



November 7, 2023

The Honorable Council President Sean Elo-Rivera, ATI Committee Chair Kent Lee, and Councilmembers  
1 Civic Ctr Wy  
San Diego, CA 92101

RE: Complete Streets Policy Recommendations

Dear Council President Sean Elo-Rivera, ATI Committee Chair Kent Lee, and Councilmembers,

Climate Action Campaign and our coalition partners believe that San Diego residents need safe and reliable multimodal transportation options to help them connect to important resources without adding to the harms of increased greenhouse gas emissions and air pollution in the current car-centric community design.

Today residents and visitors have neither safe nor reliable options. Buses get stuck in traffic, pedestrians are surrounded by unsafe, hot and autocratic streets, and cyclists are too frequently tossed right into and alongside heavy speeding vehicles, putting them at the mercy of preoccupied drivers. San Diego needs a Complete Streets Policy that produces by default, a more connected, protected, and reliable multimodal network for all residents to freely use the public right of way as they move about their precious lives.

We need the Active Transportation & Infrastructure Committee and the San Diego City Council to prioritize the urgent need for safe and reliable multimodal transportation infrastructure in their Complete Streets Policy by:

- setting a clear and fair exception process

- ensuring the policy is compatible and congruent with the City's legally-binding 2030 Climate Action Plan targets including mode share targets
- Updating additional council policies that inform the Complete Streets Policy and the subsequent Street Design Manual to allow for the deliberate attainment of the goals set forth in the Complete Streets Policy.

By following the framework above, the City will create a real path to implement foundational street level safety and it will simultaneously help the City reach its ambitious 2030 CAP mode share targets of 19% walking/rolling, 7% biking, and 10% public transit.

### *Fair Exception Process*

The current exception process is vague and can lead to an unfairly large quantity of "justified" exceptions. Currently, the draft policy reads as follows in respect to the process of granting an exception:

"Exceptions to this policy on City and private development projects should be supported with documentation or data that explains the basis for the exception and also include approval by the Director of Transportation, Directory of Sustainability and Mobility, City engineer, or their designees."

This process leaves too much latitude for exceptions. This will lead to the creation of a weak policy framework that will easily be cast aside. It is absolutely necessary to set forth a clear process to score the appropriateness of granting an exception so that exceptions are not the norm.

### *2030 CAP Targets*

In regards to the Mobility Master Plan, the success of the Complete Streets policy comes to fruition when the infrastructure improvements of the public right of way lead to high levels of pedestrian and cyclists use and better connected public transit infrastructure, therefore increasing mode share for these uses.

The Monitoring and Outreach section of the draft policy is critical. Establishing performance measures and regularly monitoring the effectiveness of the Complete Streets Policy in improving equity and accessibility and progressing CAP goals is essential and should be reported out to the public at minimum, on an annual basis.

This monitoring and reporting can be implemented into a shared dashboard that models how Complete Streets projects help us reach CAP mode share targets and GHG reduction goals. A public facing dashboard that illustrates the effectiveness of Complete Streets in furthering the Mobility Master Plan and overall 2030 and 2035 CAP goals would be the basis of a fantastic public outreach tool.

We ask the City to review the Complete Streets Policy on a regular basis to ensure it has the intended effect of advancing the Mobility Master Plan. The current draft policy states: "This Complete Streets Policy shall be reviewed periodically in concert with the Mobility Master Plan, to assess its effectiveness, incorporate lessons learned, and adapt to emerging trends, best practices in street design and transportation planning, and any updates to the City's Climate Action Plan."

### *A Deeper Look at Policies*

The Complete Streets Policy will help inform the soon to be updated Street Design Manual. The update needs to be a public process that allows for public feedback prior to adoption of the Street Design Manual. Because the Street Design Manual will be the all-encompassing framework for designing the City's streets and public right of way, any policies that relate to the Street Design Manual need to fit well with the goals of the components that build the Street Design Manual, as well as the exterior goals set forth by the current CAP.

We recommend the City reviews and possibly updates an important current Council Policy listed in the current Street Design Manual, Council Policy 200-007, Marked Crosswalk Criteria at Uncontrolled Locations. This policy is dated June 11, 2015 and could use a review for congruence with new street design criteria. It is important that the new Complete Streets Policy and the updated Street Design Manual aren't hindered by antiquated warrants, crossing treatments, and requirements that make it difficult to implement needed infrastructure adjustments to create complete streets in the City. The City should also keep in mind the changes to State law as of January 1, 2024 in regards to speed control.

### *Conclusion*

With generations of street design focused on making automobiles the dominant method of travel, the public right of way has been largely in the domain of one method of transportation. Now, we know better than to continue making the same design mistakes. We know that to create vibrant, prosperous, and healthy communities, we need more human-based design that allows for more folks to flow at safe speeds within the same area. We can increase capacity, make streets safer, and meet our 2030 CAP targets if we have a strong Complete Streets Policy that allows for better utilization of the public right of way with clear rules for fair exceptions in the few cases where it is warranted.

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City of San Diego Complete Streets Council Policy. Current Draft 15 June 2023.

[https://sandiego.hylandcloud.com/211agendaonlinecomm/Documents/ViewDocument/Draft%20Complete%20Streets%20Policy\\_6-15-23\\_v2.docx.pdf?meetingId=5621&documentType=Agenda&itemId=222995&publishId=744203&isSection=false](https://sandiego.hylandcloud.com/211agendaonlinecomm/Documents/ViewDocument/Draft%20Complete%20Streets%20Policy_6-15-23_v2.docx.pdf?meetingId=5621&documentType=Agenda&itemId=222995&publishId=744203&isSection=false)

City of San Diego Council Policy 200-007: Marked Crosswalk Criteria at Uncontrolled Locations. 11 June 2015. [https://docs.sandiego.gov/councilpolicies/cpd\\_200-07.pdf](https://docs.sandiego.gov/councilpolicies/cpd_200-07.pdf)

City of San Diego Transportation & Storm Water Design Manuals. Street Design Manual. March 2017. [http://www.sandiego.gov/sites/default/files/street\\_design\\_manual\\_march\\_2017-final.pdf](http://www.sandiego.gov/sites/default/files/street_design_manual_march_2017-final.pdf)