September 5, 2024

Board of Supervisors
County of San Diego
1600 Pacific Highway
San Diego, CA 92101
Via Email

Subject: How to Champion Equity in County Climate Action Plan

Dear Chair Vargas, Vice Chair Lawson-Remer, and Supervisors,

Climate Action Campaign (CAC) is a San Diego based nonprofit organization with a simple mission: create a clean air and climate safe future through effective and equitable policy action. We have played an active role in the development of Climate Action Plan's (CAP) throughout the region since 2015, as well as monitored their implementation through an annual CAP Report Card.

In addition to adopting the CAP in early September, our recommendations for the Board of Supervisors (BOS) are as follows.

1. Adopt and Equitably Implement the County CAP with Quarterly Monitoring
2. Carve Out a Community Equity and Resilience Fund from the Existing CAP Budget
3. Develop a Climate Equity Index to Prioritize Implementation in Communities of Concern
4. Adopt the Fire Safe and VMT Efficient Smart Growth Alternative

The goal of these asks is to institutionalize equity. Whether it is a community devastated and displaced by flooding, deadly heat waves harming health and livelihoods, collapsing coastlines, or wildfires - families living on the frontlines of pollution are hit first and worst. It is our duty and responsibility to protect and prioritize action in these communities and work hand-in-hand with the most impacted families to craft solutions that keep families safe.

Developing a Community Equity and Resilience Fund will benefit Communities of Concern (CoC) across the County that have experienced disinvestment or a lack of adequate infrastructure, or have not seen upgrades to their infrastructure historically. To fill a current gap in the CAP, this discretionary fund allocated by the BOS in the budgeting cycle can commit dedicated investments to CoC both in incorporated and unincorporated areas to improve quality of life and community resilience in the face of climate change.

Due to wildfire hazards, insurance companies are setting unaffordable premiums or simply not covering homes built in high fire hazard areas. The Fire Safe and VMT Efficient Smart Growth Alternative will benefit first time homeowners because it deters from building housing in dangerous high fire hazard areas unlike the Village Support Areas Alternative. Choosing to build housing in high fire areas perpetuates the inequity and injustices CoCs experience because not only are these homes unaffordable, they are extremely dangerous to live in. Our recommendations are detailed below.

Adopt the County CAP

We strongly encourage the BOS to adopt the proposed CAP with the addition of a Community Equity and Resilience Fund. This plan – if implemented – will help clean the air, protect public health, improve quality of life, and reduce GHG to achieve a goal of net zero carbon emissions by 2045. Once adopted, diligent, timely, and meaningful implementation must occur.

The Energy sector is the most consequential GHG emissions reduction strategy identified in the CAP. Strategy E-2.2, improving energy efficiency and electrifying existing buildings in the unincorporated areas, is responsible for approximately 32% of the total GHG reductions projected of the entire CAP by 2045. The County must prioritize action on this strategy first.

On-road transportation accounts for 45% of unincorporated County emissions. Prioritizing implementing strategies T-5 and T-6 will encourage walking, biking, rolling, and public transit while reducing single occupancy vehicle trips.

Strategy T-3, installing electric vehicle charging stations and providing incentives for zero-emission vehicles, is projected to reduce the most emissions after strategy E-2.2. However, strategy T-3 remains as a car centric solution that does not prioritize walkable bikeable neighborhoods or public transit.

The CAP must be supplemented with land use strategies in the Sustainable Land Use Framework (SLUF) that is currently being developed. SLUF must promote connecting communities with efficient public transit, protecting green space, and building communities where families feel safe walking and biking to meet their basic needs.

Equitable Implementation of the CAP with Quarterly Monitoring

To ensure equitable implementation, we recommend the County release publicly available quarterly monitoring data on top of the annual reports. Transparency is critical for accountability and timely implementation. We applaud the County for developing the robust Equity Implementation Framework as a step towards institutionalizing climate equity into the CAP and want to see this framework reported on in quarterly monitoring data to ensure that CoC are being prioritized in implementation.

Develop a Community Equity and Resilience Fund

In addition to adopting the CAP in early September, the County should commit to creating a carve out from the agreed upon CAP budget for the Community Equity and Resilience (CER) Fund. The CER Fund would be a discretionary fund of money allocated towards community infrastructure projects during the County's budgeting process to improve climate resiliency and quality of life in both incorporated and unincorporated areas. This is specifically for projects not already identified in the CAP, but have been identified by communities.

CoC across the County have experienced decades of underinvestment in basic quality-of-life infrastructure such as parks, playgrounds, safe streets, pedestrian and bicycle improvements, trees, bus shelters, fast and affordable public transportation, flood control, and insufficient street lighting. This lack of investment has limited access to opportunity and left these communities vulnerable to the impacts of extreme heat, floods, and fires exacerbated by the climate crisis.

The County CAP is estimated to cost $650 million for the first five years of implementation. The CER Fund should be carved out from this already agreed upon $650 million budget. It will NOT require additional funding. We recommend carving out approximately 20% of the total budget, or $130 million for projects to improve quality of life and climate resiliency. This would put approximately $26 million every year for five years into projects that protect and improve quality of life for families who are most impacted by the climate crisis. If the County wants to consider additional funding they should partner with private and philanthropic institutions.

The County CAP is implemented in the unincorporated areas and County operations - developing the CER Fund will allow the CAP to invest in CoC's across all five districts. Regional collaboration is required to reach our climate goals as stated by the County's Regional Decarbonization Framework. The County's RDF work already works to identify community projects across the entire County that need funding assistance, the CER Fund can pair perfectly to fund these projects. We need the County CAP to address projects across the entire region to protect our most vulnerable from the climate crisis.

The City of San Diego has already developed a model. Their Climate Equity Fund (CEF) was approved by City Council in March 2021. It has been spent to improve infrastructure within CoC including parks, bike lanes, sidewalks, streetlights and more.

The City of San Diego's CEF funding allocation to specific projects are made during their annual budget process. Currently, to be eligible to receive CEF funding, projects must have an impact on reducing greenhouse gas emissions, enhancing safety in the public right-of-way, relieving congestion, or achieving other climate equity concerns and be in a Community of Concern as identified using their Climate Equity Index.

Develop a County Climate Equity Index for Prioritization

The County should develop their own tool like the Climate Equity Index to determine eligible projects in CoC. This should be co-created alongside CBOs and the County's Office of Sustainability and Environmental Justice's (OSEJ) Environmental Justice Working Group. It is critical we use multiple data sources to inform this criteria because tools like CalEnviroScreen have imperfect blindspots that do not identify CoC accurately. They should consider already existing data such as the County of San Diego Vulnerability Assessment and Adaptation Report, CalEnviroScreen, and the California Healthy Places Index.

Similar to the City's process, project selection can happen during the budgeting cycle where the BOS can determine which community projects in their respective districts that align with the Climate Equity Index they want to invest this fund in.

Adopt the Fire Safe and VMT Efficient Smart Growth Alternative

In order to create a safe and workable roadmap for developers to produce homes promised in the 2011 General Plan that are affordable by design and sustainable while simultaneously reducing greenhouse gas emissions (GHG), the Fire Safe and VMT Efficient Smart Growth Alternative is the best option available.

The rising cost of home insurance in very high and high fire risk zones makes any house in these zones unattainable; the income needed to afford the full sticker price of such homes is far beyond the county average income. Someone's dream home will quickly turn into a nightmare as insurance costs break their budget and even worse, as fire strikes and shatters their hope for a forever home.

The County's own maps illustrate the gravity of building out villages without consideration of fire risk. The Village Support Alternative doubles down on dangerous sprawl that brings homes into the line of fire, some of which, like in the village area of Ramona, would be completely engulfed by very high fire risk wildlands with few fire stations available to help with the inevitable situation of fire disaster. The danger of choosing the Village Support Alternative is illustrated on **page 7** which highlights the overlap of where this alternative will build with the high and very high fire hazard areas.

Building in very high and high fire risk zones makes zero sense especially when VMT efficient options are available that are close to job centers and other important resources that folks need to access daily. By reducing the need for residents to drive hundreds of miles a week, folks can save money and time and reduce the frustration of daily tasks. Folks can look down the line and know for certain that they can enjoy their home for decades to come and age in place if they so choose.

The Fire Safe and VMT Efficient Smart Growth Alternative will develop housing in more concentrated and resourced areas, and not reduce the number of homes built overall in the County. This not only makes sense but it is environmentally responsible. Clean air and lowering fire risks go hand in hand.

Conclusion

Thank you for the opportunity to weigh in on the adoption of the County CAP. This is a rare opportunity to help shape climate policy in our region and open the County to more funding opportunities with the CAP adopted. With timely and equitable implementation we will build a future that ensures our families can breathe clean air, age in place with homes protected from the unnatural disasters of the climate crisis, and utilize quality sustainable infrastructure. We urge staff to adopt our recommendations to champion equity and improve the quality of life for all San Diegans.

Sincerely,

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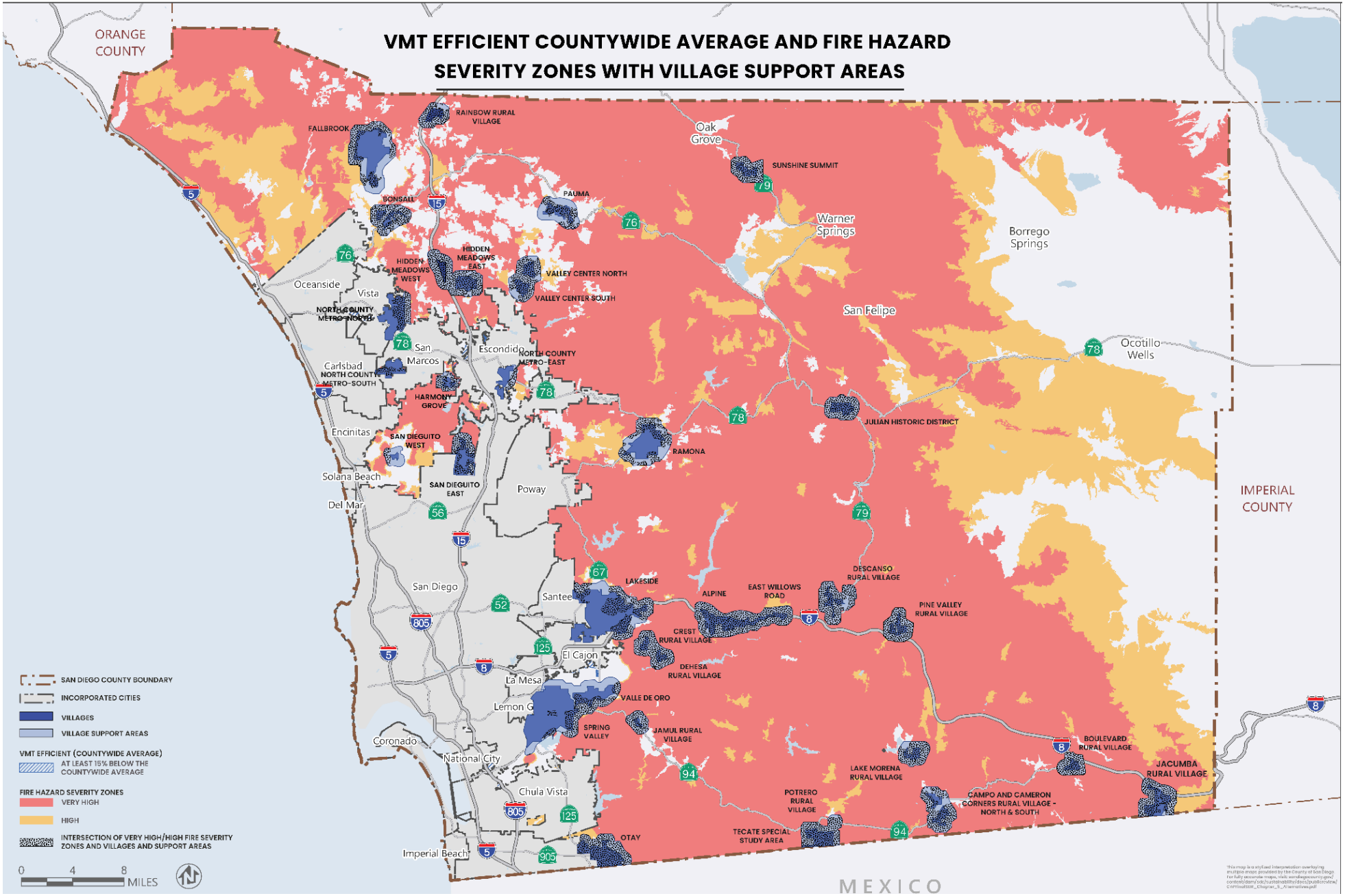
VMT EFFICIENT COUNTYWIDE AVERAGE AND FIRE HAZARD SEVERITY ZONES WITH VILLAGE SUPPORT AREAS
ORANGE COUNTY
IMPERIAL COUNTY
MEXICO
RAINBOW RURAL VILLAGE
FALLBROOK
BONSALL
PAUMA
Oak Grove
SUNSHINE SUMMIT
Warner Springs
Borrego Springs
San Felipe
Ocotillo Wells
HIDDEN MEADOWS EAST
HIDDEN MEADOWS WEST
VALLEY CENTER NORTH
VALLEY CENTER SOUTH
Oceanside
Vista
NORTH COUNTY METRO-NORTH
San Marcos
Escondido
NORTH COUNTY METRO-EAST
Carlsbad
NORTH COUNTY METRO-SOUTH
HARMONY GROVE
JULIAN HISTORIC DISTRICT
Encinitas
SAN DIEGUITO WEST
RAMONA
Solana Beach
SAN DIEGUITO EAST
Poway
Del Mar
San Diego
LAKESIDE
Santee
ALPINE
EAST WILLOWS ROAD
DESCANSO RURAL VILLAGE
PINE VALLEY RURAL VILLAGE
CREST RURAL VILLAGE
El Cajon
DEHESA RURAL VILLAGE
La Mesa
VALLE DE ORO
Lemon Grove
SPRING VALLEY
JAMUL RURAL VILLAGE
Coronado
National City
LAKE MORENA RURAL VILLAGE
BOULEVARD RURAL VILLAGE
JACUMBA RURAL VILLAGE
Chula Vista
POTRERO RURAL VILLAGE
CAMPO AND CAMERON CORNERS RURAL VILLAGE - NORTH & SOUTH
TECATE SPECIAL STUDY AREA
OTAY
Imperial Beach
SAN DIEGO COUNTY BOUNDARY
INCORPORATED CITIES
VILLAGES
VILLAGE SUPPORT AREAS
VMT EFFICIENT (COUNTYWIDE AVERAGE)
AT LEAST 15% BELOW THE COUNTYWIDE AVERAGE
FIRE HAZARD SEVERITY ZONES
VERY HIGH
HIGH
INTERSECTION OF VERY HIGH/HIGH FIRE SEVERITY ZONES AND VILLAGES AND SUPPORT AREAS
0 4 8 MILES