



September, 29, 2021

Mayor Todd Gloria
City of San Diego
202 C Street, 11th Floor
San Diego, CA 92101

Re: Climate Action Plan 2.0 Update Must Center Equity in Process and Policies

Honorable Mayor Gloria:

In order to truly achieve transformative change and increased resiliency for San Diego's communities of concern that will be hit first and worst by the climate crisis, our organizations recommend the City of San Diego address the following in the updated Climate Action Plan (CAP) 2.0:

- 1. Operationalize equity in CAP policies with dedicated implementation funding for Communities of Concern**
- 2. Include and prioritize the actions and goals identified by Communities of Concern**
- 3. Improved process through yearly analysis and updates, outreach and education and increased staffing for implementation**

It is well documented that across the world and here in San Diego, a climate gap exists between those who are positioned to persevere in a warming world and those who do not have the resources, adequate infrastructure or access to opportunity to be resilient in the face of the global existential threat that climate change poses. As mayor of the eighth largest city in the United States, you are uniquely positioned to help close the climate gap.

Our organizations want to express gratitude for the City of San Diego funding an equitable engagement process for the CAP update. We also want to express concerns and provide recommendations given that low-income communities of color that the city refers to as

Communities of Concern (CoC) are most vulnerable to the threats a changing climate brings like extreme heat and unhealthy air quality from over-pollution and wildfires.

The CAP equitable engagement process your office funded enabled Community Based Organizations (CBO's) to gather feedback from communities on the frontlines of the climate crisis who have historically been marginalized and left out of the decision making process. These communities shared their lived experience and priorities and it is up to you and your staff to ensure that feedback is incorporated and prioritized in the CAP update as actionable goals and outcomes that shift investments to the neighborhoods with the greatest need. We are concerned about the lack of clarity on how the community's feedback will result in transformative change. Even though the CAP is a legally binding document, there's lack of accountability when it comes to implementation, especially when it comes to actions and projects in CoC.

1. **Operationalize Equity.** Equity cannot solely be attached to engagement, it must be embedded throughout the plan and must show up in each of the strategies, actions, analysis and implementation.
 - **Dedicated Funding that Supports Actions in CoC.** The recent Parks Master Plan committed to prioritizing and providing direct investment to communities with limited parks. Staff should follow this approach and commit that at a minimum, 50% of the CAP implementation funds be spent in CoC. We also recommend that the City prioritize state and federal funding that will support actions in CoC. Any additional funding received by the City should see no less than 50% of that funding going to actions that directly benefit CoC.
 - **Capacity building for local community partners.** Funding should also include money to continue to build and expand the capacity of local community partners. If the City wants to continue to effectively partner with its community partners, it's critical that it provides support in helping build out their technical expertise to better engage in these conversations.
2. **Prioritize actions and goals identified by CoC.** There's a significant concern that the strategies and actions presented by the CAP update will not reflect those identified by the community. CBOs spent several months convening their communities to identify existing needs and priorities and if the City is committed to equity, then the CAP update must reflect that feedback provided by CoC. We recommend that the strategies and actions developed by the City prioritize the following:
 - a. Air quality strategy focused on particulate matter (diesel PM & PM 2.5)
 - b. Tree canopy

- c. Safe streets for walking and biking
- d. Parks and Urban Greening

3. Improved process.

- **Outreach and education efforts.** Continuous outreach and education is a critical strategy to help inform the existing CAP update process, as well as secure its approval and complete implementation. In order to have meaningful and effective outreach and education, the city must allow adequate time for engagement, especially in CoC. We understand that there's urgency to pass the CAP update and start implementation, but urgency must not come at the expense of an equitable process that allows for a collaborative and participatory approach. Additionally, outreach and education efforts should not stop with the completion and approval of the CAP update. The City must continue to engage with the community, provide regular updates and continue to improve the capacity of the community and community groups who've been involved in this process. We recommend that the City develop an engagement strategy, as well as seek funding opportunities to help with the capacity and technical expertise of community members.
- **Yearly Analysis and Evaluation.** Accountability is needed to ensure the CAP is delivering equity outcomes. Therefore, the CAP update must include equity benchmarks and indicators that will help evaluate whether the strategies and actions are meeting equity outcomes. This analysis should be completed on an annual basis to help determine if there's a need to adopt and adjust the strategy and action, especially if it's not meeting the equity goal and outcome.
- **Implementation Plan and additional staff capacity for implementing the CAP.** Implementing the CAP is no easy task and unless there is an implementation plan and dedicated staff to help advance the CAP, engage with communities and work to secure statewide or federal climate funding, then it will be difficult to meet legally-binding CAP targets. Given that there are multiple departments tasked with implementing the CAP, we recommend that the City develop a comprehensive implementation plan in 2021 in parallel with the CAP update. Waiting till after the approval of CAP update to develop an implementation plan will only delay in bringing direct benefits to CoC. We also recommend, as provided in the recent CAP audit, the City include an estimate of associated costs, information on funding sources, and identification of funding gaps for its implementation plan. Lastly, the City must hire additional staff within those departments tasked with implementing the CAP update with expertise in working with CoC. Positions should include, but not limited to a grant writer and transportation justice planner.

Thank you for your leadership in elevating the needs and voices of communities long left behind by decades of inequitable city planning, policies and spending. You have an opportunity to not only shift the narrative, but turn the community's priorities into action and make meaningful progress on closing the climate gap. Please focus Equity Stakeholder Working Group on addressing concerns before completing the update of CAP 2.0. The ESWG should be used as a venue to discuss and track progress on CAP implementation efforts.

We look forward to continuing the conversation and working together to lift up all Communities of Concern to live with dignity and prosperity in San Diego.

Signed,

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