



June 28, 2023

City of San Diego Planning Commissioners
San Diego City Hall
2020 C Street San Diego, CA 92101
Via Email

Subject: Mayor and Council Must Make Blueprint San Diego a Required Framework for All CPUs to Reach our Climate, Equity and Housing Goals

City of San Diego Planning Commissioners,

Climate Action Campaign (CAC), is a non-profit organization based in San Diego and Orange County, CA with a simple mission: create a zero carbon future through effective and equitable policy action.

Everyone deserves access to high quality, sustainable, reliable, and affordable housing and transportation networks that are connected to good schools, family sustaining jobs, grocery stores, and parks. To take a holistic approach to solving the climate and housing crises, San Diego must prioritize this land use pattern.

Since our founding CAC has advocated for the exact strategic land use framework that Blueprint San Diego (SD) is claiming it will establish. This includes CAC being at the frontlines of advocating for Community Plan Updates (CPUs) that have unfortunately done little in helping the City achieve its climate and housing goals.

We urge the Mayor and Council to make Blueprint a required framework for all CPUs.

The city's current proposal allows Community Planning Groups to opt-out of this framework, which exacerbates and perpetuates the discriminatory and inequitable patterns of land use and transportation development, and ensures the city will never reach their housing, climate, equity, and transportation goals.

The city suggests that Blueprint is de facto required because it is a General Plan Amendment (GPA), but publicly states it is not a requirement. This confusing and "wink/nod" messaging breeds distrust and erodes confidence in the city as an honest broker. The community deserves clear and accurate information.

Here are more specific recommendations:

Center Equity in the Blueprint SD Environmental Impact Report (PEIR)

Equity should be integrated and centered in the implementation of every City land use and transportation policy and framework. Climate change hits hardest in communities of concern that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 4.0, helps identify California communities that are disproportionately burdened by multiple sources of pollution. The City also has a Climate Equity Index to identify low to moderate access to opportunity census tracts across the City for priority climate investments and Climate Equity Fund dollars.

We recommend that these tools be incorporated in the Blueprint SD PEIR.

Ensure Public Transparency in the Development of Blueprint SD

Since 2016, no CPU has been approved with mode share targets that comply with the overall CAP modeshift goals. More specifically, the City has failed to use the Golden Hill, North Park, San Ysidro, and Uptown CPUs as tools to implement the 2015 Climate Action Plan (CAP) Strategy 3: Bicycling, Walking, Transit & Land Use. Most recently, the City adopted a 2022 Mira Mesa CPU with modeshift targets that are inconsistent with the CAP update and will result in significant greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) impacts. The City cannot continue developing unnecessary plans that don't align CPUs with the CAP. Doing so will continue to significantly delay new transportation strategies from being deployed, putting San Diego farther behind on meeting its mobility targets.

Blueprint SD will use the best available data and revise the 2008 [Village Propensity Map](#) to determine the exact areas that have the greatest propensity for housing, population, transit, job centers, and other daily destinations. This is great news, and should provide a baseline for how and where future growth will be concentrated. The Blueprint SD framework will also supposedly "help meet the needs of our growing city while making progress towards our climate goals."

However, inexplicably, the city says that Blueprint SD will not be a requirement for new CPUs. City staff has informed CAC that because Blueprint SD is within the General Plan the framework is de facto mandatory, but in the same breath we've also been told by staff that the Blueprint EIR is anticipated to be a "jump off point" for future CPUs and there should be no reason why CPUs do not tier off the Blueprint SD EIR unless a specific CPUs potential housing and/or jobs capacity exceeds that of the Blueprint framework, requiring its own EIR.

If this is the case, why is the City continuing to publicly frame Blueprint SD as an opt-in framework?

How will the City guarantee that Blueprint SD complies with the City's CAP goals and RHNA targets if there is no clear direction on if future CPUs will be required to use the framework in

determining the needed transportation infrastructure, and housing and job capacity for specific areas? Public transparency is essential for our communities to understand the intent and implementation of Blueprint SD.

Framing Blueprint SD as a voluntary framework while simultaneously saying that all future CPUs will tier off the Blueprint EIR is confusing and erodes public trust. Our communities deserve transparency and honesty to provide clear feedback on the policies that have a direct affect on their quality of life.

We are concerned that if Blueprint is not required for future CPUs it will be just another well-intentioned framework that does not result in any substantial or crucial action.

Clearly Incorporate the Mobility Master Plan Into the Blueprint SD Framework

The Blueprint SD framework takes into consideration the latest regional transportation network, but not the City's own Mobility Master Plan (MMP), which is said to be "comprehensive transportation planning effort to create a balanced, equitable, and sustainable transportation system for the City of San Diego."

In 2021, CAC published a report called [Missing the Mark](#) which summarized that while SANDAG's 2021 Regional Plan will provide meaningful progress towards achieving the 2015 CAP modeshift targets, the City and other government agencies must take significant additional action beyond relying on the regional plan to actually meet and exceed the CAP goals. The 2022 CAP goal of 50% modeshift for walking, biking, and transit city-wide by 2035 is a more robust goal than the 2015 CAP modeshift goal, meaning that the City must take even greater steps beyond depending on the regional plan in order to achieve its modeshift goals.

Therefore, we recommend that the next iteration of Blueprint SD clearly intersect with the MMP. This will ensure that the Blueprint SD framework considers future mobility initiatives that support investments in Communities of Concern, promote Vision Zero, and advance the goals of the CAP. Without incorporating the MMP into the Blueprint SD framework the City will not have the most up to date and accurate data for determining areas that have the greatest propensity for transportation infrastructure and housing development.

Set Specific Mode Share Targets for each CPU

Vehicles are the single largest source of greenhouse gas (GHG) emissions in San Diego and more than two-thirds of smog-forming emissions in San Diego County are generated from mobile sources.¹ Dense, affordable housing near transportation and employment is a key strategy to eliciting changes in modeshift, slashing GHG emissions from the transportation sector, and improving air quality.

¹ https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf (pg. 55)

Blueprint SD must align with the city-wide 50% modeshift goal for walking, biking, and transit by 2035 to comply with the CAP. A key strategy to achieve this travel behavior is the adoption of CPUs that prioritize equitable, dense, and affordable housing near transit and jobs centers. As long range planning documents that serve as frameworks for the future development of San Diego communities over the next 20 to 30 years, it is imperative that the city ensure future CPU's set aggressive and specific mode shift targets for walking, biking, and transit, and include strategies to meet them in alignment with the CAP goals.

It is evident that the City will not meet its CAP modeshift goals if each CPU fails to adopt and meet its own. Blueprint SD must guarantee that CPU's integrate MTS programs, SANDAG's Regional Plan, and the MMP to clearly show how the intersection of these plans and policies will help the City meet its CAP modeshift goals within CPUs.

Conclusion

Thank you for the opportunity to weigh in on the development of this critically important document. Blueprint SD presents an opportunity to help protect the health and safety of future generations from the worst impacts of climate change, as well as provide the zoning and certainty developers need to facilitate more infill housing development. We urge the City to incorporate the recommendations above to maximize emissions reductions, and deliver economic, safety, and health benefits to our communities.

Sincerely,

Madison Coleman
Policy Advocate
Climate Action Campaign