

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>



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.

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.

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.



**2727 Hoover Ave., Suite 202
National City, CA 91950**

**Phone: 619-474-0220
Fax: 619-474-1210**

www.environmentalhealth.org

