

Community Planners Committee

Planning Department • City of San Diego

9485 Aero Drive, MS 413 • San Diego, CA 92123

SDPlanningGroups@sandiego.gov • (619)-235-520

Tuesday, July 23rd, 2024
4425 BANNOCK AVE.
CLAIREMONT, 9117
REGULAR MEETING AGENDA

TIME: 6:15-7:50 p.m.

NOTE: If a Sign Language interpretation or language translation services are required, please visit www.sandiego.gov/planning/translation to submit a request at least (3) three workdays prior to the meeting date to insure availability. Times assigned for each item are approximate. The order of agenda items may be modified at the beginning of the meeting at the discretion of the Chair.

ITEM #1 - 6:15 CALL TO ORDER/MODIFICATIONS TO THE AGENDA/ROLL CALL

ITEM #2 - 6:20 NON-AGENDA PUBLIC COMMENT - 2 minutes per issue
Identification of issues that are within the jurisdiction of the CPC, but not on the agenda. No discussion or action is permitted, except to establish a subcommittee for study, or place the item on a future agenda.

ITEM #3 - 6:30 APPROVAL OF MINUTES OF JUNE 25th, 2024

ITEM #4 - 6:35 SHORT TERM VACATION RENTAL ORDINANCE (STRO) (Action Item) -
Kevin Hastings will present a Citizen-led initiative to highlight impacts of the ordinance and recommend revisions. This is in preparation for the annual review by City Council CNS Committee in July. CPC will review their letter and proposed changes.

ITEM #5 - 7:05 ENVIRONMENTALLY SENSITIVE LANDS LDC UPDATE REQUEST (Action Item) - Request from the ESL Subcommittee that the CPC submit a proposal to amend Article 2, Division 6 of the Land Development Code to ensure public awareness and provide the opportunity for public review and comment on Capital Improvement Projects proposed in locations where a project has the potential to affect Environmentally Sensitive Lands. The opportunity to make requests for changes to the LDC is open through July 31, 2024.

- ITEM #6 - 7:35 **REPORTS TO CPC:**
- Staff Report
 - Chair's Report
 - CPC Member Comments

ITEM #7 - 7:50 **ADJOURNMENT**

Draft Submittal Text for CPC Review

Next Land Development Code Update Amendment Request Form

The information below is required to determine if the amendment is warranted. You will be contacted once your item has been accepted.

Date of Request *

Submitter Name *

Affiliation *

Email Address *

Phone Number *

Name of Item *

Code Correction to Restore Process CIP/Public Project-Five for CIP & Other Public Projects that deviate from the Environmentally Sensitive Lands (ESL) Regulations.

Type of Amendment * Correction

Background *

Briefly summarize the relevant existing regulations or review process.

As a result of staff recommended changes to the Code in 2021, Section 112.0604 currently includes no process for a CIP or Public Project that deviates from the ESL regulations; and Table 143-01A incorrectly states that CIP or Public Projects that deviate from the ESL regulations need only adhere to the Process CIP/Public Project-Two.

Issue *

Briefly summarize the issue or problem that has triggered the need for the proposed amendment. Please include any real-world project examples.

The 2021 Code revisions eliminated the Process CIP/Public Project-Five for projects that deviate from the ESL Regulations (see attachment), with Section 112.0604 providing no discussion of how to proceed when a project deviates from the ESL regulations. Table 143-01A was also revised to eliminate Process CIP/Public Project-Five, so currently all CIP or Public Projects whether or not they deviate from the ESL regulations only need to adhere to the Process CIP/Public Project-Two review, which includes no requirement for a public hearing.

Objective *

Provide a one or two sentence statement of what you want to achieve with the proposed amendment

Correct the LDC to restore the Process CIP/Public Project-Five for CIP/Other Public Projects that deviate from the ESL Regulations, which would reestablish the requirement for a public hearing when impacts to ESL are anticipated.

Solution *

Briefly summarize how you propose to address the issue and achieve the objective with your proposed amendments.

A review of Code amendments made between 2013 and 2021 (see attachment) indicated no support for staff's elimination of the Process CIP/Public Project-Five for CIP/Other Public Projects when a project deviates from the ESL Regulations, therefore to address the 2021 error, 112.0604 and Table 143-01A must be corrected.

List of code sections affected by your proposal *

Please search the entire Land Development Code to identify all sections that relate to your proposal. Affected sections: 112.0602, 112.0604 and 143.0110, Table 143-01A


File Attachments * (See attached supporting documentation)

Strike-out/underline of code amendment

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Attachment 1
Request for Land Development Code Correction as part of the 2024 Update
§112.0604 Process CIP/Public Project-Five
and §143.110, Table 143-01A

Overview: On December 12, 2021, the San Diego City Council approved changes to the Municipal Code's Land Development Procedures (Chapter 11) and General Regulations (Chapter 14) that eliminated the Process CIP/Public Project-Five review for a Capital Improvement Program (CIP) project or public project that deviates from the Environmentally Sensitive Lands (ESL) Regulations. The change occurred based on planning staff's decision that an inconsistency between Chapters 11 and 14 regarding deviations for Capital Improvement Projects was the result of an error in Chapter 11, rather than in Chapter 14 (see Attachment 2 for details).

The 2021 Code Update resulted in the following wording found in the current version of the Code:

Current Version of the Code - §112.0602 Process CIP/Public Project-Two

An application for a Site Development Permit for a capital improvement program project or a public project determined to be in compliance with the Environmentally Sensitive Lands Regulations (emphasis added), Historical Resources Regulations without deviation, or a City-issued Coastal Development Permit in the non-appealable area of the Coastal Overlay Zone shall be acted upon in accordance with Process CIP/Public Project-Two.

Current Version of the Code - §112.0604 Process CIP/Public Project-Five

An application for a Site Development Permit for a capital improvement program project or a public project that deviates from the Historical Resources Regulations shall be acted upon in accordance with Process CIP/Public Project-Five.

Following the revisions made in the 2021, the Land Development Code no longer addresses how an application for a Site Development Permit for a capital improvement program project or a public project that does not comply with the Environmentally Sensitive Lands Regulations should be processed. Prior to 2021, the Code required capital improvement program projects or public projects that deviate from the Environmentally Sensitive Lands Regulations to follow the Process CIP/Public Project-Five process.

Land Development Code Correction Request: Correct §112.0604 Process CIP/Public Project-Five to read: "An application for a Site Development Permit for a capital improvement program project or a public project that (add the following: does not comply with the Environmentally Sensitive Lands Regulations) or deviates from the Historical Resources Regulations shall be acted upon in accordance with Process CIP/Public Project-Five." Additionally, revise Table 143-01A to include Process CIP/Public Project-Five to provide consistency with the requirement for adherence to Process CIP/Public Project-Five when a project does not comply with the Environmentally Sensitive Lands Regulations.

Attachment 2

Analysis and History of Code Changes Related to the Processing of CIP/Public Projects

Based on a review of the Land Development Code and the various revisions that have occurred since 2000, the Community Planners Committee has determined that the Land Development Code was incorrectly revised in 2021. Specifically, Chapter 14, Table 143-01A, Development type #9 (*Any capital improvement program project or public project that deviates from the Environmentally Sensitive Lands Regulations*) incorrectly identifies Process CIP/Public Project Two as the action to be followed for projects that deviate from the Environmental Sensitive Lands Regulations. Our review of the current Land Development Code, along with various past revisions indicates that planning staff erred in making the determination that a table in Chapter 14 took precedence over statements in Chapter 11. A review of Code revisions is provided below.

Background – Past Changes to the Municipal Code Relevant to CIP Projects

The following code change history is based on the information available on the City’s website at:
<https://www.sandiego.gov/planning/work/land-development-code/updates>.

1. 2002 (2nd Update) §143.0110 added: (a) Where any portion of the premises contains any of the following environmentally sensitive lands, this division shall apply to the entire premises, unless otherwise provided in this division. §143.0110 also includes Table 143-01A, Applicability of Environmentally Sensitive Lands Regulations, which at that time stated under item 6: any development that proposes deviations from any portion of the Environmentally Sensitive Lands Regulations is subject to SDP/Process Four (143.0130(d), (e)). Note that CIP projects and City projects were not specifically addressed in the table at that time.
2. 2015 (9th Update) - In the 9th Update (Ordinance Number O-20481), §112.0301(c) includes the first reference to Process CIP-Five and Process CIP-Two, as it describes the Notice of Public Hearing, but to this point the Code appears to be silent on the issue of CIP related permits. No changes to §143.0110 related to this issue were found.
3. 2020 (12th Update, Phase 2) - Revisions to the Code in 2020 (Ordinance Number O-21164) revised §112.0601 – Overview of Decision Process. The text, added in 2020, states: “Applications for capital improvement program projects or public projects requiring a Site Development Permit in accordance with the Environmentally Sensitive Lands Regulations . . . shall be acted upon in accordance with one of the two decision processes established in this division as depicted on Diagram 112-06A. The subject matter of the development application determines the process that shall be followed for each application.”

§112.0602 Process CIP/Public Project-Two – “An application for a Site Development Permit for a capital improvement program project or a public project determined to be in compliance with the Environmentally Sensitive Lands Regulations and Historic Resources Regulations without deviation . . . shall be acted upon in accordance with Process CIP/Public Project-Two . . .

§112.0604 Process CIP/Public Project-Five - “An application for a Site Development Permit for a capital improvement program project or a public project that deviates from the Environmental Sensitive Land regulations or Historic Resources Regulations . . . shall be acted upon in accordance with Process CIP/Public Project – Five.” However, in this version of the Code, §143.0110 (b) Table 143-01A Item 9 contradicts the detailed text in §112.0604, stating that a CIP Project or public project that deviates from the ESL regulations need only comply with CIP/Public Project-Two.

4. 2021 Update - Revisions to the Code in 2021 that were approved by the City Council in 2022 resulted in changes to §112.0604 that eliminated any discussion of deviations from the Environmentally Sensitive Lands Regulations from the Process CIP/Public Project-Five procedures. According to the 2021 Code Update Item Matrix (https://www.sandiego.gov/sites/default/files/draft_matrix_2021_code_update_11.23.21.pdf), staff determined that “Chapter 11 stated in error that deviations from the ESL regulations are a Process 5 decision, while Chapter 14, correctly identifies them as a Process 2 decision.” Based on our review of all previous versions and changes to the Code, as well as current and previous language included in other sections of the Code related to this issue, we believe the removal of the Process-Five procedures was made in error.

July 10, 2024

Via Email:

Andrea Schlageter, Chair
Community Planners Committee

SUBJECT: RESPONSE TO COMMUNITY PLANNERS COMMITTEE BLUEPRINT SAN DIEGO COMMENT

Dear Ms. Schlageter:

We thank the Community Planners Committee for their participation in the Blueprint SD General Plan Refresh and for the valuable feedback provided during the process.

Attached is the City Planning Department's response to the Community Planning Committee comment letter and executive summary provided on April 24, 2024, and the top 10 recommendations letter that the Community Planners Committee asked the City Planning Department to consider on May 28, 2024.

Please contact Nathen Causman at ncausman@saniego.gov if you have any questions or need any further assistance.

Sincerely,



Tait Galloway
Deputy Director
City Planning Department

CT/njc

Attachments: City Planning Department Response to Community Planners Committee Letters for Blueprint SD

cc: Chris Ackerman, Policy Advisor, Mayor's Office
Heidi Vonblum, Director, City Planning Department
Kelley Stanco, Deputy Director, City Planning Department
Coby Tomlins, Program Manager, City Planning Department
Sean McGee, Development Project Manager III, City Planning Department
Nathen Causman, Senior Planner, City Planning Department

Blueprint SD - City Staff Response to CPC Comments

#	Material	Element	CPC Comment	Staff Response
1	Top 10 from Letter	N /A	At the time of Community Plan Updates, the latest population forecasts shall be obtained, and the community plan development capacity, existing and proposed, reconciled with the forecasts.	<p>The City uses the most recent SANDAG forecast when beginning community plan updates to assess existing population and housing as well as adopted community plan capacity. The forecast housing and job capacity is constrained by the adopted community plan land use. The community plan updates look at scenarios that could add development capacity that exceeds the community plan which could exceed the SANDAG forecast.</p> <p>The City is required to plan for its housing needs, which are guided by the Regional Housing Needs Assessment (RHNA) allocations addressed in the General Plan Housing Element. Approximately 108,000 additional homes are required to meet San Diego's housing needs by 2029 due to decades of limiting the production of homes. Due to the nature of infill development, it is important to note also that increasing housing capacity does not mean that more homes will be produced.</p>
	Top 10 from Letter	N /A	Urban design guidelines must include provisions which ensure that the unique attributes of the communities will be retained and enhanced.	Urban Design policies are addressed in the General Plan and refined at the community plan level to address community specific needs and issues. This includes policies that contribute to the livability, vibrancy, and uniqueness of a community.
3	Top 10 from Letter	N /A	Implementation provisions shall ensure that projects with a major impact on a community will trigger a discretionary review. This trigger may be based on height, number of housing units, size of non-residential building space, or size of the site.	Projects that conform to zoning and development regulations are permitted without a discretionary review. Projects that deviate from the regulations will require a discretionary permit. Increasing discretionary review will slow down the permitting of housing and reduce the ability for the City to meet its stated mandated housing goals. Removing regulatory barriers is a part of affirmatively furthering fair housing.

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4	Top 10 from Letter	N /A	Community Plan Updates are intended to result in adequate housing sites, and projects which are suitable in density, height, and form. To prevent overriding the new community plans, the Complete Communities: Housing Solutions ordinance shall be suspended in communities that complete a Community Plan Update after the adoption of Complete Communities: Housing Solutions.	Community plan updates help to increase the opportunities for homes. Bonus Density programs such as Complete Communities Housing Solutions are implementation tools to support the production of homes needed to meet the City’s state mandated housing goals by providing homes at different income levels within sustainable development areas. Additionally, increased base density from community plan updates would increase total affordable home production under Complete Communities Housing Solutions.
5	Top 10 from Letter	N /A	In low-resource communities, policies shall include incentives for moderate income and market rate housing with opportunities for employment and provide for full-service retail outlets that brings low-resource communities within a reasonable standard deviation to match the median resources and income of the city.	The General Plan includes goals and policies for broad economic prosperity across the City, including to increase economic opportunity to lower-resource communities. The Environmental Justice Element and the Housing Element also provides policies to address the City's housing needs and affirmatively further fair housing. The City will continue to consider future incentive based programs to produce affordable homes in all communities, particularly in high and highest resource communities. The City will also continue to update community plans within higher-resource areas, especially communities with job-centers.
6	Top 10 from Letter	N /A	Community Plan Updates and infrastructure plans shall ensure that public facilities will be provided concurrent with development.	The General Plan Public Facilities, Services and Safety Element specifically identifies goals and policies to provide for public facilities for existing and new development. Specific public infrastructure needs are addressed through community plan updates.
7	Top 10 from Letter	N /A	Parks and recreation planning is based on a community’s population. Therefore, the amount of authorized development and the projected buildout population must be proportional to the parks and recreation facilities which can feasibly be provided.	The Recreation Element also includes goals and policies that call for the provision of adequate parks in accordance with the Parks Master Plan. New development also can provide for public space and recreational space as addressed in the Parks Master Plan.

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				Also see response for #6 and #10.
8	Top 10 from Letter	N /A	Develop incentives for adaptive reuse, to conserve embedded energy and limit the burdening of landfills with construction debris.	The General Plan Urban Design Element includes a proposed policy to support adaptive reuse. Both the Conservation Element and the Public Facilities, Services and Safety Element have existing policies that encourage reduction of construction waste.
9	Top 10 from Letter	N /A	Improve protections for mature trees, to preserve the tree canopy. This will help to sequester carbon and reduce urban heat-island impacts.	The General Plan Conservation Element addresses climate change related policies to reduce urban heat islands by increasing the urban tree canopy and protecting mature trees. The Conservation Element and the Urban Design Element also have policies that aim to reduce heat islands with building design approaches such as green roofs. In addition to the General Plan, Climate Resilient SD is a comprehensive climate adaptation and resilience plan that addresses the four primary climate change-related hazards for the City including extreme heat. Community plans contain policies addressing urban forestry and street tree plans.
10	Top 10 from Letter	N /A	When community plan updates occur, include an analysis of Land Value Capture to provide revenue for needed public facilities and community benefits.	Recent community plan updates have included supplemental development regulations with the intent of recapturing land values into public benefits, including regulations that require the provision of public spaces/parks - with public access - on private development. The City will continue to look for ways to for new development to provide additional public spaces and community serving infrastructure along with new housing and other development as part of community plan updates in locations that increase the opportunities for new development.

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11	Executive Summary	Land Use	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.	See response for #1.
12	Executive Summary	Land Use	Allowed density must be appropriately scoped to the expected buildout of communities. Unnecessary over zoning 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.”	See response for #1.
13	Executive Summary	Land Use	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.	See response for #1.
14	Executive Summary	Land Use	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.	The General Plan Mobility Element addresses emerging technology including micro-mobility. Given constraints to rights-of-way, micro-mobility and autonomous vehicles will complement high-quality transit.

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15	Executive Summary	Land Use	<p>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.</p>	<p>As part of Blueprint SD, the General Plan City of Villages strategy is further aligned to the Climate Action Plan to identify future opportunities for homes in jobs in areas near existing and planned high frequency transit. SANDAGs Regional Plan calls for additional transit connections to better connect to employment centers.</p> <p>The General Plan Climate Smart Village Areas focuses jobs and housing near existing and planned transit to help meet GHG reduction targets in the Climate Action Plan. This reflects the opportunity to plan for additional homes and jobs in downtown, subregional centers, and along existing and planned transit corridors to reduce vehicle miles traveled. Downtown continues to include the densest cluster of jobs in the City. The ability to implement new high frequency transit service is based on planning for jobs and homes that can support it.</p> <p>The City will continue to work with SANDAG and MTS to prioritize transit investment to job centers as well as last mile connections to and from homes and destinations. Providing more mobility options to more San Diegans will increase mode-shift, and implementation of the City of Villages land use strategy will increase the goods and services available to San Diegans near their neighborhoods, which will decrease Vehicle Miles Traveled for those that choose or need to drive.</p>
16	Executive Summary	Land Use	<p>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.</p>	<p>The General Plan Climate Smart Village Areas focus a greater propensity for homes and jobs near high frequency transit to guide future community plan updates. The Sustainable Development Areas are an implementation tool for incentive-based programs to</p>

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				support the production of homes that are accessible to a major public transit stop up to a 1-mile walk.
17	Executive Summary	Land Use	Development should be prioritized towards existing transit, not future transit (as far out as 2050) that with expected funding constraints may never be built.	See response for #15.
18	Executive Summary	Land Use	Much of San Diego’s planning overemphasizes transit access to downtown. Current planning needs to reflect that overtime 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.	See response for #15.
19	Executive Summary	Mobility	<p>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.</p> <p>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-</p>	See response #18.

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			quality transit that has convenient and competitive access to job centers.	
20	Executive Summary	Mobility	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.	See response #18.

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21	Executive Summary	Urban Design	<p>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.</p> <p>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.</p>	<p>General Plan Urban Design policies are refined at the community plan level to address community specific needs and issues. Community Plan updates have included supplemental development regulations to address community specific design requirements. The City routinely preforms updates to the land development code to improve implementation.</p> <p>Also see response for #4.</p>
22	Executive Summary	Urban Design	<p>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.</p>	<p>The General Plan Historic Preservation Element policies support historic preservation. During the community plan update process, an analysis pertaining to historic resources is conducted. Updated community plans include Historic Preservation elements with additional policies tailored to individual community needs.</p> <p>Also see response for #8.</p>

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23	Executive Summary	Urban Design	<p>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.</p>	See response for #3.
24	Executive Summary	Economic Prosperity	<p>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.</p> <p>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.</p>	<p>The General Plan Economic Prosperity Element includes goals and policies for broad economic prosperity across the City, including to increase economic opportunity to lower-resource communities. Community plans also contain goals and policies relating to economic prosperity at the community level.</p> <p>The City has prepared an Economic Development Strategy that is aligned with the Equity Forward initiative and the Climate Action Plan to placing a renewed emphasis on quality of life and community partnerships. This includes the implementation related to the Promise Zone, Housing and Urban Development services, small business engagement, and Capacity Building grants.</p>

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25	Executive Summary	Economic Prosperity	<p>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.</p> <p>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.</p>	See response for #5.
26	Executive Summary	Public Facilities, Services and Safety	<p>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.</p>	See response for #6.
27	Executive Summary	Public Facilities, Services and Safety	<p>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.</p>	<p>A majority of the City is within a Very High Fire Hazard Severity Zone including urban areas. Chapter 7A of the California Building Code and Section R337 of the California Residential Code contain requirements for buildings located in the Very High Fire Hazard Severity Zone to mitigate wildfire exposure risk through fire-resistant materials, defensible space and construction methods. These requirements can safeguard against the spread of fire within a building and between buildings.</p> <p>Also see the response for #4.</p>

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28	Executive Summary	Public Facilities, Services and Safety	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.	See response for #10.
29	Executive Summary	Recreation	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.	See response for #7 and #10.
30	Executive Summary	Conservation	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.	See response for #18.
31	Executive Summary	Conservation	One-quarter of all landfill in San Diego is construction waste. San Diego should be reducing this waste through adaptive reuse.	See response for #8.
32	Executive Summary	Conservation	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.	See response for #9.

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33	Executive Summary	Conservation	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.	See the responses for #4 and #27.
34	Executive Summary	Conservation	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.	The General Plan Conservation Element contains policies addressing water resource conservation, water management and the integration of land use and water planning. The City prepares a state required Urban Water Management Plan every five years to address water demands and supplies, water conservation activities, and assess the reliability of water sources over a 20-year planning time frame. The City prepares Water Supply Assessments for community plan updates to assess the water supply to meet the projected demand. The Conservation Element contains policies addressing urban water runoff management. Community plan updates also address urban green improvements to capture storm water.
35	Executive Summary	Noise	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.	The General Plan Noise Element contains policies addressing noise attenuation measures including building and site design techniques to reduce interior noise exposure.
36	Executive Summary	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	The Climate Equity Index was created in 2019 as part of a collaborative process between the City and several CBOs to determine climate equity and access to opportunity; it was updated in 2021 and includes 41 indicators that determine CEI score. Those 41 indicators are broken down into 5 categories: environmental, socioeconomic, housing, health, and mobility. Within the mobility category, commute burden is one of 41 indicators, and access to public transit is another. There

Blueprint SD - City Staff Response to CPC Comments

			<p>routes in south of I-8 communities, which do not take residents to high-quality job centers.</p>	<p>are an additional 39 indicators across the 5 categories that determine CEI score and access to opportunity.</p> <p>Also see response for #15.</p>
37	Executive Summary	Glossary	<p>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.</p>	<p>See responses for #4, #15 and #16.</p>