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September 1, 2016

Jeff Murphy  
San Diego Planning Department  
1010 Second Ave., Suite 1200  
East Tower, M.S. 413  
San Diego, CA 92101

**Re: Recommendations to Improve the Climate Action Plan Community Plan Update Evaluation Checklist**

Dear Mr. Murphy,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide feedback and suggestions for evaluating proposed community plan updates for consistency with the City of San Diego's Climate Action Plan.

I want to first thank you and your staff for presenting the initial draft Climate Action Plan (CAP) Conformance Evaluation for Community Plan Updates ("checklist") at the May 6, 2016 meeting of the CAP working group, where I am a member. Circulate San Diego appreciates the hard work from the Mayor, Planning Department and other City staff that helped develop the first iteration of the checklist. We advocated earlier for such a document,<sup>1</sup> and we are glad that it is a part of the City's plans. We are also grateful that staff presented sample completed checklists, to help illustrate how recent community plan updates would have measured according to the new standard proposed by the City.

This checklist is an important tool to evaluate the effectiveness of community plan updates to meet the goals for the CAP. We believe that a properly formulated checklist will make it easier for community plans to implement the Climate Action Plan.

**A. Circulate San Diego recommends the below adjustments to the City's proposed CAP checklist.**

After reviewing the checklist and the sample completed checklists, Circulate San Diego would like to suggest some changes to the document, to assist the city in ensuring successful implementation of the CAP. Our suggestions are listed below, and a version of the draft checklist presented on May 6 is attached to this letter, with proposed edits reflecting the recommendations below.

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<sup>1</sup> Circulate San Diego, Policy Letter: Initial Letter to CAP Implementation Working Group (March 17, 2016), available at [http://www.circulatesd.org/policy\\_letter\\_initial\\_letter\\_to\\_cap\\_implementation\\_working\\_group](http://www.circulatesd.org/policy_letter_initial_letter_to_cap_implementation_working_group).

1. To be consistent with the City’s Vision Zero commitment to eliminate serious traffic injuries and fatalities, the mobility elements of community plan updates should remove planned road widening, including for projects already in design, or the checklist should analyze if and why any planned road widening should be kept in the plans.
2. The checklist should examine both residential and commercial capacity in Transit Priority Areas (TPAs). Residential DU/Acre is the appropriate measure for residential, but FAR capacity should also be analyzed for jobs near transit. The checklist should also compare current capacity to updated capacity.
3. Capacity for new development is necessary, but insufficient. The checklist should analyze the non-density barriers to development, and show how the updated plans will make the added capacity feasible. The checklist should examine:
  - a. Height limits
  - b. FAR restrictions
  - c. Setback requirements
  - d. Process level required to achieve both density and overall entitlement
  - e. Other development restrictions
4. The checklist should examine whether the plan provides for achieving maximum community plan residential and employment capacities in TPAs.
5. For sections of community plans in TPAs, but for which lower parking requirements are not made available, the checklist should identify this and explain why no parking relief is offered.
6. The checklist does not specifically mention pedestrian safety, but rather talks about “pedestrian supportive design.” Circulate San Diego suggests to add text to examine support for pedestrian and bicycle safety improvements and the City of San Diego’s adopted Vision Zero goals.

**B. Circulate San Diego recommends performing quantitative analyses on proposed community plan updates to demonstrate the expected mode share outcomes from those plans.**

The City of San Diego should integrate a comprehensive quantitative analysis into the checklist to review capacity of proposed zoning, land use changes, and infrastructure improvements to achieve the mode share goals in the CAP. Specifically, the City should expand use of SANDAG's regional travel demand model to review and quantify the impact of proposed land use changes on mode share goals. Further, the City should include the same level of rigor and analysis for all community plan updates that occur after the CAP was adopted, including those that are currently in draft.

We understand that the Climate Action Plan calls for aggregate mode share outcomes in TPAs throughout the City, not for every specific TPA, or for every community plan. Individual TPAs could have mode shares that were above or below the CAP’s mode share goals, so long as the aggregate goals are

met across TPAs in the City. It is possible that an individual community plan update could be adopted with expected mode share outcomes less than what is called for by the CAP's city-wide goals. Nonetheless, a comprehensive quantitative analysis will be an important data point for decisionmakers to determine whether those updates are advancing or impeding CAP goals.

**C. Conclusion:**

Ensuring that San Diego's land use decisions are consistent with the Climate Action Plan is a vital component of San Diego's greenhouse gas reduction strategy. Circulate San Diego appreciates the City's work on developing a checklist for community plan consistency with the CAP. Our recommendations related to the checklist will help the City meet its goals, and avoid controversy about consistency in the future.

Sincerely,

A handwritten signature in blue ink that reads "Colin Parent". The signature is written in a cursive, flowing style.

Colin Parent  
Policy Counsel, Circulate San Diego

Cc:

Mayor Kevin Faulconer

Members of the City Council of San Diego

Mike Hansen