



Mayor Gloria and Council
December 18, 2020
City of San Diego
202 C St.
San Diego, CA 92101

Re: Recommendations for San Diego’s Climate Action Plan Update (CAP)

Dear Mayor Gloria and Council,

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.

In 2015, the City of San Diego adopted a landmark Climate Action Plan that made it the largest city in the nation to commit to 100% clean energy. That commitment spurred eight other cities in our region and the State of California to commit to 100% clean energy, as well as many other states around the country. And most recently, our new President has set the same 100% clean energy goal by 2035 for the nation!

We also established San Diego Community Power with four other cities to achieve this ambitious goal, putting the community in charge of their energy destiny.

But five years later, climate science and best practices have evolved, and we urge the City to use the Climate Action Plan Update 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 state climate leader.

To do so, we urge the City to adopt a “San Diego Green New Deal” Climate Action Plan by integrating strong jobs and equity components with a commitment to a zero carbon future. A “San Diego Green New Deal” Climate Action Plan will require numerous strategies, but we have six high level recommendations that we recommend you prioritize in this stage of the CAP Update:

- Align the CAP emissions reduction target with climate science and state targets by committing to achieving **zero carbon by 2045** or sooner in line with state goals (Executive Order B-55-18).
- Commit to eliminating building methane emissions through **building electrification**, a critical strategy to achieving zero carbon and safeguard public health.

- Create a **detailed roadmap** to achieve the 50-% mode share goals for commuters biking, walking, and taking transit within transit priority areas.
- 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.
- Help establish and participate in a **Regional Climate Authority** 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, over 77 countries, 10 regions, and 100 cities have committed to achieving net-zero emissions by 2050 or sooner. Additionally, the State has also recognized this goal through Executive Order B-55-18, which aims to achieve carbon neutrality by 2045.

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

As a long-term planning document, we urge you to **ensure the Update extends the CAP horizon year to 2045 or later, and that the emissions reduction target commits to zero carbon by 2045 or sooner.**

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.

Eliminate Building Emissions Through Building Electrification

Even as our cities work to achieve 100% clean electricity, natural gas remains the third most significant source of emissions in our cities, so to fully transition away from fossil fuels, we must reduce and ultimately eliminate natural gas consumption. Because appliances last several decades, it is critical that we start building electrification today by incorporating key building electrification measures in the CAP Update.

[Cities in California](#) are leading the transition from gas to clean-energy buildings, with San José, Santa Monica, Carlsbad, Berkeley, Windsor, San Luis Obispo, San Mateo, and Menlo Park passing building electrification ordinances, and other cities such as Encinitas and Lemon Grove committing to building electrification in their CAPs.

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

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, and supporting workforce development and training programs that promote good-paying careers for technicians that install and service electric appliances.

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.

Create a Detailed Plan to Achieve Mode Share Targets for Biking, Walking, & Transit

The CAP sets a target for 50% of urban residents to commute by bike, walking, 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 roadmap.

In order to meet its legal commitments, the CAP Update should commit to revising the Mobility Action Plan to establish a clear roadmap for how San Diego will meet its transportation goals.

Implementing these transportation goals are critical to ensuring our city is equitable, prosperous, and sustainable. The Mobility Action Plan should lay out both high-level policies and specific actions to achieve that vision.

Equitable Development of Housing Near Jobs and Transit

Building affordable housing near transit is a necessary strategy to reduce vehicle miles travelled (VMT) and GHG emissions, while also alleviating environmental, health, and economic disparities in low-income communities of color. However, the CAP does not currently include strategies that advance the development of affordable housing near the City's transit centers and high-frequency bus lines, which we recommend adding in the CAP Update. 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 City, so there is clarity for the public and City Staff. The City's ongoing struggle to ensure that Community Plan Updates in urban, transit-priority communities are aligned with CAP 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 that should be prioritized in CAP investments. We now urge the City to integrate the CEI into the CAP by ensuring that the CAP Update includes an Equity Section that outlines how the CEI will be utilized, as well as strategies and benchmarks that measure equitable implementation of the 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 jobs. We recommend the CAP also integrate strategies, policies, and benchmarks to ensure these jobs are good, family-sustaining union jobs.

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 Authority

Across the region, cities are struggling to meet climate goals, citing lack of funding, political will, and knowledge of best practices. Furthermore, no cities in the region are 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 Authority.

A regional climate authority could serve as a one-stop shop for coordinated action on climate action and adaptation in the region. Potential opportunities for a Regional Climate Authority include:

- Facilitating regional collaboration on climate mitigation and adaptation best practices, projects, and strategies among participating municipalities.
- Researching and creating plans to achieve zero carbon in line with EO-B-55-18.

- Promoting best practices and supporting local municipal climate efforts by offering sample ordinances and policy recommendations for cities.
- Facilitating equitable implementation of climate strategies, by identifying, through state and local analysis, frontline communities that should be prioritized in implementation of climate strategies.
- Raising and allocating resources for climate mitigation and adaptation efforts and prioritizing allocation to frontline communities.
- Facilitating stakeholder engagement on climate strategies, plans, and projects, and prioritizing frontline communities in this engagement.
- Ensuring a just transition for workers and frontline communities.
- Providing technical support to local agencies, including measuring, quantifying, and analyzing and progress towards climate goals.
- Conducting education for policymakers, key stakeholders, and the public related to climate strategies and projects.
- Collaborating with local tribal nations on climate solutions.
- Collaborating with other regional climate efforts.

Conclusion

At a time when families and the economy are struggling from the layered challenges of the COVID-19 pandemic, we believe the CAP Update can serve as a tool to help build back a more equitable and sustainable San Diego. 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 San Diego 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,



Maleeka Marsden
Co-Director of Policy
Climate Action Campaign