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County of San Diego  
San Diego, CA 92101  
Via Email

**Subject: Climate Action Campaign's recommendation for the Regional Decarbonization Framework Implementation Playbook**

Dear Dr. Baxamusa,

Climate Action Campaign (CAC) is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective and equitable policy action.

The development and adoption of the Regional Decarbonization Framework (RDF) was the first step in taking a regional approach towards addressing the climate crisis. We applaud the County for developing the RDF Implementation Playbook that provides a menu of actions for how jurisdictions, communities, and organizations can take action to decarbonize the region. This will be a valuable tool to guide and motivate the region toward scientifically proven and scalable approaches to significantly reduce greenhouse gas (GHG) emissions, especially for small jurisdictions that have limited resources and political will to adopt and implement climate policy.

It is imperative that the Implementation Playbook leads to regional actions necessary to decarbonize each pathway and achieve a zero carbon future. This includes the development of a regional GHG analysis, Regional Climate Table, and Regional Climate Action Plan (CAP).

As the RDF revealed, even if the "Best CAP Commitment Scenario with the draft City of San Diego 2022 CAP" was implemented, there would still be GHG emissions unaccounted for. This highlights the ineffectiveness of siloed sustainability planning and the need for a regional CAP that will foster coordinated jurisdictional effort to align with state climate goals and create

policies to address the impacts of climate change. The County should use SANDAG's Regional Climate Action Planning Framework (ReCAP), which uses the best available scientific data to identify best practices and guidance for preparing CAPs and monitoring implementation, as a resource when developing a regional CAP.

Climate change does not stop at any jurisdictional boundary and requires regional solutions to significantly improve the quality of life of our communities. Therefore, a regional climate table must be created in order for jurisdictions to collaborate on efforts to reduce GHG emissions, such as the development of a regional CAP. We need an all-hands on deck approach to stop the climate crisis, and a regional climate table will help to standardize climate action commitments and best practices, lure more state and federal funding, and foster regional unity.

This letter summarizes our recommendations for the decarbonization pathway menu of actions in the Regional Decarbonization Framework Implementation Playbook. However, if this Implementation Playbook isn't coupled with investments and specific policy action it will merely represent an intellectual exercise, and therefore yield little results for the communities that have and will continue to suffer the worst impacts of the climate crisis. It is critical and incumbent on the County and other municipalities in the region to move past the planning stage and into action as quickly as possible.

### ***Decarbonize Transportation***

Transportation accounts for the greatest source of GHG emissions in the region. Slashing GHG emissions from transportation requires the implementation of aggressive VMT reduction targets and mode shift strategies that give residents the opportunity to choose sustainable transportation options, such as walking, biking, and transit.

We appreciate that the RDF includes strong support for transportation strategies, including SANDAG's Regional Transportation Plan (RTP), the County's Electric Vehicle (EV) Roadmap, and other plans. To succeed, these plans require regional collaboration that will put San Diego County on a path toward dramatically reducing transportation emissions.

However, we are concerned that the RDF Implementation Playbook seems to prioritize decarbonization actions such as electric vehicles (EV) strategies over mode shift strategies. EV strategies alone will not decarbonize the transportation sector fast enough to prevent the worst impacts of the climate crisis. Bikeable, walkable neighborhoods near transit, jobs, and amenities promote healthier lifestyles and social outcomes, reduce GHG emissions, and provide cleaner air, especially for frontline, working-class communities of color.

The County has a history of avoiding legally-defensible transportation goals, both in previous iterations of the CAP, and with SB 743 implementation, due to a lack of commitments to VMT and mode share, even though studies have shown that single occupancy vehicle electrification is not a silver bullet to achieve deep decarbonization. Jurisdictions and transportation agencies, such as SANDAG, MTS, and NCTD, must collaborate to implement a connected, reliable, safe,

and affordable transportation infrastructure roadmap for how the region will achieve our modeshift goals.

We recommend the following policies be added in the Implementation Playbook:

- Strategy 3.1.1 “Reduce Vehicle Miles Driven” should include actions that go beyond providing bike facilities at new and existing buildings and sites. Safe and connected infrastructure, such as protected bike lanes and safe pedestrian walkways, from facilities to nearby transit stops are essential to incentivizing employee modeshift. This also reduces GHG emissions and prioritizes “first/last mile connection”. This strategy should also include an action to adopt a program to incentivize employees to rideshare.
- CAC **opposes** all hydrogen conversion actions listed in Strategy 3.1.2 “Increase Use of Alternative Fuels”, as hydrogen conversion is not a proven safe alternative.
- Strategy 3.1.2 “Increase Use of Alternative Fuels” should include an action to prioritize onsite solar on new buildings in addition to the proposal of requiring EV charging for new buildings. This is a key strategy to increase the use of and promote the transition to EV’s.
- Strategy 3.1.3 “Increase Vehicle and System Efficiency” should prioritize an action to implement strategies to accelerate e-bike adoption, focusing on the barriers to ownership and charging for residents within environmental justice communities.
- Strategy 5.3.1 “Reduce Vehicle Miles Driven” should include an action to develop a Regional Active Transportation Plan (ATP) that contains a Bicycle and Pedestrian Master Plan.
- CAC **opposes** all hydrogen conversion actions listed in Strategy 5.3.2 “Increase Use of Alternative Fuels”, as hydrogen conversion is not a proven safe alternative.

### ***Decarbonize The Electricity Supply***

Renewable energy is a core pillar necessary to achieving a zero carbon future in the region and is essential for decarbonizing the electricity supply. In order to build resilience, the County must focus on strategies that expand local distributed energy resources (DER’s) such as on-site solar panels, battery storage, and microgrids. In order to prioritize community-focused clean energy solutions, we recommend the following be revised in the Implementation Playbook:

- Strategy 3.2.2 “Electric Supply Decarbonization Case Studies at the Organizational Scale” should be adjusted to clarify the County’s own energy procurement structure. The County must correct this misleading statement as it utilizes a Direct Access Program and does not procure 100% renewable content for municipal operations through SDCP. We recommend that the County transitions out of the Direct Access Program and procure 100% renewable energy content for municipal operations through SDCP, as SDCP is the only program that will reinvest revenues back into the community.
- CAC **opposes** the inclusion of SDG&E’s Path to Net Zero Report as a case study in Strategy 5.4.2 “Electric Supply Decarbonization Case Studies at the Regional Scale”. The pathways in this report are inconsistent with significant measures in the RDF and calls for continued future use of methane gas. This is not representative of a sincere decarbonization case study.

Overall, implementation strategies and measures for the Decarbonization of the Electricity Supply section should prioritize local opportunities for disadvantaged communities to access DER projects to strengthen resilience.

### ***Decarbonize Buildings***

Approximately 30% of regional GHG emissions come from the electricity and combustion of methane gas in buildings. The impact the buildings sector has on decarbonization is critical for reaching zero carbon. The pathways to get there, such as electrification, are proven, efficient, and scalable and must be highlighted in the RDF.

We recommend the following additions and revisions be made to the Implementation Playbook:

- Strategies 3.3.3 & 4.4.3 “Increase Use of Low-Carbon Fuels in Buildings” should be renamed to “Limited Use of Low-Carbon Fuels in Buildings” to clarify the limited need for building decarbonization efforts outside of electrification. While alternative fuels will be needed in certain hard-to-abate industries, these are limited in San Diego County. The Implementation Playbook should clarify that this strategy does not seek to increase low-carbon fuel use in general, and specify that this is solely for buildings that are unable to electrify. CAC strongly **opposes** the use of hydrogen in buildings where electrification is feasible.
- Strategy 5.5.2 “Electrify Appliances and Buildings” should ensure the incentives available for transitioning homes to be electric-ready (ex. panel upgrades) cover the full cost for homes in disadvantaged communities by leveraging local, state and federal dollars.
- All Buildings Strategies should highlight the need to **prioritize** disadvantaged communities, rather than simply including them in various measures. In addition, measures that direct jurisdictions to “adopt an ordinance to prohibit natural gas use in new residential and non-residential development” should be prioritized. Passing “reach codes” to ensure new construction is built all-electric is essential for decarbonizing buildings and to improve our climate and health.

### ***Land Use & Natural Climate Solutions***

The RDF identifies that avoiding developing on natural and working lands is an effective strategy to sequester and store carbon. To save these valuable carbon sinks, the RDF Implementation Playbook must directly recommend that jurisdictions stop adopting policies that incentivize inequitable, unsustainable, expensive, and dangerous sprawl development in high VMT, high fire hazard zones. Auto-centric sprawl is one of our region’s greatest sources of emissions, destroying natural habitats and green spaces, and bringing greater wildfire and public health risks to adjacent natural lands.

We recommend the following be included in the Implementation Playbook:

- Strategy 3.4.2 “Preserve Existing Carbon Stocks” should emphasize preserving specific natural lands such as canyons, blue carbon habitats, and wetlands/marshlands to sequester carbon, support biodiversity, and promote clean water.
- Strategy 4.5.1 “Remove and Store Carbon” should include actions to:

- Develop community outreach and educational programs that prioritize how urbanized disadvantaged communities can plant trees in an effort to avoid the creation of heat islands;
- Commit to a tree canopy coverage percentage target and prioritize implementation in environmental justice communities first;
- Adopt an ordinance to require shade trees at trolley and bus stops in collaboration with MTS, NCTD, and SANDAG; and
- Adopt a Green Street Ordinance requiring a systemic transformation of city roads into green streets, triggered by capital improvement projects.
- Strategy 5.6.1 “Remove and Store Carbon” should include an action to develop a Regional Green Infrastructure Plan that promotes green streets, clean water, and stormwater capture.
- The Strategy 5.6.3 “Preserve Existing Carbon Stocks” Analysis/Research action must explicitly state that newly located infrastructure in urbanized areas with existing and future infrastructure near public transit **must be in alignment with SANDAG’s RTP and concentrated in VMT efficient areas and Transit Priority Areas (TPAs).**

We support all of the current Strategy 4.5.3 “Land Use and Natural Climate Solutions Case Studies at the Community Scale” and would like to emphasize the need for every jurisdiction to develop an “Urban Tree Canopy Assessment” similar to that of the City of San Diego.

### ***Food Systems & Circular Economy***

Achieving zero waste is an important GHG reduction strategy that the region must use to equitably eliminate landfill waste streams. In order to advance a circular economy, jurisdictions must increase public awareness and access to opportunities for reuse, product rentals, repair and donation.

We recommend the following be included in the Implementation Playbook:

- Strategy 3.5.1 “Reduce Organic Waste” actions should explain how and what incentives organizations can use to encourage regional waste companies to implement a restaurant food waste collection program. This strategy should also include an action to work with school districts to develop organic waste reduction programs.
- Strategy 4.6.1.2 “Carbon Farming” should include actions to:
  - Develop programs to support existing farmland to continue producing regeneratively or transition from conventional to regenerative agriculture; and
  - Create incentives for new farmers to adopt carbon farming practices.
- Strategy 4.6.2.2 “Urban Gardens” should include an action to develop tools and technology that identify priority sites for urban agriculture projects. Please refer to this [Integrating Food Systems into San Diego Climate Action Plans Report](#).
- Strategy 4.6.5 “Food Systems and Circular Economy Case Studies at the Community Scale” should include an action to create a program that will educate communities and promote the consumption of less carbon-intensive foods and seasonal eating.

We also recommend the County work in consultation with the San Diego Food System Alliance to develop the food systems and circular economy menu of actions, specifically as it pertains to their [SD Food Vision 2030](#) initiative.

### ***Funding and Financing Strategies within the Implementation Playbook***

We recommend that the County incorporate a specific section on funding and financing strategies within the Implementation Playbook. The Implementation Playbook must include a menu of funding sources that consist of associated costs, and existing and potential federal, state, and private funding sources – as well as other revenue possibilities such as [Climate Resilience Districts](#) – for each decarbonization pathway.

Early planning and preparation is key to ensuring adequate project funding. As federal and state grants become available, the region will need to demonstrate existing plans for specific projects and programs, as well as strategies for allocating expected funding. The creation of a regional climate table could be a great way for jurisdictions to collaborate on developing strategies for funding climate action, which could lead to the strong political will needed to adopt bold climate policy. Without strategies to obtain funding sources, the region may be unable to qualify or be competitive for resources needed to implement sustainability and climate initiatives.

In addition to federal and state funds, the region should consider pursuing additional private and taxpayer-funded climate action money.

We recommend reviewing the [Funding San Francisco Climate Action Report](#) that the Center for Law, Energy & the Environment (CLEE) developed. This report assesses options for developing an equitable revenue generation and implementation strategy for San Francisco's CAP. The CLEE conducted interviews with leaders across climate and municipal financing, green infrastructure and resilience investment, and other community environmental justice stakeholders. We recommend that the County scale these strategies to the region's local context.

### ***Conclusion***

We applaud the County for developing this critically important document that can lead to the implementation of actions which will protect public health, build a fossil fuel free economy, and create a climate safe San Diego region. We hope that the RDF Implementation Playbook will become the standard for regional climate action, and model complete decarbonization pathways for other metropolitan areas across the state and nation.

Sincerely,

*Madison Coleman*

Madison Coleman

Policy Advocate

Climate Action Campaign