



August 13, 2021

County of San Diego
Planning and Development Services
5510 Overland Ave, Third Floor
San Diego, CA 92101
Via Email: pds.communityplanupdates@sdcounty.ca.gov

Subject: Climate Action Campaign recommendations for the Valley Center Community Plan Update

Dear Kevin Johnston and Planning and Development Services,

Climate Action Campaign (CAC) is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

Since its founding, CAC has been at the frontlines of fighting for Community Plan Updates (CPU's) that couple climate strategies and specific plans to provide abundant affordable housing near world class transit, and create bikeable, walkable neighborhoods powered with 100% clean energy.

The County has an opportunity to make great strides in reaching its Climate Action Plan (CAP) goals with the adoption of a Valley Center CPU that couples climate strategies and a specific plan to bring clean air and water, safe streets, affordable housing near transit, and economic benefits to residents and businesses in Valley Center.

Below are our recommendations for the Valley Center CPU:

Align Valley Center Community Plan Update Housing development with SANDAG not the General Plan (GP)

The County must adopt and implement CPUs that help the region in meeting or exceeding its CAP goals. Aligning the Valley Center CPU projected housing development numbers with the General Plan's now outdated 60,000 units will significantly increase sprawl development. Forcing residents to live in extremely dangerous high-VMT, high fire hazard areas only exacerbates the climate crisis. To prevent sprawl the County must stop development or reduce density in the subareas, semi-rural, and rural areas of Valley Center.

We echo the Endangered Habitat League's (EHL) recommendations for the Valley Center CPU to align its housing projection numbers with SANDAG's Sustainable Communities Strategy allocation of 7,419 units for the County's unincorporated jurisdiction¹.

¹SANDAG "Series 14 Regional Growth Forecast, SCS Land Use Pattern", Appendix F, Table F.3: Total Housing Units by Jurisdiction, page 14
https://sdforward.com/docs/default-source/2021-regional-plan/appendix-f---reg-growth-forecast-and-lu-scenario.pdf?sfvrsn=d144fd65_2

Include Smart Land Use Policies with Affordable Housing Near Transit

To create inclusive and sustainable communities the County must prioritize developing high density affordable housing, commercial, and employment centers near train stations and mobility hubs. Building affordable housing near transit and job centers is a key equity strategy to reduce VMT, which is one of our region's greatest sources of emissions.

A reference policy within the drafted CPU reads “Concentrate new Industrial, General Commercial, Office Professional, Mixed Use, and compact residential, and compact residential development in Village areas where uses and densities have been intensified in accord with existing and planned infrastructure, services, and amenities.” However, SANDAG is not planning to designate Valley Center as a Mobility Hub or Transit Priority Area (TPA). We recommend that the County not increase housing development in the Valley Center CPU, and not permit new housing outside of existing and planned TPAs.

Set Specific Mode Share Targets for Biking, Walking, and Transit

As a long range planning document, the County needs to ensure that the Valley Center CPU sets specific targets for mode shift, and plans accordingly to achieve those targets in alignment with the forthcoming CAP's² emissions reduction targets for the transportation sector. The County should collaborate with NCTD and SANDAG to identify potential projects and programs to achieve aggressive mode shift away from fossil fuel cars, tailored to Valley Center's local context, and the CPU should outline those strategies to meet the mode shift targets.

We also recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares. Currently, the Valley Center CPU's Draft Goals and Policies, under Mobility – Active Transportation and Transit, policy 335 reads “Updates to the Mobility Element Network for Valley Center should continue to apply either Class II or Class IV bike lanes/bikeways to Mobility Element alignments. Prioritize bicycle safety considerations near schools.” However, Class II bike facilities, which are striped bike lanes without a physical barrier, do not increase ridership as much as physically protected bike lanes. Research shows that better safety outcomes for all road users, especially bicyclists, are associated with a greater prevalence of bike facilities—particularly protected and separated bike facilities—and that high-bicycling-mode-share cities are safer for all road users.³

To create bikeable and walkable neighborhoods, increase bike ridership, and secure safer streets for all, we recommend prioritizing protected and/or separated bike infrastructure. That means only installing Class I or Class IV bike facilities.

Conclusion

Thank you for the opportunity to weigh in on the development of this important document. The Valley Center CPU presents an opportunity to help protect the health and safety

² [Recommendations Letter for the County of San Diego's Climate Action Plan \(CAP\)](#). *Climate Action Campaign*. July 12, 2021.

³ Wesley E. Marshall, Nicholas N. Ferencak, “Why cities with high bicycling rates are safer for all road users,” *Journal of Transport & Health*, Volume 13, 2019, <https://www.sciencedirect.com/science/article/abs/pii/S2214140518301488?via%3Dihub>

of future generations from the worst impacts of climate change. We urge the Planning Department to incorporate the recommendations above to maximize emissions reductions, and deliver economic, safety, and health benefits to Valley Center families and businesses.

Sincerely,

Madison Coleman
Policy Advocate
Climate Action Campaign