

**City of San Diego**  
**Council President Joe LaCava**

**Subject:** Climate Advisory Board Recommendations for the City of San Diego's Draft Mobility Master Plan

Dear Council President LaCava,

The City of San Diego [Climate Advisory Board](#) (CAB) is writing to you to provide feedback on the City of San Diego's Mobility Master Plan (MMP). We commend the City for its efforts to create a comprehensive Mobility Master Plan that addresses our transportation needs and aligns with sustainability goals. The MMP is a landmark planning effort that will help achieve the City's Climate Action Plan (CAP).

As a new advisory board, we were recently briefed on the MMP, and we recognize that these recommendations are being provided in advance of potential adoption by the City Council. Per Sections 1.1 and 9.4, the MMP will be a living document that will be monitored on a four-year reporting cycle in parallel with the annual monitoring report for the CAP. In light of the need for updating the MMP over time, we offer these specific recommendations to strengthen the plan and ensure it achieves the objectives of the CAP in an effective and transparent manner.

Transportation and mobility are the largest sources of greenhouse gas (GHG) emissions in San Diego, and the City has set an ambitious goal of achieving net carbon neutrality by 2035. **Our specific requests are highlighted in yellow, and we request an update to the MMP per these recommendations prior to adoption by the City Council.**

**The Climate Advisory Board has two primary areas of concern:**

***1. The MMP needs to be more integrated with the City's other transportation planning efforts. These planning documents include:***

- a. **Comprehensive Citywide Parking Study** While "parking" is referenced 138 times in the document, there are very few tangible parking reforms in the list of 377 projects. Parking reform must be a top priority for the City of San Diego to ensure mobility justice and equitable transportation systems.
  - i. Objectives 9.1, 9.2, and 9.7 should be significantly expanded to integrate the results and recommendations of the recently completed

Comprehensive Parking Study. We request that the study's new Parking Management Framework be referenced in the MMP before the MMP is adopted. We request that future updates to the MMP score the recommendations of the Comprehensive Citywide Parking Study as a project that is evaluated through the criteria of Appendix A. Specifically, parking related projects including the recommendations for on-street parking, Mission Bay parking, and Balboa Park parking.

- ii. The City should amend Ordinance 21057 to require market rate parking pricing. The ordinance lacks a minimum fee and/or a formula to transparently calculate how parking should be unbundled from housing costs. The City should consider tying to a monthly transit pass as a minimum ([see CA State Policy as example](#)). Additionally, the City should ensure appropriate enforcement of Transportation Amenity requirements in the Land Development Manual, including a violation reporting procedure and regular inspections (these processes do not appear to exist). We request that this be scored as a project that is evaluated through the criteria of Appendix A.
  - iii. The City should explore a city-wide parking tax (including off-street, privately owned parking) and analyze revenue potential to support mode-shift goals for transit, biking, and walking. Data should be gathered from San Francisco (25% tax), Oakland (18.5% tax), Santa Monica (18% tax), Los Angeles (10% tax), and other jurisdictions that have citywide taxes on parking. The results of this analysis could/should be referenced in the CAP and the MMP if the revenue can support CAP and Vision Zero goals. We request that this be scored as a project that is evaluated through the criteria of Appendix A.
- b. Bicycle Master Plan:** The Mobility Master Plan aims to integrate pedestrian, bike, and transit planning into one document. However, the City is also developing a separate Bicycle Master Plan. The City should articulate how the Bicycle Master Plan will complement the Mobility Master Plan to ensure a cohesive, consistent approach to project prioritization. We request that the MMP be formally modified and re-adopted after the Bicycle Master Plan is finalized.
- c. Vision Zero Strategic Plan:** The Vision Zero section is outdated, as it references the Strategic Plan for years 2020 through 2025. It should be updated to include a summary of progress made to date, an outline of the remaining steps to achieve the goal, and a revised time frame. We request

that the MMP state that projects and scoring criteria should use Vision Zero as a north star for safety scoring, prioritization, and funding (in addition to the specific requests for the scoring criterion below).

- d. **Pavement Management Plan:** The MMP only mentions that projects from the PMP and MMP may be “bundled,” but there does not appear to be a clear policy on including Vision Zero strategies into roadway resurfacing projects. The projects in the Mobility Master Plan should be prioritized over resurfacing-only unless the resurfacing project has scored highly based on the criteria in Appendix A. Note, the PMP does not have reference Vision Zero. We request that the City articulate how funding for the Pavement Management Plan (PMP) will prioritize Vision Zero projects through the overarching objectives of the MMP and the CAP.
- e. **Community Plans:** It is not clear how MMP projects will be added after being vetted through the Community Planning process. If a community proposes a project that has a low score under the Appendix A prioritization process, will the project still be added to the MMP? We request that projects that are recommended from community planning processes be subject to the scoring process in Appendix A prior to adoption of the community plan. If a project conflicts with CAP and Vision Zero goals, it should be scored accordingly and not adopted into the MMP.

***2. The Project Scoring and Evaluation (Appendix A) should be further refined to ensure transparent scoring through the lens of the City’s Vision Zero commitment.***

Each of the 377 projects listed from the Focus Areas should clearly articulate how they were scored using the process outlined in Appendix A. Each scoring criterion should be publicly available to show how the City arrived at each score. This transparency is essential for building public trust and ensuring equitable decision-making. Projects should estimate vehicle miles traveled (VMT) reductions and/or mode share increases to demonstrate their impact on CAP and Vision Zero goals. We request that each of the 377 projects note if it is a capital project and if it will be scored as a capital project under Council Policy 800-14. This will help clarify how projects are integrated into the City’s Capital Improvement Program.

- a. We request that “Safety Criterion A” be modified to state that Vision Zero as the lens and the standard for evaluating safety.

- b. We request that “Safety Criterion B” be modified to include serious injuries, because fatalities are not the only safety metric. The City should clarify how “serious injuries” are defined and reported by SDPD under Vision Zero and address potential underreporting of crashes, fatalities, and injuries that occur after initial reporting.
- c. We request that “Sustainability/Mobility Criterion B” and “Sustainability Criterion A” add clearer metrics including VMT reduction, mode shift estimates, and/or trip reductions. The current scoring criteria is vague with subjective criteria defined using words like “advances walking/biking/transit” which does not articulate the return on investment for each project.
- d. We request that the Cost Effectiveness Criterion include a methodology for evaluating projects that can generate revenue (e.g., new Parking Districts, city-wide parking tax, residential parking permit reforms, etc.).

**In addition to the two broad items above, we recommend the following:**

**Executive Summary Section:**

1. **GHG Emissions and Climate Goals:** The City has set an ambitious goal of achieving net carbon neutrality by 2035, including transportation emissions. While this is briefly noted in Section 2.1.2, we request that this goal be highlighted in the Executive Summary to underscore the urgency and importance of the plan’s role in meeting CAP targets.
2. **Living Document:** The Executive Summary describes the plan as a “living document,” which suggests it can be easily modified.
  - a. We request that any modifications or deviations should follow the prioritization process outlined in Appendix A with input from key advisory boards such as the Mobility Board and Climate Advisory Board. Additionally, projects from recent Community Plan updates (e.g., the linear park on Montezuma Ave) should be scored and integrated into the Mobility Master Plan to ensure consistency and avoid fragmentation.
  - b. The MMP does not appear to state that it will be updated every four years. We request that section 9.4 clearly articulate that the MMP will be updated after the Bicycle Master Plan is finalized and every four years after that (per discussions with staff).

## City Restructuring

- 3. Departmental Clarification:** The Mobility Action Plan section requires clarification regarding the City's organizational structure. This could involve identifying which department is primarily responsible for implementing each action, and which departments are supporting implementation. We request clarifications in the MMP about how the Mobility Master Plan will be managed and implemented now that the Sustainability and Mobility Department will be divided into City Planning, Transportation, General Services, and Engineering and Capital Projects.

## E-Bike Rebates, Bike Share, and SANDAG Coordination

- 4. E-Bike Rebates:** While e-bike rebates are mentioned many times as a strategy, this program is not included in the CAP and may need further research. We request that the City conduct research and document the effectiveness of e-bike rebates on mode shift and provide data from other cities (e.g., Denver and Atlanta) to understand the return on investment (ROI) and potential VMT reductions.
- 5. Bike Share:** Objective 10.1 references bike share, but bike share is not included in the CAP. Bike share is an effective and equitable transportation service with many successful examples in the US. We request that bike share be added to the CAP with prioritization for City funding. Bike Share should be scored with the Appendix A criteria and added as a project.

## General Comments / Questions

- 6. CEQA and VMT Analysis:** For projects requiring CEQA review, is VMT analysis being conducted? We request that VMT and/or mode shift estimates be added to the MMP scoring criteria in Appendix A?
- 7. Mode Split Data:** We request that Table 2-1 include the City's existing mode splits to provide context and highlight the urgency of achieving the 2030 and 2035 goals. This data will help residents and stakeholders understand the scale of the challenge and the need for near-term, transformative action.

## Conclusion

Thank you for the opportunity to provide feedback on the Mobility Master Plan. We believe these recommendations will enhance the plan's transparency, effectiveness, and alignment with the City's climate and equity goals. We look forward to seeing how this feedback is incorporated and am happy to provide additional input if needed.

Sincerely,

Tanisha-Jean Martin  
Chair  
City of San Diego Climate Advisory Board

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