

<DRAFT>

October 7, 2025

RE: Climate Advisory Board Recommendations

To:

Mayor Todd Gloria

Council President Joe LaCava

Environment Committee Chair Sean Elo-Rivera

Randy Wilde, Mayoral Senior Policy Advisor

Brian Elliott, D1 Deputy Chief of Staff

Rosa Olascoaga, D9 staff

Shelby Buso, Chief Sustainability Officer

Andrew Martin, Climate Action Program Manager

Heather Werner, Deputy Director of Energy

In alignment with the City of San Diego Climate Advisory Board's role to support the City in 'implementing the Climate Action Plan and attaining the City's stated goals in these areas', the board respectfully submits several recommendations.

These recommendations incorporate staff responses to questions discussed at the July 1 and August 12 board meetings. A copy of the questions, and notes taken by the board are attached.

Recommendations:

1. CAP Implementation Plan Update

Staff have informed the board that the CAP Implementation Plan will be updated by the end of the year. Recently reported [2023 Total City-wide Greenhouse Gas Emissions](#) show an increase from 2022, so it is critical the city take swift action to course correct.

We recommend that the proposed CAP Implementation Plan be made available with sufficient time for our board, related boards, the Climate Equity Working Group and the community to provide feedback, which can then be considered for a revised version to present to the City Council.

We recommend that the associated stakeholder workshop be held in person in a community location near public transit, in the early evening, and provide refreshments. We also recommend that this be a hybrid meeting to allow remote attendance.

2. SB1221 Neighborhood Decarbonization Pilots

We would like to thank the city for responding to our 7/1/25 [recommendation](#) with their [supportive public comments](#) at the recent CPUC SB 1221 [Neighborhood Decarbonization Pilots Public Participation Hearing](#). These pilots redirect utility funds from aging gas pipeline replacements toward community-approved electrification projects. This is a cost-effective way to advance CAP Measure [BE-1.1](#) “Decarbonize Existing Buildings”.

We recommend the CAP Implementation Plan Update include a new action to request SDG&E submit at least 5 pilot sites located within the City of San Diego for the SB 1221 program (with at least two in flood zone areas impacted by heavy storms in January 2024), implemented utilizing a skilled and trained local workforce.

3. Reach Codes

Reach codes are a critical policy tool for the city to advance CAP Measures [BE-1.2](#) “Decarbonize New Building Development” and [BE-1.1](#) “Decarbonize Existing Buildings”

We recommend a prompt city attorney [analysis](#) of AB130, to confirm that the city is permitted to pass a residential reach code, since it will align with the city’s General Plan

We recommend the CAP Implementation Plan Update include a new action to develop cost-effective reach codes for additions and alternations to existing buildings, specifically [Single-Family AC to Heat Pump Replacements](#) and [Nonresidential Alterations](#), and others as they become available. [Five cities](#) have already passed these reach codes.

We recommend that the [City Planning Work Program FY26](#), page 28 “Enhanced Green Building Standards for New Buildings” include alterations and additions to existing buildings in its scope.

4. Benchmarking & Building Performance Standards (BPS)

Benchmarking & BPS ordinances are critical policy tools for the city to advance CAP Measure [BE-1.1](#) “Decarbonize Existing Buildings”. Two CAP actions specifically address this:

- [BE-1.1SA-2](#) Update the Building Energy Benchmarking Ordinance to expand enforcement and compliance.
- [BE-1.1b](#) “Develop a Building Performance Standards (BPS) policy.”

In 2019, the city adopted a [Building Energy Benchmarking Ordinance](#), which requires certain existing buildings over 50,000 square feet to annually submit energy data to the City of San Diego. To date, the city has been focused on education and has not assessed fines for non-compliance.

In 2022, the city joined the White House's [Building Performance Standards Coalition](#). As part of this commitment, the city established a Building Performance Standards Working Group, hosted by the World Economic Forum. Several board members were part of this working group which concluded in April 2024 with a recommended draft BPS ordinance and updates to the existing Benchmarking ordinance. We understand progress on this has been delayed, due to the need to hire additional staff to implement the BPS ordinance

We recommend immediately establishing and collecting fines for non-compliance with the Benchmarking ordinance

- Property owners have had since 2019 to comply with this ordinance
- Based on analysis of publicly available information, it appears that only about half of the currently covered 2500 buildings are reporting
- [Other cities](#) typically assess fines between \$1000-\$2000 for non-compliance to Benchmarking requirements.
- Establishing fines would increase compliance and generate revenue that could be used to meet staffing needs, e.g. $\$1000 \times 1000 \text{ buildings} = \1M

We recommend that the CAP Implementation Plan Update update the Benchmarking ordinance this fiscal year, without tying it to progress on the BPS ordinance.

We recommend that the BPS “policy framework” referenced in the [City Planning Work Program FY26](#), page 27 “Existing Building Performance Standards Policy” be a draft ordinance based on the work of the Building Performance Standards Working Group, and that the city hold a public hearing for community feedback.

We recommend funding the staff required to implement a BPS ordinance in the FY27 budget, supplemented by fines and alternate compliance payments.

5. Potential CAP 2027 update

The 2022 CAP mentions that the city plans to release an updated CAP in 2027. Staff have indicated that significant resources are needed for this update, and they have applied for a \$400K SANDAG grant to fund these activities.

The 2022 CAP has barely begun implementation, with only 14% of its actions [completed](#). The 2022 CAP is a rich source of implementation-ready actions that the city should prioritize over updating the documentation.

We recommend that the CAP update be delayed for one year to 2028, to prioritize resources towards implementing the 2022 CAP. If the \$400K SANDAG grant is secured, it should be expended to align with this timeframe.

We recommend that when the CAP is updated, that major changes to the Net-Zero Target Dates and Strategies be presented to our board and the Environment Committee well in advance of developing the measures and actions, to allow public & Committee feedback to be incorporated.

In closing, we look forward to the city adopting these recommendations to advance its Climate Action goals.

Respectfully, <chair>

Attachment

Responses to CAP Request for Information

July 1, 2025

[August 12, 2025 updates](#)

[September 16, 2025 updates](#)

RE: City of San Diego Climate Action Plan Request for Information

Dear Shelby Buso (Chief Sustainability Officer) and Andrew Martin (Climate Action Program Manager),

In alignment with the City of San Diego Climate Advisory Board's role to support the City in 'implementing the Climate Action Plan and attaining the City's stated goals in these areas', the Board respectfully requests that you provide relevant information and be prepared to address questions regarding the City's obligations and progress related to the Climate Action Plan at the upcoming Climate Advisory Board meeting scheduled for August 2025.

The notes in red are notes taken by the board from the responses provided by staff (Andrew Martin, CAP manager) at the 7/1/25 Climate Advisory Board meeting, and supplemental questions. Please provide any corrections.

Notes in orange are notes taken by the board from the responses provided by staff (Andrew Martin, CAP manager) at the 8/12/25 Climate Advisory Board meeting. Staff was provided a draft of this document on 8/26/25 to review for corrections, and on 8/28/25 declined to provide any comments in advance.

The Board would like to hear an update from you on the following topics:

Reporting and Implementation

1. Is the intent that the City will utilize the CAP Dashboard as a replacement moving forward for the CAP Implementation Plan? No, some items may overlap, but the two are complementary
 - a. Is there any information pertaining to the City's efforts and the tracking of the CAP Implementation that can be found in places other than the Dashboard? Yes - other places include budget reports, CAP Annual Report, city CAP website
 - b. The CAP Implementation Plan included resource/funding needs for each action, where is the current status on this provided? Can this information be added to the CAP Dashboard and be updated annually? Not planning to provide resource/funding needs for each action on the CAP Dashboard.

- c. Does the City intend to update the 2023 CAP Implementation Plan? When? **The CAP Implementation Plan updates are in early stages now, actively working on it, and it will be updated by the end of 2025 calendar year.**
 - d. The indicator for tracking all-electric new building construction was recently removed from the CAP Dashboard Indicator page, and had never been reported. What is the plan for making this data available? **Don't have this data, was a placeholder for an all-electric reach code related indicator, but haven't passed a reach code due to the CRA legal impacts. If the city does a reach code in the future, we could include a relevant indicator on the dashboard.**
2. Is the City planning to provide 2024 GHG inventory by Spring 2025? **No, it is always one year further back, simply don't have 2024 data, e.g. in 2025 the city will provide the 2023 data. The 2023 GHG Inventory was wrapped up last week and is on the CAP Dashboard, and will be included in the 2025 CAP Annual Report.**
- a. If not, what data from what source is not available in time?
 - i. **What steps did staff take to understand the sources of the delay and attempt to improve the timeline? 2023 is the latest data the city has, some key data sources not available for 2024 yet. Electricity emission factors from the state takes more than a year. Renewable energy content from SDGE & SDCP - more than a year lag. VMT from Caltrans, takes about a year. This timing is not out of alignment with other cities in California (LA, San Jose, Long Beach, San Francisco, Oakland) and the state itself, often a 2-3 year lag.**
 - b. What is the target date for 2024 GHG inventory?
 - i. **Do you have any data yet for 2024? Can you publish parts on CAP Dashboard as it becomes available and notify us? It's calculation chain, not very meaningful if some data is not available.**
3. When is the City planning to release the annual CAP Report? **In the near term.**
- a. How is this impacted by the recent CAP Admin Regulation that requires data for the CAP Report from CAP implementing departments by the 3rd quarter of the calendar year for analysis of the preceding year? **Not answered.**
4. When will you know whether changes to the CAP Implementation Plan are needed in 2025 based on progress towards the 2030 CAP goals? **Already working on CAP Implementation Plan update to be completed by the end of 2025. Will bring up to date, including status/timing.**

Impact of Proposed FY26 Budget Reductions

The 4/29/25 IBA Report 25-11 "IBA Review and Analysis of the Mayor's FY 2026 Proposed Budget" included the following information:

If transfers had not been made, the General Fund Proposed Budget for the Sustainability and Mobility Department would have been \$6.3 million, which is a decrease of \$1.5 million (19.4%) from the FY 2025 Adopted Budget. 8.59 FTEs were eliminated, and the remaining 26.00 FTEs are transferred to various departments, as summarized in the table on the previous page.

Significant Budget Reductions

Discussion of the various budget reductions can be found in the appropriate *Department Review* section. Reductions include:

City Planning:

- (\$562,000) – Mobility Programs
- (\$362,567, 2.00 FTEs) – CAP Positions
- (\$112,000) – Building Decarbonization Planning

Engineering & Capital Projects:

- (\$205,000, 1.00 FTE) – ADA Position

Transportation:

- (\$170,000, 1.00 FTE) – Parking District Position

General Services:

- (\$140,000, 1.00 FTE) – ZEV Projects Position
- (\$50,000) – ZEV Planning

Significant Budget Reductions

(\$562,000) – Mobility Programs

This reduction removes consultant funding for mobility planning efforts and programs. In particular, this reduction will slow implementation of the Mobility Master Plan unless additional funding can be procured.

(\$363,000, 2.00 FTEs) – Climate Action Plan (CAP) Positions

This reduction includes a reduction of a Community Development Specialist 4 (CDS 4) and the Program Manager for Decarbonization. The CDS 4 work will be distributed to existing staff as this position primarily oversaw implementation of the Climate Equity Fund and establishment of the Climate Advisory Board. The Program Manager would have overseen the Decarbonization program as a whole, but this work will also be absorbed by existing staff.

(\$112,000) – Building Decarbonization

This reduction removes consulting support for the City's ongoing building decarbonization programs, including support for the development of Building Performance Standards and other policies. Funding for this program moving forward will require successful grant applications and revenue. Of note, decarbonization of existing buildings had the largest Greenhouse Gas Reduction impact in the latest Climate Action Plan, and work on this effort scored highly through [Council Policy 900-22](#).

5. Will the CAP Implementation Plan be updated in 2025 to account for these reductions to ensure progress towards the 2030 CAP goals?
 - a. Given \$112K removal of BD consultant, what was produced before they were paused? Money was set aside for a consultant, but a consultant was never contracted.

CAP update status

6. Is the City planning to do a 2027 CAP update? Yes, this is the timeframe working towards
 - a. Why is it being updated in that timeframe? 5 year update envisioned by 2022 CAP.
 - b. How is this different than updating the CAP Implementation Plan based on progress towards the 2022 CAP each year? CAP Implementation Plan discusses implementation, who is responsible, costs. CAP update will reassess

latest GHG emissions, latest trends for population/economic growth, projected emissions, update state/federal action impacts – set future baseline, establish new targets, reassess actions.

7. What resources are needed for the update? Pretty large undertaking, have applied for a SANDAG grant for climate action planning support up to \$400K, waiting to hear back by the fall. Big milestone for CAP update when hear results.
8. What would be the impact of delaying the update by 1 year so that those resources can be allocated towards implementation of the current CAP? Can't speak to this. Will do stakeholder engagement, technical modeling of emissions, review latest annual report - will inform the scope of the effort.
9. How will you determine whether to change the city's current 2035 net-zero target date, and what the new date will be? Item for CAP update, part of the planning process.
10. How will you determine whether to include the equivalent of Strategy 6, which prioritizes focusing on known solutions and allows residual emissions to be addressed in the future? Same - Item for CAP update, part of the planning process.

AB306/AB130

11. Regarding the General Plan exception, when can you share with Climate Advisory Board the City Attorney's analysis on how that impacts the city's ability to address CAP Strategy 1 "Decarbonization of the Built Environment"? In the middle of discussing this.

We look forward to supporting the City in achieving its Climate Action Plan goals by having access to this key information needed to track progress.

Written on behalf of the Climate Advisory Board and the Committee on CAP Reporting, Implementation and Budgets