



May 9, 2023

Mayor Todd Gloria
City of San Diego
202 C Street, 11th Floor
San Diego, CA 92101

RE: University Community Plan Environmental Impact Report Scoping

Dear Mayor Gloria:

On behalf of the below-signed organizations, we are writing to urge you to ensure that Scenario One, the community-preferred scenario, is analyzed as a preferred or alternative project in the Environmental Impact Report (EIR) for the University Community Plan Update.

In February 2022, the Planning Department introduced two land use scenarios. Scenario One would have created capacity for 150,000 jobs and 83,000 homes.¹ Scenario One is also the scenario that is most reflective of the land use preferences the City heard when it surveyed the community.² The land uses contained in Scenario One would be a major step forward for the University Community Plan area, unlocking potential for desperately needed new homes and new job opportunities.

¹ Presentation to University Community Plan Update Subcommittee Meeting, City of San Diego (February 15, 2022), p. 53, available at https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usfiles.com/ugd/bf5c85_05dfcf51e63b4091b2cc54caaff47274.pdf.

² University Community Plan Update Choose Your Future! Summary Report, City of San Diego (February 2022 DRAFT), pp. 36–37, available at https://www.sandiego.gov/sites/default/files/ucpu_outreach_report_reduced.pdf.

Unfortunately, the proposed scenario in the Community Discussion Draft would create capacity for 24,000 fewer homes than Scenario One. It would also create capacity for significantly fewer jobs.³

The Community Discussion Draft also includes transportation elements. These elements generally create much safer conditions for pedestrians and bicyclists, and will result in better bus performance. In particular, the scenarios include protected bicycle facilities on La Jolla Village Drive and Genesee Avenue, which were absent from earlier iterations of the plan.⁴ This is a significant improvement.

In addition, the proposed transit network includes a number of flex lanes and bus on shoulder facilities that will result in improved bus travel time and reliability.⁵ However, the proposed transit network does not include flex lanes on Genesee Avenue between Nobel Drive and State Route 52. This area frequently experiences high levels of congestion, because it is a choke point between North University City and the Clairemont Mesa neighborhood.

While including flex lanes in high-traffic areas is politically challenging, it is also where they are most important. Flex lanes and transit only lanes move more people than ordinary vehicle lanes. Bus riders should not be stuck in traffic that they do not create. The Plan should include flex lanes on Genesee Avenue in this area.

Circulate San Diego's recent report, [Making the Most of the Mid-Coast Trolley](#), explains how adding capacity for jobs and homes is essential to getting the economic, climate, and equity benefits of the \$2.2 billion investment in the Mid-Coast Trolley. Out of all the proposals put forward by the City, Scenario One does the most to maximize those benefits.

Between September and November of 2021, the City's Planning Department conducted significant outreach for its online survey, dubbed "Choose Your Future!" The University Community Plan Update Project Team conducted over 23 tabling events, six days of canvassing, 30 office hours, two virtual workshops, two virtual open houses, and five newsletter distributions resulting in over 22,500 homes reached. Over 2,600 respondents completed the survey. Those respondents are the most demographically

³ The Community Discussion Draft scenario creates the same number of homes as Scenario A, which creates fewer homes and jobs than Scenario 2. Scenario 2 creates fewer 21,000 fewer homes and significantly fewer jobs than scenario 1. University Community Plan Update Community Discussion Draft, City of San Diego (April 2023), p. 204, available at <https://webdocs.sandiego.gov/public/ucpu-cdd-print-reduced.pdf>; Presentation to University Community Plan Update Subcommittee Meeting, City of San Diego (November 15, 2022), p. 5, available at https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usfiles.com/ugd/bf5c85_8bc50fe5d7aa42a8a5391a3a7bc1f318.pdf; Presentation to University Community Plan Update Subcommittee Meeting, City of San Diego (February 15, 2022), p. 53, available at https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usfiles.com/ugd/bf5c85_05dfcf51e63b4091b2cc54caaff47274.pdf.

⁴ Community Discussion Draft, City of San Diego (April 2023), p. 104, available at <https://webdocs.sandiego.gov/public/ucpu-cdd-print-reduced.pdf>.

⁵ *Id.* at p. 109.

representative sample of the University Community Plan area, out of any form of input collected by the City.

Over 50 percent of survey respondents favored the highest capacity option in every geographic area they were presented. These preferences were then developed into Scenario One.

The Planning Department subsequently published two new scenarios, both of which include less capacity than Scenario One. These lower-capacity scenarios do not reflect the City's stated goals to prioritize economic development, climate, and equity, nor do they reflect the stated view of the overall community as reflected in the City's own survey. Unfortunately, these lower capacity scenarios are the ones used in the Community Discussion Draft.

If the City fails to include Scenario One in its EIR, then the City Council will be denied an opportunity to vote for that scenario. Failing to include this scenario would leave the City Council without the option of voting for the scenario most reflective of community desires and most beneficial to our region.

San Diego faces an acute housing shortage, yet San Diego's current zoning rules make it illegal to build significant numbers of homes in most locations within the city. The Community Plan Update has the potential to enhance the University community by creating opportunities for families of all incomes to live and work in this transit-rich neighborhood.

The Planning Department should ensure that City Council has the option of approving Scenario One by including it in the draft and final EIRs for the University Community Plan Update.

Sincerely,

Jesse O'Sullivan
Policy Counsel
Circulate San Diego

Will Rhatigan
Advocacy Director
San Diego County Bicycle Coalition

Brigette Browning
Executive Secretary-Treasurer
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CC:

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