



May 19, 2023

Mayor and City Council
San Diego City Hall
2020 C Street San Diego, CA 92101
Via Email

Re: Climate Action Campaign Recommendation Letter for the University City Community Plan Update Community Discussion Draft

Honorable Mayor and Councilmembers,

Climate Action Campaign (CAC), is a non-profit organization based in San Diego and Orange County, CA with a simple mission: create a zero carbon future through effective and equitable policy action.

Housing is a human right. Everyone deserves quality housing that is affordable and close to life's essentials, like good schools, jobs, grocery stores, and parks. San Diego must take a holistic approach to solving the ongoing climate and housing crises concurrently.

CAC has been at the frontlines of fighting for Community Plan Updates (CPUs) that couple climate strategies and land use planning to help the City meet and exceed its Climate Action Plan (CAP) mode shift goals and Regional Housing Needs Allocation (RHNA) targets.

We hope that the City will use the University City CPU as a tool to bring clean air, safe streets, affordable housing, economic benefits, and overall improved quality of life to families and businesses in the University City community for the next 20-30 years.

Below are our recommendations for the University City CPU:

Share Existing and Projected Mode Share Data for the CPU:

The City must end its long practice of withholding mode share data from the community until the very end of the CPU process. Since 2016, no CPU has been approved with mode share targets that comply with the overall CAP modeshift goals. More specifically, the City has failed to use the Golden Hill, North Park, San Ysidro, and Uptown CPUs as tools to implement the 2015 Climate Action Plan (CAP) Strategy 3: Bicycling, Walking, Transit & Land Use. In 2022, the City adopted a Mira Mesa CPU with modeshift targets that are inconsistent with the CAP update and

will result in significant greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) impacts.

Mode share data is critical to ensuring the City can meet its legally binding CAP modeshift targets and Vision Zero goals. We are concerned that the City has yet to publicly provide mode share data for the University City CPU. We recommend that the City share the existing and projected mode share data in the next iteration of the CPU draft. Communities deserve to have this information early in the planning process to make informed and fact-based decisions on the land use scenarios that will directly impact their quality of life.

Set Specific Mode Share Targets for the CPU

The City only has 7 years to meet the 2030 CAP modeshift goals and 12 years to reach zero carbon. Vehicles are the single largest source of GHG emissions in San Diego and more than two-thirds of smog-forming emissions in San Diego County are generated from mobile sources.¹ As a long range planning document, the City needs to ensure the University City CPU plans accordingly to achieve modeshift targets in alignment with the CAP. We are concerned that the City will not meet its CAP modeshift goals if the University City CPU fails to adopt and meet its own.

The University City community has great potential for modeshift as a designated High Resource Area, with a university, and increasing capacity for homes, transportation infrastructure, and employment centers. It is imperative that the CPU set aggressive mode share targets for walking, biking, and mass transit and include strategies to meet them. This includes integrating MTS programs, SANDAG's Regional Transportation Plan (RTP), and City of San Diego specific policies such as the Mobility Master Plan (MMP) and Blueprint SD to clearly show how the intersection of these plans and policies will help the City meet its' CAP modeshift goals within the CPU.

Additionally, the City must deploy specific strategies that will induce mode shift from driving to biking, walking, and transit. We recommend the following revisions to the CPU Community Discussion Draft that will help to elicit mode shift:

- Make all areas classified as “connectors” into “corridors”. Specifically, in Figure 16: Pedestrians Facilities Network Map, the portions of North Torrey Pines Road that have increased pedestrian activity should be classified as a “corridor” instead of a “connector”.² Converting connectors into corridors can help the City meet its' Vision Zero goals and accommodate for various modes of transportation.
- Figure 17: Bicycle Network Map should include traffic calming infrastructure where there are mobility hubs.³ For example, the mobility hub at the intersection of Genesee Ave & North Torrey Pines Road does not have traffic calming infrastructure, which if implemented can help the City achieve its' Vision Zero goals.

¹ https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf (pg. 55)

² <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (pg. 100)

³ <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (pg. 104)

- To maximize modeshift, we recommend that the CPU create a bus only lane for Rapid Route 870. If there are no dedicated lanes allocated to this route, as operated on North Torrey Pines Road along the UCSD campus, the bus will be constantly delayed as a result of car congestion. Without the prioritization of a bus only lane the Rapid Route 870 may not be a preferable, reliable, and efficient option for travel in the community, as the City intends it to be.
- We are pleased that Figure 17: Bicycle Network Map shows additional Class IV bicycle lanes, especially along the UCSD campus. 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.⁴ To increase bike ridership, and secure safer streets for all, the CPU should prioritize protected and/or separated bike infrastructure wherever it is feasible.

Include Smart Land Use Policies with Affordable Housing Near Transit

We cannot solve the climate crisis without simultaneously solving the housing crisis. Infill, upzoning, and affordable housing development in smart growth areas need to be incorporated into every aspect of land use and urban design policy.

The CPU must prioritize the development of dense, affordable, on-site, mixed-use, micro and multi-bedroom unit housing in close proximity to safe pedestrian pathways, protected bike lanes, and transit hubs such as the Mid-Coast Trolley Extension, which the City of San Diego spent \$2 billion developing. The housing must also be concentrated near the major employment and shopping centers, the UCSD campus, parks, and schools within the village areas of this plan.

University City is an opportune place to develop employment centers, such as the BioMed's Towne Center View Project, which the San Diego Planning Commission recently unanimously voted in support of.⁵ Unfortunately, the project's Environmental Impact Report (EIR) estimates that the project will result in 32.6 VMT per employee daily, which is greater than the regional mean of 25.9 miles per employee. Without adequate housing and an appropriate homes to jobs ratio, University City will become a car-centric, commuter area, increasing GHG emissions and VMT.

We recommend that land use Scenario One be analyzed within the CPU EIR. Scenario One would create a total capacity for 150,000 jobs and 83,000 homes within University City.⁶ The land uses contained in Scenario One would be a major step forward in meeting the City's RHNA

⁴ Wesley E. Marshall, Nicholas N. Ferenchak, "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>

⁵<https://www.sandiegouniontribune.com/business/story/2023-05-12/mega-life-science-development-on-university-city-hilltop-nears-approval>

⁶ Presentation to University Community Plan Update Subcommittee Meeting, City of San Diego (February 15, 2022), p. 53, available at

https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_05dfcf51e63b4091b2cc54caaff47274.pdf.

targets and unlocking potential for desperately needed new homes and new job opportunities in University City.

It is essential that we prioritize housing development for all incomes to prevent displacement, and combat the housing and climate crises concurrently. The rate of San Diegans that are cost-burdened by housing range from 63-70%.⁷ We are pleased that the City is undertaking an Inclusionary Housing Study for the CPU. A robust University City-specific inclusionary housing requirement can increase affordable housing and achieve mixed-income and inclusive communities.

With the proposed increase in housing and jobs, and therefore increase in land value, we recommend the City undertake an analysis of Land Value Capture Zoning as a way to finance affordable housing development, mobility infrastructure, and parks. There are many different funding tools that can be included in a Land Value Capture Zoning study, such as the augmentation of the City's Commercial Linkage Fee. Inclusionary housing in-lieu fees can also be included in the Land Value Capture Zoning study, as these funds will specifically be used to develop affordable housing in University City. We want to emphasize that this Land Value Capture Zoning should not be a barrier to housing production, but rather provide a public benefit for those living in University City.

Building affordable housing near transit is a key climate and equity strategy to reduce VMT and GHG emissions. These strategies can also create equitable communities, where people feel a sense of belonging, while mitigating the effects of historically racist zoning laws, such as redlining.

Parks and Green Open Spaces, Carbon Sequestration Measures, and Green Infrastructure Strategies

We are pleased that the CPU will provide 130+ additional acres of open space to the community. The CPU Community Discussion Draft's Community Plan Implementation Overlay Zone (CPIAZ) also states that "Per SDR 1, all new residential or residential mixed-use development on parcels equal to or greater than 2 acres of land or with a gross floor area equal to or greater than 75,000 square feet shall satisfy the development's required recreation value points on-site by providing publicly accessible recreational opportunities".⁸ This will provide an additional 3,321 of park value.

However, according to Table 5: Parking Inventory of the CPU Community Discussion Draft, the community plan will still be short 4,937 plan build out recreation value points⁹ based on the City's Parks Master Plan guidelines, which allocate 100 points per 1,000 people. Therefore,

⁷https://www.ocregister.com/2023/05/17/southern-california-nearly-1-million-homes-short-for-low-income-residents-report-says/?utm_email=05032535C533D451343E644236&g2i_eui=%2bzanoGH0wYfJ362yqfcALmHKHMLmKcj&g2i_source=newsletter&lctg=05032535C533D451343E644236&active=yesD&utm_source=listrak&utm_medium=email&utm_term=Story+Button&utm_campaign=scng-ocr-breaking-news&utm_content=alert

⁸ <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (page 136)

⁹ <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (page 137)

these deficiencies could result in approximately 50,000 residents missing a share of recreational space. We recommend that the next iteration of the draft plan identifies strategies to reduce this shortage of recreational space.

The CPU must include robust green infrastructure strategies to sequester carbon, and deliver environmental, and social benefits to University City. Within Table 6: Plan Policies, we applaud measure 5.7: Wetlands, which reads “Preserve and enhance wetland resources, including estuarine and coastal waters, creeks, bays, riparian wetlands and vernal pools, to provide ecosystem functions and services, wildlife habitat, water quality improvement, carbon sequestration, and resilience to climate change.” In addition, we recommend that this CPU commit to a quantifiable tree canopy coverage target, by planting and caring for drought-tolerant shade trees, that aligns with the City CAP’s 35% urban tree canopy target by 2035.

We also recommend the following revisions to the CPU Community Discussion Plan that will support the City’s efforts to design green streets and enhance pedestrian and bicycle facilities:

- Figure 12: Street Tree Plan shows a potential connection to the Sorrento Valley Coaster that is not incorporated along the east side of UCSD.¹⁰ We recommend that the Coaster be connected along the east side of the University and that the connection be part of a multi-species tree initiative that results in a bike facility or trail.
- Figure 16: Pedestrian Facilities Network Map shows a connection to the Sorrento Valley Coaster, identified as a Class 1 Multi-Use Path.¹¹ This connection should be included in the Figure 12: Street Tree Plan.

Conclusion

We appreciate the opportunity to weigh in on the development of this critically important document. The University City CPU presents an opportunity to help protect the health and safety of residents from the worst impacts of climate change. With this critical goal in mind, we urge the City to incorporate our recommendations to maximize emissions reductions, deliver economic benefits, and improve the quality of life for all current and future residents of the University City community.

Sincerely,

Madison Coleman

Madison Coleman

Policy Advocate

Climate Action Campaign

¹⁰ <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (page 63)

¹¹ <https://webdocs.sandiego.gov/public/ucpu-cdd-onscreen-reduced.pdf> (page 100)