

September 28, 2015

Ms. Rebecca Malone  
Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

**PROJECT NAME: San Diego Climate Action Plan**  
**SCH NO.: 2015021053**

Dear Ms. Malone,

The Sustainable Energy Advisory Board (SEAB) for the City of San Diego convened a meeting on September 24, 2015, to formalize comments on the City of San Diego Climate Action Plan Draft EIR (CAP), the members present agreed in a 5-2-0 vote to submit the following comments.

The SEAB is proud of the City of San Diego's effort to develop a comprehensive and enforceable CAP. We fully support implementation of the plan and are pleased to have an opportunity to review it and to provide our comments.

California has become a leader and a role model for climate action because of its proactive policies to reduce greenhouse gas (GHG) emissions. Implementation of the City's CAP will provide substantial benefits such as reducing dependence on imported water and energy, diversifying energy supply, saving taxpayers money by decreasing water, energy usage and waste, achieving public health benefits, and creating "green" jobs through incentive-based policies.

San Diego's CAP is a set of strategies to be implemented by the City to support and complement actions at the state and federal level. The City's key strategies include: 1) Energy and Water Efficient Buildings, 2) Clean and Renewable Energy, 3) Bicycling, Walking, Transit & Land Use, 4) Zero Waste (Gas and Waste Management), and 5) Climate Resiliency. The specific action items with largest contribution to GHG reductions, and therefore the highest priorities, are as follows: 1) the proposed transition to 100% renewable energy on the city-wide electrical grid by 2035, 2) the increased use of mass transit by implementing the General Plan's Mobility Element and the City of Villages strategy, 3) the reduction of vehicle miles traveled through effective land use focused in Transit Priority Areas, 4) the diversion of solid waste and the capture of landfill methane, and 5) restoring green infrastructure by a robust urban forestry program. Much of the local action identified within the CAP includes partnering with other regional agencies. We encourage the City, in its partnership role, to actively advocate for the achievement of the CAP goals.

Although we agree with the strategies and associated key action items, we offer the following comments for consideration in implementation and development of supporting policies:

1. In many cases, the action items in the plan simply state that a proposal will be presented to the City Council for consideration. Although, the SEAB intends to support and offer assistance however needed, we would like to work with City staff as the specific policies

and ordinances are being developed. Further, we note that there is—and will be—a need to vertically integrate the CAP into current City policy and the development of the Community Plans that are underway. The success of the CAP will result from appropriate ongoing prioritization and budgeting that considers each action for cost-effective and equitable solutions to greenhouse gas emissions reductions. We are encouraged that the City is already investing in the implementation of the CAP in advance of the formal adoption by the City Council.

2. Should there be favorable results regarding the feasibility study of either Community Choice Aggregation (CCA) or an alternative plan, we propose that Action Item 2.1 be given higher priority and moved to Phase 1.
3. Many highly energy efficient products and technologies are already available and ready for deployment. The City should regularly examine its regulatory and incentive programs to determine whether there are cost-effective opportunities to encourage adoption and speed deployment of approaches and technologies that can support the GHG reduction goals of the CAP with the support of the private sector.
4. The state and federal regulatory environment is changing. The CAP was developed in response to AB 32 and the California Air Resources Board's (CARB) subsequent Scoping Plan, SB 1078, SB 107, SB 2, AB 758, several executive orders and other actions. However, new rules have been published or are under consideration (EPA's Clean Energy Plan, published in August of 2015, SB 350, and SB 32 to name a few). There's a need to monitor regulatory trends and to update the CAP as needed to stay current.
5. Targets are set using a baseline of 2010; it is now near the end of 2015. Monitoring should be updated as part of an annual update to show the current state of San Diego's GHG emissions. Looking at which trajectory the City has been on since the 2010 baseline was established will help determine if current actions can ensure compliance with the long-term goals. Annual updates should also include the best available data on distributed generation and utility power acquisition mix.
6. Energy Efficiency in Commercial and Multifamily Buildings is critical to achieving San Diego's climate goals. Including the AB 758 "Existing Buildings Energy Efficiency Action Plan" in the CAP is a step in the right direction to achieve energy efficiency in all buildings. However, Strategy 1: Water and Energy Efficient Buildings should include a commercial and multifamily energy efficiency goal, with a benchmarking and transparency ordinance. This will ensure the City is able to measure its progress towards cost-effective carbon reductions through building-level energy benchmarking, which is a recognized industry best practice.

Including a commercial and multifamily energy savings goal demonstrates that the City understands that all buildings must be included if we want to achieve our climate action targets. Previous barriers to whole-building data access needed for successful benchmarking are addressed in the recently passed AB 802, currently awaiting the Governor's signature. This legislation was passed with broad support from local governments, the Building Owner and Managers Association of California, the US Green Building Council California, the Efficiency Council, San Diego Gas & Electric, and other key industry stakeholders.

With the adoption of the AB 758 Action Plan and passage of AB 802, it is clear that commercial and multifamily buildings in San Diego will be compelled to benchmark and publicly report building energy use information in the coming years.

These state level legislative directives only add to the rising need for the CAP to outline a local ordinance for commercial energy transparency and goals that best fits the unique needs of San Diego, while also meeting statewide energy efficiency goals. This is an opportunity for San Diego to show its leadership on climate issues and benefit from resources for local governments to meet these targets. Aligned local action will ensure that this legislation will be done in the best interest of San Diego stakeholders.

7. Moving forward, the City should adopt a broader definition of the green economy for the CAP that includes a more complete description of the full spectrum of opportunities and commitment to local equitable growth. In addition, there is a need to ensure committed equity in allocation of resources so that communities of concern are able to participate and realize benefits of energy efficiency, renewable energy installations, urban forestry, public health benefits, and job creation, without carrying undue burden of cost.

Once methods for assessing job creation are agreed, targets should be set and progress tracked for each community planning area. According to the Bureau of Labor statistics, jobs in research and development, manufacturing and distribution, installation, and maintenance of products or services in any of the following categories could be considered "green jobs:"

- Energy from renewable sources – electricity, heat, or fuel generated from wind, biomass, solar, ocean, hydropower, biomass, landfill gas, and municipal solid waste;
- Products and services that improve energy efficiency such as energy efficient equipment, appliances, buildings and vehicles, as well as products and services that improve the energy efficiency of buildings and efficiency of energy storage and distribution such as smart grid technologies. Cogeneration is included in this category;
- Products that reduce or eliminate the creation or release of pollutants or toxic compounds, remove pollutants or hazardous waste from the environment, reduce greenhouse gas emissions, reduce or eliminate creation of waste materials, or collect, reuse, remanufacture, recycle, or compost waste materials or wastewater;
- Natural resource conservation, including products and services related to organic agriculture and sustainable forestry, land management, soil water or wildlife conservation, and stormwater management; and
- Environmental compliance, education and training, and public awareness- products and services that enforce environmental regulations, provide education and training related to green technologies and practices, or increase public awareness of environmental issues.

The CAP establishes the requirements for future policy with regard to greenhouse gas emissions targets. We request that the City clearly identify the methods, metrics, and milestones for green jobs and include numeric commitment targets for these jobs and economic development over the life of the plan. Monitoring and enforcing the economic

development metrics and milestones should be included in regular updates to the Mayor, City Council, and the community.

8. We encourage the Mayor and City Council to provide separate budget lines for the CAP as part of the budgeting cycle for each department. Regular updates should be made to assure that policy goals are on track and that implementation is being accomplished in the most cost-effective way. The Sustainability Program Manager should have adequate resources and be empowered to move forward with budgeted items.
9. Adaptation to effects of climate change that can no longer be avoided. The CAP acknowledges that a comprehensive plan for adaptation to the unavoidable effects of climate change should be developed. We agree with this priority. It should include public health issues, biodiversity, coastal resources, water, agriculture, forestry, transportation, and energy.

An urban tree planting program is the only specific tactic mentioned in the CAP for adaptation to unavoidable climate change effects – the SEAB is supportive of this goal. Appropriate installation of the urban forestry measures proposed as adaptation measures needs to include safeguards that do not interfere with the potential for rooftop and parking lot solar energy installation. Installation guidelines need to be coordinated to achieve the maximum benefits of each measure – shade, carbon absorption, and electric generation. PV installations, by creating shade, can significantly reduce heating loads on buildings and parking areas as well as contribute to the charging infrastructure for expansion of electric vehicles.

The Sustainable Energy Advisory Board is grateful for the opportunity to provide comments on the City of San Diego's CAP. We expect to be engaged throughout the development of future policy and in the implementing and monitoring of those policies that align to the CAP.

If you or any members of your staff have questions on this, please do not hesitate to contact us.

Sincerely,



John Bumgarner  
Chairman  
City of San Diego Sustainable Energy Advisory Board

Cc: Kevin Faulconer, Mayor  
San Diego City Council  
Mike Hansen, Director of Land Use & Environmental Policy, Office of Mayor Faulconer  
Brian Schoenfisch, Senior Planner, Planning Department  
Cody Hooven, Sustainability Manager, Economic Development Department