September 29, 2015

Ms. Rebecca Malone
City of San Diego Planning Department
1222 First Avenue, MS 501
San Diego, CA 92101

RE: San Diego Climate Action Plan Draft PEIR Comments

Dear Ms. Malone,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, we are pleased to submit these comments on the City of San Diego’s Climate Action Plan (CAP) Draft Programmatic Environmental Impact Report (PEIR). Circulate San Diego is a regional non-profit organization dedicated to creating great mobility choices, more walkable and bikeable neighborhoods, and land uses that promote sustainable growth.

We support the CAP’s legally-binding greenhouse gas reduction targets. In committing to and meeting these targets, the City will be doing its part in helping the state meet its 2020, 2030, and 2050 targets and be a leading example of addressing climate change regionally, statewide, and nationally. Further, actions required to meet the targets build on a foundation of policies and programs already in place.

Based on our review of the EIR document, we would like to offer the following recommendations.

1. Develop a 1-Year Implementation Plan. To ensure success of the Plan, implementation steps should be outlined. These steps can be outlined for the first year, specifically, to launch key strategies of the Plan and help budget necessary resources.

An example of budgeting needs includes, but is not limited to, infrastructure improvements needed to implement the Bicycle and Pedestrian Master Plans. Specifically, we recommend a share of transportation funds to match the CAP’s proposed mode-share goals and the expenditure of these funds in areas where traffic collisions have been concentrated, namely disadvantaged neighborhoods, as outlined in the Vision Zero Resolution adopted by the Infrastructure Committee September 16, 2015.

Other exemplary budgeting needs could include tree planting sufficient to implement the Urban Forest Management Plan and 2020 goals.
2. **Coordinate Final Review of Pending Community Plan Updates with Final Review of Climate Action Plan.** Several community plan updates are currently underway or in the pipeline. These plans are key to implementing the Climate Action Plan. In addition to the CAP Consistency Checklist (Appendix A) developed for proposed development projects, the City should provide a CAP Consistency Checklist for Community Plan Updates to ensure these updates implement the CAP at the neighborhood scale, prior to Council adoption of the relevant community plan update. The City of San Diego should also publish or attach these checklists as backups to docket items on City Council agenda items. Success metrics should include reduction of Vehicle Miles Travelled (VMT) and improvement of air quality. **Regional Transportation Planning and Funding – Leverage City Position at SANDAG.** We support the mode-shift goals outlined in the CAP and believe these targets are achievable through appropriate expenditures, policies, programs and actions. As we have recently described in our report “*New Climate for Transportation,*” the City of San Diego should use its influence on the SANDAG Board to accelerate and increase transit, walking and bicycling infrastructure expenditures to benefit San Diego residents and help achieve GHG reduction goals. Specifically, SANDAG’s Plan projects 15% of San Diegans would use alternate transportation by 2035 compared to the City’s projection of 50%.

3. **Regional Transportation Planning and Funding – Leverage City Position at SANDAG.** We support the mode-shift goals outlined in the CAP and believe these targets are achievable through appropriate expenditures, policies, programs and actions. As we have recently described in our report “*New Climate for Transportation,*” the City of San Diego should use its influence on the SANDAG Board to accelerate and increase transit, walking and bicycling infrastructure expenditures to benefit San Diego residents and help achieve GHG reduction goals. Specifically, SANDAG’s Plan projects 15% of San Diegans would use alternate transportation by 2035 compared to the City’s projection of 50%.

4. **Integrate Language on Social Equity into Goals, Targets and Actions in Chapter 3.** The Bicycling, Walking, Transit and Land Use strategy has many opportunities to focus resources where they are needed most to not only achieve GHG reductions but also community health and safety. As commented in the CAP Scoping Plan, we support the prioritization of related actions in disadvantaged neighborhoods ranked in the top 25 percent of CalEnviroScreen’s ranking for the San Diego region. Some examples include:

- Facilitate and support Transit Oriented Development throughout the City, starting in neighborhoods that are most impacted by climate change, as identified in the CalEnviroScreen.
- Improve bicycling and pedestrian infrastructure throughout the City and increase access to transit, starting in neighborhoods that are most impacted by climate change, as identified in the CalEnviroScreen.

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• Improve bicycle and pedestrian infrastructure around the City’s most dangerous corridors. The neighborhoods most affected by climate change broadly overlap the neighborhoods where a substantial portion of traffic injuries and death occur.

5. Include SB743 in Section F – Transportation and Circulation, Regulatory Setting, State. SB743 is relevant to the CAP as it creates a process to change the way transportation impacts are analyzed under CEQA. The Governor’s Office of Planning and Research has issued its draft set of guidelines to establish VMT reduction as an alternate way to measure transportation impacts. The draft guidelines criticize the use of vehicular Level of Service as forcing more road construction, minimizing transit use, and endangering bicyclists and

Include VMT Reduction in Section F.4 – Impacts for Mitigation Measures, Significance Criteria (P.3.F-12). Following the suggestion above, please include the reduction of VMT as part of these criteria, specifically, ‘Result in a reduction of VMT’.

Thank you for the opportunity to comment on this important plan. We look forward to working with the City to implement the Climate Action Plan strategies.

Sincerely,

Kathleen Ferrier, AICP
Director of Advocacy