity Section of the CAP, which outlines how the CEI will be utilized, as well as strategies and benchmarks that measure equitable implementation of all climate solutions.

The development and implementation of these strategies and benchmarks should take place in consultation with a diverse set of stakeholders and organizations that represent low-income communities of color who are disproportionately harmed by a fossil fuel economy and are hurt first and worst by the impacts of a warming climate.

Additionally, the path to a green economy means the creation of thousands of new jobs. We recommend the CAP also integrate strategies, policies, and benchmarks to ensure there are good, family-sustaining union jobs with an equitable jobs pipeline from communities of concern.

For examples of Climate Action Plans that integrate equity and jobs, we recommend referencing the [King County 2020 Strategic Climate Action Plan](#), [Oakland Equitable Climate Action Plan](#), the [“Planning for a Boston Green New Deal and Just Recovery” Plan](#), and the [Los Angeles’s Sustainability Plan “LA’s Green New Deal.”](#)

Support the Establishment of and Participate in a Regional Climate Network

Across the region, cities are struggling to meet climate goals, citing lack of funding, political will, and knowledge of best practices. Furthermore, cities in the region are not yet planning for zero carbon, as climate science says is necessary, and region-wide, climate solutions are not being implemented equitably.

Current structures and this siloed approach to climate action are proving to be ineffective and dangerous to our region’s future, which is why we are proposing a solution: the establishment of a Regional Climate Network.

A fully-funded Regional Climate Network could serve as a one-stop shop for coordinated efforts on climate action and adaptation in the region, and support implementing the County’s own Climate Action Plan and Regional Sustainability Plan.

Conclusion

At a time when families and the economy are struggling from the layered challenges of the COVID-19 pandemic, we believe the CAP can serve as a tool to help build back a more equitable and sustainable San Diego County. We urge you to seize this opportunity to put San Diego back on the map as a climate leader, and to ensure a livable, healthy, prosperous, safe, and equitable region for current and future generations.

Thank you for the opportunity to weigh in on the development of this critically-important document, and please do not hesitate to reach out if you have any questions. We are available as a resource and a partner.

Sincerely,

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