



September 20, 2016

Chairperson Stephen Haase and Planning Commissioners
City of San Diego Planning Commission
1222 First Ave, Fifth floor
San Diego, CA 92101
Via Email: planningcommission@sandiego.gov

Re: Item 8 (North Park Community Plan Update) & Item 9 (Golden Hill Community Plan Update)

Dear Chair Haase and Planning Commissioners,

Thank you for your thoughtful comments and delay of the decision on the San Ysidro Community Plan Update (CPU) last month in order to ensure we all have the information necessary to make a fully informed decision about the consistency and conformity of San Ysidro's 30-year plan for growth and development on the greenhouse gas (GHG) and land use/transportation goals of the Climate Action Plan. As was pointed out so elegantly by Commissioner Quiroz: "This is our first community plan update after the approval of the Climate Action Plan (CAP), and we need to get this right," Quiroz said. "We need to get this right so that we don't make a mockery of our Climate Action Plan...". As we have a cluster of other CPUs coming forward, it is critical that we set the right precedent for this analysis now.

As conveyed at the August Planning Commission hearing, the Climate Action Plan is essentially a math equation where we know the citywide GHG reductions we need to reach to comply with state law, and we have quantified reduction strategies to reach that 2035 target. One of the core strategies is land use and transportation, grouped together as one strategy because they are inextricably linked: Strategy 3: Bicycling, Walking, Transit & Land Use.

Under this strategy is where you will find the individual mode share goals for biking, walking and transit, as well as the decrease in average commuter miles traveled. The CAP relies on implementing a suite of policies and programs, including but not limited to the City of Villages and the Bike and Pedestrian Master Plans, to help it reach these quantified mode-share and Vehicle Miles Travelled (VMT) goals – which have a corresponding reduction in GHG emissions.¹

Since Community Plans are the long-term road maps for growth and development and implement (or not) the City of Villages and multi-modal mobility elements, the Community Plans are essential to the calculation of whether the City is on track to reach our long-term quantified GHG goals as well as the quantified land use and transportation targets for biking, walking, transit and reduction in commuter miles traveled. They all feed into each other and cannot be separated out.

¹ CAP, Technical Appendix, Page A-38.

Goal: Decrease Emissions Associated with Commuter Miles Traveled
Action 3.6 Reduction in Commute Miles

The CAP goals include decreasing the average commute distance. The city has set targets of decreasing the average round-trip commute from 25 miles in 2010 down to 23 miles in 2035, with efforts aimed at achieving the goal beginning in 2020. It is assumed that city planning efforts aimed at densifying the urban environment will result in a decreased average commute beyond those achievable through the mass transit, bicycle and pedestrian measures.

It seems obvious to say, but this analysis must be in the Environmental Impact Reports (EIRs) for each CPU. How else will the city and stakeholders assess whether we need to alter these documents to ensure consistency and conformance with the CAP's numeric targets for biking, walking, transit and land use? To not give the public that information is to subvert the purpose of CEQA and keep us all in the dark about the impact of each CPU on the goals of the CAP.

Good News?

The good news is that the City has decided to perform the analysis about the CPU's impact on mode-share and reduction in average commuter miles traveled. The not so good news is that the City has still not integrated this information into the EIRs for the CPUs, which is a critical analysis for determination of consistency with the CAP goals.

Results of CPU Mode-Share Analysis

Thus far, the mode-share analysis for North Park and Golden Hill have become publicly available. Both represent core urban neighborhoods close to employment centers. While we agree that not every CPU needs to reach the CAP bike, walk, transit and land use targets, it is imperative that on average the CPUs do reach these targets. In North Park, a little over 58% of the commuters in TPAs will still be driving in 2035, while in Golden Hill the number is at a high of over 68%. These are the best possible case scenarios, since -- for example -- North Park projects a tripling of transit commuters by 2035 though they don't have any new transit coming until at least 2035 (after CAP completed) ... and those projects aren't funded.

So, even under best possible case scenarios, neither have hit the 50% reduction target for mode share. The question then becomes, if these urban communities near job centers are not hitting the targets, which community planning updates in TPAs will hit the target or even do better than the target in order to ensure the average among the Community Plans pencils out? And, now that we know we have not yet hit the targets in these two CPUs after buildout, what solutions exist to change them so that they do? The city offers a vague list of possible ways to augment the reduction numbers, but many of those solutions are already embedded in the White Paper analysis (such as car sharing, pedestrian facilities, etc)...and none of them have been quantified or funded.

Potential to Undermine CAP Consistency Checklist for CEQA

Finally, adoption of CPUs that fail to implement and are inconsistent with the CAP would directly undermine the City's use of the CAP checklist for individual projects undergoing CEQA review. The first question on the CAP Consistency Checklist examines a proposed project's consistency with the existing Community Plan land use and zoning designations. So if a CPU fails to comply with CAP mode-share goals, and if the City approves projects based on consistency with that flawed CPU, the City will never meet its CAP goals. Reliance on the land use consistency component of the Checklist would result in potentially significant GHG impacts at an individual project-level.

Thank you again for your dedication and commitment to serving our City and ensuring we are protecting our quality of life for future generations. We look forward to having this discussion further during the North Park and Golden Hill CPU hearing on Thursday.

With respect,

A handwritten signature in black ink, appearing to read "Nicole Capretz". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Nicole Capretz,
Executive Director, Climate Action Campaign