



**Circulate San Diego**

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June 14, 2022

Chair Vivian Moreno  
Land Use and Housing Committee  
202 C Street, 12th Floor  
San Diego, CA 92101

**RE: Floor Alert: Support for Community Planning Group Reform**

Dear Chair Moreno:

On behalf of Circulate San Diego, I write to voice our support for Councilmember LaCava's proposal for Community Planning Group Reform. This package of reforms will bring community planning groups into compliance with the city charter, ensure access to participation, and encourage diversity of membership.

Recent revisions to the policy incorporated recommendations from other councilmembers, which deliver even more support for CPGs through the transition period and beyond.

A coalition of partners including Circulate San Diego, the Urban Collaborative Project, Mid-City CAN, Climate Action Campaign, the YIMBY Democrats of San Diego, NAIOP, the San Diego Regional Chamber of Commerce, BOMA, and the Building Industry Association sent a letter of support in March. That letter is attached here for your convenience.

We urge you to support the proposed CPG reforms and adopt the recommendations contained in the attached letter.

Sincerely,

Jesse O'Sullivan  
Policy Counsel  
Circulate San Diego

**CC:**

Councilmember Stephen Whitburn  
Councilmember Joe LaCava  
Councilmember Chris Cate



March 9, 2022

Mayor Todd Gloria and City Council  
City Administration Building  
202 C St.  
San Diego, CA 92101

**Subject: Support for Proposed Reforms to Community Planning Groups**

Dear Mayor Gloria and City Council:

On behalf of the below organizations, we are writing to support Councilmember LaCava's proposed reforms to Community Planning Groups (CPGs).<sup>1</sup> The proposal would bring CPG operations into compliance with the City Charter, and would increase diversity and participation in CPGs.

**Background:**

Over the past several years, calls for the City to consider reforms to Community Planning Groups have come from many sources, including the San Diego County Grand Jury, the City Auditor, the Land Use and Housing Committee of the San Diego City Council, and Circulate San Diego.<sup>2</sup>

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<sup>1</sup> The full text of Councilmember LaCava's proposed changes are online at <https://www.sandiego.gov/citycouncil/cd1/policies-priorities>.

<sup>2</sup> Circulate San Diego, Democracy in Planning (February 12, 2018), available at <http://www.circulatesd.org/democracyinplanning>; County of San Diego Grand Jury, Report on Community Planning Groups (April 18, 2018), available at <https://www.sandiegocounty.gov/content/dam/sdc/grandjury/reports/2017-2018/SanDiegoCommunityPlanningGroups.pdf>; City Auditor of the City of San Diego, Performance Audit of Community Planning Groups (December 2018), available at [https://www.sandiego.gov/sites/default/files/19-013\\_community\\_planning\\_groups.pdf](https://www.sandiego.gov/sites/default/files/19-013_community_planning_groups.pdf); City of San Diego Land Use and Housing Committee, Meeting Minutes for December 5, 2019, available at <https://onbase.sandiego.gov/OnBaseAgendaOnline/Meetings/ViewMeeting?id=1713&doctype=2>.

The Grand Jury Report found that membership of some CPGs is not sufficiently diverse to represent their communities.<sup>3</sup> Some CPGs currently create inappropriate restrictions for democratic participation, limiting community members' ability to vote and participate in elections.<sup>4</sup>

The current structure of CPGs is illegal. The City Attorney has opined that the current format of CPGs is inconsistent with the City Charter, and must be changed.<sup>5</sup> The City Attorney opinion validated issues first raised by Circulate in an April 2019 memo which explained that the City Charter requires advisory boards like CPGs to be appointed by the Mayor.<sup>6</sup>

### **The Proposed Reforms:**

The reforms proposed by Councilmember LaCava are the least disruptive option that is legally available. We support this approach.

This option removes CPGs and the CPC from official city decision making processes, but invites officially recognized CPGs and the CPC to weigh in on important planning matters in their communities.

In order to receive official recognition, CPGs would be required to adopt fair and inclusive bylaws that comply with an updated Council Policy 600-24 and its attached Terms and Conditions. The City Council would then have to vote to recognize the CPG, based on compliance with the Council Policy.

The CPC would continue to exist under an updated Council Policy 600-09, as an independent body expected to be composed of designated representatives of officially recognized CPGs.

### **Further Recommendations:**

When these reforms are passed, the City should take care to ensure communities of concern are not negatively impacted. In order to ease the transition, and to ensure

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<sup>3</sup> County of San Diego Grand Jury, Report on Community Planning Groups (April 18, 2018), p. 7-8, available at <https://www.sandiegocounty.gov/content/dam/sdc/grandjury/reports/2017-2018/SanDiegoCommunityPlanningGroups.pdf>.

<sup>4</sup> Circulate San Diego, Democracy in Planning (February 12, 2018), p. 9-10 available at <http://www.circulatesd.org/democracyinplanning>.

<sup>5</sup> Office of the City Attorney of the City of San Diego, Preliminary Legal Analysis of City Council Policy 600-24 Related to City of San Diego Community Planning Groups (December 3, 2019), available at [https://d3n8a8pro7vhmx.cloudfront.net/circulatesd/pages/211/attachments/original/1580656540/Response\\_from\\_City\\_Attorney\\_-\\_2019-12-10\\_-\\_RC-2019-9.pdf?1580656540](https://d3n8a8pro7vhmx.cloudfront.net/circulatesd/pages/211/attachments/original/1580656540/Response_from_City_Attorney_-_2019-12-10_-_RC-2019-9.pdf?1580656540).

<sup>6</sup> Circulate San Diego, Memo: Legal Concerns with Structure of City of San Diego's Community Planning Groups, (April 4, 2019), available at [https://www.circulatesd.org/memo\\_legal\\_concerns\\_with\\_structure\\_of\\_city\\_of\\_san\\_diego\\_s\\_community\\_planning\\_groups](https://www.circulatesd.org/memo_legal_concerns_with_structure_of_city_of_san_diego_s_community_planning_groups).

that community voices are heard, the City should also enact the following recommendations:

1. CPGs currently receive \$500 in annual funding. This funding should be available to CPGs for at least the next two years in order to help CPGs successfully make the transition to their new format.
2. These funds should be available up-front to CPGs, not only as a reimbursement. Reimbursement requires a CPG member with available funds to spend, which limits low-income residents' access to CPG funding.
3. A planning department staff member should be assigned to each community planning area and be made available to organizations and residents in that area, including CPGs and CPG members. This will give community members a single point of access to the planning process.
4. Trainings provided by the planning department should be expanded in audience and content. Currently, Community Orientation Workshops (COWs) focus primarily on the elements of CPG self-governance. COWs should be expanded to include how CPGs and community members at large can become more involved in city decision making, including land use decisions. In addition, City trainings should discuss the substantive impacts of planning decisions on equity, environment, and housing affordability.

Implementing these recommendations will ensure that CPGs and the community at large, will have as much continuity as possible.

### **Conclusion:**

We urge you to support the proposed CPG reforms. In addition, implementation of the above recommendations will ease the transition and help to ensure diverse community voices have access to the planning process.

Sincerely,

Jesse O'Sullivan  
Policy Counsel  
Circulate San Diego

Brian Pollard  
Executive Director  
The Urban Collaborative Project

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Jerry Sanders  
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