



Sept. 25, 2017

County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attn: Ms. Maggie Soffel (CAP@sdcounty.ca.gov)

Subject: PDS2015-POD-15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003
(County of San Diego Climate Action Plan)

Dear Ms. Soffel,

Climate Action Campaign (CAC) is committed to stopping climate change by helping local governments in Southern California pass and implement successful climate plans. We envision a future in which all communities should have healthy places to live, work, and play.

Business for Good San Diego is a non-profit organization whose mission is to bring together small business owners to drive policy that improves community. We fundamentally believe that good policy is at intersection of what is good for a business's bottom line, for its employees, and for its community.

Please accept these comments on the County of San Diego Climate Action Plan (CAP).

1. Targets must be based on mass emissions, not per capita emissions, to ensure alignment with state targets.

In order for the county to reach state GHG reduction targets, they must be based on mass emission targets. Per capita targets that are not "capped," are not meaningful as population grows. This is especially true for the County's proposal to use their CAP as a CEQA-qualified plan for new development. Instead, assuming the County reaches equivalency with a 1990 baseline by 2020, the emissions level should then be reduced by 40% by 2020 and by 80% by 2050.

Looking at the math, basing percent reduction targets on population projections for 2030 and 2050 yields less ambitious targets than simply using mass emissions and ensuring alignment with state targets. Given a 2014 baseline of 3,211,515 and a 2020 level of 3,147,285 (based on the 2% reduction target for 2020), a 40% reduction from that 2020 level would yield a 2030 emissions level of 1,888,371 and a 2050 level of 629,457. The 2030 target, in this case, would be 2% lower than in the Draft CAP, and the 2050 target would be 15% lower. These calculations show that there are significant differences between the County targets and targets that would be in line with goals established in SB 32 and EO-S-05.



2. The Direct Investment Strategy needs additional clarification and is not an acceptable replacement for direct emissions reductions from land use and transportation.

The Direct Investment Program accounts for 190,262 of 229,482 metric tons, or 83%, of reductions in the Built Environment and Transportation category. It also accounts for 21% of total annual emissions reductions (Appendix C, Table 5). This is a substantial share of the emissions reductions from the CAP; accordingly, a high degree of clarity and evidence about how the measure will reduce emissions in the county is necessary.

This strategy is untested and raises several concerns. First, the CAP lacks adequate detail describing how a direct investment program would work, what level of experience the staff running the program have, and, most importantly, demonstrating that this program would work using the “substantial evidence” test under CEQA. County staff provided examples at the informational presentation on September 19, 2017, of types of projects the County might focus on for direct investment. In addition, Appendix B lists a range of protocols that may be applied to County direct investment projects. Examples provided included weatherization of existing structures, urban tree planting, carbon farming, and methane recapture for dairy and from landfills. These are worthy ventures; however, the question remains, where is the substantial evidence that these projects, cumulatively, can provide the emissions reductions projected for this strategy? Attachment 1 of Appendix C, which shows the calculations and assumptions supporting GHG reduction estimates for each measure, omits measure T-4.1. The County must demonstrate substantial evidence that this strategy is feasible and, if implemented, would lead to the emissions reductions identified.

As importantly, how do direct investments benefit the communities where pollution from transportation is generated? What are the public health impacts the lack of investment in public infrastructure for walking and biking? Similarly, we are concerned about the air quality impacts of having direct emissions reductions from transportation and land use count for just 4.4% of total reductions.

We recommend that the Direct Investment strategy be unbundled from the Built Environment and Transportation section of the CAP. Implementation of the Direct Investment strategy will not primarily reduce emissions from Built Environment and Transportation, so it should not be listed under that umbrella. Further, lumping measure T-4.1 into the Built Environment and Transportation strategy creates the misleading impression that the reductions from that category are greater than they are in reality.



3. The Draft CAP Lacks Adequate Commitment to Emissions Reductions From Built Environment and Transportation Strategies.

Although 45% of the County's emissions currently come from on-road transportation, just 4.4% of total reductions will result directly from built environment and transportation strategies.¹ This egregious gap between the sources of emissions and the solutions advanced raises the question of whether the County CAP is consistent with and supports the intent of SB 375, which integrates transportation, land use, and housing policies to reduce emissions from passenger vehicles.

Further, this disproportionate lack of investment in land use and transportation strategies to reduce emissions will likely have significant public health impacts from continued emissions from vehicles and from a lack of safe and efficient active transportation options.

Built environment and transportation targets should include aggressive mode share targets for walking, biking, and mass transit. Measures to reach targets should include the development of extensive pedestrian networks and protected, connected bike lanes, as well as concentration of development around existing transit routes.

4. Community Plan Update Strategy Needs Clarification

Strategy T-1.3 indicates intent to update 10 community plans by 2030 and 9 more between 2031 and 2040, which will “achieve mixed-use and transit-oriented development within existing village centers.” Appendix C shows that this measure projects a 12% VMT reduction in the population affected by the Community Plan Updates. It assumes that by 2030, half of the Community Plan Updates will be implemented.

The measure, and the assumptions used to calculate reductions from it in Appendix C, need to provide more description of the set of strategies that will be required of Community Plan Updates to ensure that the reductions in VMT are achieved.

5. Recommend Increasing to 90% Zero Emissions Vehicles in County Fleet by 2030.

The performance metric for T-3.4 is to reduce County fleet emissions by 20% by 2030; we recommend aggressively pursuing the transition to zero emissions vehicles in the county fleet when updating the Strategic Energy Plan and the Green Fleet Action Plan.

¹ When the emissions reductions from the direct investment measure are subtracted out of the reductions projected from measures related to built environment and transportation (229,482-190,262=39,220), we see that just 39,220 MT CO₂e out of 879,145 MT CO₂e of reductions in 2030 are projected to come from strategies within built environment and transportation.



7. Recommend 100% Clean Energy Target with Community Choice Energy

Measure E-2.1 sets a 90% renewable electricity target for 2030. We recommend instead a 100% clean energy goal, which would make the County consistent with the city of San Diego and other cities moving toward 100%, including Del Mar, Solana Beach and soon, Encinitas.

By embracing a 100% clean energy future, all families will benefit from a greener grid because renewable energy helps clean the air, builds healthy communities, and spurs local investment and well-paying jobs from clean energy technologies. In addition, adding a 100% clean energy goal in the county would signal a region-wide commitment to the shift to renewables. It is increasingly clear that 100% clean energy is the future in California and across the nation: the County CAP should reflect a commitment to keep pace with the region and the state.

We recommend using Community Choice Energy as the key strategy to achieve 100% clean energy. Community Choice is a tried and true program allowing families throughout California to purchase cleaner, cheaper energy and enabling local governments to reinvest revenues back into the community. Every operational CCE program is successfully mitigating risk and generating significant benefits for ratepayers. The County should move swiftly to complete a Technical Feasibility Study for Community Choice Energy.

Further, it is unclear why this is marked as a high-cost measure. What are the short-term or long-term costs that individuals or private businesses would incur?

8. Recommend 90% Solid Waste Diversion Target by 2030

As the CAP notes, emissions from solid waste and existing landfills are a significant component (11%) of the total GHG emissions. It isn't clear why the CAP proposes no emission reductions by 2020 and why the County cannot begin to increase its waste diversion activities before 2020. We recommend that the CAP adopt a more aggressive but feasible target of 90% diversion by 2030, which is similar to the City of San Diego CAP target of 90% by 2035.

9. Recommend Inclusion of an Environmental Justice/Social Equity Section

While climate change impacts everyone, it hits hardest in low-income and communities of color that face a disproportionate pollution burden. The State of California has recognized the challenges facing Environmental Justice communities and prioritized those areas for allocation of Cap and Trade funds. San Diego is the first city in California to adopt a CAP that utilizes a statewide monitoring tool called CalEnviroScreen, which identifies vulnerable communities and can be used to direct investment and benefits to these neighborhoods.



We recommend that the County CAP include an Environmental Justice section that utilizes CalEnviroScreen to prioritize populations hit first and worst by climate change. Programs in EJ communities might include ensuring all populations in the County have access to solar energy, home energy efficiency upgrades, and green spaces. Lastly, the city should address how CAP strategies can create good-paying jobs for residents and improve quality of life in communities throughout the County.

10. Recommend Inclusion of Detailed Timeline and Cost Analysis for Each Strategy

We are pleased with the first iteration of the Draft CAP's implementation and monitoring plan; however, we recommend including a more detailed timeline with a system to prioritize implementation of each strategy, as well as a cost analysis for for each strategy. This level of detail is critical for public accountability of the CAP's success and will ensure the County sets sufficient budgeting and staffing levels at the appropriate time.

Finally, we are pleased that the County will conduct annual monitoring reports, perform GHG inventory updates every two years, and prepare CAP updates every five years. We agree that the CAP is a living document and note that the five-year update schedule should not preclude mid-course adjustments if new opportunities arise to further reduce emissions.

Conclusion

In this modern era of climate action planning, local governments across the region are moving aggressively toward 100% Clean Energy, CCA, significant commuter mode shift goals, and environmental justice. We hope to see the County of San Diego emerge as a regional climate leader and strongly urge you to incorporate the recommendations enumerated above.

Thank you for the opportunity to weigh in on this critically important planning document.

Sincerely,

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