

June 8, 2022

The Honorable Todd Gloria
Mayor, City of San Diego
City Administration Building
202 C St.
San Diego, CA 92101

Re: Comments from the City of San Diego Climate Action Plan Review Committee

Mayor Gloria,

On behalf of the City of San Diego Climate Action Plan Review Committee (CAPRC), please accept the attached comments regarding the City of San Diego's Climate Action Plan (CAP) update.

As background the CAPRC was created to review and provide feedback to the City on the draft CAP update, including the proposed strategies and actions, and all other content related to the CAP, and to develop recommendations on how the City can engage residents, communities, and non-governmental organizations to guide the plan's implementation. The CAPRC commenced its work on May 4, 2022 and since then has been meeting weekly. At each meeting, committee members received presentations from City staff on specific sections of the CAP, including the Implementation Matrix. In addition, the committee received public comment on each section and engaged in a discussion on the draft and specific ways in which it could be amended.

First and foremost, the CAPRC generally supports the direction of the CAP. However, in order to strengthen the City's commitments, including the strategies and actions included in the CAP, the CAPRC voted at its June 8, 2022 meeting to submit the attached comments for your and the City Council's consideration. We feel these additional items will strengthen the CAP and set the City on a path towards successful implementation.

We thank you, the City Council, and City staff for your continued interest in and commitment to these issues and look forward to working with you as you advance the Climate Action Plan and the associated Implementation Plan.

Sincerely,

Jason Anderson
Chair, City of San Diego Climate Action Plan Review Committee

cc: Council President Sean Elo-Rivera
Council President pro Tem Monica Montgomery Steppe
Councilmember Joe LaCava
Councilmember Jennifer Campbell
Councilmember Stephen Whitburn
Councilmember Marni von Wilpert
Councilmember Chris Cate
Councilmember Raul Campillo
Councilmember Vivian Moreno
Jessica Lawrence, Director of Policy, Office of the Mayor
Randy Wilde, Senior Policy Advisor, Office of the Mayor
Alyssa Muto, Director, Sustainability and Mobility Department
Shelby Rust Buso, Chief Sustainability Officer
Members, City of San Diego Climate Action Plan Review Committee

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Climate Action Plan Review Committee
Comments and Recommendations on the Climate Action Plan

June 8, 2022

General Comments

- The Climate Action Plan Review Committee supports the adoption of the City of San Diego’s Climate Action Plan.
- The City should adopt a detailed implementation plan in conjunction with the Climate Action Plan that includes dedicated budget and staff allocations. The implementation plan should be prioritized based on highest impact and need.
- The City should prioritize actions within the Climate Action Plan that create career opportunities for all San Diegans.
- They City should center all strategies within the Climate Action Plan around equity where appropriate.
- The City should address the six audit recommendations released in 2021 by the City Council.
- As appropriate, Municipal Code updates should happen concurrently with the adoption of the Climate Action Plan in order to support the advancement of related projects.
- The City should consider and account for ongoing climate change impacts as part of implementation (based on Climate Resilience Plan).
- The Climate Action Plan should identify and incorporate natural habitat and nature-based solutions, whenever possible.
- The City should use its Climate Equity Index as a tool to close the climate gap by:
 - Prioritizing investments to communities most impacted by climate change
 - Tracking projects and investments on a community basis
 - Relying on the Equity Working Group to provide input on the Climate Equity budgeting process
- The City should continue to engage all members of the community (residents, businesses, CBOs, NGOs, etc.) as part of the implementation process.
- The City should dedicate 90% of funds to implementing strategies and projects specifically within ‘Communities of Concern’ - as defined by the Climate Equity Index.
- To balance the needs of workforce and affordable housing in the region, the proposed CAP Consistency Regulations should apply only to discretionary projects and not to ministerial projects. Ministerial projects include developments like smaller projects, by-right developments, affordable housing, infill housing in the urban core near transit, and Complete Communities projects.

Narrative

- The ‘Green Economy and Just Workforce Transition’ section of the Climate Action Plan narrative must be amended to provide a clearer and stronger commitment by the City to ensure an equitable and just transition for fossil-fuel

workers negatively impacted by the actions associated with the Climate Action Plan.

- The ‘Air Quality and Public Health’ section of the Climate Action Plan should be amended to clarify the City’s use of public health goals to guide climate-related policy decisions in order to achieve measurable outcomes.
- The Climate Action Plan Consistency section should be revised to reflect adoption of the regulations/policies so future readers understand the status of the regulations/policies.

Implementation Matrix

- The Implementation Matrix should be updated to include additional columns:
 - **Community Partners:** The City should identify potential community partners, including the private sector, that can help advance the strategies within the Climate Action Plan.
 - **External Funding Opportunities:** The City should identify current and future grant opportunities that can help expedite the implementation of the Climate Action Plan.
 - **Unintended Consequences:** The City should note potential unintended or negative consequences associated with strategies within the Climate Action Plan. These might include impacts on the cost of energy or housing developments and the potential to displace workers.
 - **Co-Benefits:** The City should note co-benefits of strategies within the Climate Action Plan.
 - **Priority Ranking:** The City should work with stakeholders, including department staff, to prioritize strategies within the Climate Action Plan and budget for those prioritized strategies appropriately.
- Columns that include a ‘yes/no’ evaluation should be changed to a numeric ranking when appropriate to allow for a clearer understanding of associated benefits.
- An estimate of GHG reduction numbers should be included where appropriate to provide a better understanding of the benefits associated with applicable actions.
- An estimate (not a ranking) of implementation costs should be included where appropriate to provide a better understanding of costs associated with applicable actions.

Strategy 1: Decarbonization of the Built Environment

- Advance workforce development programs must include programs to provide for and ensure an equitable and just transition for fossil-fuel workers negatively impacted by the actions associated with the Climate Action Plan.
- The City should partner with SDG&E and provide input on programs that are geared towards low-income customers.
- The City should advocate for and market programs that provide incentives for energy related upgrades.

- The Climate Action Plan should be amended to include energy efficiency related initiatives and projects.
- Where appropriate, the City should advocate for and include battery storage projects in any solar related initiatives.
- The City should continue to partner with San Diego Community Power as they develop community related programs, including community solar programs.
- The City should work to expand the Solar Equity Program launched by SDG&E and the City of San Diego per the Energy Cooperation Agreement to increase solar for low income families.
- The City should partner with organizations including San Diego Community Power, SDG&E, The San Diego Regional Climate Collaborative and others on funding opportunities to support building decarbonization.

Strategy 2: Access to Clean & Renewable Energy

- The private sector should be identified as a partner in the supporting actions associated with Strategy 2.
- The City should use a definition of local that includes both San Diego and Imperial County for utility-scale energy projects, similar to San Diego Community Power's consideration of local projects.
- The City should streamline the permitting process for energy projects, including battery storage.
- For its own generation projects, the City should focus on local, distributed renewable energy resources.
- The City should identify opportunities to pilot new energy technologies.
- The City should advocate for incentive programs that help offset the costs of residential electric panel upgrades.

Strategy 3: Mobility & Land Use

- The City should not wait to implement actions associated with Strategy 3 until the Mobility Master Plan is adopted/implemented.
- Planning efforts should include the creation or preservation of open/green space.
- The Downtown Mobility Plan should be referenced as a good example of effective planning.
- Resiliency should be included as a core benefit of climate-focused land use.
- The City should focus on housing density in urban centers.
- The City should identify quick-build as an important strategy to cost-effectively and quickly generate mode shift.
- In order to meet its single car ridership reduction goals, the City should initiate a public educational campaign in conjunction with the Mobility Master Plan adoption.

Strategy 4: Circular Economy & Clean Communities

- The City should make space in its long-term leases for the recommended actions in 4.3.

- The City should work with community stakeholders to create a Reduce Plastic Council or Advisory Board to proactively advance plastics recycling and reduction in the City. The success of this effort must come from City planning, policy, and the active participation of community leaders to help communicate and support the benefits of a robust plastics recycling and reduction program.
- The City should consider expanding the polystyrene ban to include other types of harmful plastic from the plastic waste load.
- The City should consider establishing a team of business and subject matter experts to focus on reducing plastic in the waste stream, and to encourage use of alternatives to plastic. Such alternatives would include materials that are plant- or bio-based and could reduce the high cost and harmful health impacts of plastics in the system. The City should look at the cost of sending plastics to its landfills and the health impacts of plastic pollution in water, soil, and air. This may include investment in a better recycling technology of plastics.
- The City should consider plastics-based water quality monitoring in the waste stream from landfills and recreational waterways where high concentration of plastics can have harmful impacts on human health. Plastic pollution in soil will lead to increasing GHG emissions in the long term.
- Strategy 4 should be modified to include actions that support the 2030 Target of 85% of landfill gas capture.

Strategy 5: Resilient Infrastructure & Healthy Ecosystems

- The City should empower and appoint people to its advisory boards to help advise (AM) on wetland restoration projects.
- The City should implement actions associated with wetland restoration immediately given the complexity of the types of projects.
- Financial viability, which encompass existing grant programs that would support strategies or actions, should not impact feasibility of strategies or actions.
- The City should initiate saltmarsh restoration as soon as possible.
- The City should establish a multidisciplinary stakeholder group to advise and support the successful restoration of salt marsh habitat. This group should include a diverse mix of backgrounds to support and encourage community-wide engagement in streamlining the restoration of saltmarsh habitat in San Diego.
- Strategy 5.1 should be modified to include a target of ‘Restore eelgrass habitat as sea level rise changes subtidal and tidal City waters.’
- In order to quantify and value the sequestration of the City’s natural and working lands, the Action in Strategy 5.1 should be modified to ‘Develop Natural Resource Management Plans and include in those plans natural sequestration values as the information becomes available.’
- The Actions in Strategy 5.2 should be modified to include: ‘Prioritize the use of native plants when possible, due to their requirement for less water and maintenance than non-native species.’
- Action 5 in Strategy 5.2 should be modified to read ‘Support expansion of urban tree canopy, including native chaparral and coastal-sage scrub habitats, in parks

and along active transportation networks. Prioritize implementation in Communities of Concern.'

- The goals to increase tree canopy should prioritize communities with a lesser tree canopy as well communities with a disproportionately high levels of air pollution sources.

Strategy 6: Emerging Climate Action

- At its discretion, the City should participate in research projects that include all opportunities to achieve net zero GHG emissions – not limited to just offset or sequestration related projects.
- The City should meet with representatives of local research institutions on a continuous basis to discuss opportunities to collaborate on potential research projects and explore the creation of an advisory board to help facilitate the identification of opportunities. For example, there have been some ongoing/early studies of chaparral in San Diego and their ability to sequester carbon and other studies on the impacts of carbon sequestration on agricultural land when organic carbon is added to land. These may be too early to use in the Climate Action Plan, but these should be explored and determined what is needed for them to fit into the framework.
- The City should clearly define the multiple roles needed in successfully implementing emerging climate related technology, ones which can reduce the remaining GHG emissions needed to meet the City's net zero goal by 2035. Specifically, the City should clarify its clear role as a landowner and supporting role in developing pilot projects that can help accelerate technology testing and application.
- The City should develop a task force to target the net zero goal, determine scientific, technological and data-based best practices projects, and support the City's efforts to evaluate and review climate related technology projects proposed. This can take advantage of the many regional subject matter experts in the field.
- The City should explore all clean energy options to ensure energy reliability to all San Diego residents.

Clean Air

- The City should commit to specific, time-bound and measurable goals for air quality in the Climate Action Plan in order to reduce toxic air pollution that contributes to climate change concentrated in top 25% scoring CalEnviroScreen census tracts.
- The City of San Diego should commit to specific, time-bound and measurable goals to improve air quality in the Climate Action Plan, prioritizing reducing levels of Diesel Particulate Matter (PM) by 80% from 2016 levels by 2030 in census tracts with the highest concentrations of diesel particulate matter.
- The City should not only be advocating for the Air Pollution Control District (APCD) to develop Community Emission Reduction Plans (CERP); the City

should actively be leveraging its existing resources to create CERP-like plans to reduce exposure to high levels of air pollution in our communities, especially within communities of concern.

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