



November 23, 2015

City Administration Building
Councilmember David Alvarez
202 "C" Street, 10th Floor
San Diego, CA 92101
Via email: DavidAlvarez@sandiego.gov

RE: CAP SUCCESS DEPENDENT ON INCLUSION OF FUNDING AND EQUITY

Dear Councilmember Alvarez:

Environmental Health Coalition (EHC) is supportive of the proposed City of San Diego Climate Action Plan with amendments to include equity for impacted communities and commitments for implementation funding.

EHC is very supportive of the strong targets and actions in the City of San Diego's Climate Action Plan (CAP) and appreciate the great amount of work staff and the Environmental and Economic Sustainability Task Force has done to bring the CAP to this point. Although we appreciate the mention of equity in the CAP, in order to ensure that the CAP goals are met within the timeline prescribed in the plan in an equitable manner ***funding for implementation and integration of specific equity focused directives must be included in the CAP in each section of the plan.***

In coalition with *CERF, Citizens' Climate Lobby, San Diego Coast Keeper, Sierra Club, IBEW, MAAC, California Nurses Association, San Diego 350, Climate Action Campaign, Center for Policy Initiatives San Diego Audubon Society, Union Yes- Environmental Caucus, and City Heights Development Corporation* we have gathered approximately 1,000 signatures supporting a commitment to funding for implementation and the inclusion of equity in the actions listed in all strategies.

FUNDING FOR IMPLEMENTATION

We appreciate that the CAP acknowledges that there will be a need for proper staff and financing in order to reach the GHG emission goals in the following statement on page 29 of the document,

"The CAP identifies a comprehensive set of goals, actions, and targets that the City can use to reduce GHG emissions. These actions include a combination of ordinances, City Council policies, resolutions, programs, and incentives, as well as outreach and education activities. As implementation occurs, each action will be assessed and monitored. The City of San Diego

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recognizes the need for proper staffing, financing, and resource allocation to ensure the success of each mechanism included in the CAP.”

However, the CAP fails to identify how much funding it will take, where funding will be derived, and a timeline for when funding is anticipated to be distributed for each of the required actions. Commitments on each of these items are a critical component to ensuring the success of the CAP.

EQUITY INTEGRATION

We appreciate the mention of equity in chapter 4 of the plan, which is stated on page 49 of the document:

“The General Plan includes policies to pursue environmental justice in the planning process through greater community participation, to prioritize and allocate citywide resources to provide public facilities and services to communities in need, and to improve mobility options and accessibility for the non-driving elderly, disabled, low-income, and other members of the population.

It is important to build upon the City’s stated commitment to equity in chapter 4 by specifically incorporating it into each strategy in the plan in order to address infrastructure deficiencies of historically underserved communities and protect those that are most vulnerable to climate change. The overt inclusions of equity provisions are necessary to ensure that resources are allocated to enable implementation of future actions. Strategy 5 in the CAP provides a good example of how equity can be woven into the actions in the Climate Action Plan (i.e., “Prepare a Parks Master Plan that prioritizes parks in underserved communities,” pg. 41). This type of provision should be included consistently through the plan. Below we clearly provide specific text emphasizing equity that should be integrated into each strategy of the plan.

Furthermore, EHC is in support of the current targets for each Strategy but in order to achieve the targets we strongly support a sub-committee working group design and chair by the Environmental Committee chair, with representation from each proposed Strategy sections of the plan: Energy & Water Efficiency, Clean & Renewable Energy, Bicycling, Walking, Transit & Land Use, Zero Waste, Climate Resiliency, and Equity.

STRATEGY 1: ENERGY AND WATER EFFICIENT BUILDING

Action 1.3 (Efficiency in Municipal Buildings): Present to City Council for consideration a Municipal Energy Strategy and Implementation Plan that prioritizes efficiency and renewable energy upgrades on properties in census tracts ranking in the top 25% of CalEnviroScreen scores in the City.

STRATEGY 2: CLEAN AND RENEWABLE ENERGY

Action 2.1 (Renewable Energy Citywide): Present to City Council for consideration a Community Choice Aggregation (CCA) that increases renewable energy supply on the electrical grid to achieve the 100% renewable energy target and prioritizes efficiency and local, distributed generation resources in disadvantaged communities and good-paying jobs for local residents.

- Establish policies for the achievement of Action 2.1 and the 100% clean energy target to:
 - Facilitate solar installation in neighborhoods in census tracts ranking in the top 25% of CalEnviroScreen scores in the City as they are most impacted by climate change
 - Facilitate the creation of good jobs for local residents

New Supporting Measure: AB 693, signed into law by Governor Brown on October 7, 2015, will allocate \$100 million per year for the installation of solar energy in low income communities over the next 10 years, for a total investment of \$1 billion. Low-income families who use solar power will also be eligible to get credit for lower utility costs. The City should facilitate the implementation of the program in low-income communities within the city. The City should establish a resident assistance program to educate and support low-income renters and homeowners to access available energy efficiency and renewable energy incentives, this could be part of the Equity Specialist job responsibilities.

STRATEGY 3: BICYCLING, WALKING, TRANSIT, AND LAND USE:

Transit Priority Areas Rankings, Supporting Measure (p39): Develop new priority ranking for planning and funding infrastructure improvements and maintenance that support achieving CAP transit, pedestrian, and bicycling goals in Transit Priority Areas, using the following prioritization order:

1. Areas that meet both of the city's criteria for a transit priority area (Meets the Public Resources Code § 21099 (a)(7) definition AND is in a census tract in the City that ranks in the top 25% of CalEPA's CalEnviroScreen scores within the City.
2. Areas identified as high risk for pedestrian and bicycling collisions should be the highest priority within these communities.
Census tracts in the City that rank in the top 25% of CalEPA's CalEnviroScreen scores within the City.
3. Meets the Public Resources Code § 21099(a)(7) definition of a transit priority area.

This priority ranking system shall be integrated into the Capital Improvement Priority Matrix (Policy 800-14), for mobility assets and shall apply to all eligible sources of capital improvements funds, including but not limited to, revenue generated by TransNet, Community Development Block Grant opportunities and Public Facilities Financing Plans, as well as any General Fund revenue allocated to the capital improvement program budget.

This priority ranking system shall also commit City funds for biking, walking, and transit supporting infrastructure in an amount sufficient to ensure the CAP's mode-share goals are met or exceeded. The share of funds should at a minimum match CAP's mode-share goals and be adjusted upward periodically to ensure achievement of the goals.

Action 3.1 (Transit): Implement the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas to increase the use of transit, prioritizing implementation in census tracts in the City ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County.

Action 3.2 (Walking): Implement pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities, prioritizing implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are at high risk for collisions between pedestrians and motor vehicles. The City of San Diego should adopt a Complete Streets Ordinance by the end of 2018

Action 3.3 (Bicycling): Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities, prioritizing implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are at high risk for collisions between bicycles and motor vehicles.

Action 3.4 and 3.5 (Traffic Efficiency): Implement a Traffic Signal Master Plan (Action 3.4) and a Roundabouts Master Plan (Action 3.5) to reduce vehicle fuel consumption and improve safety and mobility, prioritizing corridors that have the highest pedestrian collision rates and are in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the City.

Action 3.6 (Transit-Oriented Development): Implement equitable transit-oriented development within Transit Priority Areas, including significant development of affordable residential housing with appropriate safety precautions. Commit to meeting the following TOD principles and goals:

- ✓ **Affordable Housing/Zoning:** Significantly increase affordable housing units near transit stops and jobs. At least 50% 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, structure regulations so transit-oriented development enables anyone who wants to remain in the community to do so. New housing should be sited with appropriate buffers (300-500 feet) from freeways or high-traffic roads (roads with more than 100,000 vehicles per day) and including health design features such as air filters and sound walls.
- ✓ **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.

- ✓ **PROVIDE OPPORTUNITY TRANSIT PASSES:** Provide opportunity transit passes for residents in the new housing development so they are able to access transit services.

STRATEGY 5: CLIMATE RESILIENCY

Action 5.1 (Urban Tree Planting Program): Present to City Council for consideration a city-wide Urban Tree Planting and Urban Parks Program that prioritizes implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are underserved.

Lastly, like the City of Portland which created an Equity Specialist position as part of their CAP implementation, we urge the City of San Diego to create such position as part of the implementation to ensure the plan achieves Equity.

We are supportive the goals in the Climate Action Plan and believe that the City Council has the ability to strengthen the CAP for all City of San Diego residents. Thank you for your consideration of these two critical elements, funding implementation and equity integration, in the Climate Action Plan. We look forward to working with you and your staff in ensuring that the City and community is able to reach the goals outlined in a timely and equitable manner.

Sincerely,



Diane Takvorian
Executive Director

CC:

Councilmember Chris Cate
Councilmember Todd Gloria
Councilmember Marti Emerald
Mike Hansen, Director of Land Use and Environmental Policy