



December 3, 2021

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Land Use and Environment Group  
County of San Diego  
San Diego, CA 92101  
[Via Email](#)

**Subject: Climate Action Campaign comments on the draft Regional Decarbonization Framework for the Technical Working Group**

Dear Dr. Murtaza H. 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 policy action.

We applaud the County for developing the Regional Decarbonization Framework (RDF) as a regional tool that can help our communities take action in line with climate science, as well as promote public health, equity, and a prosperous green economy. The potential for this Framework is huge, and we hope this plan can ultimately model regional climate planning and decarbonization for the rest of the nation. We also thank the County for the opportunity to serve on the County's Technical Working Group, and look forward to continuing to partner on this Framework.

As a member of the County's Technical Working Group, please accept the following comments regarding the draft RDF. We have also included a number of attachments related to our organization's on-going advocacy.

**Chapter 1: Study Framework**

To ensure this Framework is successfully utilized, the final RDF should be accompanied with implementation strategies that include associated costs and timelines, as well as a suite of identified possible funding sources to help implement the strategies. While we recognize that

the RDF models various pathways for consideration and is not meant to be “a precise blueprint,” the RDF will be a guiding source document for all 18 cities and the county, and we need additional structure and direction to help ensure the plan is useful for future implementation, and not just stuck on a shelf gathering dust. We recommend the study framework include detailed and specific implementation and funding strategies as part of the final RDF.

Further, the County can be a facilitator and leader in developing a regional approach on decarbonization. We urge the County to partner with SANDAG and other stakeholders like CAC to set up a Regional Climate Authority at SANDAG to help lead regional conversations, help raise and distribute funds, and engage with state and federal officials to identify pathways for implementing climate solutions and climate resiliency and adaptation strategies. As the climate emergency worsens, regional collaboration and joint funding efforts will be essential.

## **Chapter 2: Geospatial Analysis of Renewable Energy Production**

Renewable energy is one of the core pillars of decarbonization, as identified in the report. Decarbonizing our grid and transportation systems, as well as removing dangerous fossil gas from our buildings, will require an extraordinary and coordinated regional effort and political alignment.

We are fortunate to have so many resources here in San Diego and Imperial counties to help build out this necessary clean energy future, while also creating unprecedented local economic and workforce opportunities. We applaud the pathways outlined in the draft RDF to achieve local clean energy independence to help transition our region off fossil fuel electricity.

### ***Distributed Energy Resources***

We recommend that the draft RDF perform a deeper dive into additional direct benefits and co-benefits of rooftop solar, community solar, battery storage, microgrids and other distributed energy resources (DERs) within our existing built environment. DERs help reduce long term costs, protect against wildfire risks, save natural and working lands, and build resiliency and reliability in our energy system. In fact, DERs will likely save many lives and keep power on when our grid system inevitably fails or PSPS (public safety power shutoffs) occur during heat waves, wildfires and other climate disasters.

Many studies have demonstrated the benefits of local DERs. One study found cumulative savings in California of \$120 billion in reduced distribution and transmission costs through 2050

if the state invests in local DERs over utility scale generation, savings that can help families and businesses afford the necessary transition to an all-electric future.<sup>1</sup>

The economic and social benefits of reduced public safety power shut offs (PSPS) are also a significant benefit, with local DERs being able to stay online while distant, transmission-dependent resources shut down during ever more frequent wildfires and other related climate disasters. PSPS impacted over 2.9 million Californians in 2019 alone, with many already turning to DERs to blunt blackouts.<sup>2</sup>

The state and region have enormous potential for additional DERs that can help protect natural and working lands from being converted from carbon sinks to industrial uses. A 2016 analysis by the National Renewable Energy Laboratory found that California has the potential to meet more than 75% of its electricity demand with rooftop solar.<sup>3</sup> With that capacity potential, the state could save over 148,000 acres of natural lands, with 1 GW of rooftop solar potentially avoiding the conversion of nearly 5,200 acres of natural lands.<sup>4</sup>

Local build out of DERs has been proven feasible. As of January 2020, the City of San Diego has 600 MW in local solar capacity, and 90,000 local solar installations, alone.<sup>5</sup> This generation can be significantly increased with ample capacity within existing cities in the region to meet local clean energy demand, as exemplified by a 2018 study commissioned by the City of San Diego “which identified over 490 MWac of technical solar PV siting potential across more than 120 sites, with each site being able to host a solar PV system of at least 1,000 kWac.”<sup>6</sup> We encourage the RDF to include more analysis on what that build out may look like, and review Protect Our Communities Foundation’s informative report “Roadmap to 100 Percent Local Solar Build-Out by 2030 in the City of San Diego” to see what is possible.<sup>7</sup>

### ***Utility-Scale Generation***

Even with the increased transmission, distribution, and land use change costs, and reduced resiliency, there will be a need for utility scale generation. We recommend the County fully vet the impacts of utility scale projects as part of the RDF, and include specific recommendations to

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<sup>1</sup> Vibrant Clean Energy. “[Role of Distributed Generation in Decarbonizing California’s Economy by 2045](#).” (July 2, 2021).

<sup>2</sup> Environment California. “[The Environmental Case for Rooftop Solar Energy](#).” (June 2021).

<sup>3</sup> National Renewable Energy Laboratory. “[Rooftop Solar Photovoltaic Technical Potential in the United States: A Detailed Assessment](#).” (January 2016).

<sup>4</sup> Environment California. “[The Environmental Case for Rooftop Solar Energy](#).” (June 2021).

<sup>5</sup> California Distributed Generation Statistics. [Database, Statistics and Charts](#). (2021).

<sup>6</sup> Clean Coalition. “[San Diego Solar Siting Survey Final Summary Report: Solar Photovoltaic \(PV\) Commercial-Scale Sites for 1,000 kWac and Larger](#).” (December 2018).

<sup>7</sup> Protect Our Communities Foundation. “[Roadmap to 100 Percent Local Solar Build-Out by 2030 in the City of San Diego](#).” (May 2020).

mitigate those impacts on communities that may have reservations about such developments.<sup>8</sup> An analysis of Community Benefit Agreement (CBA) policies, something the County is currently exploring, would be helpful to all jurisdictions and agencies in the region to further understand what can be done to address community concerns and mitigate negative impacts.

We also recommend the RDF include a clear analysis on the cost of new transmission lines and distribution systems. Transmission and distribution costs have driven higher electricity rates across the country, adding additional cost pressures to families and businesses.<sup>9</sup> Reducing those cost pressures with DERs may be an ideal solution to stop spiraling electricity bills.

### ***Geothermal Resources and Lithium Extraction***

We recommend that geothermal opportunities in the Imperial Valley be further considered and explored. As the state and federal government look to make massive investments in clean energy technology, geothermal resources can provide significant 24/7 clean electricity resources, as well as offset potential job losses in fossil fuel industries.

However, it is critical for the San Diego region to listen, understand, and partner with Imperial and Riverside county communities to develop strong CBAs that can uplift communities of concern and provide good middle class and union jobs. We recommend the RDF analyze the work of the Lithium Valley Commission to better understand geothermal and related-lithium extraction issues, and connect with community and place-based organizations near these proposed facilities around the Salton Sea to hear their concerns and needs.<sup>10</sup>

### ***Community Choice Energy***

CCE will be our only pathway to achieving a 100% renewable energy future. Since their inception, CCE programs have created or contracted nearly 10,000 MW of long-term new-build clean energy resources, making them pivotal to meeting state and local renewable energy targets.<sup>11</sup>

To help coordinate local renewable energy development, we recommend the County work with San Diego Community Power (SDCP) CCE program, which is about to conduct an energy needs assessment, the first step toward creating a Community Power Plan (CPP) for its member

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<sup>8</sup> San Diego Union Tribune. "[Jacumba residents sue to stop 600-acre solar project.](#)" (September 21, 2021).

<sup>9</sup> US Energy Information Administration. "[Electricity prices reflect rising delivery costs, declining power production costs.](#)" (September 7, 2021).

<sup>10</sup> California Energy Commission. [Lithium Valley Commission](#). (2021); Alianza Coachella Valley. [Environmental Justice](#). (2021).

<sup>11</sup> CalCCA. "[California CCAs Secure Almost 10,000 Megawatts in Long-Term Contracts with New-Build Clean Energy Resources.](#)" (November 3, 2021).

jurisdictions. SDCP’s CPP will be modeled after East Bay Community Energy’s “Local Development Business Plan”—a roadmap for local renewable energy and program development.<sup>12</sup> We recommend the RDF explore and learn more about these opportunities for renewable energy planning. We also recommend that the region’s other CCE program, Clean Energy Alliance, be part of these discussions as well.

### ***A note on Emerging Technologies***

As the climate crisis accelerates, we must rapidly transition away from fossil fuel resources by deploying and scaling existing technologies: solar, wind, geothermal, battery storage, etc. While an exploration of emerging technologies can be helpful, we do not have the time to wait for them to become feasible. Hydrogen, biomass, carbon capture, and “renewable” natural (methane) gas are dead-end pathways that distract us from proven solutions, while perpetuating the fossil fuel industries that created the climate crisis harming our communities today.<sup>13</sup> The RDF must focus on existing opportunities and proven technologies for its clean electricity pathways, not fossil fuel industry proposals that will lock in more emissions for decades to come.

## **Chapter 3: Accelerating Deep Decarbonization in the Transportation Sector**

We appreciate that the draft RDF includes strong support for existing and planned transportation strategies, including SANDAG’s forthcoming 2021 Regional Plan and 5 Big Moves, the County’s Electric Vehicle (EV) Roadmap, and other plans. To succeed, these plans require the region’s support, and together, will put San Diego County on a path toward dramatically reducing transportation emissions.

However, we find it problematic that the model used to inform Chapter 3 (EnergyPATHWAYS) assesses decarbonization through fuel shifts, not mode shifts. Unlike SANDAG’s Activity Based Model (ABM2+), the draft RDF does not consider a Vehicle Miles Travelled (VMT) reduction. The County has a long track record of avoiding legally-defensible transportation goals, both in previous iterations of the Climate Action Plan, and with SB 743 implementation, due to 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.

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<sup>12</sup> East Bay Community Energy. “[Local Development Business Plan](#).” (July 18, 2018).

<sup>13</sup> EarthJustice. “[Hydrogen No Silver Bullet for Climate Crisis, Focus on Electrification](#).” (August 31, 2021); EarthJustice and Sierra Club. “[Rhetoric vs. Reality: The Myth of “Renewable Natural Gas” for Building Decarbonization](#).” (July 14, 2020); Cleantechica. “[Another Carbon Capture & Storage \(CCS\) Project Doesn’t Live Up To Its Targets](#).” (September 13, 2021).

Mode shift and VMT reduction goals are also important, because by the draft’s own admission, even SANDAG’s planned 2021 Regional Plan (RP) and existing local strategies will not be sufficient to meet local and state transportation decarbonization targets. CAC and Circulate San Diego came to the same conclusion after analyzing SANDAG’s projected mode share for the RP within the City of San Diego—the RP “will only achieve 27% of commuters taking bike, walk, and transit in City of San Diego TPAs by 2035.”<sup>14</sup> While this is a significant improvement when compared to the 2015 RP, it is not enough to meet the City CAP’s 50% target. The RDF should be just as aware of these VMT reduction projections when developing recommended transportation pathways.

VMT reduction must also be a priority to meet international climate targets. The Rocky Mountain Institute's “Policy Brief: US Sector-Level Strategies and Targets to Limit Warming to 1.5°C” identifies a 20% reduction in VMT from 2019 levels as necessary to keep the planet safe from climate change.<sup>15</sup> A report by C40 Cities concluded that “city residents worldwide need to choose modes like walking, biking and transit for at least 40 percent of the miles they travel by 2030 in order to prevent global heating from exceeding the 1.5°.”<sup>16</sup> Again, EV strategies alone will not decarbonize the transportation sector fast enough to prevent the worst impacts of the climate crisis.

### ***Transportation and Public Health***

There are also significant public health benefits in biking, walking, and transit focused pathways. A 2016 study of 14 cities around the world found that “design of urban environments has the potential to contribute substantially to physical activity.”<sup>17</sup> In our region, “areas such as Barrio Logan, western National City, Chula Vista, Southeast San Diego, San Ysidro, and El Cajon are some of the most polluted neighborhoods in California.”<sup>18</sup> Bikeable, walkable neighborhoods near transit, jobs and amenities promote healthier lifestyles and social outcomes, in addition to reducing emissions and providing cleaner air, especially in frontline, working-class communities of color.

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<sup>14</sup> Climate Action Campaign. “[Missing the Mark: City of San Diego must double down on Bike/Walk/Transit Targets in Climate Action Plan.](#)” (October 2021).

<sup>15</sup> Rocky Mountain Institute. “[Policy Brief: US Sector-Level Strategies and Targets to Limit Warming to 1.5°C.](#)” (April, 2021).

<sup>16</sup> Streetsblog USA. “[Report: Climate Goals Impossible Unless Sustainable Transport Claims 40 Percent of Mode Share.](#)” (November 12, 2021).

<sup>17</sup> The Lancet. “[Physical activity in relation to urban environments in 14 cities worldwide: a cross-sectional study.](#)” (April 1, 2016).

<sup>18</sup> Climate Action Campaign. “[The Dream is Possible: World-Class Transit In The San Diego Region.](#)” (May 2021).

### ***Transportation and Land Use***

The RDF should also more closely link transportation and land use pathways to reduce emissions and VMT. As the California Air Resource Board (CARB) made clear in 2018, no region will meet their emissions reduction targets without significant land use changes that reduce trip distance and auto-dependence.<sup>19</sup> We recommend that both the transportation and land use elements of the RDF be more closely aligned, and that any specific pathways related to transportation decarbonization be considered and tied to corresponding land uses to reduce emissions and VMT.

## **Chapter 4: Natural Climate Solutions and Other Land Use Considerations**

### ***Sprawl Development***

To achieve a zero carbon future, the County and local jurisdictions must avoid development on natural and working lands, which the draft RDF correctly identifies as effective carbon sequestration and sinks. However, just as our 2021 report “Solving Sprawl: Building Housing for A Sustainable and Equitable San Diego” concludes, the RDF must be direct in recommending to policy makers that sprawl development, which destroys natural habitats and brings greater wildfire and public health risks, must be stopped for our region to have any chance at meeting and exceeding local and state emissions reduction targets.<sup>20</sup>

### ***Affordable and Missing Middle Housing***

Climate policy does not exist in a vacuum, and the housing affordability crisis in our region must be addressed. Jurisdictions and agencies can plan, invest, and develop both affordable deed-restricted and missing middle market rate housing in existing and future urbanized areas near transit and job centers. To support this key emissions and VMT reduction strategy, we recommend the draft RDF align its land use recommendations with SANDAG’s “Sustainable Communities Strategy” housing allocation numbers and SB 743 VMT efficient areas.<sup>21</sup> Consistent regional planning that aligns our climate, housing, and transportation goals is key. See our sprawl report for additional recommendations to promote housing affordability and prevent displacement.

### ***Land Use Changes, Emissions Accounting, and Offsets***

We agree that positive carbon emissions from land use changes should be accounted for in the final RDF and Climate Action Plans. We hope the RDF elevates this recommendation to all

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<sup>19</sup> California Air Resources Board. “[Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets](#).” (February 2018).

<sup>20</sup> Climate Action Campaign. “[Solving Sprawl: Building Housing for A Sustainable and Equitable San Diego](#).” (October 2021).

<sup>21</sup> SANDAG. [Sustainable Communities Strategies](#). (2021).

jurisdictions so they may incorporate the costs of emissions from land use changes and the lost sequestration potential when considering land use planning decisions. This accounting will be critical to consider as the lost annual negative emissions would need to come from other sources like other natural and working lands or reductions in other sectors.

We also support governments utilizing the most recent and localized data possible when estimating natural climate solutions' contributions to decarbonization. Localized data is crucial because inaccurate data can lead to overestimating net negative emissions, thus leading to falling short of net zero goals, or underestimating net negative emissions, which may permit inefficiencies or higher costs incurred in other sectors contributing to net zero goals. The County's history of overinflating carbon offset opportunities makes accurate data even more critical. The Energy Policy Initiatives Center (EPIC) report "Opportunities for Local Carbon Offset Credits in the San Diego Region" is a helpful analysis on this issue.<sup>22</sup>

### ***Land Use and Transportation***

To have any impact, land use and transportation decarbonization pathways must be interlinked consistently. We recommend that the County collaborate with MTS and NCTD to develop pathways for complete streets policies, smart growth strategies, and optimize world class transit options to create inclusive bikeable, walkable neighborhoods.

## **Chapter 5: Decarbonization of Buildings**

Building decarbonization will be one of the most challenging and critical transitions to a Zero Carbon future. The draft RDF analysis includes a number of pathways to achieve building decarbonization, though there must be more focus on proven solutions, rather than pursuing half measures that will perpetuate fossil fuel consumption. As we noted in our comments on Chapter 2 of the draft RDF, dead end pathways are unjustifiable in the face of a rapidly worsening climate crisis. To that point, we recommend the RDF remove the partial electrification pathway, and focus instead on central (high electrification) scenarios. Unproven technologies like "low carbon" fuels, biomethane, and hydrogen-based fuels should not take precedence over proven, cost-effective, and scalable electrification solutions.

The RDF must include strong examples of how jurisdictions and agencies can develop all-electric reach codes to stop the proliferation of fossil fuel infrastructure and stranded assets in our communities. The San Diego region is home to the first city in California to adopt an all-electric reach code (the City of Carlsbad), in a state that now has more than 50 cities, including the cities

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<sup>22</sup> Energy Policy Initiatives Center. "[Opportunities for Local Carbon Offset Credits in the San Diego Region](#)." (June 2021).



of Encinitas and Solana Beach, who have passed building electrification ordinances for new construction.<sup>23</sup> These “no regret” policies are critical to stop the building of stranded fossil fuel infrastructure assets, and must be elevated and explained in detail in the RDF for cities to explore and enact.<sup>24</sup>

Building electrification strategies must also be informed by existing research and case studies. We recommend the RDF explore and include concrete examples of building electrification efforts across the country to model best practices. The Building Electrification Institute’s resource library includes a number of reports with recommendations the County may want to review and include for jurisdictions and agencies to consider as part of their overarching building decarbonization strategies.<sup>25</sup>

### ***Building Electrification and Public Health***

Building electrification is not only critical to our climate, but also to our individual and collective public health. Methane gas pumped into our homes has been proven countless times to increase negative health outcomes.<sup>26</sup> A recent study in Australia linked indoor air pollution from methane gas as equivalent to secondhand smoke in asthmatic children.<sup>27</sup> And we have known about the negative health impacts of methane gas for decades, including a 1992 study that found children who live in a home with a methane gas stove have a nearly 20% increased risk of developing respiratory illnesses.<sup>28</sup> The Aliso Canyon gas leak also demonstrated the dangers of methane gas to outdoor air quality as well.<sup>29</sup> We recommend the RDF include an analysis of the public health impacts of indoor and outdoor air pollution from methane gas, including the health and social benefits of electrification.

### ***Starting-Line Disparities in Building Electrification***

The RDF may consider complementary pathways to address starting-line disparities in building decarbonization. Deferred maintenance in old buildings, which are more likely to be occupied by working-class communities of color and low income families, face deadly health impacts from lead, mold, asbestos, and other structural deficiencies. The RDF should recognize these risks as part of the broader building decarbonization effort, and prioritize equity in

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<sup>23</sup> Sierra Club. “[California's Cities Lead the Way to a Gas-Free Future.](#)” (July 22, 2021).

<sup>24</sup> Rocky Mountain Institute. “[Decarbonizing Homes: Improving Health in Low-Income Communities through Beneficial Electrification.](#)” (October 2021).

<sup>25</sup> Building Electrification Institute. “[Resources.](#)” (2021).

<sup>26</sup> Physicians for Social Responsibility, Rocky Mountain Institute, et al. “[Gas Stoves: Health and Air Quality Impacts and Solutions.](#)” (2020); Power Past Fracked Gas. “[Methane Gas: Health, Safety, & Decarbonization.](#)” (August 2021).

<sup>27</sup> Climate Council. “[Kicking the habit: How gas is harming our health.](#)” (2021).

<sup>28</sup> Journal of the Air & Waste Management Association. “[Synthesis of Environmental Evidence: Nitrogen Dioxide Epidemiology Studies.](#)” (1992).

<sup>29</sup> California Air Resource Board. “[Aliso Canyon Natural Gas Leak.](#)” (2021).

electrification pathways which may require significant, targeted investments in pre-weatherization and weatherization in communities of concern. The Green and Healthy Homes Initiative 2020 report on this issue is a good resource to explore starting-line disparities.<sup>30</sup>

### ***Equitable Community Engagement, Outreach, and Partnership***

Building decarbonization must be completed with a careful eye on community and worker impacts. Equitable electrification for communities of concern and a just transition for fossil fuel workers must be key elements of any building electrification strategy. There has been significant research and progress made on how to engage with communities and workers. The Greenlining Institute’s “Equitable Building Electrification” report includes some key case studies of communities in California who have undergone building decarbonization, which may prove insightful for our region.<sup>31</sup> We recommend the RDF building decarbonization component include an analysis of equitable building electrification and just transition strategies, with key takeaways for jurisdictions and agencies to consider. We have additional comments and recommendations on just transition planning in the next section.

## **Chapter 6: Employment Impacts through Decarbonization for the San Diego Region**

The jobs analysis is an exciting highlight of new jobs and career pathways for San Diegans as part of the region’s decarbonization. We also appreciate the preliminary framework for just transition pathways outlined in the draft RDF. While we do not have any recommendations related to the jobs impact methodology and are eager to see the final workforce development pathways report, we will elevate some key examples and reports of just transition planning across the country.

### ***Illinois Clean Energy Jobs Act***

This past September, the state of Illinois passed the Clean Energy Jobs Act (CEJA).<sup>32</sup> A comprehensive framework, CEJA includes a number of critical components to ensuring a just transition for displaced fossil fuel workers, coupled with policies and programs designed to increase renewable energy development and high-road jobs and careers. As key element of CEJA is “The Displaced Energy Workers Bill of Rights” which includes:

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<sup>30</sup> Green and Healthy Homes Initiatives. “[Leading with Equity and Justice in the Clean Energy Transition: Getting to the Starting Line for Residential Building Electrification.](#)” (2020).

<sup>31</sup> The Greenlining Institute. “[Equitable Building Electrification: A Framework for Powering Resilient Communities.](#)” (September 30, 20219).

<sup>32</sup> State of Illinois. “[Gov. Pritzker Signs Transformative Legislation Establishing Illinois as a National Leader on Climate Action.](#)” (September 15, 2021).

- Advanced notice of closure
- Financial advice to displaced workers
- Continued health care and retirement packages; and
- Full tuition scholarships at state and community colleges and trade programs with guaranteed state funding<sup>33</sup>

We hope the final workforce development pathways report and final RDF will analyze and include something as comprehensive as Illinois’ CEJA approach.

### ***Authentic Engagement with Workers***

As the region looks to develop just transition pathways, we also recommend it do so in an equitable way that approaches these complex issues with sensitivity and cultural competency. We recommend the Equity Research Institutes “Just Transition/Transition to Justice” report that provides some concrete ideas on how to decarbonize our communities with a focus on equity and social justice.<sup>34</sup>

### ***Good Union Jobs and Equitable Access to High-Road Careers***

Having high worker standards will be key to building community buy-in for decarbonization pathways. As the draft RDF discovered, many of the best paying jobs are union jobs, protected by collective bargaining, and offering prevailing wages, healthcare benefits, and pensions. We recommend the County ensure the transition to an all-electric and fossil fuel free future be built by union workers. Equally important will be ensuring equitable access to these jobs for working class communities of color, which can be accomplished through targeted zip code hiring requirements, and government, workforce development, and union investments in pre-apprenticeship and apprenticeship programs in communities of concern. The RDF should encourage these investments to advance economic, social, and racial justice in our region.

## **Chapter 7: Key Policy Considerations for the San Diego Region**

We value the RDF proposal for region-wide institutional governance for decarbonization. To establish effective collaboration between jurisdictions and agencies, and to ensure long lasting and innovative solutions for decarbonization, we recommend that regional governance involves procedures to:

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<sup>33</sup> Illinois Clean Jobs Coalition. “[Supporting Fossil Fuel Workers and Communities. A Just Transition to a Clean Energy Economy.](#)” (September 2021).

<sup>34</sup> Equity Research Institute. “[Just Transition/Transition to Justice: Power, Policy and Possibilities.](#)” (June 2021).

- Monitor and evaluate progress towards targets; regularly evaluating progress and updating plans can assist local governments in reflecting the latest science, technological advancements, financial situations, and development capacities.<sup>35</sup>
- Create systems to help maintain clear, open, and continuous communication between all jurisdictions and agencies.
- Identify and/or develop new funding mechanisms to raise money to ensure the implementation of effective decarbonization actions.
- Work in a multi-level governance framework to avoid policy gaps between local climate action plans and state, national, and international frameworks.
- Ensure equitable climate action and investment across the region.
- Create a Regional Adaptation Plan to plan for regional climate impacts such as fires, droughts, extreme heat, sea level rise, etc.
- Provide sample ordinances and policy recommendations for cities and act as a one-stop-shop for best practices.
- Analyze and monitor regional progress on climate targets and act as a data repository.
- Coordinate regional efforts to build a local, clean energy economy with a just transition for workers across sectors and industries.
- Collaborate with neighboring tribes and advance Indigenous and traditional ecological knowledge (e.g. cultural burning to mitigate wildfires, environmental stewardship).

The governance structures, mechanisms, and principles should be designed to achieve ambitious decarbonization objectives. The RDF’s suggested institutional framework is a good starting point that must be developed and built up.

Regional coordination is critical because today in San Diego, local governments are working in silos to address the climate crisis, and are struggling to meet climate goals—citing lack of funding, political will, and know-how. Climate solutions have not been equitably implemented, and the COVID-19 pandemic has deepened existing inequities. On top of these issues, no local governments are prepared to do what climate scientists say is necessary—rapid decarbonization to zero carbon.

Collaboration across cities, sectors, and industries is essential to accomplish the state’s most ambitious climate goal—Executive Order B-55-18, which aims to achieve carbon neutrality by no later than 2045—and ensure solutions are implemented equitably with an emphasis on communities of concern, and adapt to the impacts of the climate crisis that are too late to mitigate.

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<sup>35</sup> Sustainability. “[Strategies and Governance for Implementing Deep Decarbonization Plans at the Local Level.](#)” (2021).

To address these regional issues and ensure successful implementation of the Regional Decarbonization Framework, we recommend the establishment of a Regional Climate Authority under the jurisdiction of SANDAG.

A Regional Climate Authority would serve as the County’s climate coordinator and resource center, working with local governments, regional bodies, tribal governments, non-profits, academic institutions, and the State of California to mobilize the region toward climate targets and prepare for a changing climate.

## **Chapter 8: Local Policy Opportunities**

We support efforts to analyze local Climate Action Plans (CAPs) in aggregate to understand what commitments exist to reduce emissions across the San Diego region. We encourage the EPIC team leading on this analysis to include an additional analysis of implementation efforts thus far. Climate Action Campaign releases an annual report card scoring cities on their CAPs and corresponding implementation efforts.<sup>36</sup> A technical report on implementation efforts showing specific emissions reductions (or lack thereof) from local CAPs would be helpful in highlighting the opportunities and challenges that exist to reaching full decarbonization in our region. We hope this analysis will ultimately encourage local policymakers to work together in concert at SANDAG to reduce and eliminate emissions.

## **Chapter 9: San Diego as a Model**

We hope the RDF may become a model for successful regional climate planning across the state, nation, and world. Our region has a long history leading on climate policy, including the City of San Diego’s landmark 2015 Climate Action Plan that included the first in the nation top 10 city commitment to 100% clean energy by 2035.<sup>37</sup> The RDF may continue that legacy, though we hope the County and region will not repeat the same mistakes the City has made in failing to implement its vision for a climate safe and ready future.

In the Outline Guidebook, we hope there will be a consistent emphasis on implementation planning and centering equity in a climate policy. The Greenlining Institute has a number of resources available on best practices for engaging and uplifting vulnerable working-class

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<sup>36</sup> Climate Action Campaign. “[4th Edition: San Diego Climate Action Plan Report Card.](#)” (February 2020).

<sup>37</sup> The New York Times. “[San Diego Vows to Move Entirely to Renewable Energy in 20 Years.](#)” (December 15, 2015).

communities of color, which may be informative for other regions looking to develop comprehensive climate solutions that can meet their communities of concern where they are.<sup>38</sup>

## Conclusion

We applaud the County for leading on this critical planning document that can help protect public health, build a fossil fuel free economy, and create a climate safe San Diego region. We hope the final RDF, paired with a robust implementation plan with identified funding strategies and project timelines, can become the backbone for regional climate action, and model complete decarbonization pathways for other metropolitan areas across the state and nation.

Sincerely,



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<sup>38</sup> The Greenlining Institute. [All Resources](#). (2021).