

Re: Recommendations to Improve the Climate Action Plan Community Plan Update Evaluation Criteria (Item #7, May 24) - Quantitative Metrics and Modeling Needed

Dear Chair Moty and Members of the Community Planners Committee,

Thank you for reviewing and providing an opportunity to comment on the first draft of the Climate Action Plan (CAP) Conformance Evaluation for Community Plan Updates (“Checklist”). The undersigned organizations and individuals thank the Mayor, Planning Department and other City staff who helped develop the first iteration of the Checklist. This Checklist is a key facet of ensuring our Community Plans conform to the required goals of the CAP and has the potential to provide community members with neighborhood scale feedback on where and how the community needs to grow and develop to meet the CAP goals. Ultimately, we hope the Checklist will make it easier for Community Planning Groups (CPGs) to comply with the adopted Climate Action Plan.

The current draft of the Checklist to be presented by the City at your meeting does not provide the necessary clarity and certainty for CPGs, the public, or City staff. Using a qualitative and subjective approach, it fails to give the quantitative data needed to evaluate whether Community Plan Updates conform to the CAP goals, as well as where and how neighborhoods in Transit Priority Areas will evolve in order to be in compliance with the CAP mode share goals (i.e. mass transit mode share of 12% by 2020; walking commuter mode share of 4% by 2020; and bicycle commuter mode share of 6% by 2020 in Transit Priority Areas). Without this quantitative and neighborhood scale greenhouse gas (GHG) data, the public cannot have confidence and assurance that accommodations made in their Community Plan Updates will actually meet the CAP goals. Further, it potentially creates unnecessary divisions between neighbors living in the same community plan area. **Thus, we urge the City to include quantitative criteria and GHG modeling to assess conformance with the CAP, rather than the qualitative, subjective-based approach proposed.**

With the right quantitative and modeling modifications, the Checklist can be a tool for CPGs, community members, and City staff to proactively ensure Community Plan Updates are supporting the City’s CAP goals from the beginning of the planning process. It would be valuable for communities to understand the implications of various development and transportation scenarios and their associated GHG emissions so communities can effectively “own” and reduce their carbon footprint, as well as track how they are doing through the City’s annual monitoring CAP reports.

The good news is that a tool, developed in the public sector, exists to model each neighborhood’s carbon footprint for various development scenarios, to help communities find the right mix of land use, density, and transportation needed to meet the CAP goals through a common metric of GHG intensity. This Utility Spatial GHG Assessment Protocol tool can be used to model quantitative land use (i.e. utility building energy and water) and related GHG emissions through GIS mapping. Further refinements can be made to incorporate transportation-related information with SANDAG’s Activity Based Model (ABM) Series 13 that is currently in testing stages and being examined with the Mission Valley Community Plan Update. The ABM simulates individual and household transportation decisions that compose their daily travel itinerary. This could be a potentially innovative model that has been tested in practice in the San Francisco, Atlanta, and New York regions. Lastly, this protocol can be incorporated into future consultant work planned for CAP implementation and tracking.

CAC and other community organizations will be joining the City in closely evaluating conformance of upcoming CPUs with the CAP both in the actual plans and in the CEQA documents. A good example that already been accomplished by the City is the Draft Downtown Mobility Plan (April

2016), specifically on page 4, “The charts... serve to compare the forecast buildout mode share (2035) for the Downtown Mobility Plan to the 2035 CAP mode share targets for Transit Priority Areas. As shown, the forecast auto mode share for Downtown San Diego of 46% is closely aligned with the CAP auto mode share target of 50%. Additionally, the 43% forecast active transportation mode share for Downtown San Diego is much higher than the CAP Transit Priority Area target of 25%.” As this modeling approach is in its early stages, CAC believes that this similar analysis be incorporated within the current CEQA documents for the Community Plan Updates for Uptown, North Park, Golden Hill, etc.; although it is not our intention to slow down the update process in those communities. A possible route would be to ensure that the CPU EIRs incorporate the most recent ABM modeling.

In order to provide the clearest path forward for CPGs, the public, and the City, we urge you to join us in recommending:

“The City should revise their draft Checklist with more quantitative metrics and a clear modeling tool for development and planning scenarios.”

We hope to work proactively with the City and Community Planning Groups to ensure Community Plan Updates start off on the right foot with clear, quantitative guidelines and modeling that arms the community with the best tools and information possible. We look forward to continued dialogue so that we can work together to ensure the City meets the goals of the Climate Action Plan and protects our quality of life for children and the next generations to come.

Sincerely,

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<p>Sara Kent Programs Director Coastal Environmental Rights Foundation</p> 	<p>Dr. David Engel Chair STAY COOL for Grandkids</p> 
<p>Dr. Bruce Bekkar Physician</p>	<p>Joe LaCava LaCava Consulting</p>
<p>Jay Powell Environmental Advocate, City of San Diego Sustainable Energy Advisory Board</p>	<p>Gabriele Schubert Water Tech Alliance</p>