



February 25, 2021

Mayor Gloria and Council
City of San Diego
202 C St.
San Diego, CA 92101
Via Email

Re: CAC Comments on the Performance Audit of the City's Climate Action Plan & Recommendations

Dear Mayor Gloria and Council,

We were pleased to see the Performance Audit for the City's Climate Action Plan (CAP), a landmark document passed in 2015 to help the City slash its carbon footprint in half and help make the city climate safe and climate ready.

Upon review of the audit, **we agree with all the findings and recommendations** made in the report. We also appreciate that our annual Climate Action Report Card was referenced to help evaluate the successes and failures of the CAP's implementation.

However, we are concerned that the audit does not go far enough or deep enough into the specific areas where the city is falling short in implementing the CAP. We are not told which CAP strategies the City is behind on, how far behind, and what needs to be done to get back on track. As a legally binding document created to protect residents from the worst impacts of the climate emergency, the lack of specificity is problematic.

Along with the audit recommendations, we want to provide these additional recommendations:

- **Request an Accelerated Timeline for Implementation:** In the Sustainability Department's Response to the Audit, "Management Response to Performance Audit" dated 02/17/2021, the Sustainability Department identifies implementation and completion dates for the recommendations in the audit, some extending as far as December 2022. Unfortunately, the City's legal GHG reduction commitments and the

rapidly accelerating climate crisis do not afford the City these lengthy timelines. **We urge the Sustainability Department and Mayor's Office to revise these timelines to be significantly more ambitious, and commit to implementing as much as possible this year.**

- **Correct the Vehicle Miles Travelled (VMT) baseline:** As Reported in the San Diego Union Tribune, the CAP's baseline data for VMT is based on flawed modeling projections that inaccurately inflate the City's progress towards GHG emissions reductions. The CAP 2.0 must use accurate data for VMT baseline.
- **Detailed Roadmap to Transportation Goals:** The CAP requires that 50% of urban residents in Transit Priority Areas (TPA's) commute by bike, walk, 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 critical information. In order to meet its legal commitments, the Mayor must revise the Mobility Action Plan to establish a clear roadmap for how San Diego will meet its transportation goals.
- **5-Year CAP Outlook:** Shortly after the development of CAP 2.0, the City must release a CAP Five-Year Outlook as an addendum to the Five-Year Financial Outlook. That outlook, a five-year CAP implementation plan with associated costs that has been completed but not released, would offer the Mayor and Council a clear understanding of the actions and investments needed to hit CAP targets. The City must take a holistic, programmatic approach to CAP implementation, rather than continuing a piecemeal approach through the annual budget cycle.
- **Climate Equity Fund:** The City of San Diego needs a separate and dedicated fund for equitable climate mitigation, adaptation and resiliency projects and planning (including the City's new CAP Update and Climate Adaptation and Resiliency Plan) to support neighborhoods most vulnerable to the climate crisis, as identified in the City's Climate Equity Index.
- **Climate Grant Writer:** As a hire that will many times over "pay for itself," we recommend the City fund a grant writer to secure funds to achieve the goals of the CAP and the Climate Adaptation and Resiliency Plan without impact to the general fund. Multiple programs and projects critical to implementing the CAP, including the Urban Forestry Program, have identified staffing and funding shortfalls.
- **Increase Funding for the Sustainability Department:** In order for the Sustainability Department to implement the recommendations in the audit as well as implement the numerous strategies of the current CAP and CAP 2.0, the City must increase funding for the Sustainability Department.
- **Regional Climate Authority:** The City of San Diego and other cities would benefit from enhanced coordination, collaboration, and funding. We encourage the City to support

the creation of a Regional Climate Authority. Several bills, including Ward-AB 11, propose regional collaboration on climate, and we urge the Mayor and Council to support the establishment of a Regional Climate Authority.

Thank you for the opportunity to weigh in on this critical document. We look forward to partnering with the City to navigate these challenges and secure a climate-safe future for San Diego residents.

Sincerely,



Maleeka Marsden
Co-Director of Policy
Climate Action Campaign

cc: Paola Avila, Chief of Staff, Office of the Mayor
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