



June 16, 2024

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

RE: Blueprint Fails to Conform to the Climate Action Plan – Here's How to Fix It

Dear Honorable Mayor and Councilmembers,

San Diegans deserve access to high quality, sustainable, reliable, safe, and affordable housing and transportation networks built by a skilled and trained workforce that are connected to important resources like schools, high road high wage jobs, healthcare centers, grocery stores, and recreation.

San Diegans also deserve clean air and good health. Methane gas (also referred to as natural gas) contains harmful pollutants that are dangerous for public health and the climate. Air pollution generated by burning fossil fuels indoors significantly impacts residents and workers health leading to significant health disparities between those with electric appliances and those with gas appliances.

The Problem

The City's Climate Action Plan (CAP) 2.0 rightly recognizes our collective right to clean air, good health, robust transportation options, and homes free of dangerous fossil gas.

- 1) CAP 2.0 has requirements for mode shift, yet Blueprint SD and the Program Environmental Impact Report (PEIR) fail to demonstrate the 2035 target of 50% of all trips via walking/rolling, biking, and public transit. Even by the year 2050, there is zero evidence to demonstrate the City is on target to attain its CAP Strategy 3 greenhouse gas (GHG) reduction targets. In fact, the delta in 2050 is more than 20% from the 2035 50% target.

Thus, the City is failing to align the General Plan Amendment referred to as Blueprint SD Initiative as well as the PEIR by not demonstrating a land use growth strategy that will address the sustainable, net zero GHG emissions future that CAP 2.0 legally promises to all residents.

- 2) CAP 2.0 also sets guidelines for reducing GHG emissions from methane gas in Strategy 1, with the decarbonization of new development being a foundational action to meet the reduction goals. The City of San Diego's GHG emissions inventory for 2019 also identifies 18% of emissions coming from methane gas.

Despite the City identifying the need to decarbonize, Blueprint SD does not implement performance and sustainable workforce safety measures nor does it set the bare minimum threshold of no gas infrastructure for new development. In fact, the PEIR states, "new development occurring under the project may result in the need for new electric and natural gas transmission lines...." It also cites, "residential consumption of natural gas for heating and cooking is the second highest percentage...."

How to Fix Blueprint: Require All-Electric Buildings

Higher density development will only result in low energy consumption consistent with CAP 2.0 if there are regulatory mechanisms to incentivize the development of all-electric buildings. In fact, the PEIR admits that, "as new development is constructed, new or renovated buildings would use electricity and natural gas to run various appliances and equipment...Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand." The impacts would certainly be found significant with the addition of more methane gas in new developments. The PEIR however, inaccurately states the impact would be "less than significant."

We ask the City to adjust the PEIR and Blueprint SD to correct these inaccuracies and state that the impacts of gas are significant. Without this change, the public has no transparency of the PEIR's impact on increasing GHG emissions and the city will certainly not achieve net zero emissions by 2035.

The City must adopt a High Performance Reach Code that sets performance standards for new construction to limit the expansion of new gas infrastructure and meet the needed emissions reductions. The Reach Code must require all electrical work be done by C-10 licensed contractors employing state certified general electricians. While the Zero Emissions Municipal Buildings & Operations Policy (ZEMBOP) aids the city in removing gas from municipal facilities, it does not address gas expansion in residential and commercial buildings.

While positive steps have been taken to address growth and development within the CAP framework, the scope is too limited. The potential of new development to include methane gas would prevent the city from achieving its 2030 and 2035 CAP targets for reducing GHG emissions via elimination of fossil fuels in the form of gas for residential and commercial development. Blueprint SD and the PEIR need to be reconfigured with transparency and accountability for achieving CAP 2.0 targets so we can reach the zero carbon future we all deserve.

Sincerely,

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