



September 17, 2018

Mayor Faulconer and Council
City of San Diego
202 C Street
San Diego, CA 92101

Re: Midway-Pacific Highway Community Plan Update

Dear Mayor Faulconer, Council President Cole, and Councilmembers:

While we are strongly supportive of the increased density included in the Midway-Pacific Community Plan Update and commend the community for saying yes to new housing, we are writing to express significant concerns with the mobility component of the plan, which fails to align with San Diego's Climate Action Plan (CAP) transportation targets.

In 2016, we called for quantitative analysis of CAP conformance for the North Park, Uptown, and Golden Hill Community Plan Updates. After months of advocacy, the city finally completed that analysis, which revealed that none of those plans would result in mode share aligned with the city's CAP targets. We expressed our concern at the time that we needed a roadmap to let us know where we needed more density and transit investments to reach the CAP targets. That was supposed to be in the Transportation Master Plan the city contracted out to develop in early 2017. We don't know what has happened to it since, but clearly the city has not received a roadmap, and we are closing in on the 2020 CAP goals. We further understand that the city was hoping to have "flexibility" in meeting their enforceable transit strategies, using ideas like Transportation Demand Management Policies. We are open to that, but nothing has been put on the table as we approach 2020.

We have continued to call for mode share analysis to be a part of the Community Planning process at the front end of the process, so that residents have the chance to take that analysis into consideration as they offer their input into the future of density mobility in their community.

Needless to say, it is disappointing that the mode share analysis for this plan will not be publicly available until minutes before public comment starts during the final hearing on this plan. To the best of our knowledge, the plan will lead drive-alone trips to decrease just two percent, from 91% of trips to 89%, coming nowhere near the 50% target set for 2035.¹ Vehicle miles traveled per capita will decrease, but the fact remains that the city is failing to shift trips from cars to biking, walking, and transit. The plan in fact *invites* new cars onto the road, by including 11 road widenings and five new roadway segments, rather than supporting a shift away from driving.

Further, this continued prioritization of driving is an issue of equity and economic justice. Those most impacted by the lack of viable non-car options are those who pay more than they can afford in order to drive, and those who depend on transit to get to work, school, and daily errands. Researchers at the Price School at the University of Southern California found that low-wage workers in San Diego who drive have

¹ Because mode share analysis is still not publicly available for this plan, we relied for these figures on information conveyed over the phone by the Planning Department on September 14, 2018.



access to 30 times as many jobs as those who rely on transit.² By moving forward with plans that heavily favor driving, the city is continuing to deny low-income San Diegans economic opportunity and is failing in its commitment to equity in the CAP.

Our overarching concern is that the city continues to fly blind on mobility. There is no comprehensive roadmap, no Transportation Master Plan, to meet the city's transportation targets, nor is the city conducting annual monitoring of mode share. Instead, we are left with a piecemeal approach — one Community Plan Update at a time — without knowing what mode shift it will take in each community to get the city to its overall targets.

This lack of a roadmap to the CAP mobility targets makes it virtually impossible to develop long-range fiscal plans to implement the CAP. Without those fiscal plans, infrastructure investments such as protected bike lanes that would increase bike/walk/transit mode share are continually delayed. And each year, the fact that the city is veering further and further off track from its mobility targets is obscured by the fact that we have no roadmap against which to measure.

Finally, the failure of this plan to achieve adequate mode shift toward biking, walking, and transit, points out how crucial it is for San Diego to take a leadership role at SANDAG to ensure the 2019 Regional Transportation Plan Update prioritizes transit and aligns with San Diego's mode share targets. This Community Plan Update includes a significant increase in density, which we welcome, but density without transit infrastructure does not result in mode shift. SANDAG's cooperation is essential in moving San Diego toward a transit-rich future.

This plan is going to serve this community for decades, so it needs to be done right. We ask that the Council delay the vote to figure out the bigger strategy to ensure that collectively, Community Plan Updates lead the city to its 2020 and 2035 CAP targets. Short of that, we need the Council to ask the Mayor's office today for a citywide plan to reach the CAP goals, so that *future* Community Plan Updates' mobility outcomes align with the city's CAP.

Sincerely,

A handwritten signature in cursive script that reads "Sophie Wolfram".

Sophie Wolfram
Director of Programs, Climate Action Campaign

² <https://priceschool.usc.edu/how-transit-affects-job-seekers-first-and-last-mile-to-the-station-make-all-the-difference/>