

START HERE, START NOW

An Environmental Justice Assessment of the
City of San Diego Climate Action Plan



ABOUT ENVIRONMENTAL HEALTH COALITION (EHC)

Environmental Health Coalition (EHC) is a 38-year old environmental justice organization based in National City, California. EHC leads community-based efforts to reduce toxic pollution and improve environmental and public health in the San Diego / Tijuana region.

EHC operates on the foundation that all people have the right to live, work, and play in a healthy and safe environment, and this is achieved when informed and empowered communities act together to make social change. Through grassroots organizing, education, policy advocacy, and leadership development, EHC works with community residents, regional and international allies.

EHC's inspiration comes from the conviction that real justice is only achieved when the most vulnerable communities, "participate as equal partners at every level of decision-making, including needs assessment, planning, implementation enforcement and evaluation" (Delegates to the First National People of Color Environmental Leadership Summit).¹

For more about EHC, please visit: www.environmentalhealth.org.



October 22, 2018

*Cover Image:
City Heights Community Action Team members.*

¹ Delegates to the First National People of Color Environmental Leadership Summit. Principles of Environmental Justice. (1991). <https://www.ejnet.org/ej/principles.html>

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EXECUTIVE SUMMARY

Paw Shar Wah and Hser Gay at Recipes for Respect in City Heights

The unequal burden placed on low-income communities of color resulting from historically discriminatory policies calls for an environmental justice (EJ) analysis of the City of San Diego's Climate Action Plan (CAP). *Start Here, Start Now: An Environmental Justice Assessment of the San Diego Climate Action Plan* evaluates implementation progress and recommends immediate and long-term solutions.

In 2015, Environmental Health Coalition (EHC) joined residents from impacted communities and partner organizations to advocate for meaningful language in the CAP that would result in its equitable implementation. San Diego's CAP recognizes "disadvantaged communities," or what we refer to herein as "EJ communities," as those ranking in the top 30% of the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen tool, ranked regionally, plus areas eligible for Community Development Block Grant funding (CDBG).

It has been more than two years since the City adopted the CAP. Now we must assess if the City of San Diego is on track to meet its stated objectives. Divided into six sections, *Start Here, Start Now: An Environmental Justice Assessment of the San Diego Climate Action Plan*, hereafter referred to as the EJ Assessment, analyzes the overall allocation of funds to program management and implementation, the CAP's strategies, and air quality. **It is important to highlight that this is a baseline analysis, which includes recommendations to advance equity and data collection necessary to assess progress.**

MAJOR FINDINGS

PROGRAM AND FUNDING CAPACITY

The 2017 City of San Diego's budget allocated \$94.5 million in indirect funding to the implementation of the CAP, which was three times more than the reported \$32.7 million allocated to direct implementation costs.² The adopted 2018 budget does not provide direct or indirect details. No public data is available on how much funding has been invested in EJ communities since the CAP adoption.

This raises a question about how much of the CAP funding is **actually new spending** that is generating new solutions, versus how much goes to projects the City is required to do under other regulations or the City had already planned to implement. For this reason, **we ask the City to be transparent and report a breakdown of direct and indirect CAP expenditures in EJ communities and the City.** When it is clear where funds are invested, we can better track the progress in EJ communities.

Recommendations

1. Report only direct funding in the CAP implementation or breakdown spending by new and existing direct and indirect funding.
2. Track and report funding for CAP implementation invested in EJ communities.
3. Increase EJ community-specific direct investment by the year 2020 to be proportionate to the EJ community population as recognized by the CAP (about 60% of the City's population).
4. Conduct a phased approach to achieve equitable CAP implementation. Phase One (first 5 years), should focus the implementation of the CAP's strategies in census tracts in the top 30 percent of the regionally ranked CalEnviroScreen. The second phase then expands to the top 60% and so on based on progress made in phase one.
5. Increase staff capacity dedicated to the CAP implementation from one employee (2018) to a total of five by 2019 with 2 staff persons dedicated to implementation in EJ communities.
6. Establish a hiring committee composed of EJ community members and organizations to ensure the newly approved full time environmental justice specialist for the CAP has experience working with and represents EJ principles. This committee's responsibilities include the creation of the job description, the hiring process, and once hired, regular meetings with EJ communities.

The City has the opportunity to be a model for national climate policy if it redefines priorities with concrete actions towards environmental justice.



² Caldwell, Erik Director, Economic Development City of San Diego. Fiscal Year 2017 Climate Action Plan Budget & Implementation Report (2016), 5. www.sandiego.gov/sites/default/files/fy17_cap_funding_implementation_memo_may_2_2016_final_2.pdf

TRANSIT, WALKING, BICYCLING, & LAND-USE

Transportation continues to be the single largest source of greenhouse gas (GHG) emissions in San Diego, making up 54.24%³ of GHG emissions. EJ communities in San Diego have more than triple the number of transit-dependent households compared to the City overall⁴. **The City must use its considerable authority to ensure that SANDAG reduces vehicle miles traveled (VMT), and increases mass transit and active transportation opportunities.**

Recommendations:

1. VMT Reduction:
 - Reduce traffic density in EJ communities to be comparable to non- EJ communities.
 - Prioritize funding for projects that reduce VMT in EJ communities.
2. Pedestrian and Transit First:
 - Prioritize funding to increase bus routes, quality service, public transit affordability, and pedestrian and bike safety infrastructure in EJ communities.
 - Increase the number of fulltime staff dedicated to mass transit and active transportation to a minimum of two by 2019.
3. Clean Transportation in EJ Communities First:
 - Reduce diesel particulate matter (PM) in EJ communities to be comparable to non-EJ communities.
 - Prioritize zero-emissions vehicle infrastructure for transit vehicles before single-occupancy vehicles infrastructure.

AIR QUALITY

In the City of San Diego, 90% of census tracts with the worst air pollution due to diesel emissions are located in EJ communities.⁵ Air quality and climate change are inextricably linked, however, the CAP does not include goals related to air quality. **Improvements in air quality and public health can be a key outcome of aggressive implementation of the CAP's transit, walking, biking, and land-use strategies.**

Recommendations:

1. Include an air quality strategy in the CAP implementation moving forward.
2. Advocate at SANDAG and the State of California for investment in zero-emission vehicle (ZEV) technology and heavy-duty freight equipment.
3. Allocate sixty percent of the transportation funds, which is proportionate to the EJ population in San Diego according to the CAP, to reduce VMT in EJ communities.

ENERGY DEMOCRACY

Non-EJ communities have more than double the residential solar than EJ communities in San Diego.⁶ We attribute this to a variety of barriers making solar installation difficult to access and afford for all people.

³ The City of San Diego. 2016 Annual Report: Climate Action Plan Appendix. (2016). www.sandiego.gov/sites/default/files/2016_cap_annual_report_appendix_final.pdf

⁴ Source: American Community Survey, Table B08141, 2016 5-year data. According to the 2016 ACS 15,505 (3.7%) households in EJ communities in the City of San Diego do not have a car, compared to 4,092 (1.7%) households outside of EJ communities.

⁵ San Diego has 22 census tracts that rank at the very top of all census tracts in the state for CalEnviroScreen's diesel PM indicator, and 20 of these are in EJ Communities. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

⁶ Net Energy Metering (NEM) Currently Interconnected Data Set, available from the California Distributed Generation Statistics website www.californiadgstats.ca.gov/downloads/

Recommendations:

Implement the following recommendations taken from the *Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Businesses Contracting Opportunities in Disadvantaged Communities* report from the California Energy Commission (CEC) and apply them at the local level to remove barriers to clean energy.

1. Advocate for dedicated resources from the new California program Solar on Multifamily Affordable Housing (SOMAH) for solar installations in EJ communities.
2. Collaborate with SDG&E and future community choice energy (CCE) program to:
 - Establish a one-stop shop that provides technical assistance, targeted outreach, and funding services to enable owners and tenants of EJ communities to implement energy efficiency, clean energy, zero-emissions transportation infrastructure, and water-efficient upgrades in their buildings.
 - Lock-in the energy rates for EJ communities.
3. Partner with the Center on Policy Initiatives (CPI) and International Brotherhood of Electrical Workers (IBEW) Local 569 to develop and track progress of workforce development efforts resulting from clean energy and zero-emissions transportation programs.

CLIMATE RESILIENCY

13% of the City of San Diego has tree-canopy coverage to provide shade and natural resources, while EJ communities average only 10.6%.⁷

Recommendations:

1. Budget funding sufficient to implement the City's Urban Forestry Program Five Year Plan adopted in January 2017 and prioritize its implementation in EJ communities.
2. Track tree canopy in EJ communities and non- EJ areas at the census tract level.
3. Create economic incentives to increase food gardens in EJ communities.

ENERGY & WATER EFFICIENCY

The lack of energy and water efficiency in EJ communities means no co-benefits like lower cost and immediate health improvements for most vulnerable communities. An EJ approach to efficiency includes solar energy, as well as insulation, air sealing, windows, heating, ventilation, and air conditioning (HVAC) systems, new appliances, zero-emissions vehicles, and more.

Recommendations:

1. Establish a task force for program alignment between the energy, water, resilience, housing, and low-emission transportation infrastructure programs for EJ communities.
2. Phase in the benchmarking ordinance by prioritizing EJ communities; and expand its implementation to include new and multifamily residential buildings, industrial uses, and open facilities.
3. Pursue additional financial resources and incentives to assist low and moderate-income households and businesses in EJ communities with implementing energy and water efficiency measures.

⁷ TreeCanopy_2014_Sandiego tree canopy raster dataset, converted to GIS shapefile, available from SANGIS Data Warehouse: <http://www.sangis.org/download/index.html>. EJ communities' percentage is based on the tree canopy data compiled by the City using CalEnviroScreen2.0 results.

CONCLUSION

When cities advance environmental justice, everyone benefits. *Start Here, Start Now* provides a strong baseline analysis and recommendations to advance the City's ambitious climate goals leading to tangible and measurable environmental justice outcomes. Through this assessment, it is evident that climate investments need to be measured to demonstrate a clear benefit to EJ communities. The assessment also demonstrates the centrality of sustainable transportation. Nearly all of the key priorities of the San Diego Climate Action Plan would benefit from significant investments in public transit and active transportation. Transportation Justice – here and now – is the most important message of this report. Vast improvements in transportation will improve air quality, create jobs, increase access to economic opportunity and do more to achieve GHG reductions than any other action.

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EHC is proud of the community based climate solutions that are included in the CAP, like the equity commitment and policy direction such as AB 805 that promotes transit expansion and transportation justice. Now it is critical that the City take substantial steps to continue this momentum. The City has the opportunity to be a model for national climate policy if it redefines priorities with concrete actions towards environmental justice. **This is an invitation to decision makers, staff, and stakeholders to end the status quo and collectively turn inequitable car centric San Diego into a model City.**



EHC members at the California Environmental Justice Alliance Lobby Day, Sacramento.



EHC members at the Port of San Diego's Cesar Chavez Park

DEFINING ENVIRONMENTAL JUSTICE

"Environmental Justice (EJ)," as defined by California Government Code section 65040.12(e), means "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."⁸ Fair treatment means that no population should be forced to carry a disproportionate share of exposure to the negative effects of climate change and toxic pollution due to lack of political or economic strength. **Low-income communities of color in the San Diego region currently carry the burden of climate change because they are home to the largest sources of greenhouse gas emissions (GHG) and toxic pollution.** These are linked to cancer, asthma, heart attacks, low birthweight, and more. This unequal environmental burden calls for an environmental justice analysis of the implementation of the City of San Diego's Climate Action Plan.

With a foundational understanding of environmental justice and the communities most impacted, the City of San Diego can *Start Here and Start Now* to prioritize benefits

to these communities as it carries out the implementation of its Climate Action Plan.

Environmental Justice Communities vs Disadvantaged Communities

This document will use environmental justice (EJ) communities to refer to disadvantaged and impacted communities. As explained by the California Environmental Justice Alliance, "impacted communities often prefer to use the term 'environmental justice (EJ) communities' instead of 'disadvantaged communities' when describing areas most burdened by pollution and vulnerable to its effects. While EJ communities have long advocated for cumulative-impacts tools such as CalEnviroScreen 3.0 that identify 'disadvantaged communities' in public policy, they often feel that the term 'EJ communities' more accurately describes the neighborhoods that experience the highest cumulative burdens and should therefore be prioritized for greater protections and investment. This is, in part, because the term encompasses other important EJ indicators, such as race, that are known to correlate with disproportionate environmental burdens."⁹

⁸ California Governor's Office of Planning and Research. General Plan Guidelines (2017), 165. http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf

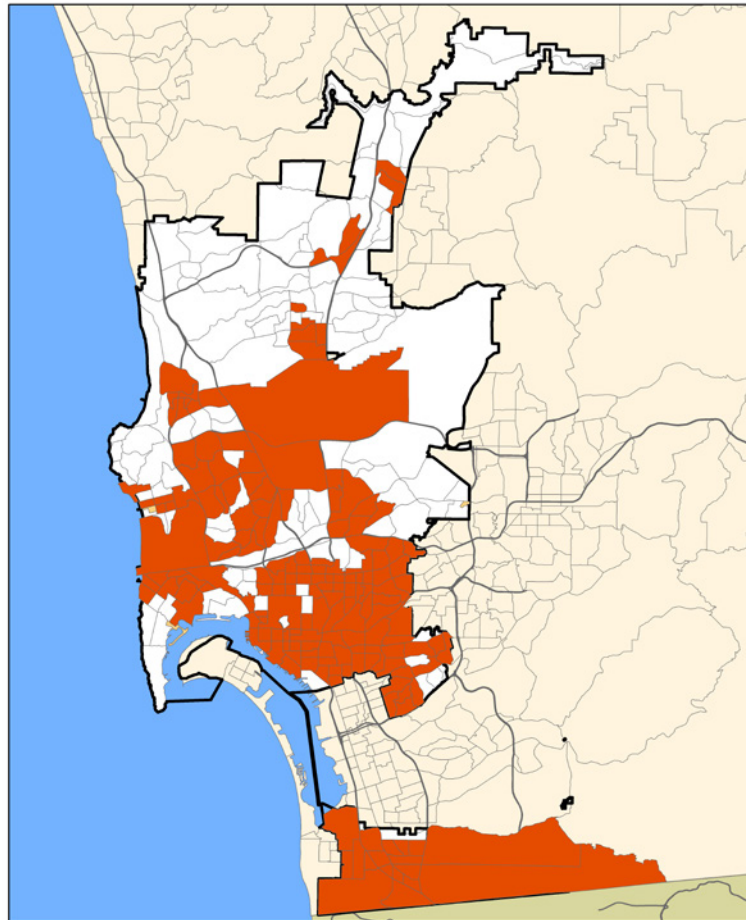
⁹ CEJA & Place Works. SB 1000 Implementation Toolkit: Planning for Healthy Communities (2017), 5. <https://caleja.org/2017/09/sb-1000-toolkit-release/#form>

EJ communities in this assessment are identified using the City of San Diego's criteria.

The Climate Action Plan (CAP) recognizes "disadvantaged communities," or what we refer to herein as "EJ communities," as those ranking in the top 30% of the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen tool, ranked regionally, plus areas eligible for Community Development Block Grant funding (CDBG). The set of areas highlighted in red on the map titled *San Diego Climate Action Plan Disadvantaged Communities CES to top 30% plus CDBG Low-Mod 2010 census tracts* was compiled by Environmental Health Coalition and represents its best effort to identify these areas; however, it is not an official map of these areas. Since the City's broad definition includes a large portion of its geographic area, **we recommend a phased approach to achieving equitable CAP implementation. Phase one (first 5 years), should focus the implementation of the CAP's strategies in census tracts in the top 30 percent of the regionally ranked CalEnviroScreen.** Then Phase Two expands to the top 60% and so on based on progress made in phase one.

Equity in the Climate Action Plan

In 2015, Environmental Health Coalition (EHC) joined residents from impacted communities and partner organizations to advocate for meaningful language in the Climate Action Plan (CAP) that would result in its equitable implementation. As stated in the 2015 plan, Council Policy 800-14 "... sets the City's priorities for the City's Capital Improvements Program (CIP). The policy prioritizes projects in underserved communities including those with low-income households, low community



San Diego Climate Action Plan Disadvantaged Communities, CES top 30% plus CDBG Low-Mod 2010 census tracts

engagement and low mobility or access to transportation systems based on SANDAG census tract. The City elected to comply with the Council Policy to include the use of the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen tool¹⁰ to identify underserved communities and prioritize [investment in] the City's Capital Improvements Program (CIP) in census tracts ranking in the top 30% of CalEnviroScreen scores, which may be locally normalized. The policy also prioritizes projects located in areas eligible for the Community Development Block Grant funds, and projects located within a half a mile of affordable housing" (City of San Diego, 50).¹¹

It has been more than two years since the City adopted the CAP. Now we must assess if the City of San Diego is on track to meet its

¹⁰ California Communities Environmental Health Screening Tool (CalEnviroScreen) identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

¹¹ City of San Diego, Climate Action Plan (2015), 50. https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

stated objectives. This assessment evaluates how equitable the implementation of the plan has been and provides recommendations to enable the City to achieve true equity. **In that process we want to acknowledge that the City will not reach its climate goals alone. It is essential that regional agencies like the San Diego Association of Governments (SANDAG), Metropolitan Transit System (MTS), San Diego Gas and Electric (SDG&E), San Diego Air Pollution Control District (APCD) and the Port of San Diego collaborate with the City and play an equally important role in addressing climate change.**

START HERE, START NOW: AN EJ ASSESSMENT OF THE SAN DIEGO CAP

The San Diego CAP Environmental Justice Assessment (EJ Assessment) is a result of a collaborative effort between three leading San Diego organizations dedicated to building climate resilience: Environmental Health Coalition (EHC), the Center on Policy Initiatives (CPI) - a nonprofit research and action institute working to advance social and economic justice for working people in the region- and San Diego 350 (SD350) - a group devoted to preventing the worst impacts of climate change. These groups integrated their respective areas of expertise in environmental health and economic stability to steer local, regional, and state responses to climate change toward redressing inequities and ensuring meaningful and tangible change in the most impacted communities.

Divided into six sections, the EJ Assessment analyzes the overall **allocation of funds to program management and implementation, the CAP's strategies, and air quality**. Each section compares citywide investments to those directed to the City's priority areas as defined in the CAP. **Since the Climate Action Plan is more than two years into its implementation, we consider this assessment to be a baseline analysis, which includes recommendations to advance equity and data collection necessary to assess progress.**



Llesenia Cevallos
Transportation Justice Poster Making Workshop, 2015

Assessment Sections

1. **Program Funding** looks at the investment and capacity allocated to the implementation of the Climate Action Plan.
2. **Transit, Walking, Bicycling, & Land-Use** assesses transportation related investments.
3. **Air Quality**, assesses progress based on air quality indicators from CalEnviroScreen. While not included in the CAP goals, is key to achieving climate and environmental justice.
4. **Energy Democracy** examines the amount and location of residential solar photo voltaic (PV) panel installations and associated job creation.
5. **Climate Resiliency** examines tree-canopy, green space increases, and budget allocations.
6. **Energy & Water Efficiency**, provides recommendations for the benchmarking ordinance implementation and from the *SB 350 Low-Income Barriers Study, Part A* report done by the California Energy Commission.



EQUITY: WHEN CITIES ADVANCE ENVIRONMENTAL JUSTICE, EVERYONE BENEFITS

Patricia Rosales from City Heights at the Community Action Team meeting preparing her public testimony.

Jurisdictions across California and the United States are beginning to see the benefits of integrating environmental justice into resource distribution and decision-making processes. The following section provides important tools to understand and properly address equity in policy.

EQUITY: A DEFINITION

For the purpose of this analysis, it is important to understand that **equity is not equality**. **Effective equity policy recognizes that a larger proportion of resources need to be invested in low-income communities of color in order to remedy the damage caused by historically discriminatory policies.**

“Equity is not the same thing as equality; giving everyone exactly the same transit options will not allow those who are, say, more reliant on public transit to easily get to work or school. Second, equity is not one-size-fits-all; creating job opportunities from transit investment or park expansion for formerly incarcerated people requires a different set of policy interventions and social service supports than what might be needed for, say, the working poor” (Carter 22).¹²

¹² Carter, Vanessa, et al. Measures Matter: Ensuring Equitable Implementation of Los Angeles County Measures M & A (2018), 22. http://dornsife.usc.edu/assets/sites/242/docs/M_A_Final_WebVersion_02.pdf

Environmental Justice Principles for Policy Implementation

The following principles from the California Environmental Justice Alliance (CEJA), a statewide, community-led alliance that works to achieve environmental justice by advancing policy solutions, provide a strong overarching framework on how to best advance equitable policy. Below is a full description of each principle. The principles can be found in CEJA's 2017 Environmental Justice Agency Assessment.¹³

1. Prioritize and value prevention, human health, and improving quality of life:

These needs must be given full weight in decision-making, not overlooked in favor of business interests or cost effectiveness, as is often the case, and particular concern must be given to the health and well-being of residents in highly impacted neighborhoods.

2. Do no harm: (Government) agencies must commit to actions that do not further harm environmental justice communities. The most egregious decisions are those that actively exacerbate environmental health and justice inequalities, which are unfortunately all too common.

3. Prioritize environmental justice communities: There is a long-standing history of pollution burdens and environmental hazards disproportionately impacting low-income communities and communities of color, which is well documented by communities themselves, as well as academic and state agency studies. It is simply not sufficient to look at impacts of policies moving forward; there is a historic legacy and burden the (government) agencies have a responsibility to proactively address. There is an ethical, environmental and public health imperative to ensure that environmental justice communities are prioritized for targeted resources and

programs, and receive special consideration within regulatory decision-making by (local) and state agencies.

4. Meaningful community engagement:

Residents in environmental justice communities must have the ability and opportunity to inform design and implementation for policies that impact their health and quality of life. Many agencies use a flawed "decide, announce, defend" process whereby an agency determines and releases documentation on a policy devoid of any community input, engages with environmental justice communities in public discussions after the fact, and ultimately moves forward with implementing their initial proposed policy without incorporating significant feedback from environmental justice communities. Other times, community organizations and members are engaged in dialogue but agencies do not alter any decisions even after hearing significant feedback. Environmental justice communities must be engaged early, often, and in a meaningful way.

5. Responsiveness: (Government) agencies must respond, and be willing to address, community concerns once they have been articulated rather than simply noting them in the public record. Without a clear commitment to responsiveness, community engagement efforts become a "check box" rather than a meaningful attempt to work with stakeholders in policy design and implementation.

6. Accountability: As the public stewards of a clean, safe, and healthy environment for all, the City of San Diego must be accountable for any and all (in)actions and commitments made from policy or project inception through implementation, all decision-making processes, and all relevant impacts from their (in)actions, commitments, and decision-making processes, including benefits and harm to community health and safety.

¹³ California Environmental Justice Alliance. Environmental Justice Agency Assessment 2017 (2017), 31. <https://ceja.org/2018/05/2017-environmental-justice-agency-assessment/>

7. Transparency: Agencies must be clear in: (a) detailing the processes by which all decisions are made and regularly reviewing the processes to ensure accessibility by communities most impacted by environmental hazards; (b) disclosing all factors and stakeholders that inform and influence all decisions affecting all policies and projects; and (c) describing decisions made, in addition to upholding the principles of engagement and responsiveness outlined above.

8. Proactivity: To be truly stellar on environmental justice issues, regulatory agencies need to work proactively and in partnership with environmental justice communities and organizations to develop innovative ways of addressing key environmental justice issues in communities.



Barrio Logan community members at the City of San Diego Council Meeting when the Community Plan was approved.

CALENVIROSCREEN

“CalEnviroScreen is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution” (OEHHA).¹⁴ “Low-income communities and communities of color have faced years of poor land-use planning and exposure to toxic

¹⁴ Office of Environmental Health Hazard Assessment. CalEnviroScreen 3.0. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

emissions. When combined with decades of disinvestment, chronic unemployment and poverty, the result is a disproportionate burden and a cumulative impact that extends beyond any one factor” (California Environmental Justice Alliance 1).¹⁵ The tool uses 20 indicators to rank all the census tracts in California. The most recent version, CalEnviroScreen 3.0 includes the following indicators:

¹⁵ California Environmental Justice Alliance. CalEnviroScreen 3.0, A Tool For Advancing Environmental Justice (2018), 1. <https://caleja.org/wp-content/uploads/2015/09/CES3.0-5.pdf>

POLLUTION BURDEN

Exposures

- Ozone concentrations
- Particulate Matter 2.5 concentrations
- Diesel Particulate Matter emissions
- Pesticide use
- Drinking water contaminants
- Toxic releases from facilities
- Traffic density

Environmental Effects

- Cleanup sites
- Groundwater threats
- Hazardous waste
- Impaired water bodies
- Solid waste sites & facilities

POPULATION CHARACTERISTICS

Sensitive Populations

- Asthma emergency room (ER) visits
- Cardiovascular disease (as measured by ER visits for heart attacks)
- Low birth weight infants

Socioeconomic factors

- Educational attainment
- Housing burdened low income households
- Linguistic isolation
- Poverty
- Unemployment

Because of EHC’s successful organizing and advocacy efforts, the City of San Diego incorporated CalEnviroScreen in the policy and implementation of the Climate Action Plan to prioritize investments in EJ communities. The City now uses the California Office of Environmental Health Hazard Assessment

(OEHHA) CalEnviroScreen tool¹⁶ to identify under-served communities and prioritize the City’s Capital Improvements Program (CIP) in census tracts ranking in the top 30% of CalEnviroScreen scores.

¹⁶ Office of Environmental Health Hazard Assessment. <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>



Members of Environmental Health Coalition and San Diego 350 Poster Making Workshop for the 2017 People's Climate March.

REAL CLIMATE SOLUTIONS: EJ COMMUNITIES ARE LEADING THE WAY

Climate Justice is defined as, “ensuring that the people and communities who are least culpable in the warming of the planet, and most vulnerable to the impacts of climate change, do not suffer disproportionately as a result of historical injustice and disinvestment” (Climate Justice Working Group, 3).¹⁷ Unfortunately, the impacts of climate change are disproportionately felt by low-income communities of color, and it is these same communities who “have been kept out of the global processes to address climate change” (Indigenous Environmental Network, North America).¹⁸ **Climate Justice affirms the rights of indigenous people and communities most affected by climate change to lead with the solutions; EJ communities represent and speak for themselves.**

¹⁷ Climate Justice Working Group. *Advancing Climate Justice in California: Guiding Principles and Recommendations for Policy and Funding Decisions* (2017). 3. <http://www.healthworldforall.org/en/express-img/17081516-3570-img1.pdf>
¹⁸ Indigenous Environmental Network, North America, et al. *Bali Principles of Climate Justice* (2002) <https://www.ejnet.org/ej/bali.pdf>

Puerto Rico's recent climate crisis provides a great example of self-determination. As the island works to recover from the 2017 hurricanes Irma and Maria, the Puerto Rican people are actively working for a Just Transition. They are reclaiming the island and establishing solar energy cooperatives, sustainable agricultural practices, collective kitchens and more. As explained by Elizabeth Yeampierre and Naomi Klein, “that experience is at the heart [of] just recovery...It’s a vision for an island where people are not saved by benevolent outsiders, but are given the tools to become true partners and save themselves. An island where the people of Puerto Rico transition rapidly to renewable power – and claim their full political power at the same time” (Yeampierre 7).¹⁹

¹⁹ Yeampierre, Elizabeth, and Klein, Naomi. “Imagine a Puerto Rico Recovery Designed by Puerto Ricans” *The Intercept*, October 20, 2017. <https://theintercept.com/2017/10/20/puerto-rico-hurricane-debt-relief/>



ENVIRONMENTAL JUSTICE INTERSECTIONALITIES

The environmental burden placed on low-income communities of color intersects with various oppressive institutions like racism, sexism, classism, transphobia, and more. Intersectionality, a term coined by Kimberly Crenshaw, explains that real solutions for systematic oppression need to be intersectional. **Environmental racism intersects with the housing crisis and unemployment, therefore it is of vital importance that climate policy prevents displacement, increases affordable housing, and includes quality jobs.** For decades, EJ communities have worked arduously and against all odds to transform their communities into healthy neighborhoods. In that process, these communities have become attractive to investors. According to Angotti (qtd. In Gould) in the book *Green Gentrification: Urban Sustainability and the Struggle for Environmental Justice*, “as investors large and

small move in, they effectively appropriate the value generated by others. This is now known as gentrification. It is not simply a change in demographics. It is the appropriation of economic value by one class from another.”²⁰

“We want climate justice; we want our communities to be healthy!”

Irma Ortiz, Logan Heights

20 Gould, Kenneth A., and Lewis, Tammy L. *Green Gentrification: Urban Sustainability and the Struggle for Environmental Justice*. New York, (2017), 25.



HERE TO STAY

The San Diego region, along with many municipalities throughout California, is experiencing a housing crisis. Corporate landlords and weak housing policies are displacing residents in EJ communities from the neighborhoods they worked hard to transform into healthy communities. Barrio Logan, Sherman Heights, and City Heights, the same neighborhoods hit first and worst by climate change, are also some of the San Diego neighborhoods where residents have to spend more than 1/3 of their income on rent. In March of 2018, NBC 7 reported that, "In the Barrio Logan neighborhood, ZIP code 92113, over 42 percent of homeowners spend more than a third of their income on housing costs" (Jones).²¹ Infrastructure improvements

²¹ Jones, Tom, and Campbell, Ron. "MAP: Housing Costs Continue to Outpace Incomes in San Diego County." NBC 7 News, March 30, 2018, <https://www.nbcsandiego.com/news/local/MAP-Housing-Costs-vs-Incomes-in-San-Diego-County-478428343.html>

and investments resulting from the CAP implementation must protect and develop more affordable housing while putting anti-displacement strategies and policies in place.

In September 2015, EHC submitted the following recommendations to the City's Climate Action Plan draft environmental impact report to preserve neighborhood character and prevent displacement. They continue to be relevant today.

- **Inclusionary Housing/Zoning:** Commit to significantly increase affordable housing units near transit stops and jobs to reduce vehicle miles travelled and increase equity, while using an appropriate buffer and siting to avoid exposing affordable housing residents to excess air pollution levels and other hazardous material. **At least fifty percent** of all housing developed or redeveloped as a consequence of any

transit oriented development should be protected to ensure that it remains permanently affordable. Furthermore, local regulation should be structured so transit oriented development enables anyone who wants to remain in the community, to do so. (PolicyLink)²²

- **Incentive-Based Zoning:** Incentive-based zoning can reward developers with density bonuses or floor-area bonuses if they meet affordable housing counts.
- **No Net Loss:** Commit to “no net loss” of residents and local businesses with a multifaceted strategy that could include efforts to preserve existing affordable housing, help renters become owners before prices rise, and efforts to support local businesses.
- **Transit Passes:** Often times, people who are in need of affordable housing are also in need of affordable transportation options. Provide opportunity transit passes for residents in the new housing development so that they are able to access transit services. This type of program is currently being done in Los Angeles. In MacArthur Park; residents of the new housing development are given a monthly METRO pass (a subsidy that both the housing developers and METRO help allocate). Each household gets one free monthly transit pass and residents pay \$20 (market cost is \$70 for the pass). This public transportation pass voucher has been able to help housing developers receive state tax credits.
- **Cultural and Social Services Access:** Community-serving institutions and businesses are needed to stabilize existing low-income communities of color as gentrification occurs. Affordable commercial space should be prioritized in Transit Oriented Development (TOD) and surrounding areas for community centers, cultural centers, service providers, and

No Net Loss: Commit to “no net loss” of residents and local businesses with a multifaceted strategy that could include efforts to preserve existing affordable housing, help renters become owners before prices rise, and efforts to support local businesses.

culturally relevant businesses. A good example of this, the Fruitvale Village in Oakland, has a health care facility, a childcare center, a public library, a senior center, and a charter high school. While the MacArthur Park TOD does not have any of these social services, they are located in the neighborhood within walking distance of the TOD.²³

- **Reduce Parking Requirements:** Reducing parking requirements can increase the feasibility of mixed-income and mixed-use TOD because parking is expensive. Parking influences the development budget and is a key factor in determining housing prices.²⁴ Reducing parking requirements can be addressed with transportation demand management strategies such as, developing a Transit Pass Fund, which supports transit passes for residents living in affordable housing.

²² Policy Link. Building the line to Equity: Six Steps for Achieving Equitable Transit Oriented Development in Massachusetts. August 2006. <http://www.reconnectingamerica.org/assets/Uploads/2006BuildingTheLineToEquity.pdf>

²³ Sandoval, Gerardo and Roanel Herrera. (2015).

²⁴ The Center for Transit-Oriented Development. Mixed-Income Housing Near Transit One in a series of best practices guidebooks from Increasing Affordability With Location Efficiency. <http://www.reconnectingamerica.org/assets/Uploads/091030ra201mixedhousefinal.pdf>

- **Authentic Public Participation:** Include EJ communities who are stakeholders in community planning and policy to be part of decision-making. Mechanisms for authentic public participation need to be incorporated into all projects, especially those where there are gentrification risks. This participation needs to go beyond what is legally mandated. It should also exclude artificial forms of public engagement where decisions that have already been made by planners are the driving force behind large-scale development projects.²⁵
- **Rent Control and stabilization:** Adopt rent control and just cause eviction policies that ensure property owners can only increase rents by reasonable amounts and protect families from unfair evictions.

Jobs

Historically, policy makers and the public have been misled to think they must choose between protecting the environment and public health or protecting the economy and jobs. This is a false choice. **We need to ensure climate change policies invest in creating a sustainable economy that bridges the income gap and ensures a more resilient community.** We can do this by facilitating the development of green jobs to maintain and create pathways into the middle class for everyone. **Policy tools like Community Benefit Agreements, joint labor-management apprenticeship partnering opportunities, workforce safety standards, and responsible contractor criteria** are some of the tools that policy makers can employ to create sustainable jobs that provide upward mobility and career opportunities. For example, as the number of low-wage service sector jobs near walkable, mixed-use communities *centered* around quality transit systems also known as transit oriented development (TOD) areas increases, it is important to ensure they are living wage jobs. **Jobs AND the environment is the right choice.**

²⁵ Sandoval, Gerardo and Roanel Herrera. (2015).



(L-R) Klaus Gohlke, Philomena Marino, & Panchito Martinez - Newly Elected Barrio Logan Planning Group Members and EHC leaders, 2018

"I'm glad our elected officials have recognized climate change as an issue. Now we need to truly prioritize the families most impacted first."

Panchito Martinez, Barrio Logan



PROGRAM & FUNDING CAPACITY

EHC members and allies at the Scoping Plan Workshop with the California Air Resources Board

The 2017 City of San Diego's budget allocated \$94.5 million in indirect funding to the implementation of the CAP, which was three times more than the reported \$32.7 million allocated to direct implementation costs.²⁶ The adopted 2018 budget does not provide direct or indirect details. No public data is available on how much funding has been invested in EJ communities since the CAP adoption.

This analysis demonstrates that the City of San Diego does not currently have the capacity or infrastructure in place to advance equity nor achieve the goals of the Climate Action Plan (CAP). With limited direct funding allocated to the implementation of the CAP, the program is underfunded and has inadequate staff capacity resulting in the

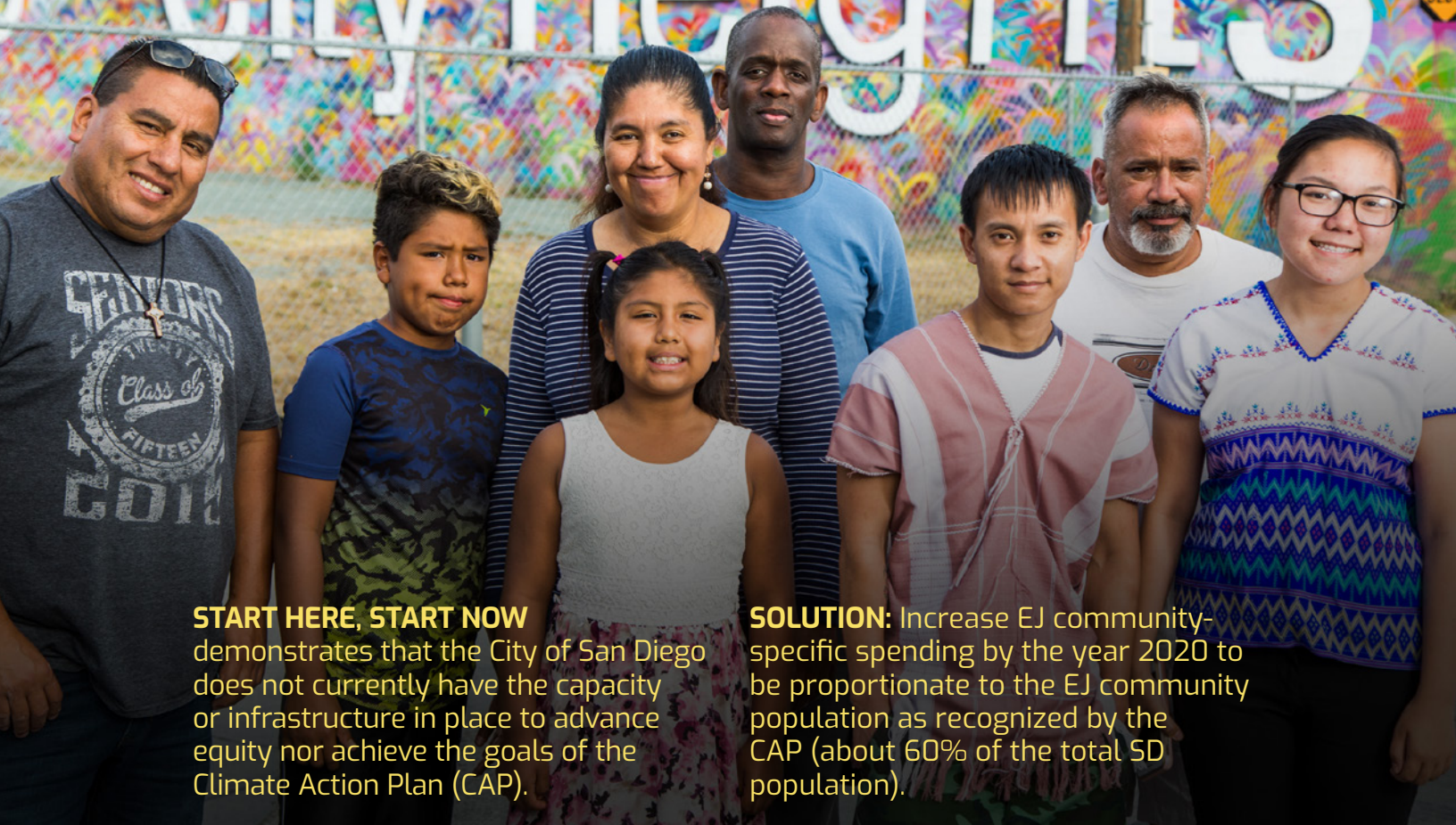
City's inability to track climate investments with detail and obtain new applicable state and federal funding sources. We commend the City Council for their recent approval of a budget to create the Office of Sustainability, which expands the staffing to include a full time Environmental Justice Specialist. These actions reflect a commitment from the City to increase capacity and prioritize EJ communities.

DIRECT AND INDIRECT FUNDING

The City's own analysis of its funding of the CAP related or supporting efforts incorporates a distinction between "direct" and "indirect" funding. The City defines:

- **CAP Direct Funding** as efforts in department budgets that either are explicitly identified as actions in the CAP

26 Caldwell, Erik Director, Economic Development City of San Diego, 5. https://www.sandiego.gov/sites/default/files/fy17_cap_funding_implementation_memo_may_2_2016_final_2.pdf



START HERE, START NOW demonstrates that the City of San Diego does not currently have the capacity or infrastructure in place to advance equity nor achieve the goals of the Climate Action Plan (CAP).

SOLUTION: Increase EJ community-specific spending by the year 2020 to be proportionate to the EJ community population as recognized by the CAP (about 60% of the total SD population).

(e.g., landfill gas capture) or that directly support the CAP greenhouse gas reduction goals (e.g., increasing sidewalks or bikeways to increase biking and walking).

- **CAP Indirect Funding** is defined as efforts that are **not explicitly specified in the CAP or only partially support CAP** through climate change efforts (e.g., funding for the Pure Water San Diego program, which supports climate resiliency through a diversified water supply and water reuse to help prepare for droughts).²⁷

Of the \$94.5 million in indirect funding proposed in the 2017 budget, \$81 million was for “climate resiliency,” referred to as the “[preparation] for risks such as increased heat waves, droughts, wildfires, more intense storms, and rising sea levels.” (Caldwell)²⁸ This raises a question about how much of the claimed CAP funding is actually generating new solutions, **versus how much goes to projects the City is required to do under other regulations or the City had already planned**

to implement. For this reason, **we ask the City to be transparent and report a breakdown of direct and indirect CAP expenditures in EJ communities and the City.** When it is clear where funds are invested, we can better track the progress in EJ communities.

Recommendations:

1. Report only direct funding in the CAP implementation, or breakdown spending by new and existing direct and indirect funding.
2. Track and report funding for CAP implementation invested in EJ communities.
3. Increase EJ community-specific direct investment by the year 2020 to be proportionate to the EJ community population as recognized by the CAP (about 60% of the City’s population).
4. Conduct a phased approach to achieve equitable CAP implementation: Phase one (first 5 years) should focus the CAP’s

²⁷ Caldwell, Erik, City of San Diego Economic Development Director, 12.
²⁸ Caldwell, Erik, City of San Diego Economic Development Director, 12.

strategies in the regionally ranked top 30 percent of CalEnviroScreen census tracts. The second phase then expands to the top 60% and so on.

- Increase staff capacity dedicated to the CAP implementation from one employee (2018) to a total of five by 2019 with 2 staff persons dedicated to implementation in EJ communities.

- Establish a hiring committee composed of EJ community members and organizations to ensure the newly approved full time environmental justice specialist for the CAP has experience working with and represents EJ principles. This includes the creation of the job description, the hiring process, and once hired, regular meetings with EJ communities.

PROGRAM AND FUNDING CAPACITY METRICS & RECOMMENDATIONS

	Citywide/non-EJ Communities	EJ Communities	Recommendations
Total CAP Direct Funding in the adopted 2018 City Budget ²⁹	\$46.4 Million	???	<ul style="list-style-type: none"> Track investments in EJ communities. Increase EJ community-specific investment to be proportionate to the EJ population (about 60%) by 2020.
Total CAP Indirect Funding in the adopted 2018 City Budget	\$81.6 Million	???	<ul style="list-style-type: none"> Track investments in EJ communities. Increase EJ community-specific investment to be proportionate to the EJ population (about 60%) by 2020. List spending required by other local, state, or Federal regulations.
New CAP funds in the 2018 adopted budget ³¹	\$129 Million	???	<ul style="list-style-type: none"> Track amounts spent in EJ communities. Increase EJ community-specific spending to be proportionate to the EJ population (about 60%) by 2020.
CAP dedicated staff	1 + sustainability department	1 (Recently approved)	<ul style="list-style-type: none"> Increase staff capacity to a total of 5 by 2019 with 2 staff dedicated to implementation in EJ communities.

²⁹ The City of San Diego. Climate Action Plan. (2015) <https://www.sandiego.gov/sustainability/climate-action-plan>
The 2018 adopted budget does not break out direct and indirect funding.

³⁰ The question marks in the tables refer to information that could be known but the City has not compiled.

³¹ The City of San Diego. <https://www.sandiego.gov/fm/annual>



TRANSIT, WALKING, BICYCLING, & LAND-USE

(L-R) Hser Gay, Yin Hoo, Paw Shar Wah, and Po Grip.
Proud Karen family organizing in City Heights to advance pedestrian safety, mass transit, and prevent displacement

Transportation continues to be the single largest source of greenhouse gas (GHG) emissions in San Diego, making up 54.24%³² of GHG emissions. EJ communities' vision of Transportation Justice is one where people will not have to own a car to access jobs, go to the doctor, go to school and take care of their basic needs. Affordable, zero-emission mass transit is the way towards this vision. A mass-transit focus moves the greatest number of people and if built equitably, serves those already suffering from GHG pollution. The City must prioritize mass transit and pedestrian safety in order to achieve the CAP targets equitably.

32 The City of San Diego, San Diego 2016 CAP Annual Report Appendix

"The City must hold SANDAG accountable to increase transit by using the augmented influence that resulted from the passage of Assembly Bill 805."

Ana Reynoso, EHC Transportation Justice Advocate

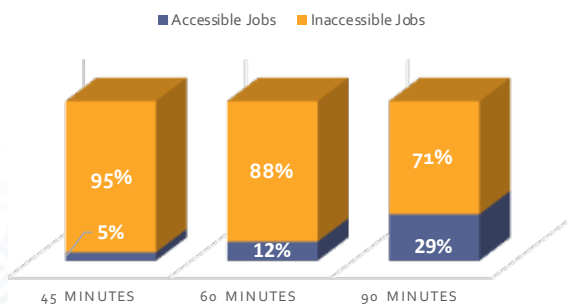


Unfortunately, the San Diego Association of Governments (SANDAG) has continuously failed the region by prioritizing freeways over transit dependency and the health of community members. SANDAG's historical lack of funding on transit has deep impacts on the EJ communities that rely on it every day. SANDAG only dedicates 46%³³ of its funding to transit, while Los Angeles County dedicates 61%³⁴. The City must hold SANDAG accountable to increase transit by using the augmented influence that resulted from the passage of Assembly Bill 805.

In San Diego, EJ communities are highly dependent on public transit. According to the 2016 American Community Survey,³⁵ 15,505 (3.7%) households in EJ communities in the City of San Diego do not have a car, compared to 4,092 (1.7%) households outside of EJ communities. This means, **EJ communities in San Diego have more than triple the number of transit-dependent households compared to the City overall**, and thousands more families that must rely on walking, biking, or transit for all their travel needs. SANDAG has not done enough to ensure these families have access to an affordable and practical public mass transit.

³³ SANDAG, Proposed Final 2016 Regional Transportation Improvement Program, Table 1-1 (September 2016), 3. www.sandag.org/uploads/projectid/projectid_528_20882.pdf
³⁴ SCAG, Draft 2017 Federal Transportation Improvement Program Executive Summary Volume I of III (July 2016), 4-5. <http://ftip.scag.ca.gov/Documents/D2017-FVIP-ExecutiveSummary.pdf>
³⁵ Source: American Community Survey, Table B08141, 2016 5-year data.

Jobs Accessible by Public Transportation (San Diego - Carlsbad - San Marcos)



Source: "Missed Opportunity: Transit and Jobs in Metropolitan America." Appendix 5. Brookings Institution. Author: Adie Tomer, Elizabeth Kneebone, Robert Puentes, and Alan Berube. 2011.

According to the Brookings Institute, **the average resident cannot reach 71% of jobs within 90 minutes on public transit.**³⁶ The 2016 United States Census Bureau's American Community Survey shows that 76% of San Diego workers drive alone to work while only 3% use public transportation. By comparison, in Los Angeles, 74% of workers drive alone and 6% use public transportation. This means that Los Angeles averages more than twice San Diego's rate of transit commuting with 200% more public transportation ridership than San Diego. The current state of San Diego's transportation planning confirms that SANDAG has avoided any fundamental changes to the status quo.

"Freeways can wait, but people can't."

Esperanza Gonzalez, City Heights



In 2016, non-EJ communities reported 10 pedestrian-involved fatalities, versus 17 in EJ communities. Data compiled by the State of California and made publicly available by UC Berkeley demonstrates that more of the collisions in San Diego's EJ communities involve walkers or bikers.³⁷ EJ communities had twice the percentage of traffic collisions that involved pedestrians in 2016, and 23% more collisions involving bikers. For example, City Heights is a community within the City of San Diego that has suffered from decades of disinvestment, crumbling transportation infrastructure, and polluting freeways. Many residents are transit users and pedestrians.

³⁶ Tomer, Adie Tomer, et al. Missed Opportunity: Transit and Jobs in Metropolitan America. Appendix 5. Brookings Institute. (2011). https://www.brookings.edu/wp-content/uploads/2016/06/0512_jobs_transit.pdf
 This data includes areas outside of the City of San Diego as an effort to capture accurate job travel time for EJ residents that travel outside of the City for jobs
³⁷ Transportation Injury Mapping System. <https://tims.berkeley.edu/>



OUR STORIES, OUR VOICES TAKING ACTION

In 2015, a car struck Paw Seh (second from right) and her daughter (holding baby) at the intersection of Altadena and El Cajon Boulevard. Their City Heights neighbors jumped into action to demand better safety measures at this notoriously dangerous intersection. The City responded to community members by installing a few safety measures. However, EHC conducted a community survey of residents in the area and found that residents felt more in danger the more they used the intersection. City Heights residents jumped into action once again to demand funding for a High-Intensity Activated Crosswalk (HAWK) at this same intersection. After months of advocacy, the City approved funding for the HAWK lights community members needed. Now, Paw Seh and her family can feel a little safer walking in their community.

which makes safety measures especially important to the families that walk to work and school.

Addressing these transportation discrepancies through the Climate Action Plan in an equitable way requires that the City implement three fundamental strategies:

1. VMT Reduction

Vehicle Miles Traveled (VMT) refers to the miles traveled by any vehicle in a region over a given period. In San Diego, passenger vehicles and light trucks generate 92%³⁸ of the City's VMT. Many statewide emission-mitigation policies recognize the importance of a dual focus on VMT and GHG reduction. A sole focus on GHG emission reduction makes way for transportation solutions that do not work for EJ communities -- for example,

38 The City of San Diego, 2017 Annual Report Climate Action Plan. (2017). https://www.sandiego.gov/sites/default/files/final_capannualreport_pdf.pdf

ride-sharing and zero-emission single occupancy vehicles. VMT is important for EJ communities because it forces cities to move away from transportation planning centered on single occupancy vehicles and toward solutions that move a greater number of people.

2. Pedestrian and Transit First

The City of San Diego has prioritized cars over pedestrians for decades. A freeways-over-people model has led to displacement, car-dependency, and higher rates of transportation related pollution and health impacts in EJ communities. To reverse this system, the City must put pedestrians and transit at the center rather than the outskirts of their planning. A Pedestrian and Transit First strategy allows the City to reevaluate project funding through a new lens: one that prioritizes the needs of EJ communities.

3. Clean Transportation in EJ Communities First

While clean transportation access is ramping up throughout the region, EJ communities are once again facing less investment in these opportunities. Many people in EJ communities cannot afford new zero-emission vehicles (ZEV). On the other hand, these same residents would benefit greatly from an increase in ZEV transit service and infrastructure. The City must work with MTS to implement mass ZEV transit service to ensure that renewable resource investments are helping EJ communities. Through this approach, the City will be able to prioritize new technology in EJ communities while ensuring residents have access to that technology.

Recommendations:

1. Vehicle Miles Traveled (VMT) Reduction:

- Reduce traffic density in EJ communities to be comparable to non-EJ communities.

- Prioritize funding for projects that reduce VMT in EJ communities.

2. Pedestrian and Transit First:

- Prioritize funding to increase bus routes, quality service, public transit affordability, and pedestrian and bike safety infrastructure in EJ communities.
- Increase the number of fulltime staff dedicated to mass transit and active transportation to a minimum of two by 2019.

3. Clean Transportation in EJ communities First:

- Reduce diesel particulate matter (PM) in EJ communities to be comparable to non-EJ communities.
- Prioritize zero-emissions vehicle infrastructure for transit vehicles before single-occupancy vehicles.

TRANSPORTATION METRICS & RECOMMENDATIONS

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Fulltime City staff dedicated to Active Transportation	1.4 staff per million population	???	???	• Increase to a minimum of two by 2019.
Reduce VMT in Transit Priority Areas	544,231 ³⁹ reduced, based on new class bike lanes ⁴⁰	???	???	• Prioritize VMT reduction projects in EJ communities with high traffic densities and/or high collision rates.

³⁹ The City clarified in their 2017 CAP report that emission reductions are due, in part, to updated modeling technologies. Based on available technology at the time, SANDAG reported a higher number of VMT in 2010. When SANDAG updated their modeling in 2015, SANDAG found that VMT in 2010 was in fact significantly lower. This discrepancy showed VMT decreasing when it is in fact on an upward trend.

⁴⁰ The City of San Diego. 2017 Annual Report Climate Action Plan. (2017). https://www.sandiego.gov/sites/default/files/final_capannualreport_pdf.pdf

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Pedestrian and Bicycle Master Plan improvements funding adopted in the 2018 budget	\$806,746 ⁴¹ Bicycle Master Plan specific	???	\$350,000 CDBG funds allocated to sidewalks and transit improvements	<ul style="list-style-type: none"> Track amounts spent in EJ communities in 2019 Fiscal Budget. Designate funding to EJ communities to be proportionate to EJ population (about 60%). Track spending in the established Pedestrian and Bicycle Master Plan when creating the 2019 CAP.⁴²
Length of sidewalk improved	12,000 feet ⁴³	???	???	<ul style="list-style-type: none"> Prioritize and track sidewalk projects within high collision corridors in EJ communities.
Optimize traffic signals and roundabouts	60 signals & 2 roundabouts ⁴⁴	???	???	<ul style="list-style-type: none"> Prioritize and track signals, roundabouts, and other speed reduction measures in high collision corridors within EJ communities.
Length of bike infrastructure improvements	56.8 bike lane miles added or improved ⁴⁵	???	???	<ul style="list-style-type: none"> Prioritize and track bike lane projects in high demand corridors within EJ communities.
Pedestrian injuries as a percentage of total collisions⁴⁶		5.5%	11%	<ul style="list-style-type: none"> Allocate more funding to increase pedestrian and bikeway safety infrastructure, citywide and in EJ Communities.

41 City of San Diego Fiscal Year 2018 Proposed Budget CAP Funding listed within the Bicycle Master Plan improvements. Funding for the Pedestrian Master Plan improvements was not specifically listed.

42 The Pedestrian and Bicycle Master Plans are components of the city's General Plan that aim to increase pedestrian and bicycle infrastructure throughout the City. The City's CAP Proposed FY 2018 Budget Plan does not track \$11,422,850 of Bicycle, Walking and Transit Strategy funds through any specific plan such as the Bicycle Master Plan or the Traffic Signal Plan. The City must specify which projects increase pedestrian safety in order to clearly track progress of the Pedestrian and Bicycle Master plans in both EJ and non-EJ communities.

43 The City of San Diego. 2017 Annual Report Climate Action Plan. (2017). https://www.sandiego.gov/sites/default/files/final_capannualreport_pdf.pdf

44 The City of San Diego. 2017 Annual Report Climate Action Plan. (2017). https://www.sandiego.gov/sites/default/files/final_capannualreport_pdf.pdf

45 The City of San Diego. 2017 Annual Report Climate Action Plan. (2017). https://www.sandiego.gov/sites/default/files/final_capannualreport_pdf.pdf

46 Transportation Injury Mapping System. <https://tims.berkeley.edu/> (need source from Joy)

Statistics are for all those accidents that included XY location data and could be allocated to EJ or non-EJ communities – approximately 91% of all accidents.

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Bike Fatalities		1	1	<ul style="list-style-type: none"> Allocate more funding to increase pedestrian and bikeway safety infrastructure, citywide and in EJ Communities.
Bike injuries as a percentage of total collisions		6%	7.4%	<ul style="list-style-type: none"> Allocate more funding to increase pedestrian and bikeway safety infrastructure, citywide and in EJ Communities.
Mode Share: Percent of commuters (employed people traveling to or from work) using a particular mode of transportation.	2015 Mode share: ⁴⁷ Transit: 4% Walking: <i>Unknown</i> Bike: <i>Unknown</i> Goals: <i>Unknown</i>	2015 Mode Share: Transit: 1.8% Walking: 3.3% Bike: 0.97%	2015 Mode Share: Transit: 5.3% Walking: ⁴⁸ 3.3% Bike: ⁴⁹ 1.04% Goals: ⁵⁰ 2020: 12% 2035: 25%	<ul style="list-style-type: none"> Establish citywide goals for mode share. Track mode share progress in EJ and non-EJ communities. Prioritize mode share shift in Transit Priority Areas. Shift mode share consistent with CAP targets: <p>Transit 12% by 2020 25% by 2035</p> <p>Walking 4% by 2020 7% by 2035</p> <p>Bike 6% by 2020 18% by 2035</p>

47 Data Source: ACS 2015 5-year Table S0802. "Citywide mode share" is determined for all the census tracts whose centroid is within the City of San Diego.

48 ACS 2016, 5-Year data Table S0801.

49 ACS 2016.

50 The City of San Diego. The City of San Diego Adopted Budget: Fiscal year 2018 Appendix (2018), 315.

https://www.sandiego.gov/sites/default/files/fy18ab_v1appendix.pdf

The City has mode share goals for Transit Priority Areas but not for the city as a whole.

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Funding invested in active youth transportation	???	???	???	<ul style="list-style-type: none"> Track investments by age of users. Determine infrastructure and operational (e.g. fares, schedules) needs of youth for transit, walk, and bike investments. Invest in active youth transportation.
Safe routes to Transit Stops	???	???	???	<ul style="list-style-type: none"> Identify transit stops that are at dangerous intersections or need sidewalk improvements.
Amount of monthly income spent on transportation, or percent of population that spends more than 15% on transportation	???	???	???	<ul style="list-style-type: none"> Advocate at SANDAG and MTS for lower fares and free transit passes for students.
Percentage of jobs that are accessible within 90 minutes using transit⁵¹	29%	???	???	<ul style="list-style-type: none"> Develop methodology to track travel time of public transportation.
Prevailing Wage jobs created through the Capital Improvement Program funding for active/public transportation	???	???	???	<ul style="list-style-type: none"> Track through certified payroll data.

⁵¹ Tomer, Adie., et al. https://www.brookings.edu/wp-content/uploads/2016/06/0512_jobs_transit.pdf



*A freeways-over-people model
has led to displacement, car-
dependency, and higher rates of
transportation related pollution and
health impacts in EJ communities.*



AIR QUALITY

Barrio Logan resident Maria Martinez speaking at the Port of San Diego

In the City of San Diego, 90% of census tracts with the worst air pollution due to diesel emissions are located in EJ communities.⁵² Air quality and climate change are inextricably linked; however the CAP does not include goals related to air quality. **Improvements in air quality and public health can be a key outcome from aggressive implementation of the CAP's transit, walking, biking, and land-use strategies and strongly relate to greenhouse gas reduction.** CalEnviroScreen includes several indicators related to air quality: Ozone, PM_{2.5}, Diesel PM, and traffic density. A large body of research indicates that diesel exhaust causes human health impacts including cancer and respiratory, reproductive, and cardiac health effects, giving these indicators great importance in our region.

⁵² OEHHA, <https://oehha.ca.gov/calenviroscreen>
San Diego has 22 census tracts that rank at the very top of all census tracts in the state for CalEnviroScreen's diesel PM indicator, and 20 of these are in EJ Communities.

CalEnviroScreen is the most appropriate tool at this time for community level data to compare EJ and non-EJ communities of San Diego because it uses census tracts as the unit of analysis. This set of metrics clearly demonstrates the disparity in air quality between EJ and non-EJ communities, and provides a baseline to which future years can be compared.

In CalEnviroScreen version 3.0, San Diego has 22 census tracts that rank at the very top of all census tracts in the state for CalEnviroScreen's diesel PM indicator, and 20 of these are in EJ Communities. Particulate matter refers to a mixture of particles found in the air, some so small they can't be seen and can get deep into the lungs, and bloodstream. On this indicator, non-EJ communities reported a 45% average score, compared to EJ communities at 60%. Two metrics have been used – the number of census tracts in the top percentile for diesel PM, and the

average percentile on diesel PM -- as a readily available method of tracking relative levels of an air pollutant with direct links to CAP implementation and important public health consequences. The CalEnviroScreen traffic density score has also been used as another metric that indicates community exposure to traffic pollutants and has a clear link to CAP transportation measures. On this unit-less measure, EJ communities average 42% higher than non-EJ communities, and 13% higher than the City as a whole.

Recommendations:

1. Include an air quality strategy in the CAP implementation moving forward.
2. Advocate at SANDAG and the State of California for investment in zero-emission vehicle (ZEV) technology and heavy-duty freight equipment.
3. Allocate sixty percent of the transportation funds, which is proportionate to the EJ population in San Diego according to the CAP, to reduce VMT in EJ communities.

"Trucks drive through my community all day long. As a result, my son suffered from asthma growing up. We need clean air"

- Maria Martinez, Barrio Logan



Carolina Martinez, EHC's Policy Director

AIR QUALITY METRICS & RECOMMENDATIONS

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Number of census tracts in top 5% of CalEnviroScreen statewide for diesel PM⁵³		2 Census tracts at top 5% ⁵⁴	20 Census tracts in Barrio Logan, Logan Heights, downtown, and Southeast SD	<ul style="list-style-type: none"> • Prioritize these census tracts for all investments during phase 1 of the CAP implementation. • Update data as CalEnviroScreen is updated. • Advocate at SANDAG and State of CA for local funding for zero-emission heavy-duty freight equipment.
CalEnviroScreen V3.0 Diesel PM percentile, average	54	45	60	<ul style="list-style-type: none"> • Track data as CalEnviroScreen is updated. • Advocate at SANDAG and State of CA for local funding for zero-emission heavy-duty freight equipment.
CalEnviroScreen V3.0 Traffic Density Score, average (unitless)	1286	1018	1450	<ul style="list-style-type: none"> • Track CalEnviroScreen updates. • Develop methodology to estimate VMT at neighborhood scale. • Implement funding and policy to reduce VMT in EJ Communities.

⁵³ OEHHA. <https://oehha.ca.gov/calenviroscreen>

⁵⁴ One of these is the Naval Station, 92136, and the other is in Balboa Park.



ENERGY DEMOCRACY

Art by Melanie Cervantes.

In San Diego, non EJ communities have more than double the residential solar (40 per 1000 residents) compared to EJ communities (18 per 1000 residents).⁵⁵ We attribute this discrepancy to a variety of barriers making solar installation difficult to access and afford for all people.

SOLAR POWER INSTALLATION

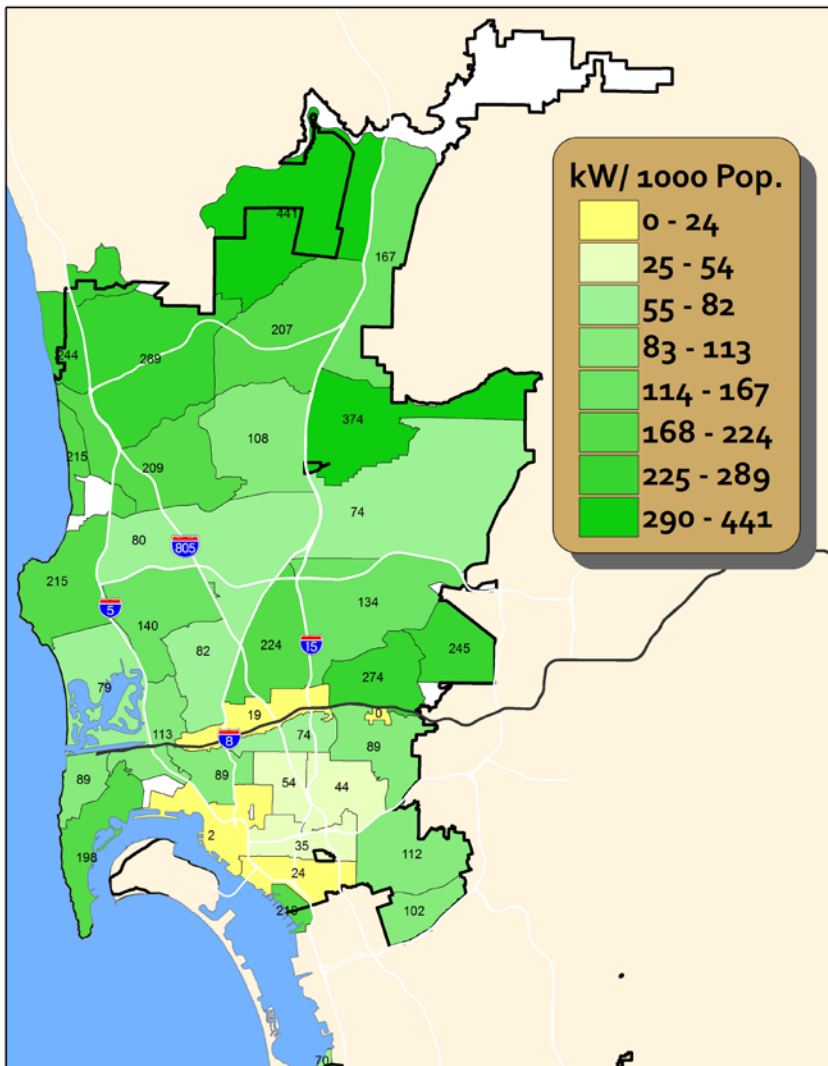
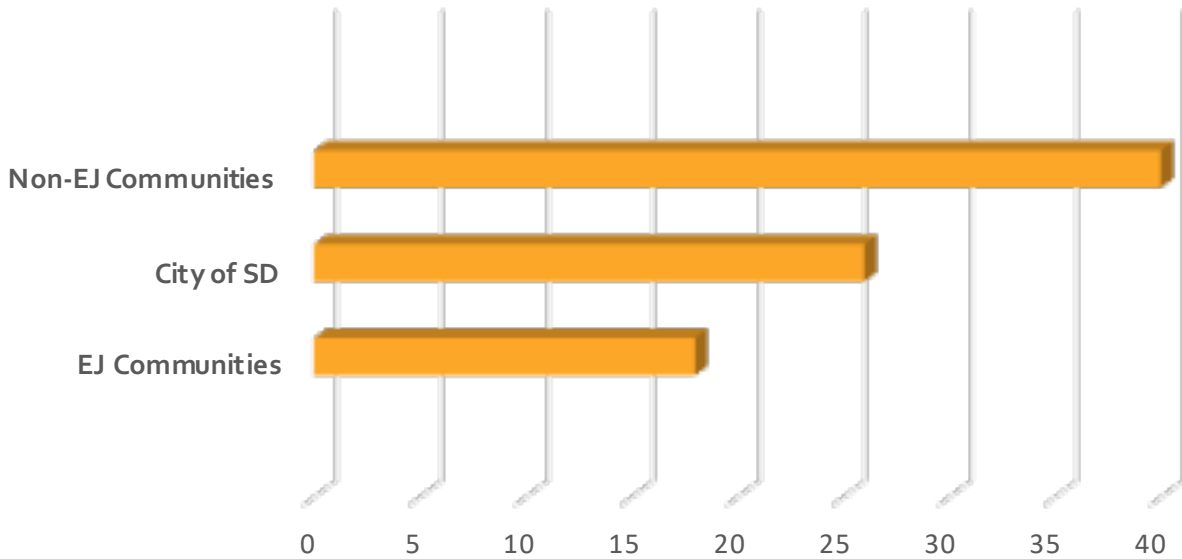
San Diego is a “solar star,” but not for environmental justice communities. According to a 2018 report by Environment California, San Diego has the second most solar power capacity among the 69 cities surveyed.⁵⁶ Unfortunately, installed solar power does not extend to EJ communities.

⁵⁵ California Distributed Generation Statistics. Net Energy Metering (NEM) Currently Interconnected Data Set. (2018). <https://www.californiadgstats.ca.gov/downloads/>
⁵⁶ Environment California Research and Policy Center. Shining Cities 2018. How Smart Local Policies Are Expanding Solar Power in America. (2018), 5. https://environmentamerica.org/sites/environment/files/reports/EA_shiningcities2018_scrn%20%282%29.pdf

The map titled Installed Residential KiloWatts of Solar Power, per 1000 Residents, by Zipcode, City of San Diego, 2017 shows the geography of the number of kilowatts installed per 1,000 residents. The table titled Average Number of Solar Installations per 1000 people includes this metric and the average number of installations broken out by EJ communities, City, and non-EJ communities. Both statistics highlight that residential solar power installation in EJ communities is minimal.

A study done by the California Energy Commission identified barriers and recommendations to bridge the clean energy gap for low-income customers and small business contracting opportunities in disadvantaged communities. The structural barriers identified include low home ownership rates, insufficient access to capital, and aged buildings. The policy and program barriers are due to inadequate outreach, rate uncertainty,

Average Number of Installations (per 1000 people)



Installed Residential KiloWatts of Solar Power, per 1000 Residents by Zipcode, City of San Diego, 2017

unrecognized energy benefits, and lack of data. For local small businesses in disadvantaged communities, the lack of access to information and technical support to meet requirements, and financial obstacles, exclude them from accessing clean energy programs.⁵⁷ The report by the California Energy Commission is an excellent guide to inform the implementation of the San Diego CAP.

JOBS

Building San Diego's clean energy and public transportation infrastructure can provide well-paying construction jobs and opportunities for residents

⁵⁷ California Energy Commission. Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities. (2016).



"I live in affordable housing, but we do not have solar panels. In fact, we don't have much solar energy here."

Maria Martinez, Barrio Logan

of EJ communities. Apprenticeship programs provide training for building trades careers where people without college education can learn and earn at the same time. However, specific policies are needed to ensure that public funds used for construction go to contractors that meet high standards for job quality and that residents of EJ communities are prioritized for apprentice opportunities and in the hiring of journey-level workers.

Infrastructure for public transit and pedestrians is another important climate investment. City spending on such infrastructure is already covered by prevailing wage requirements that guarantee job quality. The City receives data on payroll from construction contracts covered by prevailing wage requirements. It is recommended the City expands this data collection to track the

share of the projects' workforce made up of residents from EJ communities.

Recommendations:

Implement the following recommendations taken from the "Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Businesses Contracting Opportunities in Disadvantaged Communities" report from the California Energy Commission (CEC) and apply them at the local level to remove barriers to clean energy.

1. Advocate for dedicated resources from the new California program Solar on Multifamily Affordable Housing (SOMAH) for solar installations in EJ communities.

2. Collaborate with SDG&E and future community choice energy (CCE) programs to:
 - Establish a one-stop shop that provides technical assistance, targeted outreach, and funding services that enable owners and tenants of EJ communities to implement energy efficiency, clean energy, zero-emissions transportation infrastructure, and water-efficient upgrades in their buildings
 - Lock-in the energy rates for EJ communities.
3. Partner with the Center on Policy Initiatives (CPI) and International Brotherhood of

Electrical Workers (IBEW) Local 569 to develop and track progress of workforce development efforts resulting from clean energy and zero-emissions transportation programs.

- Establish a clean energy workforce fund to support a workforce development strategy focused in EJ communities.
- Incentivize solar companies demonstrating commitment to hiring employees in EJ communities.
- Ensure clean energy contracting in EJ communities use workforce agreements.

RESIDENTIAL SOLAR METRICS & RECOMMENDATIONS

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Installations 1999 to Nov 2017⁵⁸	Average 26/1K ppl Total 35,359	Average 40/1k ppl Total 19,508	Average 18/1K ppl Total 15,851	<ul style="list-style-type: none"> • Establish a one-stop shop to provide technical assistance, targeted outreach, and funding opportunities to enable owners and tenants of EJ communities to implement energy efficiency. • Partner with EHC to facilitate the implementation of the SOMAH program.
Capacity of KW 1999 to Nov 2017	Average: 172/1K ppl Total 165,822 KW	Average: 204/1K ppl Total 98, 185 KW	Average: 78/1K ppl Total 67,637 KW	<ul style="list-style-type: none"> • Establish a clean energy fund with diverse funding mechanisms for EJ communities to address structural barriers.

⁵⁸ California Distributed Generation Statistics. <https://www.californiadgstats.ca.gov/downloads/>

	Citywide	Non-EJ Communities	EJ Communities	Recommendations
Community Choice Energy	Not Applicable			<ul style="list-style-type: none"> • Create a nonprofit agency subject to the Brown Act inclusive of EJ representation to serve as an advisory board to the program. • Job creation. Require 50% of the workforce to be from EJ communities. • Immediately after the formation of a general community advisory committee, allocate funding proportionate to the EJ population (about 60%) of the surplus funds to a Community Benefits Agreement to be administered by EJ communities with the goal to address barriers to solar power.
Number of annual Jobs from private solar power⁵⁹	414.8 Construction & installation jobs 136 Additional induced jobs Supply chain jobs not included	???	186 construction and installation jobs ⁶⁰ 61 Additional induced jobs	<ul style="list-style-type: none"> • Track number of jobs in EJ and non EJ zipcodes using Department of Energy JEDI model and data from California Solar Statistics to estimate jobs created for installation.

⁵⁹ The metric tracks the overall job creation due to rooftop solar installations, as well as the share of such jobs created by installations in EJ communities. No data on the residence of the workforce is presently available for solar installations.
⁶⁰ Estimate based on number of installations in EJ communities versus the City as a whole. This does not signify that the jobs were held by workers who live in EJ communities.



CLIMATE RESILIENCY

(L to R) Yin, Tranisha, Marco, Patricia, David, Melissa, Paw, Kevin, and Roddy from the City Heights Community Action Team.

13% of the City of San Diego has tree-canopy coverage to provide shade and natural resources, while EJ communities average only 10.6%.⁶¹ Green spaces (tree canopy, parks, food gardens, natural open spaces, beaches, playing fields, trails, and recreational facilities) are crucial to EJ communities. They clean the air, cool the environment, improve mental health and community building, and are linked to decreased rates of obesity. However, not all communities have equal access to green space. Parks for Everyone, a study from the San Diego Foundation, assessed access to green space inequities in the San Diego region and concluded that “the most park-poor areas of the region are also the areas with the highest concentrations of low-income

households and people of color. In fact, there are few areas in the region with high concentrations of low-income households and people of color that are not park-poor.”⁶²

“When you walk or drive through this part of University Avenue, it is always cool and pleasant because of the shade provided by the trees. It is one of my favorite areas in City Heights. A great example of what we would like to see throughout our community,”

– Roddy Jerome, City Heights

⁶¹ TreeCanopy_2014_Sandiego tree canopy raster dataset, converted to GIS shapefile, available from SANGIS Data Warehouse: <http://www.sangis.org/download/index.html>. EJ communities' percentage is based on the tree canopy data compiled by the City using CalEnviroScreen2.0 results.

⁶² The San Diego Foundation. Parks for Everyone: Green Access for San Diego County. (2010). 7.

The National Recreation and Parks Association recommends ten acres of park space per 1,000 residents. EJ communities in the City fall far short of that recommendation. As an example, Barrio Logan has less than 3 acres of green space per 1,000 residents. In addition, although no data exists on the neighborhood's tree canopy, based on residents' observation, it is noticeably low.

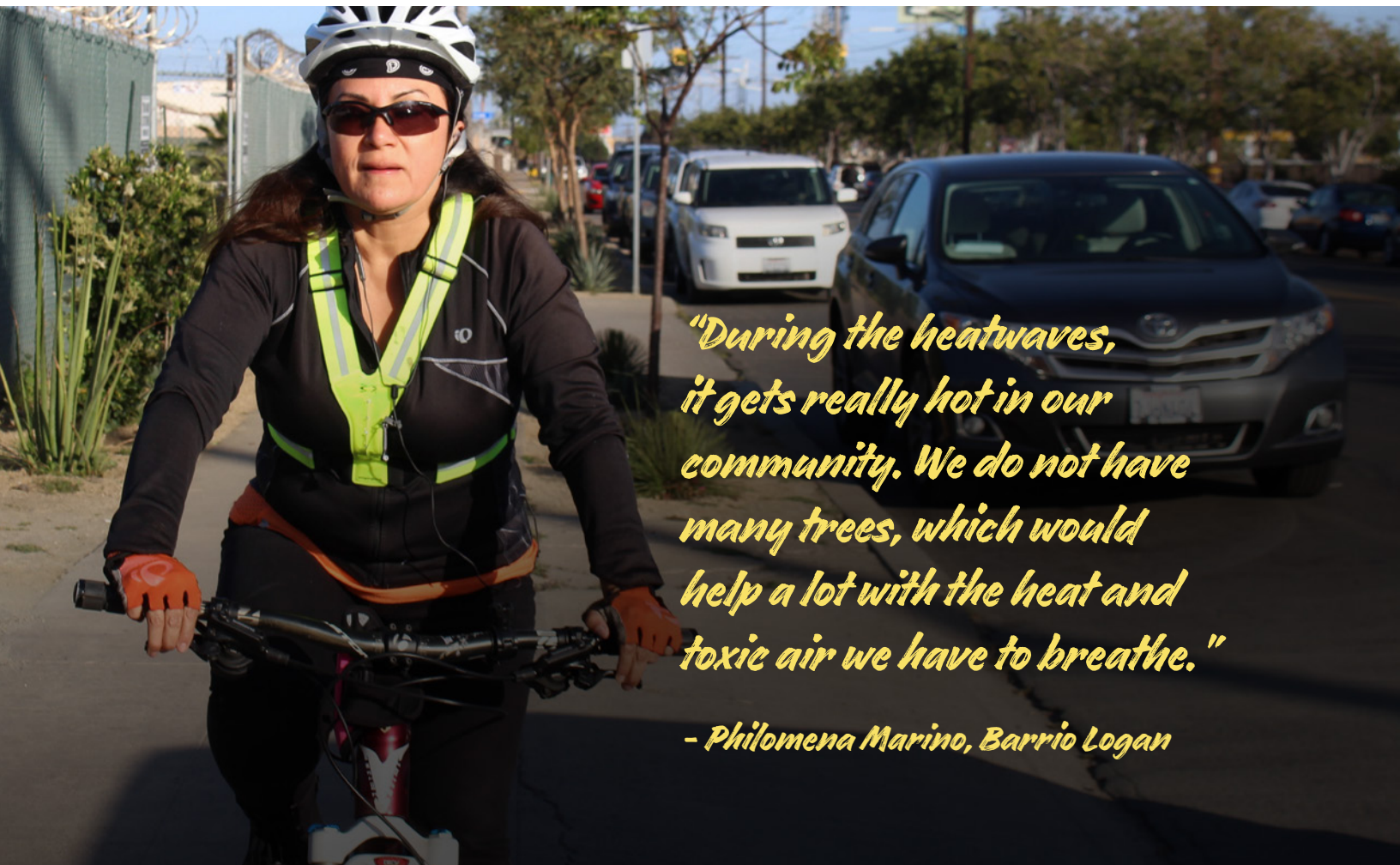
In efforts to address the green space inequities, the City must take into account that simply having green space or trees in EJ communities does not make it accessible or ensure that it will be used to its full potential. As explained by Carolyn Finney, the legacies of slavery, Jim Crow, and racial violence have shaped cultural understandings of the "great outdoors" and determined who should and can have access to natural spaces.⁶³ Therefore, the design of the green spaces must be

⁶³ Finney, Carolyn Finney, *Black Faces, White Spaces: Reimagining the Relationship of African Americans to the Great Outdoors*. (2014).

community driven. It should take into account the underlying barriers to access and provide necessary amenities that meet the needs and desires of the community. New and existing green spaces must ensure accessibility by public transit, include culturally relevant programming, age-friendly amenities, and basic infrastructure like restrooms.

Recommendations:

1. Budget funding sufficient to implement the City's Urban Forestry Program Five Year Plan adopted in January 2017; and prioritize its implementation in EJ communities.
2. Track tree canopy at the census tract level.
3. Create economic incentives to increase food gardens in EJ communities.



"During the heatwaves, it gets really hot in our community. We do not have many trees, which would help a lot with the heat and toxic air we have to breathe."

- Philomena Marino, Barrio Logan

CLIMATE RESILIENCY METRICS & RECOMMENDATIONS

	Citywide	non-EJ Communities	EJ Communities	Recommendations
2018 Adopted Budget includes \$300,000 for tree planting, and one new Horticulturist position at \$100,000	\$400,000	???	???	<ul style="list-style-type: none"> In the Urban Tree Canopy Budget, allocate at least 60% of the total budget or \$180,000 for EJ communities to be proportionate to its population.
Urban tree canopy cover increase: CAP 2020 goal: 15% CAP 2035 goal: 35%	13% cover in 2014	???	10.6 % cover in 2014 ⁶⁴	<ul style="list-style-type: none"> Track tree canopy at the census tract level.
2018 Adopted Budget includes funding for about 1,800 trees⁶⁵	1,800 trees	???	???	<ul style="list-style-type: none"> Ensure about 60% (proportionate to the EJ population) of the tree planting takes place in EJ communities.
Percent of residents within a half-mile (10-minute walk) of a park/green space	???	???	???	<ul style="list-style-type: none"> Determine the percent of residents within a half-mile of a park/ green space and utilize information to prioritize new green space development.
Acres of park/ green space per 1,000 residents, which includes parks, natural open spaces, beaches, playing fields, trails, and recreational facilities⁶⁶	???	???	???	<ul style="list-style-type: none"> Create economic incentives to increase green space. Invest in a pilot program to encourage heavy greening inclusive of food gardens in EJ communities.
Food gardens, vertical and rooftop gardens	???		???	<ul style="list-style-type: none"> Create economic incentives to increase food gardens in EJ communities. Invest in a pilot program to encourage food gardens in EJ communities.

⁶⁴ TreeCanopy_2014_Sandiego tree canopy raster dataset, converted to GIS shapefile, available from SANGIS Data Warehouse: <http://www.sangis.org/download/index.html>. EJ communities' percentage is based on the tree canopy data compiled by the City using CalEnviroScreen2.0 results.

⁶⁵ The City of San Diego. The City of San Diego Adopted Budget: Fiscal year 2018 (2018), 115. https://www.sandiego.gov/sites/default/files/fy18Bab_v1appendix.pdf

⁶⁶ Harnik, Peter and Martin, Abby. Close-to-Home Parks: A Half-Mile or Less, http://parkscore.tpl.org/Methodology/TPL_10MinWalk.pdf



ENERGY & WATER EFFICIENCY

(R-L) Ngoc Nguyen and Tim Dinh, City Heights

Old buildings, limited infrastructure, policy, and funding barriers make it difficult for EJ communities to benefit from energy and water efficiency. For these communities, efficiency results in meaningful cost savings and immediate health improvements. An environmental justice approach to efficiency includes solar energy, as well as insulation, air sealing, double windows, heating, ventilation, and air conditioning (HVAC) systems, new appliances, zero-emissions vehicles, and more. At this time, the Environmental Health Coalition team was unable to identify metrics for this section, but the barriers and potential for our communities are recognized. Therefore, the following recommendations are based on the City's benchmarking ordinance and the SB 350 Low-Income Barriers Study, Part A report by the California Energy Commission.

"Water is sacred, I wish I could use it more efficiently at home. I am a tenant and I do not know of existing City programs to support efficiency for renters."

- Ngoc Nguyen, City Heights

Barriers that the City must address in its efficiency program:

- **Infrastructure:** “Older buildings are more likely to have structural or design issues that make energy efficiency and renewable energy retrofits unviable, particularly for people in EJ communities, who are more likely to live in such housing.”⁶⁷
- **Education:** “Multifamily building owners often lack accurate information about the savings potential of building retrofits.”⁶⁸
- **Process:** The bureaucratic process associated with accessing energy efficiency financing discourages EJ communities from tapping into the resources.
- **Funding:** The obvious, “insecure, inadequate, or inequitable program funding”⁶⁹ restricts the impact level.

Recommendations:

1. **Establish a task force** for program alignment between the energy, water,

resilience, housing, and low-emission transportation infrastructure programs for EJ communities. The task force should initiate a neighborhood wide pilot program in EJ communities rather than a building-by-building strategy that expands to include zero-emissions transportation programs, water-efficient appliances, as well as non-energy improvements that address asbestos, lead, mold, and structural maintenance.

2. **Phase in the benchmarking ordinance** by prioritizing EJ communities; and expand its implementation to include new and multifamily residential buildings, industrial uses, and open facilities.
3. **Pursue additional financial resources and incentives**, including but not limited to funds from the California Greenhouse Gas Reduction Fund, ratepayer funds via a Regional Energy Network or SDG&E Local Government Partnership, and U.S. Housing and Urban Development and Department of Energy grants, for local programs to assist low and moderate income households and businesses in EJ communities with implementing energy and water efficiency measures.

67 California Energy Commission. Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities. (2016). 3.

68 California Energy Commission. (2016). 49.

69 California Energy Commission. (2016). 55.



Roddy Jerome from City Heights asking for the CAP to prioritize EJ communities in 2015.



METHODOLOGY

Patricia, Marco, Melissa, Kevin and David from City Heights.

Data for the metrics came from publicly accessible government and academic sources, referenced in the tables. In many instances data does not exist, or does not exist at the community level. In these cases, this report recommends that the City begin to compile or track the data as needed to initiate the capacity to assess equity from this point forward. Below is the methodology by section.

Program & Funding Capacity

Information on the City allocations for the CAP and individual elements of it came from two sources:

1. The 2018 Proposed City Budget, which includes proposed amounts for Direct and Indirect CAP expenditures; and
2. The 2018 CAP Annual Report, which provides detail on actual expenditures in 2017.

Transit, Walking, Bicycling, and Land-Use

Sidewalk funding, Bike Plan implementation, Optimized signals and roundabouts and VMT Reduction in Transit Priority Areas figures were included in the *2017 CAP Annual Report*. Data on mode share percentage is not included in this report for the City as a whole or for EJ Communities; we have flagged this as an important statistic that should be tracked.

Data on bike and pedestrian injuries was acquired from the Transportation Injury Mapping System, developed at UC Berkeley to enhance access to accident data collected by the State of California, the Statewide Integrated Traffic Records System. Many different statistics are available in this data set. We used bike and pedestrian injuries as percentages of total accidents as metrics that highlight the relative danger of biking and walking in EJ communities compared to the City as a whole. Data is from 2016.

The percentage of jobs that are available using transit within a 90- minute commute is a key equity metric that illuminates the social inequity embedded in transit dependence in a region that has invested heavily in infrastructure for private vehicles rather than public transit. The data was acquired from a report done by the Brookings Institute, and while we acknowledge that the study was labor intensive and not likely to be repeated at regular intervals, we believe it is important to track some measure of job access and how it is served by the region's transit resources.

For the Active Transportation Funding, the citywide total is from the proposed 2017 budget. We note also 2017 CDBG funding, as mentioned in the 2017 CAP Annual Report, included an allocation for \$350,000 for sidewalks and transit improvements; by definition, this funding goes into EJ communities.

Mode share, in this analysis, means the percentage of commuters in Transit Priority Areas using mass transit as their means of transportation to get to work.

Air Quality Metrics

Census Tracts in Top 5% of CalEnviroScreen statewide for the Diesel Particulate Matter indicator. This CalEnviroScreen indicator provides a screening level indication of diesel pollution, relative to all other census tracts in California. Diesel is a particularly harmful component of air pollution, and, according to the California Air Resources Board, accounts for up to 70% of the cancer risk from air pollution. The primary source of diesel particulate matter in ambient air is diesel vehicles, such as heavy-duty trucks and trains. Communities that rank high on this indicator will benefit from policies that reduce reliance on fossil fuels in transportation.

CalEnviroScreen Traffic Density score. This CalEnviroScreen indicator provides a relative assessment of how impacted a community is by traffic. Policies that reduce total VMT in and around a community will reduce traffic density and the disparity between EJ and

The primary source of diesel particulate matter in ambient air is diesel vehicles, such as heavy-duty trucks and trains. Communities that rank high on this indicator will benefit from policies that reduce reliance on fossil fuels in transportation.

non-EJ communities. The Traffic Density Score is developed by the state agency OEHHA and is defined as: "Sum of traffic volumes adjusted by road segment length (vehicle-kilometers per hour) divided by total road length (kilometers) within 150 meters of the census tract boundary."

Energy Democracy

Residential Solar Installations from 1999-2017 and Total Kilowatts data was downloaded from the Net Energy Metering (NEM) Currently Interconnected Data Set, available from the California Distributed Generation Statistics website (<https://www.californiadgstats.ca.gov/downloads/>). The NEM data is at zipcode level. Zipcodes that are partly within the City but mostly outside of it were left out, for a total of 37 zipcodes.

Using ArcMap GIS software, residential solar installation and kW totals were allocated to census tracts using area weighting; the proportion of land area within the zipcode that is occupied by a census tract was assumed to be equivalent to that census tract's proportion of the solar resources within the zipcode.



First public workshop of the California Air Resources Board in Barrio Logan to discuss the state's Scoping Plan, 2016.

Census tracts were allocated to EJ communities based on CalEnviroScreen top 30% and/or CDBG status; other census tracts within the City were deemed non-EJ for this analysis.

Population totals used were ACS 2015, 5-year totals at census tract level. The solar power and population numbers used were for the included census tracts only and may be somewhat lower numbers than other analyses would show.

Jobs Installing Solar Power

Metrics for power job impacts were created by Peter Brownell, from the Center on Policy Initiatives (CPI), using DoE NREL JEDI PV model (PV12.23.16). The installation data source used Net Energy Metering (NEM) currently interconnected data as of 12/31/2017, during the interconnection application approved during Calendar Year 2017 ("Date the interconnection application is approved and issues Permission to Operate (PTO) letter to customer"). Geography: City of San Diego (including installations in "La Jolla" and "San Ysidro"). Two installs that listed "San Diego" as the "servicecity" but the servicezip" was not in the City of SD were omitted. Estimates do NOT include supply chain impacts, which may or may not be local, which add an additional 387.8 direct full time equivalent (FTEs) and 124 induced FTEs.

Climate Resiliency

Tree Canopy. The City's CAP publications include goals for tree canopy in terms of percentage of land area covered by trees (tree canopy) and results in terms of numbers of trees planted and budget allocated to tree maintenance. This lack of alignment between goals and activities makes it difficult to assess progress toward meeting the long term goal of 35% tree canopy Citywide by 2035. However, both tree planting and maintenance are important programmatic elements of the effort to reach the tree canopy goals, and should be tracked for the EJ communities along with tree canopy percentage itself. The City commissioned high resolution aerial photography of its tree cover in 2014 and subsequently digitized the data for use in mapping applications; this is the data from which the current estimate of tree canopy in EJ communities is derived. At such time as updates of tree canopy are done, the EJ tree canopy should be tracked and reported along with the citywide totals.

Energy and Water Efficient Buildings

No metrics were identified for this version of the EJ Assessment. Recommendations were based on the City's benchmarking ordinance and the *SB 350 Low-Income Barriers Study, Part A* done by the California Energy Commission.



CONCLUSION

When cities advance environmental justice, everyone benefits. *Start Here, Start Now* provides a strong baseline analysis and recommendations to advance the City's ambitious climate goals leading with tangible and measurable environmental justice solutions. The City of San Diego now has clear guidelines and community support to take concrete actions to undo the history of racism in environmental policies and to advance real climate solutions. Transparent reporting specifically related to direct investments in EJ communities is critical to the CAP's success.

Environmental Health Coalition is proud of the community based climate solutions that are included in the CAP, like the equity commitment and policy direction such as AB 805 that promotes transit expansion and transportation justice. Now it is critical that the City take substantial steps to continue this momentum. We recognize the important role that the present CAP staffer, Cody Hooven, is playing in its implementation, and we commend her and the City for the participation in the national working group with other cities to identify concrete ways to implement and measure equitable climate policy.

The assessment demonstrates the centrality of sustainable transportation. Nearly all of the key priorities of the San Diego Climate Action Plan would benefit from significant investments in public transit and active

transportation. **Transportation Justice – here and now – is the most important message of this report. Vast improvements in transportation will improve air quality, create jobs, increase access to economic opportunity and do more to achieve GHG reductions than any other action.**

Through this assessment, it has become evident that climate investments need to be outlined in detail and measured in order to demonstrate a clear benefit to EJ communities. Now that we have a baseline analysis with *Start Here, Start Now*, EHC is committed to future and improved iterations of this analysis. The city can be a model to national climate policy if it redefines priorities with concrete actions. **This is an invitation to decision makers, staff, and stakeholders to end the status quo and collectively move inequitable car centric San Diego to a model city.**

The authors and collaborators of this report navigated new territories when providing specific and measurable recommendations to advance equitable climate policy. To our knowledge, this report is one of the first of its kind and something we are proud of while we also recognize the room for growth. EHC and partners look forward to the community-based advocacy efforts for EJ communities that will result from *Start Here, Start Now*, and the future versions of this report.

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Primary authors:

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Karla and Aiyana at the Barrio Logan Community Garden.



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