



Peninsula Community Planning Board
1220 Rosecrans Street PMB 549
San Diego, CA 92106
pcpsd@gmail.com

Date: April 18, 2024

TO: BlueprintSD@sandiego.gov

Subject: 2024 General Plan Amendment Comments, BluePrint SD

Dear Mayor Gloria, Councilmembers, and Planning Department Staff:

The City of San Diego released the update to the General Plan, BluePrint SD, on March 15, 2024 along with the associated Programmatic Environmental Impact Report (PEIR) for Public Review. Community comments are due within a short 45-day review period, April 29, 2024. BluePrint SD proposes to make substantial changes to current zoning and maximum densities that increase densities throughout the City with New York style densities of up to 290 plus units per acre along with increased densities in existing single-family neighborhoods. As stated in the PEIR, increased densities will result in significant unmitigated environmental impacts. Identified impacts include insufficient public services, recreational facilities, and infrastructure which will have a detrimental impact to the quality of life to San Diegan's.

The Peninsula Community Planning Board (PCPB) opposes the adoption of BluePrint SD and requests that the City of San Diego extend the comment period, provide projected numbers as to how the zoning and density changes will affect the number of units built in Point Loma and their impact on parking and infrastructure compared to the existing general plan, and provide a public outreach program which reflects the proposed vast changes in land use and character of Point Loma. The vague maps in BluePrint SD do not provide this information that is necessary for adequate public input.

Following are PCPB comments to the General Plan update and PEIR:

General

BluePrint SD updates the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density and areas that convert low-density single-family housing to multi-housing use. As stated, this map forms the base for further updates to Community Plans. The Propensity map lacks specifics, does not define increased densities and the scale provides uncertainty to the parcels (areas) proposed for change. In addition, the maps do not provide projected housing numbers under the proposed amendments and current general plan to inform the public about the resulting changes to density, parking or infrastructure the amendments would create. These proposed changes will create densities that will resemble cities such as New York, San Francisco and Los Angeles. Many San Diegan's do not wish San Diego to morph into the densities of these cities that the plan amendments could create. **Provide Village Propensity Maps with proposed density changes (units per acre) rather than using the terms low and high. These terms are subjective and are inadequate to inform the Public.**

The Environmental Document (Section 3.5.1.3) states that Community Plan Updates that are consistent with the Propensity Map and the City of Villages Strategy would be evaluated consistent with the Proposed Programmatic Environmental Impact Report and proposed density and not require additional environmental review. **PCPB cannot support the adoption of the Proposed Propensity Map without greater detail and community input.**

Increased Flooding

Blueprint SD will reduce greenspace area while increasing impervious surface areas resulting in increased surface runoff. The PEIR identifies that BluePrint SD... “would have the potential to exceed the capacity of existing or planned stormwater drainage facilities.” Due to the recent devastating flooding that affected our City, the **PCPB requests that a comprehensive analysis be performed to identify the increased risk of flooding and analysis of the associated run-off with increase densities proposed under BluePrint SD.**

Traffic Congestion and Incomplete Transportation system

BluePrint SD and the City of Villages Strategy is based on connectivity of the regional transit system, future transit investments, and implementation of SANDAG’s 2021 Regional Plan. There is a shortfall and gap of funding for the implementation of the \$170 billion, 2021 Regional Transportation Plan. Increases in density are also proposed outside the conventional one-half mile commuter walking/rolling distance from transit. Studies and state standards have demonstrated the usage of public transportation drastically drops off beyond a one-half mile walking distance. The Blueprint SD Plan wants to designate land use density to support transit goals rather than plan transit to support existing and forecasted land use and density which is backwards planning. **PCPB requests that BluePrint SD comply with recognized standards and update the General Plan to reflect the actual public transit system rather than speculating on future funding and a non-existing transit system.**

Greenhouse Gas Emissions (GHG)

BluePrint SD states that “Fuel-powered vehicles are the largest source of greenhouse gas emissions and pollutants impacting our air quality. The Climate Action Plan sets a goal of net zero emissions and at least half of all trips across the City will need to shift to more sustainable, climate-friendly modes like walking/rolling, biking, or taking transit. **Also, the Mobility Plan and PEIR fail to incorporate the most recent state and federal mandates that all new passenger cars will be zero-emission vehicles by 2035. PCPB requests that the City update and revise both BluePrint SD and the PEIR to reflect recognized distance to transit state standards and zero-emission vehicle regulations.**

Local Peninsula Community Opposes BluePrint SD Density Increases. BluePrint SD proposes to update the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density. This map will form the base for further updates to Community Plans. As stated in the report and shown on the map, areas shown in purple and blue have the highest densities. The Propensity map does not define the increased density and the scale provides uncertainty to the areas proposed for density increases. PCPB cannot support the adoption of the Proposed Propensity Map without greater detail and community input.

The Village Propensity Map proposes to locate a high-density village in the Fleetridge /Wooded Area of Point Loma . This area is currently zoned single family -low density. The PCPB opposes a village strategy in this area, without community input and support. This area lacks adequate transportation, has the potential to hinder and block view corridors, and lacks the infrastructure to support high density.

Page LU-6 states that residential land use designations will increase to higher uses. The Village Propensity Map recommends a conversion of single-family zoning in the Roseville neighborhood and other single-family neighborhoods in the Point Loma Community. **Clearly define the areas where single family residential land use designations are proposed for greater densities and seek community input.**

SANDAG Series 15 Population and Housing Forecast and Consistency with BluePrint SD

As the local Planning Agency SANDAG works with local jurisdictions, the State Department of Finance, demographic and economic experts, and other stakeholders to create a long-term forecast that predicts what the region will look like in terms of population and housing. SANDAG Series 15 Population forecasts a decline in population in eleven jurisdictions in the County and only a slight growth of City San Diego's population by 5 percent by 2050. The Region's population in 2050 is expected to be only 3 percent higher than in 2022. See Attached SANDAG Series 15 Regional Forecast. **The PCPB requests that BluePrint SD maintain consistency and reflect SANDAG Series 15 population and housing projections into the General Plan Update. PCPB also requests that BluePrint SD provide a numerical projection of housing units proposed in BluePrint SD and reflect consistency with SANDAG Series 15 forecast, the Region's Local Planning Agency.**

Mobility Element

Bikeways. Large sections of roadways needed for Vehicle Traffic have been converted to bikeway use thereby causing increased congestion on City Roadways, and in one case just having one lane for traffic in both directions. Bikeways in urban areas are not used nearly as much as vehicles and are seldom used by Seniors when residents need to go shopping. Policy needs to be amended to specify that bikeways will not be designed that significantly and adversely affect vehicle traffic causing vehicle congestion. Also specify that any bikeway conversion leave at least two lanes for vehicle traffic (coming and going) and that roadways will not be diverted to bicycle use where there is little to no bicycle traffic.

Parking. The existing general plan allows developers to pay an in-lieu fee rather than provide parking for their developments. This should not be allowed. The proposed amendments also allow the city to charge a floating parking rate to limit demand. This would be another way for the city to generate more revenue and should not be allowed because it adversely affects lower income residents. Adequate parking is needed to support development to avoid traffic congestions that these policies do not promote and should be deleted as part of the general plan amendments.

The letter was approved with a vote of 12-0.

Sincerely,



Frederick W. Kosmo, Jr.
PCPB-Chair

CC; SD Planning Commission
Honorable Mayor and City Council

Attachment: SANDAG Series 15 Forecast