



Friends of Rose Creek *

"Connecting Our Communities"

4629 Cass Street #188
San Diego CA 92109



January 23, 2018

Via Email (Mprinz@sandiego.gov)

Michael Prinz, Senior Planner
Planning Department

RE: Balboa Avenue Station Area Specific Plan Draft Dated December 4, 2017

Dear Michael,

Thank you for the opportunity to comment on this project. Rose Creek is the heart of this community and we feel very strongly that by creating a project that recognizes the central role the creek serves in creating our community character, we can enhance the neighborhood for existing and future residents. Unfortunately, the plan as presently written does not do enough for the creek while asking the creek to provide a large number of functions. However, we believe that by incorporating our recommendations, this project can benefit the creek and the neighborhood.

FUNDING

The "Infrastructure Financing Study" should be completed before this plan moves forward in the planning process so that the community can understand the improvements to be made, who will pay for them, and the timeline for implementation before increased housing density is permitted. From funding trashcans along Rose Creek to providing park staff to help

**A member of the Rose Creek Watershed Alliance*

**A Friends Group of San Diego Canyonlands, Inc.*

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volunteers manage the creek, funding is the linchpin of this project and needs to be identified prior to furthering this plan.

PARKLAND DEDICATION

In regards to sections 5.1.1, 5.1.2, and 5.1.4, the project plan should dedicate as parkland the following Assessor Parcel Numbers that are publically owned. **In the Pacific Beach Community Plan update of 1992** the community identified Rose Creek as serving the community in the form of open space parkland. The time to take action is as part of the Balboa Ave Station area specific plan. See Table 1 below for a list of parcels in public ownership appropriate for parkland dedication.

Table 1: Rose Creek Parcels

Parcel # ¹	Acres	Notes
Caltrans Paper Street **		Caltrans property to the west of APN 6760100600 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711400 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711300 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711300 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711100 to the freeway. Rose Creek and location of Rose Creek Bikeway.
4245710200 **		Caltrans property to the north of APN 42457102 to the freeway. Rose Creek and location of Rose Creek Bikeway
4245710200 **	2.39	Flood Control Channel placed on top of creek. Rose Creek and location of Rose Creek Bikeway

¹ Parcels designated with + are identified in the Pacific Beach Community Plan as being open space parks. Parcels designated with the ** are identified by the Friends of Rose Creek as potential parcels for SANDAG mitigation efforts.

Parcel # ¹	Acres	Notes
4171801500 ^{+ **}	13.78	APN owned by Federal Government. Only the Southeast corner is in the creek and has open space on it. The east strip of the entire parcel should be included for upland habitat.
4172504000 ⁺ (On the SANDAG GIS Map this encompasses APN 7601038300) **	3.28	Owned by City of San Diego
7601038300 ^{+ **}	.17	Owned by City of San Diego
4172421300 ^{+ **}	1.27	Owned by City of San Diego
4172423100 ^{+ **}	NaN	Owned by City of San Diego
4172423200 ^{+ **}	NaN	Owned by City of San Diego
4172423300 ^{+ **}	NaN	Owned by City of San Diego
4172423400 ^{+ **}	NaN	Owned by City of San Diego
4172422400 ^{+ **}	NaN	Owned by City of San Diego
4172421300 ^{+ **}	NaN	Owned by City of San Diego
4172421900 ⁺	NaN	Private Property extending into creek. Owned by Don F. Fells. Only dedicate portion in channel if possible.
4172422600 ⁺	NaN	Owned by City of San Diego
4172422800 ⁺	NaN	Owned by City of San Diego
4172423600 ⁺	NaN	Owned by City of San Diego
4172423000 ⁺	NaN	Owned by City of San Diego
4172912300 (Also listed as APN 41729122) ⁺	NaN	Owned by City of San Diego
4172910300 ⁺	NaN	Owned by City of San Diego
4192910200 ⁺	NaN	Owned by City of San Diego
4172910100 ⁺	NaN	Owned by City of San Diego
Pico Street Paper Street south of APN 4172910100 ⁺	NaN	Owned by City of San Diego
4172820500 ⁺	NaN	Owned by City of San Diego
4241020500 ⁺	NaN	Owned by City of San Diego
4241123400 ⁺	NaN	Owned by City of San Diego
4241112800 ⁺	NaN	Owned by City of San Diego
4241020500 ⁺	NaN	Owned by City of San Diego
Pico Street Paper Street East of APN 4241020500 and West of 4241123400 ⁺		Owned by City of San Diego

Parcel # ¹	Acres	Notes
7600351300, 7600350501, 7742446422, 7600350200, 7600350400, 7742446716, 7742446722, 7742446723, 7742446724, 7742446905, 7742446617, 7742446618, 7742446906, 7742446907, 7742446619, 7742446620, 7742446418, 7742446419, 7742446421, 4244600500, 7742446420, 7742446908, 7742446509 ⁺		Owned by City of San Diego and may already be dedicated parkland. (Is this all in Mission Bay Park already or is part of it City of San Diego Parks & Rec?) Are any of these parcels not dedicated parkland?

Because an approved project plan in the form of a community plan update reduces the requirements for CEQA review, we feel very strongly that protections for Rose Creek need to be in place before any zoning changes are approved as **the City of San Diego has been dragging its heels on this issue for twenty-five years**. The primary goal of parkland dedication is to ensure Rose Creek is managed for habitat, water quality, and recreation with ranger support, trash cans, and interpretative activities as indicated in the Rose Creek Watershed Alliance Opportunities Assessment (available on-line at <http://www.rosecreekwatershed.org/projects/#oppassessment>). Our vision is for lower Rose Creek to be an open space park providing recreational and learning opportunities and a clean, healthy, aesthetically pleasing environment for residents, visitors, businesses, and native plants and animals, while serving as an accessible link for bicyclists and pedestrians to move between Rose Canyon Park, Marian Bear Park, Mission Bay Park, and the surrounding communities. If other means provide the same benefits as parkland dedication and that will ensure the land remains open space, we look forward to hearing how alternative land use designation can achieve the same community benefits.

PAPER STREET

As part of the community plan update, the extension of Pico Street south of Garnet should be removed from the planning maps. This paper street currently exists in portions of Rose Creek (south of where Pico and Garnet Avenue intersection through Rose Creek and along Mission Bay High School and are east of APN 4241020500 and West of 4241123400).

LANDSCAPING

In regards to section 4.4.2, the plant palette for any projects in the area should emphasize the Coastal Sage Scrub community. For trees, there should be a focus on natives such as Torrey Pines, Coast Live Oak, Western Cottonwood, and Sycamore where large trees are appropriate. In areas better suited to small trees, the tree pallet should include Coast Scrub Oak, Lemonade Berry, and Toyon. All plant palettes used along the creek should consist solely of plants in the Coastal Sage Scrub community to protect the creek and the creatures that live in and along the creek. Any non-native plants on the CAL-IPC Inventory should be expressly precluded from planting along the creek or within the adjacent neighborhoods (see <http://www.cal-ipc.org/plants/inventory/> for a complete list).

ADDITIONAL PARKS TO SUPPORT ADDITIONAL RESIDENTS

Any additional parks or parklets provided by redevelopment should be publically accessible and include dog use areas. Currently Rose Creek is the only community dog walking area and there are no public playgrounds in the neighborhood. There needs to be dog walking areas and children's playgrounds within the project area outside of the Rose Creek corridor.

PACIFIC BEACH ECODISTRICT

Please incorporate the recommendations from the Pacific Beach EcoDistrict into the project plan and require all new development and/or re-development to adhere to the Project Design Guidelines for Pacific Beach EcoDistrict Compatibility (available at <http://beautifulpb.com/wp-content/uploads/2013/02/PBPGecoDistrictDesignChecklist20161020.pdf>)

GARNET AVENUE BRIDGE

In regards to the proposal to widen the Garnet Avenue Bridge over Rose Creek, we strongly oppose this recommendation. The City of San Diego does not maintain the area under the bridge currently and increasing the width of the bridge will just increase housing opportunities for homeless people. However, the bridge could be redesigned using the following are recommendations:

1. Use the minimum amount of impermeable surface (building footprint, paved driveway, etc.) as practicable.
2. Use flow control structures such as swales, retention/detention areas, and/or cisterns to maintain the existing (preproject) peak runoff.
3. Direct downspouts to swales or gardens instead of storm drain inlets.
4. Use flow dissipaters at runoff inlets (e.g., culvert drop-inlets) to reduce the possibility of channel scour at the point of flow entry.
5. Maintain native shrubs, native trees and groundcover whenever possible and revegetate disturbed areas with local natives.
6. Combine flow-control with flood control and/or treatment facilities in the form of detention/retention basins, ponds, and/or constructed wetlands.
7. Use flow control structures, permeable pavement, cisterns, and other runoff management methods to ensure no change in post-construction peak runoff volume from pre-project conditions for all activities.
8. Stream crossings shall incorporate a free-span bridge unless infeasible due to engineering or cost constraints or unsuitable based on minimal size of stream (swale without bed and banks or a very small channel). If a bridge design cannot free-span a stream, bridge piers and footings will be designed to have minimum impact on the stream.
9. Please perform a hydraulics analysis, demonstrating that widening of the bridge will not cause significant scour or channel erosion.

10. Include upland habitat beneath the bridge to provide undercrossing areas for wildlife species that will not enter the creek. Native plantings, natural debris, or scattered rocks will be installed under bridges to provide wildlife cover and encourage the use of crossings.

LIGHTING

Any lighting installed along the creek should follow the guidelines in *A Review of the Impact of Artificial Light on Invertebrates*. Bruce-White, Charlotte and Matt Shardlow. 2011. ISBN 978-1-904878-99-5. Lighting along the Rose Creek Bike Path can have negative impacts to invertebrates and other wildlife if not properly designed.

We would like to see the specific type of lighting included in the Environmental Impact Report (EIR) as the type of lighting used could have significant negative impacts on invertebrates. Certain types of lighting are generally not proposed for use near water bodies. We recommend the use of Low-pressure sodium vapor lamps, also known as sodium oxide lamps (SOX). Red, yellow and amber LED lamps each have a specific, narrower spectrum and have peak wavelengths between 590 and 660 nm, which is less attractive to invertebrates (See Hewes, J. (2009) Light emitting diodes (LEDs). [online]. London, The Electronic Club. Available from: <http://www.kpsec.freeuk.com/components/led.htm>).

Here are some general suggestions to minimize negative impact to biologic resources.

1. Use narrow spectrum light sources to lower the range of species affected by lighting.
2. Use light sources that emit minimal ultra-violet light.
3. Lights should peak higher than 550 nm.
4. Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue short wave length content they should be of a warm / neutral color temperature <4,200 kelvin.
5. Lamps should not emit light at angles greater than 70°.

Because the impacts of night lighting on invertebrates and other wildlife can be quite disruptive, we request that the Plan specify the type of lighting suitable for use along Rose Creek including the specific types of lighting fixtures and lighting technologies with light spectrum, wattage, technology and angles clearly indicated.

CLIMATE ADAPTATION

The State of California Climate Adaptation Strategy requires new planning efforts to address climate adaptation strategies. From Senate Bill 379, “Upon the next revision of the housing element on or after January 1, 2009, the conservation element shall identify rivers, creeks, streams, flood corridors, riparian habitats, and land that may accommodate floodwater for purposes of groundwater recharge and storm water management.” As the area between Mission Bay Drive and Rose Creek is in a 500-year flood plan and as sea level rise projections show portions of the project area under water at high tide, restoring the biologic functions of Rose Creek is critical to protecting existing and future development in the project area. In the EIR, please include a detail analysis of sea level rise as part of this project in order to assess areas that are better preserved as habitat to protect developed areas that could otherwise be inundated during heavy storm events and/or high tides scenarios.

PEDESTERIAN IMPROVEMENTS

Please make additional density contingent on pedestrian improvements by assessing developer fees for any density increase and requiring the pedestrian improvements to be made prior to completion of any new projects.

On behalf of the Friends of Rose Creek, we thank you for considering these key points to create a Transit Oriented Development Area that benefits rather than harms Rose Creek. When Rose Creek is healthy and well cared for, the surrounding neighborhood will be a desired location for families, young adults, and seniors, as well as those who have lived along Rose Creek for decades.

Deepest regards,



Karin Zirk
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cc: Mayor Kevin Faulconer via email (kevinfaulconer@sandiego.gov)
Councilmember Lorie Zapf via email (loriezapf@sandiego.gov)