

Community Planners Committee

Blueprint SD Responses

Revised 4-22-24

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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 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which reflect statewide, national, and global trends, San Diego continues to plan for unlimited future growth based on outdated data.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SD's stated goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to advances in personal mobility options and the anticipated future availability of micromobility and eventually autonomous vehicles, which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.

Land Use and Community Planning Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

Proper planning needs to start 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. In particular, the Draft Blueprint San Diego relies on 2019 Series 14 forecast projections, and the Series 15 forecast cited above is substantially less than the previous projection.

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) pushed development away from village centers. Instead, development should be concentrated to create destinations along transit corridors 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. Dispersion of development (via Sustainable Development Areas that define transit-oriented development as any part of the city that is within an unrealistic one-mile walking distance to transit lines) undermines the City's Climate Action Plan.

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.

Coupling overly dense zoning with the removal of parking produces a spike and sprawl pattern of development whereby scattered highrises are surrounded by zones of exclusion between projects, which must be far enough away to similarly absorb on-street parking. Finally, disconnected development hinders the creation of coherent commercial districts that would promote walkability.

San Diego's zoned housing capacity is dwarfed by its bonus incentives in commercial/multi-family and single-family zones. Because these bonus programs override community plans, the resulting developments create infill sprawl by pushing development away from transit and separating activities.

The excessive zoning overrides in Complete Communities Housing Solutions also confound the community plan update process because CCHS targets lower density zones that are intended for transitions between dense transit-oriented development and lower-density residential.

The misconstruction of the SDA drives two negative outcomes: first, turning single-family neighborhoods into de facto multi-family zones via Bonus ADUs and the proposed SB 10 implementation allows opportunistic investors to crowd out would-be homeowners; and second, diffusing development across an overly broad SDA inhibits the creation of neighborhood-centering density that is essential to the success of City of Villages, both for neighborhood economic development and for transit efficiency and connectivity.

DETAILED COMMENTS

p. LU-6 – LU-8 Tables LU-1 – LU-3 (revised)

Calling out the acreage for residential misleads that these areas should be prioritized for development. Given that we are only adding 200,000 people between now and 2050, we only need to put these people on 1,000 acres to be above the critical density threshold for transit adoption. Note that Table LU-3 identifies 3,600 acres of vacant land, some of which could be used to meet housing needs without landfilling existing structures.

p. LU-8 Goals

Added goals are good, but the carryover goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to expected adoption of electric and 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.

p. LU-8 A. City of Villages Strategy

The goal of “Mixed-use villages located throughout the city that are connected by high-quality transit” should be based on Proximity/Time to the nearest major employment center should be a component of the definition of high-quality transit.

Discussion (added) [NOTE: citations from the Blueprint SD draft are highlighted in blue throughout this annotated critique of the plan.]

The city strives to be a leader in sustainability and proactively address the challenges presented by climate change. Much of the city is shaped by homes located far away from places of work, school, and other daily needs. This pattern has resulted in significant traffic congestion and harmful pollutants, or greenhouse gas emissions, that worsen our environment and air quality. The limited availability of homes to serve the needs of the city’s diverse population has further worsened emissions by creating long distances and lengthy travel times to daily destinations. Due to the limited availability of developable vacant land, infill and redevelopment must play an increasing role in providing homes and jobs to support the city’s future growth.

Identifies City of Villages as taking advantage of natural environment and job centers, but Mission Valley is a huge impediment to mobility and economic opportunity. Further, San Diego’s polycentric 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) mean that development is pushed away from village center. The plan needs to focus more on walkability rather than adding more ways to get somewhere else.

Much of San Diego’s planning is stuck in a 1940s mindset that prioritizes transit access to downtown rather than recognizing that San Diego’s post-WW II development was based on automobile suburbs and freeway access to widely distributed (polycentric) job centers.

This shift in mobility was accompanied by a shift in housing and employment to the north of Mission Valley.

p. LU-8 Village Types

Blueprint SD proposes a revised set of Village Types:

Downtown (p. LU-11) – continues to be overweighted in San Diego’s planning, especially as the imagined economic and cultural center of San Diego.

Subregional Employment Areas (p. LU-11) – Mid-city is not a regional employment area, yet is mistakenly accentuated in the propensity map because of vestigial transit to employment that no longer exists downtown.

Urban Village Centers (p. LU-12) – Despite being centrally located via freeway and trolley access, Mission Valley remains underzoned, including CCHS FAR allowance.

Community and Neighborhood Village Centers (p. LU-13) – These should be central element of CPUs instead of the afterthought that they have been, particularly as CPUs move to underserved communities that could substantially benefit from revitalization. CPUs lack any substantial consideration of economic development and prosperity, small business or otherwise.

Transit Corridors (p. LU-14) – This added definition states that:

[Transit Corridors - The city contains a significant number of linear commercial areas that are lively and vital, pedestrian-friendly, and home to a rich variety of small businesses, restaurants, and homes. They are located along streets and major roads and are served by higher speed and more frequent transit service. These Transit Corridors provide valuable new home opportunities with fewer impacts to the regional freeway system because of their available transit service.](#)

The propensity map contradicts the statement that “These Transit Corridors provide valuable new home opportunities with fewer impacts to the regional freeway system” particularly as it relates to the overweighting of Mid-City. Housing in Mid-City lacks viable high-volume public transportation to take residents across Mission Valley to employment centers in Kearney Mesa, University/Sorrento Mesa, Rancho Bernardo, or elsewhere. The transit system in Mid-City is designed to take residents downtown, and that’s it.

San Diego should focus intensity on its transit corridors by shrinking SDAs to walkable distances to existing transit. Development should create destination nodes within corridors that are more walkable, livable spaces, with commercial, entertainment, and residential opportunities.

Figure LU-1 Village Propensity Map (p. LU-17)

The Village Propensity model has a number of flaws in its application to Mid-City, including:

- The east-west transit lines on El Cajon Boulevard and University Avenue are oriented to the mid-1900s, when Downtown was the primary employment center. This transit does not effectively get residents to employment, shopping, recreation, and other areas north of I-8.
- Not only does it fail to consider the profound topographic barrier of Mission Valley, it also fails to understand how the topography of Mid-City itself inhibits walkable village centers.
- The Economic Development Element does not propose any meaningful economic development for Mid-City, which will perpetuate its circumstance as a commuter suburb of San Diego, with detrimental effects to air quality and VMT.
- The 2050 regional plan is unrealistic in its projections for San Diego’s population growth and available funding for a major buildout of the transportation system.

San Diego would do better to concentrate future development around existing transit, especially existing trolley lines. In other areas it makes sense to create community centers that provide local, walkable destinations for residents. In this regard, the plan should distinguish planning for different mobility modes instead of citing the all-inclusive language of “convenient and affordable opportunities to walk/roll, bike and ride transit.” Each of these modes serves a different need of residents, and effective planning needs to account for when these needs conflict and require compromises.

There are several patterns that emerge from the Village Propensity Map:

- Downtown –while its importance as a job center has waned with passing decades, this has been counter-balanced by the transformation of downtown into a major entertainment and residential center.
- Tech/Life Sciences job centers – the biggest locus is UTC (which also captures UCSD), and also extends less intensely across Mira Mesa Blvd., with an uptick in intensity around the I-15 junction.
- Tourism/Lifestyle – commercial and multi-family corridors from I-5 to the ocean in Pacific Beach and the Midway district through Ocean Beach
- Barrio Logan – combination of direct access to downtown employment and local industrial uses, which provide higher paying jobs but with environmental concerns.
- Mid-City – this is based on “high-quality” transit; however, most of the transit routes are vestiges of the mid-1900s when downtown San Diego was still the dominant job center in San Diego. As job patterns have changed, mid-city and southeast San Diego have been left behind, making these opportunity deserts.

Policies (p. LU-18) ADDED

LU-A.1. Designate a hierarchy of village sites for citywide implementation that promotes a sustainable land use pattern and progress towards climate goals and greenhouse gas emission reductions identified in the Climate Action Plan.

c. Designate Urban Village Centers that cluster more intensive employment, residential, and regional and subregional commercial uses in order to maximize walkability, support transit, and promote the vitality of broader Subregional Employment Areas and the city.

This hierarchy needs to emphasize creating compact development near viable transit that provides access to high-quality job centers. It is unrealistic to plan to densify the entire city.

p. LU-19 ADDED

LU-A.7. Consider higher densities/intensities in village areas to support the production of new homes that are affordable to people of all incomes.

Density must be appropriately scoped to the expected buildout of the community. Overzoning unnecessarily drives up land prices and hence resulting rents. Coupling overzoning with unrealistic removing of parking requirements creates a highrise surrounded by a zone of exclusion to the next project, which must be far enough away to similarly absorb on-street parking. Finally, disconnected development hinders the creation of coherent commercial districts that would promote walkability.

p. LU-20

LU-A.8 ADDED

d. Evaluate the quality of existing public facilities and the potential to expand these facilities to support future growth.

e. Engage public agencies for facility planning efforts (refer to Public Facilities, Services and Safety Element).

Current policies that minimize or eliminate development fees ensure that there will be insufficient revenue to meet these goals.

LU-A.11. Robust policies for historic preservation and adaptive reuse are necessary to maintain or enhance Main Street character.

Previous LU-A.11 DELETED

~~LU A.11. Design and evaluate mixed-use village projects based on the design goals and policies contained in the Urban Design Element.~~

Objective design standards should be considered a critical part of San Diego's planning rather than an inconvenience to developers that should be gotten rid of.

LU-21 B. General Plan Land Use Categories (AMENDED)

Goals

- Land use categories and designations consistent with City of Villages strategy.
- Land use categories and designations that ~~remain consistent with~~ provide consistency between the General Plan ~~Land Use Categories as~~, community plans ~~are updated and/or amended~~, and the City's climate goals set forth in the Climate Action Plan.

San Diego's zoned housing capacity is dwarfed by its bonus incentives in commercial/multi-family and single-family zones. Because these bonus programs override community plans, the resulting developments create infill sprawl by pushing development away from transit and separating activities.

p. LU-22 Policies

Rather than relying on densities (du/acre), the city should define buildings by height limits, angle planes, floor area ratios, setbacks, and other form-based codes. This would give developers the flexibility to meet local community needs consistent with the scale of the surrounding buildings.

p. LU-46 Land Use Plan Amendment Policies

Add policy that Community Plan Updates (CPUs) should be zoned to no more than a 2x ratio of target density. Successful Transit Oriented Development (TOD) requires horizontal development along transit corridors, not isolated residential towers that can't provide enough ground floor retail and other activities to meet residents' daily needs.

Given that Blueprint SD introduces new extremely high density zones (218 du/acre and 290 du/acre), it is important that these only be deployed where they match the expectations for future growth.

p. LU-58

strengthen language to Affirmatively Further Fair Housing by adding underlined language to the second paragraph:

"An important program that supports the development of affordable housing across the city is the Inclusionary Housing Ordinance (adopted in 2003 and amended in 2022). The Inclusionary Housing Ordinance requires all new residential developments of five units or more within the Coastal Overlay Zone and ten units or more outside of the Coastal Overlay Zone to provide affordable housing through a variety of methods. The required affordable homes are either provided on the same site as the market-rate units, on a different site within the same community planning area, or through developer payment of in-lieu fees which are deposited into the Affordable Housing Trust Fund. Affordable developments derived from developer payment of in-lieu fees must be built only in tracts identified as high resource or highest resource areas for the year in which they are approved by the city in accordance with the California Tax Credit Allocation Committee and the California Department of Housing and Community Development (CTCAC/HCD) Opportunity Map ensuring the city meets AFFH goals. No affordable developments derived from payment of in-lieu fees deposited into the Affordable Housing Trust Fund may be used to construct any new affordable units in low resource, moderate resource, or high poverty & segregated areas as defined by the CTCAC/HCD Opportunity Map."

Note the following reflection from Dr. Matthew Desmond, from his 2023 book, *Poverty, By America*: "By deconcentrating poverty in schools and communities, integration blunts its sting. Simply moving poor families to high-opportunity neighborhoods, without doing anything to increase their incomes, improves their lives tremendously. (pp. 161)."

Accordingly, San Diego should remain committed to making communities more inclusive, including building new income-restricted projects in high and highest resource areas.

Mobility Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

DETAILED COMMENTS

p. ME-3 (amended):

[The Mobility Element contains policies that will help walking/rolling, bicycling, and shared mobility devices...](#)

The association of “rolling” with “walking” assumes that these are equivalent needs and forms of mobility. In particular, this mis-association fails to account for inclines, extended stairways, and conditions or absences of sidewalks.

p. ME-3 (added):

[To attain equity, the City acknowledges the need to engage communities of concern and understand where disparities exist and identify ways to address those disparities based on access to opportunity during the planning process. The confluence of transportation and land use polices can be used as a tool to address historic inequities in San Diego by prioritizing access to social and economic opportunities, such as jobs, affordable homes, healthy food, education, healthcare, and recreation, particularly in areas with the greatest needs. With the highest need to equalize the playing field and connect people to more resources through mobility, the transportation system should also include multi-modal options that are safe, affordable, reliant, enjoyable and easy to use.](#)

The starting point needs to be an analysis of the current transit system, including the development of transparent metrics for transit efficacy, which is particularly important because the Planning Department's own data clearly demonstrates that the areas with the greatest "transit richness" are also the areas of least economic and social opportunity. This is an artifact of transit routes in the areas of greatest needs being historically structured around downtown San Diego as the primary job center for San Diego.

The Climate Equity Index (see Glossary) includes a factor for proximity to transit but does not record average commute times for residents using transit and the quality of jobs that those commutes provide.

Further, Blueprint SD focuses on getting residents to job rich areas rather than presenting ideas for how to improve employment opportunities in areas of the greatest need. The city needs to do a lot more community outreach and economic analysis to enhance the Economic Development Element of Blueprint SD.

p. ME-5 Mobility system concept from the Kearny Mesa Community Plan

What street is this being applied to? It would require a massively wide street to provide all of the mobility and public space amenities depicted. We need realistic strategies for our actual streets, including deciding on which amenities should be given priority to others based on local community needs.

p. ME-8 Figure ME-1B Transit Land Use Connections with Village Propensity

To make this an effective planning tool, there needs to be an overlay of travel patterns during the day (flows to and from job centers in the morning and evening, shopping and entertainment destinations after hours).

This map fails as a planning tool in two ways:

1. It shows high in the mid-city area (University Avenue and El Cajon Boulevard). This is interpreted as this area being a prime target for housing development. However, this area has a high concentration of poverty and low economic opportunities. Transit in mid-city is a vestige of the early to mid 1900s, when San Diego's primary job center was downtown and buses and trolleys took people to where those jobs were.
2. The map shows low density in the geographic center of the City (Kearney Mesa, Clairemont Mesa, and Mira Mesa), which are areas near high-quality job centers.

In short, the Village Propensity map proposes pushing more housing into areas with low economic opportunity away from job centers, while avoiding the most job-rich areas of the city. As demonstrated by this map, San Diego's transit and development planning remains stuck in nostalgia for the "streetcar suburbs" of the 1930s instead of recognizing the automobile-driven northward shift of the city.

p. ME-9 Relationship Between Land Use and Transportation Planning

San Diego's infill planning policies fail to appreciate that randomly adding density to suburban sprawl perpetuates suburban sprawl. We would need roughly 5 times San Diego's current population density to produce the levels of transit usage that are imagined in San Diego's Climate Action Plan. Accepting the reality that San Diego is only projected to grow 10% or less, we need to identify a limited number of specific locations or transit corridors that make sense to densify, instead of relying on overly expansive Sustainable Development Areas (SDAs) to justify upzoning almost all of our commercial and multi-family areas and over half of our single-family neighborhoods. Given that transit adoption is driven by population density, especially at the destination end of the trip, the smaller our transit-oriented development footprint is, the more likely it is to succeed.

p. ME-9 Prioritizing Sustainable Modes (added):

Shifting from a car-centric transportation system begins with establishing a roadway mobility priority system (also referred to as mobility loading prioritization). This system prioritizes the safety of the most vulnerable users because they are most at risk. People walking/rolling are the top priority on every street, followed by people who ride a bike and use micromobility, then transit riders. The priority system concludes with people using shared, commercial, and personal electric or alternative fuel vehicles (both for personal trips or for the delivery of goods). As these priority modes have historically encountered underinvestment, rebalancing the City's transportation network to better allocate roadway space, amenities, and connections for these modes will address the needs of their users and make them a more convenient choice for how people move around the City.

Looking at the Climate Action Plan (CAP), even the most optimistic scenario is that at least half of all trips across the city will be diverted from automobiles.

This means that any meaningful gains in GHG reduction will come from transition to low-emission or fully electric vehicles.

p. ME-10 adds language that:

Previous land use decisions emphasized suburban development resulting in longer commutes between homes and jobs. Creating a sustainable framework for growth to support current and future San Diegans requires close coordination between land use changes and transportation planning.

The City of Villages strategy calls for increasing homes and jobs in village areas that are connected to the regional transit system and future transit investments. Homes and jobs adjacent to high-frequency transit helps make transit convenient for more people and allows for a more cost-effective expansion of transit services. Transit-oriented development involves more than just building homes near transit; it is also a mix of land uses that provide opportunities for people to live near their jobs, and helps support the use of neighborhood shops and services. Convenient access to places and resources

should also be complemented with walkable/rollable and bikeable public spaces that reduce the need to drive and are supported by a balanced transportation system. Such a growth strategy provides a sustainable framework that enables San Diegans to accomplish everyday tasks locally and more efficiently further improving the quality of life in the City.

The Village Propensity Map makes a false association between jobs and transit. Regardless, the reality is that cars will become less polluting. Point-to-point travel will continue to be vastly more time-efficient for most San Diegans. San Diego might consider how to replicate this with autonomous vehicles and on-demand micro-transit solutions, but large-capacity fixed route systems are unlikely to achieve the goals that proponents have set for them.

The implication that people are going to move every time they change jobs is not realistic. However, housing should be located in areas that have efficient access to job-rich areas, either by transit or by reduced driving distances.

Transit-oriented development needs to be in close proximity to transit. Best practices are within 1/4 mile of bus stops and 1/2 of rail. Given the limited number of additional future residents, the smaller the identified footprint of future transit-oriented development, the more likely it is to succeed. To this end, San Diego should not only reduce the distance to transit (1 mile) of the Sustainable Development Areas (SDAs) to 1/2 mile walking distance, but it should also restrict the SDA map to existing and not unfunded future transit stops.

By zoning for scattered highrises. San Diego is failing to produce the density of commercial activity that is necessary to “accomplish everyday tasks locally.”

The Transit/Land Use Connections Transit Map (Figure ME-1B)

p. ME-11 Relationship with Other Plans and Programs

Given that San Diego’s population projections continued to be revised downward, and there is insufficient identified funding for a massive expansion to San Diego’s transportation, priority should be given to existing transit. In particular, San Diego’s Sustainable Development Area and Transit Priority Area maps should be based on the Regional Transportation Improvement Program (RTIP) and not the current reliance on the Regional Transportation Plan (RTP). We shouldn’t be basing land use decisions on a 2050 transit network wishlist.

Further, the one-mile walking distance for the Sustainable Development Area (SDA) is inconsistent with federal funding guidelines for transit-oriented development funding (1/4 to 1/2 mile walking distance).

Further comments on Village Propensity Map

San Diego’s planning is based on a failure to understand that our residential footprint is largely automobile suburbs. It will be impossible to substantially alter this citywide. Instead, we need to identify a limited number of specific locations or transit corridors that make sense to densify, instead of relying on overly expansive Sustainable Development Areas (SDAs) to justify upzoning almost all of our

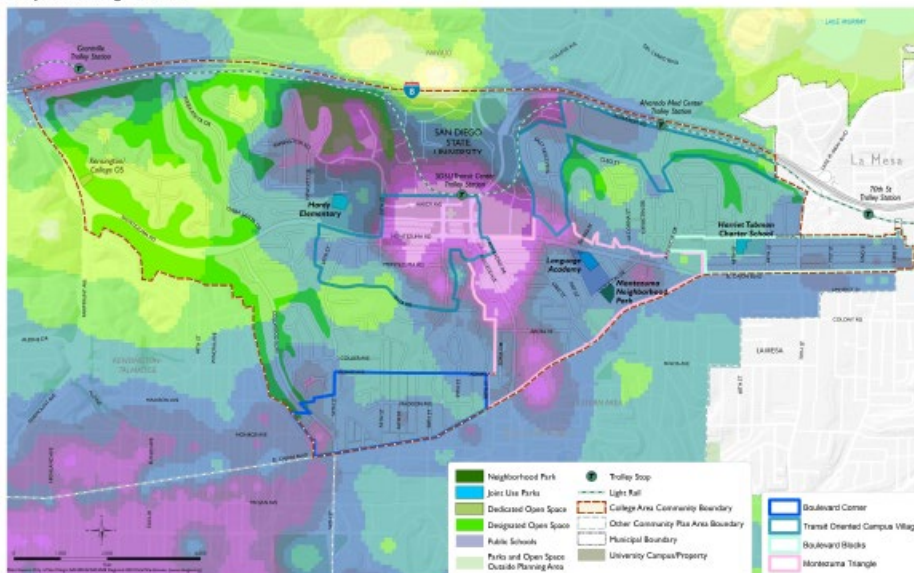
commercial and multi-family areas and over half of our single-family neighborhoods. Given that transit adoption is driven by population density, especially at the destination end of the trip, the smaller our transit-oriented development footprint, the more likely it is to succeed.

The underlying modeling technology of San Diego’s transit propensity maps is in flux. Blueprint SD is based on the SANDAG Activity-Based Model (ABM) specification¹. Specifically, Blueprint SD relies on SANDAG’s ABM2+ model, which is based on the CT-RAMP (Coordinated Travel Regional Activity-Based Modeling Platform) family of Activity-Based Models. SANDAG is replacing CT-RAMP models with a newer modeling capability call ActivitySim, and Blueprint SD will also need to be updated to utilize the newer and presumably higher fidelity simulations made possible by ActivitySim.

Further, it is important to understand that these Activity-Based Models rely heavily on the assumptions of household composition, community demographics, economic choices, and available modes of transit. The models are particularly sensitive to planned transit, and San Diego’s experience dictates that our near-term transit planning (RTIP) often takes many more years to be built, and our long-term transit plans (RTP) change every few years and in many cases never materialize.

Finally, it is worth asking whether SANDAG’s current ABM approach is the best way to assess transit opportunities. Current ABM models rely heavily on Census data, surveys, and other demographic studies to set up the conditions of the simulation. Rather than ask people how they use transit, a much better approach would be for their cellular devices to simply tell us. Because it wouldn’t rely on broad categorizations of individuals, trips, and destinations, the results would be intrinsically more accurate and less subject to skewed assumptions. As an example, the Blueprint SD map of the college area most likely reflects three different types of transit modalities: students going to and from SDSU, commuters using the trolley, and local trips on El Cajon Boulevard. Unfortunately, the heat map fails to elucidate these differences, resulting in a proposed infill development pattern that prioritizes student housing throughout the College Area over other residential and commercial needs of the community.

Blueprint San Diego Scenario



Ref 1: SANDAG Travel Demand Model Documentation:

https://www.sdforward.com/pdfs/RP_final/AppendixT-SANDAGTravelDemandModelDocumentation.pdf

ME-14 A. Walkable Communities

Recognizes that the appropriate extent of walkability is 1/2 mile, not the unrealistic and excessive standard of 1 mile that has been adopted by San Diego for the SDA. Less is more.

In addition to the stated attributes, it is important that sidewalks provide a continuous walking path.

p. ME-15 ff Policies

Need tree-lined sidewalks that are wide enough to support the local pedestrian density.

In general sidewalks are given a limited amount of attention relative to other forms of mobility.

p. ME-19 Added

ME-A.10. Create walkable destinations equitably across the City by increasing opportunities for placemaking and community gathering spaces, facilitating outdoor dining, and allowing for the creation of more designated space for active transportation.

Form-based code, including preserving historic community centers, is key to place-making.

ME-A.10 How does the city intend to balance outdoor dining while maintaining adequate sidewalk width for the expected pedestrian traffic?

p. ME-29 Bicycle Trail on Map ME-2

Remove the trail from this map that shows a "Proposed Bikeway Facility" connecting Regents Road from the north and south sides over (or through) Rose Canyon. The City deleted the Regents Road extension across Rose Canyon in 2016, removing the project from the University Community Plan. Hence, a bikeway along this non-existent road is not feasible and should be deleted from Figure ME-2.

p. ME-30 Bicycling Policies

Bike lanes should be located off main streets, where feasible and sensible. This should be done to improve safety, without compromising convenient access to destinations. This should also be considered to reduce conflicts between cars, bikes, and people crossing the bike lane to enter parklets (restaurant seating).

Urban Design Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

Angle planes and upper story setbacks are particularly important because the Land Use Element introduces extremely high density zones (218 du/acre and 290 du/acre). Angle planes ensure that projects built in these zones are appropriate in height to their surroundings. Angle planes should not only be relative to other buildings, but also the street widths. (A typical guideline is one-to-one, so that a 50 ft wide street would have a height limit of 50 feet.) This prevents streets from becoming tunnels as they are built out. These restrictions should be applied to projects built under base density and bonus density programs, especially Complete Communities Housing Solutions, which has Floor Area Ratio (FAR) allowances that vastly exceed base densities in areas where these projects are being built.

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.

DETAILED COMMENTS

p. UD-4 (added):

[While certain aspects of design may be subjective, there are design principles that can be implemented to promote a positive identity across San Diego's various communities. To effectively implement a citywide urban design strategy requires the establishment of objective urban design guidance. Objective design criteria are measurable, verifiable,](#)

and involve no personal or subjective judgment by public officials and/or decision-makers. The Urban Design Element provides high-level guidance to establish an overall urban design strategy.

Previous drafts included the concluding phrase “which is intended to be implemented through objective design criteria in community plans, zoning regulations, and other related efforts.” The elimination of this phrase backs away from the commitment to good design in community planning.

Objective design standards are critically important in a permitting regime where the majority of projects are ministerial. Unfortunately, past code changes and Development Services permitting practices have eschewed objective design standards and fundamental principles of form-based code. Adherence to these principles is necessary to create expectations of infill projects for both developers and affected nearby residents. City planning should be creating the molds into which developers pour their projects, not deregulating San Diego’s land use and letting developers build whatever they want, wherever they want.

p. UD-4 – UD-5:

- (amended) Direct growth into transit-oriented mixed-use and commercial areas where a high level of activity already exists or can potentially be realized; and
- (added) A sense of place, where community members can enjoy time outside their homes and jobs with each other.
- (removed) ~~Preserve stable residential neighborhoods.~~

The amendments to prioritize transit/commercial corridors and the enhancement of public spaces are key priorities.

While the reference to stable neighborhoods has been removed, likely due to it being potentially misconstrued as preventing development in single-family neighborhoods, it is nonetheless critical that there be expectations of development of matching scale and conformance to objective design standards to ensure the compatibility of infill housing with their surrounding buildings. Rigorous code enforcement is equally critical in this regard, as lax enforcement has had a corrosive effect on public trust, with a resulting overall negative effect on housing production consistent with this proposed Urban Design Element.

p. UD-5 – UD-6:

The Urban Design Element addresses urban form and design through policies aimed at respecting our natural environment, preserving open space systems and targeting new growth into compact villages. Urban form and how it functions becomes increasingly important as changes in density and intensity occur over time, as San Diego evolves. The urban design principles established in this element are intended to help achieve an identity for the City as a whole, while encompassing its physical, social and cultural

diversity. A higher overall quality of urban design is another fundamental goal. Urban design applies at multiple levels from citywide to community to neighborhood and ultimately to individual projects.

Urban design is a process to foster quality in the built and natural environment as the City changes.

Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the General Plan's Urban Design Element influences the implementation of all elements of the General Plan and community plans as it establishes goals and policies for the pattern and scale of development and the character of the built environment. The urban design policies will be implemented through objective design criteria, including area-specific community plan recommendations.

These are principles that should have broad agreement across residents and developers; however, the reality is that to date San Diego has fallen far short of these goals in pursuing housing unit counts at the expense of other public priorities.

p. UD-6:

Goals

- A built environment that respects San Diego's natural environment and climate.
- An improved quality of life through safe and enjoyable neighborhoods and public spaces.
- A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects and enhances community character and context.
- A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact outside of their homes and jobs.
- Maintenance of historic resources that serve as landmarks and contribute to the City's identity.
- Utilization of landscape as an important aesthetic and unifying element throughout the City.

Again, these are widely accepted goals, but the city has not been adhering to them. The key requirement is that ongoing development is consistent with the scale and design of surrounding buildings, that standards for future development are objective and provide clear expectations for developers and community residents, and that increased density due to infill development brings benefits to communities that outweigh potential negative side effects.

See below for notes on historic resources.

p. UD-7-UD-8

The reference to the Urban Design policies being “intended to influence project design, and to be used in the development review process” was removed. Striking this language implies that San Diego is not committed to Urban Design.

p. UD-10 Sustainable Development (amended)

Sidewalks and street canopy are a key element of walkable neighborhoods, but aren’t mentioned here. Form-based code is not just about the relationship of buildings to each other, but how buildings integrate with and enhance the public sphere.

p. UD-11 Building Design

What’s missing here are guidelines about scale and transition. Angle planes are critical – to reduce the feeling of urban canyons and to ensure air circulation, heights of buildings should be in proportion to street widths, and there should be guidelines for transitions between zones, potentially including provisions for adaptive height limits as areas evolve over time.

p. UD-14 Historic Character (Policy UD-A.7)

Part of what makes neighborhoods distinctive and welcoming is preservation and enhancement of their historic context. Other cities in Southern California have recognized this by developing adaptive reuse policies. See for example:

Los Angeles

https://planning.lacity.org/odocument/d39bf248-681f-4a63-aaf3-7829d25f273c/Citywide_ARO_Draft_Ordinance_Strikeout_May_2023.pdf

Long Beach

https://www.longbeach.gov/globalassets/lbds/media-library/documents/publications/lbds-publications/341586_adaptive-reuse-standards_lr_r3

Santa Ana

<http://www.sohosandiego.org/enews/images/0522santaanaadaptivereuseordandmap.pdf>

Adaptive reuse, which can be applied to both designated and non-designated historic resources, enhances historic resources, decreases landfill, and, as naturally occurring affordable housing, provides more affordable housing, as can be seen from a comparison of rents and condominiums in downtown Los Angeles, which has relied extensively on adaptive reuse, and downtown San Diego, which consists of mostly new high-rise construction.

Creating an adaptive reuse policy provides a framework in which preservationists and developers can work together, setting clear common expectations that avoid litigation and keep projects on schedule.

Beyond historic designation, objective design standards are critical to maintaining coherent neighborhoods as they go through redevelopment. These can be created in collaboration between community planning groups and the Planning Department. More rigorous standards might be produced by historic districts, while still allowing for change over time.

p. UD-12 Landscape

Where possible, community plans should broaden sidewalks to allow planting of shade trees, which will create more inviting, walkable streets, reduce heat island effects, and absorb runoff.

p. UD-14 Streets

Consideration should be given in community plans to reconfigure commercial side streets to increase outdoor public spaces, such as for dining. This would help to create a neighborhood core and generate economic activity as a destination. If complete removal of automobiles is not possible, public space could be recovered by turning two-way streets into one-way streets.

p. UD-15 Structured Parking

Even as parking is being separated from other uses, particularly housing, it is going to take decades to create neighborhoods that are less automobile dependent. Parking structures provide a transitional parking solution that can be combined with adjacent uses, such as rooftop solar generation, electric charging stations, secure delivery lockers for online shopping, storage, and other uses that might not otherwise be available to a renter.

p. UD-17 Surface Parking (Policy UD-A.12)

The introductory sentence should acknowledge that an oversupply of parking is critical for certain community assets, such as supermarkets and drug stores.

Outside of these necessary uses, surface parking should be discouraged in the highest zoned areas, particularly along transit and commercial corridors. Various mechanisms have been proposed to spur redevelopment of vacant lots, surface parking, and other underutilized parcels, including vacancy taxes, land taxes, split roll taxes, and fees on unused floor area ratio (FAR). The city of San Diego should be

exploring these options as an alternative to upzoning, which tends to increase property values and resulting housing costs.

p. UD-19 Mixed-Use Villages and Commercial Areas:

The City of Villages strategy identifies a village as a mixed-use center of a community where residential, commercial, employment, and civic uses are present. The intent is that a high quality of urban design will achieve the maximum possible integration of uses and activities connected to the surrounding community fabric and the transit system. Villages will be compact and walkable, with inviting streets and public spaces for community events. Villages will serve as focal points for public gatherings as a result of their outstanding public spaces. In addition to compact residences and retail establishments, villages will contain public spaces that include plazas, public art, cultural amenities, transit centers, enhanced streetscapes, urban trailheads, parks and pocket parks. Publicly-oriented buildings including civic buildings and monuments, public facilities and services, and social services will also contribute to villages as activity centers.

The City of Villages is intended to realize the mutual community benefits of adding density. When done well, increasing density will have broad popular support within a community. If done without regard to the urban design guidelines in the City of Villages, added density will be divisive because negative consequences (infrastructure, noise, parking, heat islands, and traffic) will not be mitigated by positive alternatives (walkability, street canopy, community).

Methodologies to implement City of Villages in a community plan update include:

- Consider reconfiguring side streets to create quieter, human scale public spaces, such as outdoor dining and pocket parks.
- Consider converting larger (big box) shopping centers into community plazas, which are lacking throughout San Diego today outside of shopping malls.
- Develop anti-displacement measures for small businesses, which give neighborhoods their character and are most vulnerable to temporary closure or relocation of their businesses and challenges to get business loans to restart their businesses once redevelopment is completed.
- Define meeting places for local residents, thereby strengthening the community fabric, including joining communities across major thoroughfares.
- Create attractive and novel destinations and experiences for outside visitors, thereby driving economic development.

p. UD-24:

Where feasible, use small buildings in key locations to create a human scale environment in large retail centers. Incorporate separate individual main entrances directly leading to the outside from individual stores.

Adaptive reuse could play a key role in creating the human scale environment to connect the public realm to new developments.

p. UD-27 Distinctive and Inclusive Neighborhoods and Residential Design

Discussion

In conjunction with the General Urban Design Goals identified in the previous section, the following policies are intended to provide further guidance for ~~maintaining our distinctive neighborhoods and~~ achieving high-quality residential design. As the City grows, new development, whether it is in the form of infill, redevelopment, or first-time development, is critical to meeting the needs for the people that live in these homes. ~~Consciously designed projects~~New development. ~~The design and quality of infill housing is critical to ensuring that new housing fits into our existing neighborhoods. Preserving neighborhood character does not mean maintaining the status quo. Sometimes change is welcome, as private and public investment can contribute to the beauty, vitality, and functionality of a neighborhood. However, new development, whether it is in the form of infill, redevelopment, or first-time development,~~ All projects Development should contribute to the ~~creation and preservation of neighborhood character and~~ creation of a sense of place aligned with the City's overall Urban Design Strategy and promote a positive and inclusive community identity.

San Diego's distinctive neighborhoods are a great asset to the City. Some neighborhoods date back to the early days of San Diego's history and a few are still emerging, but each has elements that set it apart from the others and establish its identity. Many of San Diego's neighborhoods are the product of small incremental parcelizations and development over a long period of time. Neighborhood character is defined in part by certain physical qualities that repeat throughout neighborhoods, such as landscape and massing of buildings, colors, and materials. The character of a neighborhood or community is also defined by factors including topography and natural features, street layout and streetscape, and landmarks and civic land uses.

Residential housing types include ~~conventional~~ single-home family detached homes and multiple family home development, including , small-lot single-family homes, rowhomes, townhouseshomes, duplex and triplex dwellingshomes, and a wide variety of apartment and condominium unitshomes. While densities, unit mix, and design parameters will vary based on individual community plans recommendations, there are overall policies that are applicable citywide.

The residential design policies are intended to foster the development of high quality housing homes that meet the needs of San Diego's populations and that becomes an integrated part of the larger inclusive neighborhood and community. ~~The distinctive neighborhoods policies strive to preserve the desirable distinctive qualities of existing neighborhoods while~~ These policies strive to encourage encouraging a coherent image of the City as a whole. These policies are intended to be implemented through objective design criteria as a part of community plans, zoning regulations, and other related efforts. It is intended that these general policies be supplemented with site-specific guidance in community plans.

Policies

Residential Design

UD-C.1. Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

[previous (a) deleted]

- a. Design new construction to respect the pedestrian orientation of neighborhoods.
- b. Provide innovative designs for a variety of housing types to meet the needs of the population.
- c. Consider appropriate transitions between newer and older development. Take into consideration factors such as building bulk and mass, existing points of ingress/egress, and the potential for shadow casting.

UD-C.2. Achieve a mix of housing types within single developments (see also Land Use and Community Planning Element, ~~Section H~~, and Housing Element).

- a. Incorporate a variety of homeunit types in ~~multifamily~~ multi-home projects.
- b. Incorporate a variety of ~~single-family~~ housing types in single-home developmentfamily projects/ subdivisions that enhance the existing community.
- c. Provide transitions of scale between higher-density and lower-density development based on lot size, physical constraints, and other site conditions ~~and lower-density neighborhoods.~~
- d. Identify sites for revitalization and additional housing opportunities in neighborhoods.

Subdivisions

UD-C.3. Design subdivisions to respect the existing lot pattern established within neighborhoods to maintain community character.

- a. Create lot divisions that respect the existing pattern of development for neighborhood continuity and compatibility.
- b. Design lot divisions to have a portion of each created lot in areas of less than 25 percent gradient.

There is a lot to process in these changes, but the overall implication is that infill housing should not be constrained by neighborhood character. In the end, this attitude is short-sided and counterproductive.

Insertion of Policy UD-C.c (shadow casting) is welcome, especially since it does not appear to currently factor into permitting decisions, particularly for Complete Communities Housing Solutions projects, which vastly exceed the height restrictions of existing zoning.

Economic Prosperity Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

DETAILED COMMENTS

p. EP-5:

Despite the economic growth that has occurred over the last several years, economic prosperity has not been evenly distributed in San Diego. National and local economic trends are potentially creating a skewed economy (fewer middle-income jobs, more high-quality professional jobs, and many low-wage services jobs), exacerbating income, social, and spatial disparities.

It is unclear how Blueprint SD is going to address this issue, given that most of San Diego's high paying jobs in tech and life sciences are in the northern part of the city, and south of I-8 communities, particularly in Council districts 4, 8, and 9, do not have effective non-automotive transportation to job-rich areas. The mass transit lines in these districts were designed when downtown San Diego was the dominant job center, and San Diego's topography and overall low population density have precluded the evolution of modern efficient transit.

To remedy this situation, San Diego needs economic development targeted to these neighborhoods. Part of this can be triggered by community-centering mixed-use development, but there is also a need for high value products and services, either through clean additive manufacturing (3D printing), green technology, fashion and design, media, electrical vehicle conversion, upcycling, and similar businesses. Further, encouraging the development of co-working spaces would increase employment in areas with

the greatest needs, reduce traffic congestion, and allow for a flexible, hybrid compromise between working remotely and working at a corporate headquarters.

p. EP-40:

The continuing growth of the production-sharing industry in Tijuana plays an important role in the region. San Diego-based companies offer critical support in terms of administration, logistics, transportation, research and development, shared manufacturing, warehousing, and distribution. However, the industry is under competitive pressure from other offshore production centers where the cost of labor is comparatively cheaper. To counter this effect, Baja California is developing other sectors such as the automobile, pharmaceutical, and technology industries, and defense work where proximity to the market is a significant factor.

The Port of San Diego represents the economic ideal of industrial diversification as an economic motivator for the entire region. The San Diego region operates cargo facilities that support trade and manufacturing, as well as non-manufacturing activities, such as maritime commerce, goods movement, retail, boat charters, marina services, bay cruises, sport and commercial fishing, yacht sales, lodging, and the military. The waterfront supports a significant amount of both civilian and military workers. Based on the economic importance of the waterfront to the San Diego region, preserving and protecting San Diego's waterfront business activities is critical in providing a diverse workforce and regional economic vitality.

While transborder trade and production sharing has potential to address the need for diversification of economic opportunity in areas of greatest need, we should also look for economic development strategies that can be implemented within the City of San Diego and don't depend on cross border trade. Future-oriented businesses, such as were mentioned in the previous comment, would bring resiliency, creativity, and innovation to areas of greatest needs.

p. EP-45 Economic Reporting EP-L.1 – EP-L.5

Economic reporting and updated policy-making should specifically track and develop policies for economic development in areas of greatest needs.

Public Facilities, Services and Safety Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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, Complete Communities Housing Solutions, and other programs based on Sustainable Development Areas (SDAs), which do not exclude Very High Fire Hazard Severity Zones from high-density development.

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.

DETAILED COMMENTS

p. PF-4

The terms “urbanized,” “planned urbanizing,” and “future urbanizing” obscure the fact that most of the so-called urbanized areas are persistently suburbanized areas, and, because of the limited future growth in the city’s population (roughly 200,000 new residents between now and 2050), San Diego will only be able to reach true urbanized densities (20 people or more per acre) in selected and intentional target areas.

p. PF-7 Infrastructure and Public Spaces Policies

Add the following policy:

"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."

Funding is essential to development and the additional infrastructure and public facilities that will be needed.

The policies in the proposed Blueprint project would allow significantly more housing units, commercial development, and public investments. The City should utilize Land Value Capture (LVC) tools to ensure that increases in property value resulting from land use changes are shared with the public.

This important and much needed revenue source would greatly contribute to ensuring well-functioning communities with affordable housing for all income levels, public infrastructure, safe mobility options for walking, biking and transit, open space, and excellent parks and recreation facilities.

D. Fire-Rescue

p. PF-19:

The topography and terrain throughout the City present considerable demands on fire-rescue services under various conditions and can also affect response times. Future infill development in very high fire hazard severity zones will place an increasing demand on the capabilities of fire-rescue resources to deliver an acceptable level of emergency service.

p. PF-21

The very high fire hazard severity zones are located throughout the City. Inclusion within these zones is based on five factors: density of vegetation; slope severity; five minute fire department response time; road class/proximity, and proximity to fire hydrants and CAL FIRE's vegetation cover and fire behavior/fuel spread model. Based on these factors, the zone encompasses a large portion of the City including most land use designations, major freeways and roads, various structures and major utilities and essential public facilities.

As noted above, much of the city lies within Very High Fire Hazard Severity Zones, and San Diego has elected not to prohibit new dense development in these zones. As a compromise, the city should at least consider reducing allowed densities in Very High Fire Hazard Severity Zones, particularly adjacent to open space areas.

p. PF-54 Policies

Consider libraries as a ground floor use of mixed use-development. This could potentially open up public land for parks, for example.

Recreation Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

The lower fees in the Parks Master Plan mean that there are fewer park funds 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

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

DETAILED COMMENTS

p. CE-9:

The City of Villages strategy focuses the City's growth into compact, mixed-use centers of various scales that are linked to the regional transit system, and preserves open space lands. This strategy creates opportunities for more convenient travel by transit, bicycles and foot, which will help reduce local contributions to greenhouse gas emissions that might otherwise occur by reducing the length and number of auto trips. Since the City of Villages strategy seeks to accommodate most of the City's growth needs through infill and redevelopment, it provides an alternative to lower density, auto-oriented development in the outlying areas of the City and region. Close coordination of land use and transportation planning are fundamental for establishing an urban form that integrates principles of sustainability.

This statement obscures the fact that purported urban infill is actually development in what were previously outlying areas of the City and which retain their original automobile dependency. To change transit choices, San Diego needs to intentionally focus density onto commercial and transit corridors rather than spreading it into San Diego's infill suburbs.

p. CE-10:

Buildings account for nearly half of the total energy used in the United States and represent a significant portion of the nation's consumption of energy and raw materials, and waste output.

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

p. CE-11:

The design of commercial and residential developments is a significant factor in creating what is known as an "Urban Heat Island Effect." Heat islands form as cities replace natural land cover with dark-colored impermeable pavement for roads and parking lots; construct buildings that block natural cooling from wind; and otherwise collect and retain heat so much that a city can be up to ten degrees warmer than nearby open spaces.

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

p. CE-14:

Develop policies that encourage and incentivize developers, homeowner associations, and other organizations to preserve, maintain and plant trees.

This statement is in contradiction to San Diego's ADU bonus density program and the proposed SB 10 implementation, which encourage clear-cutting properties to construct as many units as will fit on the lot.

p. CE-B.1:

Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.

This statement is contradicted by land use policies that are highly preferential to dense development along canyon and mesa rims in Very High Fire Hazard Severity Zones, including bonus ADUs, SB 9, and the proposed SB 10 implementation.

p. CE-25:

Increasing global temperatures are accelerating rates of sea level rise. In the 20th century, sea levels rose 0.71 feet in San Diego. By 2025, sea levels in San Diego may rise between 1.2 to 2.8 feet and by 3.6 to 10.2 feet by 2100 (California Coastal Commission, 2018). This range of sea level projections demonstrates the increasing uncertainty associated with estimating sea level rise in the long term, especially after 2050. Overall, coastal storms are projected to occur more frequently in the future, which will further exacerbate flooding and erosion along the coast.

Sea level rise is especially an important concern for the proposed redevelopment of the Midway area, yet it was ignored during the consideration of raising the height limit.

p. CE-30 D. Water Resources Management discussion

The City has no direct control over the imported water supply, but is a member agency of the San Diego County Water Authority (SDCWA), which is responsible for securing the region's imported water supply. Additional dedicated water supplies and increased water-use efficiency programs are needed for the region to support growth projections and industry needs. In response to imported water supply uncertainties, the City prepared a Long-Range Water Resources Plan, which defines a flexible 30-year strategy and includes evaluation tools for continued water resources planning.

In addition, the City is leading on a phased, multi-year program that will provide nearly half of San Diego's water supply locally by the end of 2035, through the Pure Water San Diego program. The Pure Water San Diego Program will use proven water purification technology to clean recycled water to produce safe, high-quality drinking water. Pure Water San Diego offers a cost-effective investment for San Diego's water needs and will provide a reliable, sustainable water supply.

San Diego needs a contingency plan whereby none of its water supply is imported, that is, access to external sources is completely cut off, and all water comes from Pure Water recycling or desalinization.

p. CE 31-32 Policies

Add an item (o.) to the effect of: "Develop plans for runoff collection into existing parkways, yards, and other potential mechanisms for groundwater replenishment."

As we lose permeable surfaces to infill development, we will experience more runoff going into sewers rather than the ground.

p. CE-36 Urban Runoff Management discussion

Open space areas and permeable surfaces are important to ensuring water quality. When storm water (or other urban water runoff) passes over these areas and surfaces, some of it is absorbed into the ground and cleansed by natural filtration processes.

Again, paving over residential neighborhoods reduces permeable surfaces and associated water absorption. We need to develop compensatory strategies for localized retention of rainwater, such as by diverting runoff into parkways.

p. CE-40 Urban Runoff Management policies:

Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs.

Again, paving over residential neighborhoods reduces permeable surfaces and associated water absorption. San Diego needs to treat backyards and parkways as urban forest management rather than targets for massive densification.

p. CE-52 Urban Forestry policies

CE-J.a Identify City lands and spaces that need trees and identify ways to increase permeable areas for new trees, focused in areas with the greatest needs.

If it follows the pattern of ADU development, SB 10 is most likely to target areas with the greatest needs, with projects that remove permeable surfaces and urban canopy.

CE-J.3. Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan (added – “see Conservation Element Policy CE-J.1”).

Noise Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

DETAILED COMMENTS

p. NE-5 Table NE-1

Add the following to the list of noise sources.

- Helicopter
- Electric generator, including food truck
- Electric vehicle (car) at 25 feet at 65 mph

p. NE-9 Policies (Noise and Land Use)

Add a land use policy for angle planes and setbacks of high-density zones to disperse ground noise. Straight vertical walls reflect noise into offices and residents, as well as onto pedestrians and other people outdoors, creating an unhealthy environment.

p. NE-12 Motor Vehicle Traffic Noise

Noise can have a significant impact on quality of life. In addition to purely residential neighborhoods, consideration should be given to noise abatement on commercial and transit corridors, particularly areas where it is planned to add mixed-use, transit-oriented development. Consideration should also be given to how transition to electric vehicles will make street quieter.

p. NE-13 Policies (Motor Vehicle Traffic Noise)

NE-B.10: This policy should also include design standards for angle planes and upper story setbacks to mitigate environmental noise impact on residents.

p. NE-18] Policies (Helicopter Operations)

There is fudging of helicopter flight operations at the edge of influence zones.

p. NE-20 Policies (Commercial and Mixed-Use Activity Noise)

As recommended previously, add a policy for land use development using angle planes and upper story setbacks in order to dissipate and mitigate ground level noise.

Add a policy to encourage use of electric powered (vs. gas) generators, including for food trucks.

p. NE-23 Reducing the Source Noise

Add replacement of gas-powered vehicles, generators, and other gas-powered equipment with electric-powered alternatives as a means of reducing source noise.

p. NE-24 Interrupting/Separating the Noise Path

Add angle planes and upper-story setbacks in building design as a means of dissipating noise.

Glossary

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

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.

DETAILED COMMENTS

p. GL-7 (added) [Climate Equity Index](#)

[A tool to measure the level of access to opportunity residents have within a census tract and assess the degree of potential impact from climate change to these areas.](#)

Given their relevance to the Land Use, Mobility, and Economic Prosperity Elements of Blueprint SD, there are several components of the Climate Equity Index (<https://www.sandiego.gov/climateequity>) that warrant refinement:

Environmental Indicators

Fire Risk should include enhanced risk due to overlap of Sustainable Development Areas with very high fire hazard severity zones. San Diego has deemed that these zones should not be excluded from densification, but that does not mean that the risk from densification should not be accounted for.

Housing Indicators

Overcrowdedness does not specifically account for the number of bedrooms in a housing unit or the ages of the occupants (e.g., adults vs. children). Adjusting for the number of bedrooms would better measure the deficiency of 2 and 3 bedroom units, which are a critical target of the Housing Action Package 2.0 and other San Diego housing incentive programs.

p. GL-7 (added) Communities of Concern

A census tract that has been identified as having very low or low access to opportunity as identified in the San Diego Climate Equity Index.

Recommend reexamining the Climate Equity Index as detailed above.

p. GL-12 (removed) ~~Facilities Benefit Assessment (FBA)~~

~~Provides 100 percent of funds for public facilities projects which service a designated area of benefit and are identified in a Public Facilities Financing Plan (PFFP). The dollar amount of the assessment is based upon the cost of each public facility equitably distributed over a designated area of benefit in the community planning area. Liens are recorded with the County Assessor's Office.~~

Replaced by DIFs.

p. GL-20 (added) Multiple-Use Commercial Land Use

Provides for employment, shopping, services, recreation, and lodging needs of the residents of and visitors to San Diego. Recognizes the benefit of providing more than one use in the same location to reduce dependency on the automobile and encourages the provision of housing for all citizens of San Diego. Allows multiple uses in a mixed-use site plan or building that is commercially focused. Residential density ranges and allowed uses are further refined through community plans. This category of land use includes:

Neighborhood Commercial - Provides local convenience shopping, civic uses, and services serving an approximate three mile radius. Housing may be allowed within a mixed-use setting.

Community Commercial - Provides for shopping areas with retail, service, civic, and office uses for the community at large within three to six miles. It can also be applied to Transit Corridors where multifamily residential uses could be added to enhance the viability of existing commercial uses.

Regional Commercial - Serves the region, within five to 25-plus miles, with a wide variety of uses, including commercial service, civic, retail, office, and limited industrial uses. Residential uses may occur as part of a mixed-use (commercial/residential) project.

It is important that walkable mixed-use communities require horizontal development. Allowing too much density on a single parcel may result in the unintended consequence of isolated, automobile-dependent, premium rent residential towers.

p. GL-22 (added) Multiple-Use Residential Land Use

Accommodates a variety of housing types, encourages the provision of housing for all citizens of San Diego, and recognizes the benefit of providing more than one use in the same location to reduce dependency on the automobile and provide for a walkable pedestrian-oriented setting. Allows multiple uses in a mixed-use site plan or building that is residentially focused. Residential density ranges and allowed uses are further refined through community plans. This category of land use includes:

Multi-Family Residential (details omitted)

Community Commercial (details omitted)

Downtown (details omitted)

It takes more than words to achieve these goals, and it is not clear how Blueprint SD will achieve them.

p. GL-31 (added) Residential Land Use

Accommodates a variety of housing types, including both single-family and multi-family, at various specified densities throughout the City and encourages the provision of housing for all citizens of San Diego. Residential land use can be residential-only or accommodate multiple uses in a mixed-use site plan or building (see "Mixed-Use" and "Multiple-Use Residential Land Use" for further information). Residential density ranges and allowed uses are further refined through community plans.

Note that zoning overrides such as Complete Communities Housing Solutions and the Bonus ADU program, override zoning by an extreme amount, confounding the community plan update process.

p. GL-35 (added) Structurally Excluded Community

A shift from labeling a community as underserved to structurally excluded places the focus on systems intentionally created to exclude, marginalize and oppress instead of the individuals or people living in their communities. The term structurally excluded community takes into consideration how racial disparities are often connected to place and are rooted in historic racialized policies and practices that created and maintain unfair racial outcomes. A structurally excluded community takes into consideration how systems interact with racial and ethnic differences to design disparities and shape racial biases which impact access to health, education, economic capital, social position, safety and opportunity.

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.

The misconstruction of the SDA drives two negative outcomes: first, turning single-family neighborhoods into de facto multi-family zones via Bonus ADUs and the proposed SB 10 implementation allows opportunistic investors to crowd out would-be homeowners; and second, diffusing development across an overly broad SDA inhibits the creation of neighborhood-centering density that is essential to the success of City of Villages, both for neighborhood economic development and for transit efficiency and connectivity.