



Susan Morrison, Environmental Planner  
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Via email: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

**Re: Project 453425 Midway-Pacific Highway and Old Town San Diego Community Plan Updates- Climate Action Campaign Comments**

Dear Ms. Morrison,

On behalf of Climate Action Campaign (CAC), please accept these scoping comments on the Midway-Pacific Highway and Old Town San Diego Community Plan Updates preparation of a Program Environmental Impact Report. CAC is a watchdog organization dedicated to stopping climate change and protecting San Diego's quality of life.

Our comments pertain primarily to ensuring the Plans and PEIR support and are consistent with the goals of state climate laws and the City's Climate Action Plan—which is likely to be adopted as city policy by the time the PEIR is complete—to reduce greenhouse gas emissions (GHGs), shift to 100% clean energy, increase and improve transit and mobility, eliminate waste, and increase tree coverage.

**Project Objectives**

CAC suggests the project objectives should include the following:

- Reduce greenhouse gas emissions consistent with and supportive of the goals of the City's Climate Action Plan and state climate laws, including Executive Orders B-30-15 (reduce GHG emissions by 40% below 1990 levels by the year 2035) and S-3-05 (reduce GHG emissions by 80% below 1990 levels by 2050).
- Support and achieve consistency with the goals of the City's Climate Action Plan to shift to 100% clean energy; increase and improve transit and mobility so 50% of commuters in transit priority areas will use alternative and active transit; increase tree coverage to 35%; eliminate waste; and support social equity and quality jobs.

**Greenhouse Gas Emissions**

The PEIR should analyze if the project would reduce greenhouse gas emissions consistent with and supportive of the goals of the City's Climate Action Plan (reduce GHGs 50% below 2010 levels by 2035) and state climate laws, including Executive Orders B-30-15 (reduce GHG emissions by 40% below 1990 levels by the year 2035) and S-3-05 (reduce GHG emissions by 80% below 1990 levels by 2050).

**Land Use and Transportation/Traffic**

The PEIR should analyze the project's consistency with the goals of the City's Climate Action Plan to increase and improve transit and mobility to achieve 50% of commuters in transit priority areas using alternative and active transit by 2035, as well as support social equity and quality jobs. Rather than outdated "level of service" measurements for car and truck traffic, success should be measured in terms of share of commuters using transit, walking and biking; improved access via alternative transit to jobs and other community needs; and reduced Vehicle Miles Travelled.

**Population and Housing**

The PEIR should analyze the project’s consistency with the Climate Action Plan’s goals for social equity and support for affordable, appropriately sited, transit-oriented housing to ensure that all San Diegans in transit-priority areas can access convenient, affordable, and safe transit, walking, and biking opportunities and that low-income populations will not be displaced.

**Biological Resources**

The PEIR should analyze the project’s consistency with the Climate Action Plan’s goals to increase urban tree coverage to 35%, in order to provide shading, reduce the need for energy-intensive cooling technologies, and sequester carbon dioxide. The PEIR should also analyze water needs and impacts associated with this.

**Human Health, Public Safety, Hazardous Materials**

The PEIR should analyze the potential impacts of rising sea levels and storm surge that may cause the project to disrupt human health, infrastructure, and public safety. The PEIR should also analyze the project’s ability to improve public safety and human health with safer active transportation infrastructure (bicycling and pedestrian facilities), reduced greenhouse gas pollution, and improved air quality.

**Public Services and Facilities**

The PEIR should analyze the adequacy of public facilities to serve as cooling locations for public access during heat events, which are expected to become more common as climate change becomes more pronounced.

**Energy**

The PEIR should analyze the project’s consistency with the goals of the Climate Action Plan to achieve 100% clean energy by 2035, support local solar, and improve energy efficiency and conservation.

Thank you for the opportunity to submit these comments. We look forward to working with the City further to ensure all Community Plan Updates moving forward support the Climate Action Plan.

Sincerely,



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