



November 12, 2025

Chair Elo-Rivera and Committee Members
City of San Diego Environment Committee
202 C St.
San Diego, CA 92101
Via Email

Subject: Urgent Action Needed to Meet the Climate Action Plan and Legal Settlement Obligations

Dear Chair Elo-Rivera and Committee Members,

Climate Action Campaign (CAC) is a nonprofit organization dedicated to securing a clean, healthy, safe, and affordable clean energy future for all San Diego families.

In 2022, CAC and the Center for Environmental Rights Foundation (CERF) sued the City of San Diego for violating the California Environmental Quality Act (CEQA). The lawsuit argued that the City's Climate Action Plan (CAP) lacked the necessary mechanisms to ensure it would achieve its legally mandated goals: reducing greenhouse gas emissions by 40% by 2030 and reaching net zero by 2035.

A settlement was reached in 2024. Under this agreement, the City is required to:

- **Track progress** toward climate goals annually, and
- **Take corrective action** if it falls behind, beginning in 2025.

Unfortunately, recent data shows the City is not meeting these obligations. The latest 2023 greenhouse gas inventory reveals emissions increased by 2% from 2022, reaching 8.52 million metric tons of CO₂e. To meet the 2030 target of 4.2 million metric tons, emissions must be cut in half within just four years. This troubling trend demands transparency, accountability, and decisive action.

1. Take Ownership Over Increasing Emissions

The City must acknowledge its rising emissions and act in accordance with the settlement. Our community deserves honest communication and urgent corrective measures to get back on track.

2. Host a Meaningful Stakeholder Workshop

The settlement requires that *if the City is not on track to meet its goals by the end of 2025*, it must host a stakeholder workshop to discuss CAP implementation and proposed updates. Although staff have indicated this workshop will occur in December, no public notice has been issued. Scheduling it during the holiday season would limit community participation. To ensure meaningful engagement, the workshop should be postponed to early 2026.

3. Update the CAP Implementation Plan

The settlement also requires that, by the end of 2025, staff request a City Council hearing to discuss an updated CAP Implementation Plan. This update should include adjustments to sequencing, timing, funding, and implementation pathways necessary to meet the City's climate goals. **Building electrification and energy efficiency policies** must be at the center of this update as the IBA has pointed out this is the most consequential sector for reducing emissions via the CAP. In California 80 jurisdictions have adopted these types of building reach codes since 2022, the City of San Diego has yet to do so.

This settlement presents a vital opportunity for collaboration between the community, industry, and the City to create effective and equitable climate solutions. However, success depends on the City's commitment to uphold its legal obligations.

We urge the City to act swiftly and transparently to meet these requirements and protect our shared future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Dang', with a stylized, cursive script.

Anthony Dang
Policy & Community Outreach Manager
Climate Action Campaign