



Pacific Beach Planning Group

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October 01, 2020

TO: City of San Diego Mayor Faulconer, City Council members, Planning Director Hansen

FR: Pacific Beach Planning Group (PBPG)

RE: "Complete Communities Housing Solutions" (CCHP) & Parks Master Plan (PMP)

In July, PBPG designated a Land Use & Planning Sub-Committee to review the CCHP and PMP programs. They met seven times for a total of about eleven hours, with nine Board members able to attend all or parts of the meetings. The full Board heard the item in August as an Information Item and then took action at their regular September meeting.

Below is a summary including the Motions passed along with some comments and quotes from other comment letters that were distributed to the group.

We respectfully invite you to attend one of our Board meetings on the 2nd Wednesday of each month, beginning at 6:30pm. We urge that the item not be docketed until the many substantive comments have been addressed/replied to.

The motions in the pages that follow are organized into the following sections:

1. Requests for responses to significant public comments & allow public time to review and respond.
2. Affordable Housing (PBPG supports doing more)
4. Parks (keep land as part of the standard), Equity (yes), Commercialization (no)
5. Funding (please require estimates for funding changes; do not reduce funding as proposed)
6. Building Intensity (details matter)
7. C3 Letter (we endorse it; see attached – it addresses some issues that aren't addressed in our other motions)
8. Planning Commission 17 recommendations (yes to all of them, see attached)

Thanks for your consideration of these significant issues.

Karl Rand
Chair, PBPG

Carolyn Chase
Chair, Land Use & Planning Sub-Committee

Overall Statement of Principles adopted unanimously by the PBPG Board:

A complete community doesn't recognize one issue over another. Although members of our group have different perspectives on the details of implementation, we support planning efforts in our community that give equal consideration to:

- Increased density and affordable housing;
- Maintaining and increasing both public access to parks and open space, as well as increasing park acreage to accommodate increased density;
- Improving transit infrastructure and inspiring increased and enhanced access to mass transit;
- Encouraging mobility by implementing pedestrian, bike, and multimodal usage in planning;
- and
- Featuring community involvement in the planning process, so that community members can provide insight on the present and future needs of our neighborhoods.

MOTIONS AS PASSED with comments

1. Delay in order to respond to public comments

*"I strongly urge the City to slow down the approval process to allow for a more transparent and participatory public input process which includes the sharing of any revisions and refinements made by City staff prior to seeking decision-makers' approvals." Letter dated June 11, 2020,,
Deborah Sharpe, ASLA Landscape Architect*

The letter dated June 22, 2020, from Nico Calavita and Susan Baldwin, as well as the letter to LU&H (Land Use & Housing Committee) points out: *"Bold actions are needed; but in these uncertain times perhaps we have the luxury of moving Housing Solutions (CCHP) forward at a slower pace. This would give the city time to consider strategic issues that might improve the distribution of housing citywide, such as bringing more housing to the North of the city where most jobs are located and bringing more jobs to the South, to create more of a job-housing fit, with significant benefits for climate change."*

...
"We believe that Housing Solutions, which is proposing citywide changes greater in scale and significance than those proposed years ago under the City of Villages projects, is being pushed through with unnecessary speed."

Citing a letter dated June 13, 2020, by Jeff Harkness, *"...the City is asking decision-makers to approve a PMP that has not been thoroughly vetted by communities and recreation councils."*

1a. MOTION: Wait to docket Complete Communities plans until both the housing and infrastructure portions have been fully developed and reviewed by all stakeholders including Community Planning Groups. MOTION Passed unanimously

1b. MOTION: Ask the City of SD to respond to the following letters: by Howard Greenstein dated June 11, 2020,, by Jeff Harkness dated June 13, 2020,, by Deborah Sharpe dated June 11, 2020,, the Kensington-Talmadge Planning Group Letter dated May 14, 2020,; by Tom Mullaney dated July 13, 2020,, and by Nico Calavita and Susan Baldwin dated June 22, 2020, MOTION Passed unanimously

1c. MOTION: Request that the Infrastructure components be released for review before all other components are considered for approval. MOTION Passed unanimously

Allow public time to review changes

At the PS&N Committee hearing, staff announced changes that were not made available to the public. Such changes should have been made available to the public at or directly after the hearing. These changes are still not available as of this writing. Providing changes only with the minimum 72-hour notice required for a City Council hearing is insufficient time to review significant changes and consider them.

In addition, the letter dated June 22, 2020,, from Nico Calavita and Susan Baldwin, as well as their letter to LU&H points out *"The communities affected (whose residents have been left out of the crafting of this initiative) should be brought to the table to participate fully in the planning process."* and *"A comprehensive Proposed Funding or Implementation Section of the plan is not included in the PMP. The plan allows for "flexibility in implementation which enables staff to adjust, refine, and improve strategies" depending on future needs and capabilities, without further approvals. Therefore, it is essential that a Review Body is established to oversee and approve the periodic proposed refinements and revisions. "*

Also in Howard Greenstein's letter: *"Establish a Recreational Value Oversight Committee that would be responsible for monitoring the point system, identifying programs or inconsistencies, and recommending refinements or amendments to the system. The committee could be comprised of members of the public, representatives of community planning groups and/or recreation councils, landscape architects and other planning or design consultants and representatives from the Park and Recreation and Planning Departments."*

1d. MOTION Use the Recreational Advisory groups and specifically direct and support them to monitor the points system and recommend refinements and amendments.
MOTION Passed unanimously

2. Affordable Housing

The letter dated June 22, 2020, from Nico Calavita & Susan Baldwin notes: *"We remain concerned that eighty percent of the housing will be market rate and the affordable housing requirements address the needs of the very-low and low-income households only marginally. This influx of middle-class newcomers leads to higher rents usually displacing lower income residents, a process referred to as gentrification."*

PBPG supports increased Affordable Housing requirements. However, especially in beach communities, even smaller market-rate units are no "affordable" and smaller units in these areas are more likely to be rented out for short term rentals, instead of for longer term housing. Affordable Housing requirements are especially essential in the Coastal Zone. Location cannot be factored out of market pricing of real estate.

2a. MOTION to adopt CPC motions re to affordable housing:

- Double the off-site affordable housing requirements
- Add a higher percentage of affordable housing units overall
- Remove the one-mile offsite allowance and require the affordable units to be in the same community planning area. MOTION Passed unanimously

2b. MOTION: To ensure more Affordable Housing is constructed, increase the Affordable Housing requirement, especially for moderate incomes levels as that can be met by building smaller units, and provide a low and very low rate housing subsidies beyond smaller unit

sizes and a higher % in order to encourage use of the program. MOTION Passed unanimously

2c. MOTION: The plan has problems with: 1. not enough affordable housing, 2. inappropriately distributed FAR, 3. inadequate transition provisions, and 4: lack of discretionary review for projects. MOTION Passed unanimously.

3. Parks, Equity, Commercialization

Re: Equity: Parks funding has been decreasing over the past decade.

3a. MOTION: Increase parks funding to increase equity across our city. MOTION Passed unanimously.

3b. MOTION: Establish a minimum percentage of the Citywide Park Fee to be earmarked for new parkland acquisition based on population density. MOTION Passed unanimously.

Re: Commercialization of Parks

In the PMP process the City Proposes to add:

Policy A3: Where appropriate, accommodate and design for temporary or permanent commercial uses in parks to increase public use of the park's space. Examples of commercial uses may include, but are not limited to, restaurants and cafes, food trucks, carts and kiosks, youth-oriented facilities, bike rental and repair, museums, culture centers and other retail uses and other similar uses.

Comment: this is very broad language including not just "other retail uses" but all "other similar uses" and also "not limited to" - what would not be allowed under this?

Quoting from letters by retired park planners: *"Retail uses are not appropriate within public parks and should not be allowed to use space that could be used for basic or upgraded recreational amenities. Delete all references to retail uses in the Plan."*

"Commercialization of parks is a slippery slope that could morph into a requirement to buy something as a prerequisite to using a park and the amenities provided such as tables/seating."

3c. MOTION: Keep language being proposed to be removed from the Recreation Element: "Protect parks from commercialization and privatization." MOTION passed unanimously.

Citing the letter dated June 13, 2020, by Jeff Harkness, "The PMP places little value on park acreages, such as assigning the same amount of points for a transit stop as for 3 to 8 acres of parkland."

"The scoring system appears to be arbitrary and subjective, making it ripe for racking up points to avoid having to acquire actual acreage for park purposes. To help remedy this, specific baseline, or essential park amenities, should be established for each park type to eliminate the possibility of displacement of amenities for the purpose of meeting scoring criteria. The addition of upgrades or new amenities should not be allowed to displace existing baseline amenities (including trees), such as encroachment into open turf areas, unless the turf area exceeds the baseline size identified for the particular park type."

Comments: Since this is the first system of its kind to be proposed in the nation, there are many questions that need to be answered. How will the the points system be used in practice? We'd like to ensure we don't do damage to existing parks. Chasing points might not improve a park. Meeting the points goal could be a way to lose public amenities and never gain acreage and potentially not serve as many people. There is a limit to how much you can pack into a park.

3e. MOTION: Scrap the Points System

MOTION passed 9-3-0 (note we recommend ways to improve the point system in other motions).

Comment against: Many parks have no amenities and points could provide incentives to build amenities. Nothing is done now because there is no incentive to make them nicer. It shouldn't be an either/or. Land acquisition needs to be valued much higher.

3f. MOTION : Adopt changes to the value scoring matrix to capture the value of natural parks and open space areas in an effective way. MOTION passed unanimously.

Comment: There should be limits on how much can be infilled; open park land is not valued currently in the points system

3g: MOTION: The addition of upgrades or new amenities should not be allowed to displace existing baseline amenities (including trees), such as encroachment into open turf areas, unless the turf area exceeds the baseline size identified for the particular park type. MOTION passed unanimously

Comment: Open park land areas should not be regularly targeted for filling/elimination.

Comment: We realize that Council Policy 600-33 will still apply to park project processing, noticing and review. However it's unclear how and when the points system will be used during the process.

Re: Friends of Rose Creek comments

3h. MOTION: Recommend changes cited in Friends of Rose Creek letter:

Policy CO6: Should be modified from "plant trees" to "plant drought-tolerant trees not on the California Invasive Plant Council list of invasive plants for southern California" to ensure park trees do not negatively impact our open space.

Policy CO7: We strongly recommend the addition of "ensure trash containers are provided in

all areas where unhoused persons reside.” MOTION passed unanimously

3i. MOTION: No lighting should be located in our undeveloped canyons and open space areas. MOTION passed unanimously

Other: pocket park requirement

3j. MOTION: Require Transit-Oriented-Density projects where there is a major bus stop to create a pocket park adjacent to the bus stop MOTION passed unanimously

4. Funding

Parks funding declined significantly beginning in 2008 (ref PMP page 37). Staff has declined to provide scenarios comparing Parks Development Impact Fees (DIF) in the new points system or for and CCHP scaling (decreasing) proposals vs the existing system (regardless of how fees are distributed). It would be a shame if the new system results in less park DIF fees in the face of increased growth. DIFs are capped by law and limited to the growth impacts from that project. Reducing them, or setting them too low, reduces the amount available to support that growth. Staff has indicated they have no plans to increase existing out-of-date DIFs.

4a. (also listed as 3a in the Parks section): MOTION: Increase parks funding to increase equity across our city (repeating from above for emphasis since underlying park deficiencies are due to underfunding of parks generally). Motion Passed unanimously.

4b. MOTION: Require City staff to provide estimates of DIF funds for the current structure vs proposed system including examples in each Council district. Motion Passed unanimously.

4c. MOTION: Change Neighborhood Enhancement Fee to base on Square footage not Lot size. Motion Passed unanimously.

4d. MOTION: To adopt motion in CPC letter: Base the DIF on Building Floor Area instead of Lot area. Motion Passed unanimously.

4e: Infrastructure Funding to Support Density Increases

Quoting again from Nico Calavita & Susan Baldwin: "Under Housing Solutions there are no FAR limits downtown eliminating the current FAR acquisition and FAR incentives programs. These programs have been successful. The FAR and Bonus Payment Program, for example, has generated approximately \$10 million since 2006 to help implement the open space and park system downtown. The original fee was \$15 per square foot of building area (not of lot area); it is now close to \$19. We are concerned that the proposed change will result in less funding for downtown open space and park system and other public benefits."

"The proposed benefits are small because the blunt approach that treats all properties the same, regardless of their location and base density, is very ineffective in capturing land values."

4f. MOTION: Prepare a comparison of the benefits of each program over time for decision makers and the public to review. Motion Passed unanimously

Comment: Staff has declined to provide estimates for the CCHP DIF fee reductions or for changing from Community-based park fees, to citywide park fees, or for the new

Neighborhood fee. While detailed analysis is provided for how changes in the Mobility plan will reduce developer costs, decision-makers and the public deserve estimates for all the proposed fee changes.

4g. MOTION: Support increasing PB DIFs to market rate (the current plan set fees as of July 1993). Motion Passed unanimously

Comment: We understand that the term “market-rate” doesn’t quite apply to how DIFs are established; the sense of this motion is that that current DIFs in the PB Community Plan are out-of-date and should be raised to match an adequate park standard along with the adoption of Parks Master Plan. Staff presented a chart of DIFs citywide noting that many were out-of-date yet they have presented only a plan for decreasing them, not for bringing them up-to-date, nor have they provided implementing language for the Citywide Park Fee.

4h. MOTION: Oppose reductions in DIFs where there are no affordability requirements. Motion Passed 11-1-0.

4i. MOTION: Earmark park funds on an annual basis for rangers, trash and whatever maintenance is required. MOTION passed unanimously.

5. Building Intensity

Floor Area Ratio Increases

5a. MOTION: Reduce the FAR in the Coastal Zone to 2.0 Motion Passed 11-1-0.

Comment: Increasing the FAR above 2.0 is contrary to the Prop D 30 ft height limit in the Coastal Zone.; Most of current FAR is .8 so we’re not asking to reduce density, we want it to be consistent with Prop D.

Transitional Zoning

From the Letter by Nico Calavita and Susan Baldwin:

"Recommendation: Apply transitional zoning principles from FARs of 5 along transit corridors such as El Cajon Boulevard to lower FARs on side streets. To provide more transition, eliminate RM-1-1, RM-1-2, and RM-1-3 zones from the Initiative. These zones “permit lower density multiple dwelling units with some characteristics of single dwelling units” (San Diego Municipal Code).

5b: MOTION: Apply transitional zoning principles to lower FARs on side streets. Motion Passes 11-1-0, Chair not voting

6. Planning Commission 17 recommendations from June 18, 2020 hearing

MOTION: Recommend all 17 Planning Commission recommendations be adopted. Motion Passes 11-1-0 Chair not voting.

<end of motions; see next page for NOTE related to other comments reviewed>

NOTE: In addition to materials available via the City of San Diego's website, including Council Committee hearings, key comment letters were reviewed and referenced above that are not available online, but the text is available via email. If you would like to receive a copy, [email: planning@iconactweb.com](mailto:planning@iconactweb.com)

These include:

Affordable Housing comments by Nico Calavita, Professor of Planning Emeritus, SDSU and Susan Baldwin, retired SANDAG housing planner

Environmental Health Coalition group letter

City Heights Community Development Corporation comments

Community Planning Group comments from Kensington/Talmadge and La Jolla

Community Planners Committee Motions

“Builder Impact Fees and Affordable Housing” by Brian J. Curry, MAI, SRA, CRE, FRICS

Park Master Plan comment letters by Deborah Sharpe, Jeff Harkness, and Howard Greenstein

Deborah Sharpe, Howard Greenstein and Jeff Harkness are all landscape architects who retired from the city of San Diego with over 80 years of combined public service, which included the creation and implementation of park policies and regulations. They are all residents of park-deficient, urban communities.

Read their op-ed in the *Voice of San Diego* that summarizes their concerns:

New Plan for City Parks Misses the Point by Deborah Sharpe, Jeff Harkness, and Howard Greenstein

The City's proposed new point system for parks in effect devalues parkland, and would predictably lead to few or no new parks and sports fields.

Voice of San Diego: <https://www.voiceofsandiego.org/topics/opinion/new-plan-for-city-parks-misses-the-point/>