



August 10, 2021

VIA ELECTRONIC MAIL

City of San Diego Sustainability Department
ATTN: Alyssa Muto, Department Director

RE: STAY COOL Comments on 2020 CAP Annual Monitoring Report and 2030 CAP Update

Dear Ms. Muto,

STAY COOL for Grandkids appreciates the opportunity to comment retrospectively on the current Climate Action Plan and prospectively on the plan that is in development. We thank Moriah Saldana for presenting to our membership on July 8, reviewing the CAP 2020 Annual Report as well as the “Our Climate, Our Future” update project, and taking our questions.

Inspired by love for our grandchildren and alarmed by the threat of climate change, STAY COOL for Grandkids was established as a nonprofit organization of elders who seek to mend our generation’s legacy and protect our grandchildren’s climate future. We are well-informed, collaborative, constructive and nonpartisan.

Comment 1 – Community Choice Aggregation

The goals of the current CAP are laudable and sought to reduce the “business as usual” scenario of 14 million metric tons (MMT) of CO₂e down to 9.7 MMT by 2020 if the CAP was fully implemented between 2015 and 2020. On pages 19-30, the CAP underscores the significance of State and Federal actions that result in the majority of GHG emissions. Table 3.1, on page 30, is the summary of GHG reduction strategies. The supporting actions, such as SB 375 implementation, led by SANDAG, and the nine supporting State and Federal Actions, make up approximately 3.8 MMT of the total 4.3 MMT reductions for 2020. Pertaining to Community Choice Aggregation (CCA), which has come to fruition as San Diego Community Power, Item 2.1 shows a reduction of 531,254 MT by 2030, but below that, in “Supporting State and Federal Actions”, it is listed as having a reduction of 960,098 MT reduction.

QUESTIONS: Although CCA was enabled by the State, is this not a local action? Second, what accounts for the difference in MT reduction on the Table? The choice that has been made by the City to use San Diego Community Power was not mentioned in the formal presentation to STAY COOL, and yet selecting the “greenest” power sources will make a huge difference in GHG locally. Will this be acknowledged in the new report?

Comment 2 – Tree Canopy coverage

The goal of achieving 15% urban tree canopy coverage by 2020 was not realized.

QUESTION: Will new policies and/or partnerships be made available to meet the 35% urban tree coverage by 2035? If so, that should be stated.

Comment 3 – Wetlands Carbon Sequestration

The only mention of wetlands in the existing CAP is on page 63, and states, “Healthy natural water systems, vegetation areas, wetlands, estuaries and the associated biome are important assets to the region. In San Diego, a healthy environment also increases the quality of life for residents and workers and attracts tourists.” There is no mention of the fact that wetlands are a vital resource to sequester carbon.

Wetlands are 100 times more efficient in sequestering carbon than drylands. San Diego has an opportunity to be a leader in using natural processes to sequester carbon by not only protecting the Kendall Frost Reserve wetlands but expanding them through the ReWild Mission Bay “Wildest” initiative.

QUESTION: Would you consider mentioning the research provided by the ReWild Coalition to underscore the importance of wetlands protection? Additionally, would the 2030 CAP include a commitment to expand wetlands?

Comment 4 – Building Electrification

Burning natural gas, propane and other fuels in buildings emits nearly 10% of California’s greenhouse gases, and this does not include leaks from pipelines. “Building Electrification” will reduce our reliance on natural gas. In California, over 40 jurisdictions have passed ordinances requiring or encouraging that new construction be all-electric or are in the process of applying with the California Energy Commission (CEC).

QUESTION: Why is the Sustainability Department not prioritizing updates to Reach Codes? It is falling behind, and frankly, the lack of leadership on this issue is very troubling. Will you work with the Development Services Department to change our local ordinances and/or building codes so that San Diego, like other leading municipalities, will require new construction be all-electric?

Comment 5 – Food Waste

The current CAP mentions the importance of supporting local food production. However, nothing was said about food waste. This can be a huge component of GHG, not to mention the embedded water loss from food production. It is true that the City cannot monitor the waste from each household; however, the CAP can serve as a comprehensive document that highlights the role of individual actions.

QUESTION: Would you and/or your staff review “The Carbon We Consume” for an overview of the GHG emissions associated with food choices, and consider adding more specific provisions in the CAP that commit the City to specific actions that will further reduce food waste? This is

an area where personal choice also can have tremendous impact. [the carbon we consume.pdf](#) ([sfenvironment.org](#))

Comment 6: Transportation and Land Use

In the presentation we heard from Moriah Saldaña, one of the goals of the Climate Action Plan update was to develop metrics for walkable communities. We have noticed a disconnect between the goals of the CAP and the actual day-to-day decision-making by the City. Streets are still being prioritized for cars to travel through communities at high speeds with multiple lanes which discourage biking and walking - especially for children.

QUESTION: How will the CAP ensure that the City prioritizes the Climate Action goals in all land use decisions?

Comment 7: “Code Red for Humanity”

The most recent IPCC report is stark and states that we have very little time to act. It calls upon all of us, including local governments, to not waste time on “feel good” plans that do not result in tangible results. Therefore, we are calling upon the City to take bold action now and set measurable goals for the CAP that takes us to 2030. As stated by Stephen Cornelius, chief adviser on climate change at WWF, “This is a stark assessment of the frightening future that awaits us if we fail to act. With the world on the brink of irreversible harm, every fraction of a degree of warming matters to limit the dangers.”

QUESTION: Mayor Todd Gloria has been an avid supporter of strong climate action. The Council seems to be willing to take the advice of your staff, who are deemed to be the subject matter experts. Will you ensure that their recommendations are consistent with the best-in-class actions demonstrated by leading cities in the country?

Sincere thanks to your staff for the years of hard work to develop and monitor the success of the current CAP, and for the hard work to incorporate relevant and meaningful updates to the new CAP. We look forward to your reply and answers to our questions. We will participate with the Sustainability Department again in the Fall to help our STAY COOL members understand what the new CAP will include.

Sincerely,

Linda Giannelli Pratt

Linda Giannelli Pratt
STAY COOL for Grandkids Advisory Council Chair

CC: Moriah Saldana
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