



4 January 2024

Re: Feedback on the San Diego County draft Climate Action Plan

Dear County Sustainability Planning Division Team,

The [San Diego Building Electrification Coalition](#) (SDBEC) is an alliance of community, business, faith, justice, and environmental organizations coming together to equitably accelerate electrification in residential and commercial buildings. Building electrification is essential to meeting California and San Diego's ambitious climate goals by reducing greenhouse gas emissions, improving air quality in our homes and buildings, and protecting public health.

We are pleased that the County's Climate Action Plan recognizes the urgency to significantly reduce and avoid GHG emissions to achieve net zero emissions by 2045. And while the plan focuses on five emission reduction sectors, the importance of the Energy sector cannot be overstated. Electrifying buildings is one of the most effective ways to cut climate pollution. Our electricity is increasingly cleaner thanks to the County's decision to join San Diego Community Power. Furthermore, the technology needed to transition from methane gas to clean electricity already exists today.

It is in this spirit that we offer the following recommendations on the draft Climate Action Plan:

Energy Sector Vision (Chapter 4, Energy Sector, page 65)

- Many measures & actions in this sector rely on electrification as well as energy efficiency to meet the targets, yet the vision does not mention electrification.
 - We recommend a more inclusive Vision, e.g. **efficient electric buildings**

Measure E-1: County Operations (Chapter 4, Energy Sector, page 67)

- While the County's Zero Carbon Portfolio Plan (ZCPP) reduces GHG emissions in municipal operations, we recommend adding additional actions to the CAP, in alignment with the City of San Diego's goals in their Zero Emissions Municipal Building Operation Policy ([ZEMBOP](#))
 - Expand the scope beyond "owned & occupied properties" to include **properties owned by the County and leased to others**
 - **Require gas equipment be replaced at end of life**, or sooner, with electric alternatives
 - Accelerate the timeline for **100% renewable energy by 2025**

Measure E-2: Unincorporated Area (Chapter 4, Energy Sector, page 68)

- The County has many activities that impact new and existing buildings, that can updated to include electrification
 - We recommend adding a measure that **all county housing policies, funding and contracts, leases require all-electric buildings.**



- We recommend that the “Equity Based Outcomes” of “Reduced utility bills for homeowners and renters” be updated to include **improved air quality**.
- We recommend the “Community” co-benefit score be increased to reflect the **public cost-savings of energy efficiency and electrification**. Mass electrification will enable the decommissioning of expensive and aging gas pipelines.

Action E-2.1: New Buildings (Chapter 4, Energy Sector, page 68)

- Due to on-going litigation, we recommend that this action be supplemented to create an ordinance to **encourage all-electric equipment, until it is possible to require it**.

Action E-2.2: Existing Buildings (Chapter 4, Energy Sector, page 68)

- We recommend the following additions to address the urgency of electrifying of existing buildings
 - **Require all air conditioning units to be replaced upon burnout with heat pump appliances**
 - **Streamline the permitting process for building electrification, especially emergency replacements**
 - **Support residents with an Electrification Retrofit Accelerator program**
 - **Accelerate the timeline for existing building electrification**
 - **Commit to seeking additional policy pathways to electrify faster**

In addition, details for each action including **estimated costs, specific benchmarks and implementation timelines** are critical and must be transparently developed and robustly funded.

Our region is far behind in meeting mandated GHG reduction goals. Strong leadership at the County level must be demonstrated, leading by example, to achieve the significant results that are needed in the face of our climate emergency.

Sincerely,



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