

Community Planners Committee
Blueprint SD Responses – Executive Summary

Revised 4-22-24

Executive Summary

This document provides the responses of the Community Planners Committee to Blueprint SD, which is an update to San Diego's General Plan. This section summarizes the responses to each of the elements in Blueprint SD, followed by sections that detail each element.

Land Use and Community Planning Element

Proper planning starts with transparent and realistic estimates of San Diego's future population growth and housing needs. The most recent and authoritative forecast (SANDAG Series 15) projects that the City of San Diego will increase in population by only 65,345 (4.8%) residents between 2022 and 2050. Despite these projections, which reflect statewide, national, and global trends, San Diego continues to plan for unlimited future growth based on outdated data.

Allowed density must be appropriately scoped to the expected buildout of communities. Unnecessary overzoning drives up land prices and rents. As summarized by Patrick Condon, author of *Sick City*, "No amount of opening zoning or allowing for development will cause prices to go down. We've seen no evidence of that at all."

Realistic estimates of future housing allow planners to properly define the future shape of the City, including where to concentrate development, and what the height and density of neighborhoods should be.

Blueprint SD's stated goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to advances in personal mobility options and the anticipated future availability of micromobility and eventually autonomous vehicles, which de-prioritize fixed-route connectivity between villages and instead allow each village to be considered on its own local merits. Further, transition to electric vehicles will take place much more quickly than build out of fixed route transportation networks.

Blueprint SD identifies City of Villages as taking advantage of natural environment and job centers. This is not supported by reliable data. For example, Mission Valley is a huge physical impediment to mobility and access to employment centers in the northern half of the city. Further, San Diego's distributed job centers and overall low population density make it unrealistic to create an effective transit network that can replace point-to-point commutes for most San Diegans.

Overly large Sustainable Development Areas (SDAs) push development away from village centers. Development should be concentrated along transit corridors to create destinations that are walkable, livable spaces, with commercial, entertainment, and residential opportunities.

Development should be prioritized towards existing transit, not future transit (as far out as 2050) that with expected funding constraints may never be built.

Much of San Diego's planning overemphasizes transit access to downtown. Current planning needs to reflect that over time development has spread out, based on automobile suburbs and freeway access to widely distributed (polycentric) job centers. The Village Propensity Map reflects these outdated assumptions of transit and economic opportunity.

Mobility Element

Transit usage depends on high population density to support the concentration of activities at transit destinations that make transit usage convenient and efficient. Because the population of San Diego is so spread out, there is no amount of service that will turn most of San Diego's drivers into riders. San Diego's transit-oriented development plans can only succeed by concentrating development around high quality transit lines, particularly adjacent to trolley lines.

Automobile suburbs – most of San Diego – will remain automobile suburbs, particularly if new development is randomly spread around the city instead of intentionally concentrated near high-quality transit that has convenient and competitive access to job centers.

The Village Propensity Map for south of I-8 communities is based on long outdated transit patterns that took residents in the 1930s and 1940s to the primary job centers of downtown and Midway. Further, the model used to create the map presumes that everyone that lives near transit will take transit. The model then simulates that behavior without accounting for how residents will be motivated to give up automobiles and instead use a transit system that is largely rigid, impractical, inconvenient transit. The rolling hills and interconnected canyons which are characteristic of San Diego makes transportation via the automobile a “must” for the vast majority of San Diego families and the City's aging population.

Urban Design Element

A thoughtful, comprehensive, and self-adapting Urban Design element is necessary to clearly define spatial relationships between buildings and surrounding land uses. It is critical to guide future growth that is not only compatible with its surrounding buildings and the public realm, but complements the implementation of the desired densities identified in Blueprint SD.

Bonus density incentives, particularly Complete Communities Housing Solutions, override deliberate planning without considerations of the local conditions of the project. To mitigate these effects and set proper expectations for both developers and residents, San Diego should consider form-based codes that ensure good outcomes, including angle planes (relative both to neighboring buildings and street widths, with 45 degrees being the preferred angle), setbacks, objective design standards, floor area ratios (FARs), and other public-facing aspects of the development.

Historic preservation should be rightfully considered as form-based code that naturally provides compatibility with neighboring buildings. Historic preservation is also a key method for achieving the City of Villages' place-making goals. Other benefits are that it reduces construction waste (25% of San Diego's landfill) and supports higher paying construction jobs.

The City has been moving towards allowing as many projects as possible to be processed ministerially. Ministerial projects have no requirement for public notice, no public hearings, no right of appeal, and no requirement to follow Community Plans. Further, ministerial approvals give Development Services full authority to interpret ambiguous land development codes without public or Council input. Blueprint SD should include policies to require discretionary processing for projects that exceed certain density or size thresholds.

Economic Prosperity Element

Blueprint SD correctly identifies that economic growth and opportunity is unevenly distributed across San Diego, but presents no concrete, actionable proposals for how to address this. There needs to be a plan for economic development in south of I-8 communities.

The areas south of I-8, and other low resource areas, need to become economically balanced with the rest of the city. Development in these areas needs to focus on building moderate and market rate housing and employment areas to draw up the average incomes in the areas. Concentration on improvements in education is also needed in these areas.

Low income housing added to these areas will compound inequity problems, including low economic opportunity, low education, lack of recreation opportunities, lack of grocery stores, pharmacies, healthcare facilities.

For the envisioned balanced villages, development in the high resource areas needs to meet the city's target of a minimum of 10% onsite inclusionary housing, so people with low incomes are able to live near where they work, get better educations and have amenities available in close proximity to their homes.

Public Facilities, Services and Safety Element

The City should re-commit to providing adequate public facilities concurrent with development. Given that San Diego has reduced or eliminated fees on much of its development, it is unclear where the city will get funding for these public facilities.

San Diego should not be promoting development in high fire hazard zones, as it does with the Bonus Accessory Dwelling Unit program and Complete Communities Housing Solutions.

When community plan updates occur, include an analysis of Land Value Capture, as a way to provide revenue for needed public facilities and community benefits.

Recreation Element

The lower fees in the Parks Master Plan mean that there is less funding for parks overall. Almost every community in San Diego is park-deficient and there isn't a clear plan to catch up. Recent community plan updates can't even meet the much lower bar set by the Parks Master Plan and its controversial points system. Clearly, we need new strategies for reaching our park goals.

The City should continue to prioritize converting surplus city-owned land in park-deficient communities into parks. Otherwise, because the City has eliminated its Planned District Ordinances (PDOs) that required developers to provide onsite outdoor space, the only choice the city has is to purchase land from private owners at prices inflated by the City's own actions.

Conservation Element

The vast majority of San Diego's residents rely on automobiles for daily activities. To change transportation choices, San Diego needs to intentionally focus density onto commercial and transit corridors rather than spreading it into San Diego's existing automobile-dependent suburbs.

One-quarter of all landfill in San Diego is construction waste. San Diego should be reducing this waste through adaptive reuse.

Heat island effects are increased by infill development that clear-cuts urban canopy. We should be planting more trees and not removing the ones we have.

San Diego's conservation efforts are undermined by land use policies, including Complete Communities Housing Solutions, Bonus ADUs, and SB 9, that are highly preferential to dense development along canyon and mesa rims in Very High Fire Hazard Severity Zones.

San Diego is being overconfident about its water-sufficiency. San Diego needs a contingency plan whereby if external water supplies are reduced or disrupted, San Diego can rely on reservoirs, Pure Water recycling, and desalinization. As was demonstrated by the recent flooding, as we lose permeable surfaces to infill development, we will experience more runoff flooding homes and going into sewers rather than being absorbed into the ground.

Noise Element

In order to reduce noise along transit and mixed-use corridors, design elements should include provisions for noise abatement, including adequate angle planes and setbacks to disperse ground noises.

Glossary

Given their relevance to the Land Use, Mobility, and Economic Prosperity Elements of Blueprint SD, the assumptions of Climate Equity Index (<https://www.sandiego.gov/climateequity>) should be reexamined to justify whether the Climate Equity Index is being properly calculated and truly assesses the circumstances of San Diego neighborhoods. This is particularly true with regard to the overweighting of archaic transit routes in south of I-8 communities, which do not take residents to high-quality job centers.

Regarding the definition of "Structurally Excluded Community," a key structure of exclusion in San Diego is the overextension of Sustainable Development Areas (SDAs) and Transit Priority Areas (TPAs) as applied to the south of I-8 communities that constitute the areas of greatest needs. This results from the unwarranted extent of the SDA (up to 1 mile from transit), inclusion of future transit stops instead of limiting to existing transit, and failure to recognize that the transit routes in these areas are vestiges of the mid-1900s when downtown was the major job center for the city, and therefore do not meet the outcome-based standards of high-quality transit.