



January 31st, 2023

County of San Diego  
1600 Pacific Highway  
San Diego, CA 92101

**Re: Climate Action Campaign recommendations for County Climate Action Plan**

Dear County Sustainability Planning Division Team,

Extreme heat, fires, flooding, record breaking temperatures—the Climate Emergency is here now, and it requires immediate action.

Climate Action Campaign (CAC) has played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, including the County's CAP development and implementation process. Despite multiple fatally-flawed and legally-indefensible attempts, the County still has a golden opportunity to adopt a CAP that meets the scale and scope of the climate crisis and confirms San Diego's position as a national climate leader.

To achieve this, the County must align the CAP overall emissions reduction target with evolving climate science and best practices by committing to achieving **zero carbon by 2040** in line with the County-adopted Regional Decarbonization Framework (RDF) and AB 1279, which codifies, and establishes a clear and legally binding goal to achieve statewide carbon neutrality no later than 2045.

CAC advocates for the creation of resilient, bikeable walkable neighborhoods served by world class transit that consist of all-electric homes powered by 100% renewable energy. We do this through a lens of equity and justice because we know that environmental justice communities have and will continue to experience the worst effects of the climate crisis.

These are the exact strategies and measures the County CAP must prioritize. County policies significantly influence actions in both incorporated and unincorporated areas of the region. Therefore, the County must adopt a robust and legally binding CAP that will signal to other jurisdictions in the region their level of commitment to urgent climate action and environmental justice.

This letter summarizes our initial recommendations for the County CAP through CAC's "[Five Fights](#)":

### ***Resilience***

Residents are already feeling the impacts of the climate crisis through wildfires, heat waves, droughts, sea level rise, flooding, and more. However, these effects are not felt equally throughout the region, with low-income communities of color being the most vulnerable. It is not enough that the County adopt policies that stop GHG emissions at their source, the County must also work to ensure that everyone can prepare, adapt, respond, and thrive despite external stressors as a result of climate change. To ensure the County is creating sustainable and climate resilient communities, we recommend the following strategies be included in the CAP:

### ***Expand Tree Canopy***

The County must allocate appropriate funding, staff and resources to meet the goals established in the 2018 County CAP which include:

- Planting 35,146 trees by 2030, with an additional 28,202 trees planted between 2031 and 2050 at new residential developments in the unincorporated county, as committed to in [Measure A-2.1](#) of the 2018 County CAP.
- Planting 49,000 trees by 2030 and an additional 70,000 trees between 2031-2050 in the unincorporated county, as committed to in [Measure A-2.2](#) of the 2018 County CAP.
- Conducting a Tree Canopy Assessment by 2025.

Note: The County CAP Measure A - 2.1 Increase Residential Tree Planting 2020 target is reported as "in progress" suggesting the target has not been met.

### ***Planning for Healthy, Resilient Communities***

The County must invest in local resiliency programs that protect our communities from the main impacts of the climate crisis. This includes:

- Utilizing the best data, research, maps, models, and up-to-date climate science, including CalEnviroScreen 4.0, to have the most complete picture of what climate impacts our communities should prepare for.
- Implementing County specific innovative resiliency projects, such as the [City of Phoenix's gray streets program](#) to reduce urban heat health impacts and prevent heat-related deaths.
- Examining holistic adaptation and resiliency plans that focus on coastal impacts such as [Louisiana's Strategic Adaptation for Future Environment \(LA SAFE\)](#) and determine best practices for San Diego County.
- Integrating green infrastructure elements to streets, alleys and parking lots through permeable pavement, bioswales, urban planter boxes, rain gardens, and trees.
- Bringing together emergency and community services to create interagency plans to protect public health and ensure safety.

### ***Bikeable, Walkable Neighborhoods***

At minimum, everyone deserves quality affordable housing in close proximity to life's essential services such as public transit, schools, job centers, and green open spaces. Building affordable housing in VMT efficient areas is a necessary strategy to reduce greenhouse gas (GHG) emissions, and improve public health and economic disparities, especially for low-income communities of color. Inequitable, dangerous, unsustainable, and expensive sprawl development far away from current and future infrastructure remains one of the region's greatest threats to our goal of reducing VMT and GHG emissions. Families should not be forced to live in sprawling, high fire areas where they can spend more than 50% of their income on housing and transportation alone.

Land use and housing are not typically prioritized in CAP measures because it is hard to quantify GHG emissions reductions from these sectors, but it is still necessary to mention them in the CAP as they affect potential GHG emissions reduction in other sectors such as transportation, the built environment, and energy. It is essential that the County align its current General Plan and any subsequent updates with the CAP. This will ensure interdepartmental consistency with GHG reduction measures as the County adopts new land use and housing policies. We therefore recommend the following strategies be included in the CAP:

#### ***Equitable Development of Homes Near Jobs & Transit***

- Measures to prevent sprawl and advance the development of dense, affordable, onsite infill development near current and future job centers, transit, and high-frequency bus lines, in alignment with SANDAG's Regional Transportation Plan (RTP) and County's-own Sustainable Land Use Framework (SLUF). This can include the development of an Inclusionary Housing Program.
- Anti-displacement strategies for residents and small businesses, such as the creation of Community Land Trust (CLTs). These strategies should be developed in consultation with stakeholders and the community, prioritizing environmental justice communities.
- Provide specificity of the areas where smart growth and density should be targeted. This includes aligning the General Plan and Community Plan Updates (CPUs) with the CAP by providing the transportation mode share, VMT reduction, and land use goals for communities throughout the unincorporated areas, catered to their local context.

### ***World-Class Transit***

According to the 2018 CAP, on-road transportation accounts for 45% of unincorporated County emissions, more than any other sector, but only 13% of projected reductions were set to come from the "Built Environment and Transportation" sector. This massive discrepancy between emissions and associated reductions is unacceptable, and must be addressed in the new CAP. The County will not be able to meet zero carbon by 2040 without significantly slashing GHG emissions for the transportation sector, which produces the greatest source of emissions in our region. This requires the implementation of aggressive VMT reduction targets and a mode shift strategy that safely, affordably, and efficiently connects residents to transportation options, such walking, biking, and transit. If the County's CAP does not incorporate successful mitigation of

GHGs from the transportation sector, it will not meet the needs of our communities and our climate goals. We therefore recommend the following strategies be included in the CAP:

**Create Detailed Plans to Achieve Mode Shift and VMT Reduction Targets:**

- Optimize transit options in collaboration with NCTD, MTS, and SANDAG to develop bus routes in all unincorporated communities.
- Update the County's [Active Transportation Plan \(ATP\)](#) and incorporate the required infrastructure to promote active transportation options through pedestrian and bicycle infrastructure improvements in the unincorporated County. This includes providing shaded ATP corridors, preferably with California native plants.
- Review and increase the utilization of the Buena Creek Sprinter Station as a highly desired method of connection between unincorporated areas and local municipalities. This can be done via the extension of NCTD & MTS bus routes, micro transit, and ATP.
- Plan and fund complete bus stops with bus shelters, benches and lights, which the County can fund on unincorporated land.
- Pursue community-specific telecommuting policies in collaboration with local employers, accompanied with efforts to increase broadband access for historically disinvested in communities.
- Commit to electrifying 100% of the County owned fleet, including all County-heavy duty and emergency response vehicles, by 2035.
- Commit to implementing a County-wide electric vehicle strategy to accelerate EV adoption, including electric bicycles, that focuses on the barriers to ownership and charging for residents within historically disinvested in communities.
- To maximize the intent of Transit Oriented Development (TOD) and reduce GHG emissions the County must prioritize "first/last mile connection". This includes protected bike lanes and safe pedestrian infrastructure in Transit Priority Areas and VMT efficient areas.

**All-Electric Homes**

In order to improve the health and safety of our homes, communities and the environment, fossil fuels can no longer power the buildings we live and work in. Electricity and methane gas used in buildings account for approximately one third of the unincorporated County's total GHG emissions. This is also an urgent environmental and racial justice issue because methane gas pollution is typically highest in low-income communities of color that are already disproportionately burdened with pollution from other sources. Building electrification is a critical strategy to improve our climate and health. We therefore recommend the following strategies be included in the CAP:

**Electrify New Buildings**

- Adopt an all-electric ordinance for new construction with little to no exceptions that also covers additions and alterations. Over 70 jurisdictions in California have adopted all-electric ordinances, meaning abundant resources, templates, and best practices are available for the County to utilize.

### Electrify Existing Buildings

- Develop and implement a plan to electrify all existing buildings. The County should set a target to electrify 90% of buildings by 2035. The plan should include scope, scale, estimated costs, specific planning and implementation timelines, and an outline for community and stakeholder engagement. A building and housing stock analysis must be conducted to inform the plan. Equitable electrification for communities of concern and new job opportunities for fossil fuel workers must be key elements of all building electrification strategies.

### Electrify Municipal Buildings

- Implement the Zero Carbon Portfolio Plan, including electrification of all municipal facilities, starting in 2023. This strategy must outline estimated costs and timelines for electrification, as well as include a target date to complete the decarbonization of municipal operations. Electrifying municipal facilities is necessary to meet GHG reduction targets and to exemplify the path for decarbonization to residents and businesses throughout the County.

### **100% Renewable Energy**

Ensuring our region reaches 100% clean energy is crucial for reducing emissions and ensuring a just, climate-safe future. The County must explore existing and new opportunities to develop programs and initiatives to expand clean energy in all areas of the unincorporated County, prioritizing environmental justice communities and renewable energy opportunities at municipal facilities. The County must also collaborate with local community choice energy programs in order to ensure ratepayer money is reinvested back into neighborhoods. To strengthen the County's clean energy capacity and build resilience, we recommend the following strategies be included in the CAP:

### Increase Renewable Energy Supply

- Procure 100% renewable energy to power homes and buildings in the unincorporated County through San Diego Community Power. This strategy can be implemented rapidly and should be prioritized.
- Move County buildings from direct access to San Diego Community Power in order to reinvest revenues back into County operations.
- Implement the Zero Carbon Plan, including increasing energy efficiency & renewable energy generation at county facilities.
- Increase energy efficiency with targets for all residential, non-residential, and County-owned buildings.
- Expand local Distributed Energy Resources (DERs) throughout the County and specifically in communities of concern. Local DERs are the most climate resilient renewable energy systems that exist as extreme weather and fires threaten the reliability of large scale transmission lines and power plants. On-site solar panels, battery storage, and microgrids can provide ample protection from ever more frequent climate disasters.

### ***Center and Strengthen Equity***

The County must intentionally incorporate equity throughout each strategy and measure of the CAP. This includes ensuring the development and implementation of the CAP takes place in consultation with a diverse set of stakeholders from the most impacted unincorporated communities. The [California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0](#) is a great tool that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. The County should work with key stakeholders and utilize CalEnviroScreen and other indicators to incorporate equity considerations into CAP implementation. We recommend the following strategies of how the County can center equity in the CAP:

- Create a Climate Equity Index (CEI) that explicitly defines which communities in the unincorporated County are most vulnerable and impacted by the climate crisis, and prioritizes said communities to ensure those most impacted by climate change and environmental pollution are prioritized in the implementation of GHG reduction strategies.
- Actively prioritize social equity measures, actions, and goals that are identified by environmental justice communities. The County must develop tracking and reporting metrics to determine progress and success, and make necessary updates based on the results and community feedback.
- Operationalize equity in CAP policies with dedicated implementation funding for working-class environmental justice communities. Improve this process through yearly analysis and updates, community outreach, feedback, education, and increased staffing for implementation.

### ***Fund CAP Implementation***

To reduce GHG emissions from each measure within the CAP so that the County can reach zero carbon by 2040, the County must develop and adopt a comprehensive funding and implementation plan with associated costs, existing and potential funding sources, and planning and project timelines, which coincides with the adoption of the CAP. This includes developing a 5-year budget outlook for CAP implementation funding needs, and aligning those outlooks in annual budgeting processes.

Early planning and preparation is key to ensuring adequate project funding. As federal and state grants become available, the County will need to demonstrate existing plans for specific projects and programs, as well as strategies for allocating expected funding. Without these, the County may be unable to qualify or be competitive for resources needed to implement sustainability and climate initiatives. CAC recommends that the County hires grant writers and establishes working groups to seek local, state, and federal funding sources and ensure the County budget is written to achieve the timely fulfillment of CAP priorities

In addition to federal and state funds, the County should consider pursuing additional private and taxpayer-funded climate action money. Below are a few examples of cities and counties across the U.S. taking the lead on these funding initiatives:

- [City of Boulder](#): Since its inception in 2007, the City of Boulder CAP Tax has provided over \$22 million in critical funds for Boulder residents and businesses climate initiatives, generating about \$1.8 million per year for the city's climate work.
- [City and County of Denver](#): In 2020, the City of Denver approved a climate action sales tax, which is the financial basis of the city's Climate Protection Fund Five Year Plan (CPF). Denver's CPF, is expected to raise up to \$40M per year and it's set to fund high impact projects rooted in sustainability and resilience and aims to spend at least 50% of funds to directly benefit under-resourced and vulnerable communities.
- [City of Ithaca, New York](#): The City of Ithaca, NY secured \$100 million in financing from private equity firm Alturus for building electrification, and will seek up to \$250 million more for additional climate action efforts including transitioning the city to electric vehicles.
- [King's County, Washington](#): King County's Strategic Climate Action Plan has a Cost Shared Climate Budget in which the carbon footprint of four major departments (including Metro, Natural Resources & Parks, Roads, and the Department of Social and Health Services) determines the percentage they contribute to the implementation of the CAP. For FY 2023-2024 King County will create a new [Climate Office](#) with a \$2.3 million budget to elevate County's commitment, coordination, and ability to deliver on climate action internally and in partnership with cities and regional partners.
- [City of San Francisco](#): The Center for Law, Energy & the Environment (CLEE) developed a report, [Funding San Francisco Climate Action](#), which analyzes funding and financing strategies to generate sufficient revenue for San Francisco's CAP, adopted in 2021. One example funding strategy are [general obligation bonds](#) for building decarbonization, housing, and transportation, contingent upon an increase in the City's existing general obligation bond limits. It is important to note that the highest-cost strategies for the San Francisco CAP assume roughly \$5 billion dollars. This means that the CAP will require the funding of a mix of revenue streams across decades in order to support implementation.

### **Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. The County CAP offers a rare opportunity to help shape the climate policy in our region and state, and model the implementation of a zero carbon future. We urge staff to incorporate our recommendations into the CAP to maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses in the unincorporated area.

Sincerely,

*Madison Coleman*

Madison Coleman  
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Climate Action Campaign