

February 5, 2020

City of San Diego Planning Department  
c/o: Marlon Pangilinan  
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San Diego, CA 92123  
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Re: Comments on Clairemont Community Plan Update  
Community Discussion Draft—Initial comments

Dear Marlon:

Here are my initial comments on the Clairemont Community Plan Update –Community Discussion Draft January 2020. I know that there will be updates put out by the city and there will be input from the subcommittee that could affect my comments. However for discussion purposes here are my initial thoughts.

Page 11 Land Use and Economic Prosperity Element Goals

First Bullet should be changed to say “ A vibrant multimodal balanced community that provides residential, commercial, office, industrial, institutional, and civic uses.” This is more consistent with the balanced approach in the Mobility Element first bullet point under Goals. Our communities are not just pedestrian oriented. Auto represents the primary mode of circulation especially for Prime Industrial and most retail-even after the CAP is fully implemented.

Page 13 Community and Neighborhood Village

Comment/ Proposed edit:

*Community Village Center and Neighborhood Village Centers designations allow for areas with commercial, office, and multifamily residential uses including mixed-use buildings ~~with~~ integrating office or residential space ~~above~~with retail space.*

Horizontal mixed use should be allowed for greater flexibility.

Page 14 Business Improvement, Attraction, Retention, and Expansion

2<sup>nd</sup> paragraph *The Community Plan designates the Rose Creek/ Canyon Industrial Business Park as Prime Industrial Land.*

Comment: Figure 2.5 designates far more than the Rose Creek/Canyon Business Park at the north end of Morena as Prime Industrial. Figure 2-5 uses the map from the General Plan. EPA-15 of the General Plan implies that the Community Plan when it is updated should verify the appropriateness of the PI map. Most of the uses along Morena Blvd are not Prime Industrial base sector industries. The Prime Industrial designation has adverse impacts on potential releasing of tenant spaces that are not PI.

Page 16 Villages and Districts (comment: Please include map of Villages, Districts, and Nodes.)

## Community Core

### Existing draft:

The Community Plan envisions the Community Core as the Community's vibrant, pedestrian and transit oriented, mixed-use village. Within this village, the combination of commercial and entertainment uses along with residential uses will provide activity and vitality. A network of pedestrian walkways and bikeways will serve to breakup the superblock to create a walkable block pattern for development while improving internal vehicular, pedestrian, and bicycle circulation and connectivity to the surrounding neighborhoods. Public spaces such as promenades, mini parks, and plazas will provide spaces for recreation, public gatherings, and community activities (e.g. outdoor markets and festivals).

### Proposed revised draft:

The Community Plan envisions the Community Core as the Community's vibrant mixed-use village that benefits from a balanced multi-modal transportation system. Within this village, the combination of commercial and entertainment uses along with residential uses will provide activity and vitality. A network of pedestrian walkways and promenades will serve to interconnect the various uses within the core and through the core to surrounding neighborhoods. Public spaces along the promenades including potentially mini parks and plazas will provide spaces for public gatherings, and community activities (e.g. outdoor markets and festivals).

### Rationale:

A large retail uses such as a Home Depot of the size of Genesee Plaza, even with the parking being in a 3-level parking structure would require approximately 8 acres (350,000 sf +/-) of land. That is the equivalent of approximately 4 average city blocks of 90,000 sf. A 150,000 sf Target is 1 2/3 city blocks without providing any parking. Genesee Plaza is approximately 40 acres of land or the equivalent of over 19 city blocks. The introduction of roadway system with bicycle lanes dissecting the center will create traffic challenges and safety issues for circulations going through the center. There are existing roadways and pedestrian pathways from Balboa to Balboa Arms, but the vehicular way is offset to minimize cut through traffic that would adversely affect the internal circulation of the center. Further the transportation department of the city as part of the Balboa Revitalization Project called for the closure and reduction of driveways accessing Balboa to minimize the impact on Balboa. This concept proposed in the draft goes directly in contradiction to that concept. What is important is a balanced multi-modal transportation system. When the revitalization of Genesee Plaza happened about 10 years ago, pedestrian walkways were integrated into the project including 4 pedestrian walkways through the main parking field with two pedestrian pathways extending back to Balboa Arms. Outdoor plaza for eating have been integrated as was shown to the subcommittee. It is important to understand the type of uses and their sizes that make up a community commercial core. They are not small retailers. Even a grocery store of 50,000 sf requires approximately 120,000 to 150,000 sf of parking unless the parking is in a parking structure. This would require more than a city block. The grid network based on 300 feet x 300 feet with 60' two lane streets would reduce the net usable area by 30 %. If you consider the adverse impact on the size and type of uses, it could be argued that the property value is being reduced by well over 30% by what is proposed.

Comment: Figure 2.5 designates far more than the Rose Creek/Canyon Business Park at the north end of Morena as Prime Industrial. Figure 2-5 uses the map from the General Plan. EPA-15 of the General Plan implies that the Community Plan when it is updated should verify the appropriateness of the PI map. This reverification led to the Costco property being removed from PI designation. Most of the uses along Morena Blvd are not Prime Industrial base sector industries. The Prime Industrial designation has adverse impacts on potential releasing of tenant spaces that are not PI.

#### Land Use and Economic Prosperity Element Policies

LUEP-4.1 Establish an internal east west road that aligns with the entrance of Mount Etna to become a “Village Main Street” as part of the village mobility network for the Genesee Plaza village area.

Comment: first there are three property owners so the feasibility of that concept is slim. Second, this driveway is the main vehicular access point into the center. Locating a “main street” here with adverse impact on access for vehicles will have an adverse impact on the center and reciprocally on the surrounding roadways because you won’t be able to move easily off Genesee Ave into the center. The last place to locate pedestrian oriented crossing and a “main street” is where there is a high volume of cars. Most “main streets” that were analyzed in the ad hoc subcommittees on the new mixed-use zoning for the City of San Diego had the main street internal to the project and not on high volume streets. I can provide numerous examples from the ad hoc committee meetings.

LUEP 4.2. Establish an internal north-south roadway that aligns with the existing entrances at Balboa Avenue to provide a connection between Genesee Plaza and Balboa Mesa Village areas.

Comment: This roadway connection between Genesee Plaza and Balboa Mesa has already been built. So why is this a policy? There is also pedestrian crossings there.

LUEP 4.5 Establish multiple pedestrian and bicycle connections from surrounding neighborhoods into the village, especially along adjacent neighborhood streets and open spaces, such as Balboa Arms Drive, Mt Alifan Drive and the SDG&E easement.

Comment: When the revitalization of Genesee Plaza happened about 10 years ago, pedestrian walkways were integrated into the project including 4 pedestrian walkways through the main parking field with two pedestrian pathways extending back to Balboa Arms. The number of access points to Balboa Arms are dictated by the size of the large tenants that are serving the community. Pedestrian access is provided to Genesee Plaza from Mt Abernathy as well. Due to the grades on the south side of Balboa Mesa there is only one access point for pedestrian, but an ADA pathway is provided. Outdoor plazas for eating have been integrated as was shown previously to the subcommittee. A pedestrian network through both Genesee Plaza and Balboa Mesa were incorporated when the centers were redeveloped. The current community plan calls for separate bicycle pathways through the shopping centers. When the revitalization of each center occurred the community planning group was asked how you physically can do that. No one had any idea. I would aa staff the same question?

LUEP-4.6 Create a linear park and multi-use urban path along both sides of Genesee and Balboa Avenues?

Comment: How? The agreement with the revitalization of Genesee Plaza and Balboa Mesa was that the City would pay for the non-contiguous sidewalk if the developers paid for the roadway improvements and traffic signal which they did. Is the city going to acquire land to build these parks and maintain them? Is this the best place to be putting FBA fees?

LUEP-4.7 Utilize canopy street tree to provide shade as well as palm trees as accent trees to continue the design theme along Balboa Avenue.

Comment: The combination of palms and canopy street trees are existing based on what the urban forester called for when Genesee Plaza and Balboa Mesa were revitalized. I assume that this policy is for the portion of the block on the south side east of Balboa Mesa that hasn't been redeveloped.

LUEP 4.8 Strengthen the internal road connection between the north and south sides of the village linking the two ends of the village.

Comment: Introduction of general vehicular cross traffic through the center can adversely affect the internal circulation of customers both in vehicles and on foot. By increasing the vehicular circulation volume. It can also impact the synergy of the interaction between stores. Is this a private street or public street?

LUEP 4.9 Establish an internal east-west road that aligns with the entrance at Lakehurst Avenue to Clairemont Mesa Boulevard that bisects the center to serve as a "Village Main Street," and primary entrance as part of the village Mobility network for the village area.

Comment: A "village Main Street" is one design option that could be developed by the Property owner but should not be mandated as a policy statement. Therefore, the policy should begin "Consider establishing an east-west "Village Main Street" between Lakehurst Avenue and Clairemont Mesa Boulevard. Not all Main Streets are actually vehicular oriented. Some are totally pedestrian. Requiring a "main street" should not be a requirement.

LUEP-4.11 Establish building frontages along Clairemont Mesa Boulevard and Clairemont Drive with uses that enhance a pedestrian environment and promote active frontages, such as retail storefronts and multifamily residential with walk-up entrances.

Comment: Multi-family residential frontages should be allowed but will require zoning code changes. Have you looked at the Clairemont Drive side of the center with the loading and rear sides of the existing facilities? Where is the rear side of the building suppose to be? Internal to the parking lot or should tenants simply eliminate the loading and rear functions of a building. Establishing building frontages along Clairemont Dr means basically tearing down what is existing. Is that economically practical.

LUEP 4.12 Create a linear park and multi-use urban path along Clairemont Mesa Boulevard and Clairemont Drive.

Comment: How? Is the city going to acquire land to build these parks and maintain them? Is this the best place to be putting FBA fees?

LUEP 4.74 Incorporate a roadway, pedestrian, and bicycle mobility network to create a walkable scale for new development with a "Village Main Street."

Comment: I would add at the end: “. . . where applicable.” “Main Street” is not the only concept for mixed-use development.

LUEP- 4.75 Locate Mixed Use Development along “Village Main Streets” to create a pedestrian environment with an active streetscape and public realms.

Comment: To much emphasis is on the term “Village Main Street.” It is not the only place for Mixed Use.

LUEP 4.77 Locate auto oriented and drive-thru uses away from entrances to prevent vehicle and pedestrian conflicts and to maintain the street wall.

Comment: The idea of minimizing vehicular and pedestrian conflicts is good, but locating these uses away from streets and entrances introduces more vehicular traffic internally to the center which is where you would like to create a more friendly pedestrian environment. Drive through facilities want to be located so people driving by can see them because they are designed to be convenient for customers driving by. It is important to remember that even with the Climate Action Plan fully implemented, the majority of customers to shopping centers and even most mixed-use retail will be coming by vehicles despite the increase in transit, pedestrian and bicycles.

LUEP 4.78 Locate buildings to the front to create a street wall.

Comment: Not in all cases. Is the street identified in the Mobility Element as “vehicular priority corridor.” Is the street wall critical on 6 lane prime arterial streets or is it more important on a 2 lane street that is more pedestrian oriented? How do you create enough street wall when parking requires often 60-70 percent of the site? It is challenging to comply with the code requirement for parking lot orientation of 50% of the parking is screened by buildings on projects of over 100,000 sf of building area. 100,000 sf of building area is more than a one block area. Therefore, the code concluded that it was not practical to require 50% screening of parking under 100,000 sf of building area. An answer is to require expensive parking structures whose costs will be transferred to tenant rent. How many tenants will go somewhere else that doesn't have a parking structure.

LUEP-4.79 Orient building frontages, entrances and windows to the public street.

Comment: As part of the effort of the Subcommittee on the development of the new Mixed-use zones, it was concluded that this is not always practical. The focus instead was on articulating the street façade. The key was to orient building frontages, entrances to pedestrian paseos and walkways.

LUEP-4.80 Develop the village with defined block and development pattern and comprehensive circulation design that facilitates walkability and provides for pedestrian scaled development.

Comment: This is an Economic Prosperity policy. Yet it restricts potential economic redevelopment. One Paseo is a mixed-use development on 23 acres of land with one private street going through it. A typical block is approximately 2 acres. If this were the policy, that project should be divided into 10 blocks. It would not have been practical. Further the traffic impacts of all of those streets on Del Mar Heights Road and El Camino Real would have been significant. This type of policy would eliminate large retail establishments that serve the community. It is a flawed policy that is not needed to create a walkable center.

LUEP 4.82 Expand the interior frontage areas of commercial buildings facing the center's parking lots so that more space is provided for gathering areas and ample pedestrian connections between stores, and a more "street-like" experience.

Comment: Delete the phrase "~~and a more "street-like" experience.~~" Streets are typically vehicular oriented. That is why they are called streets instead of sidewalks, promenades or paseos. The important thing to remember is that the public gathering places should be located where the center or project can activate it. LUEP 4.86 Provide internal pedestrian circulation system with wide sidewalks and pathways that are landscaped with trees.

Comment: Is this a policy for new projects or remodeled. Remodel projects may have numerous constraints which makes this difficult to accomplish.

LUEP 4.102 Minimize the number of curb cuts and driveway entrances for any parking and loading areas. Whenever possible, design driveways to be shared among neighboring properties in order to reduce potential conflicts with pedestrians and bicycles.

Comment: this is a good policy but in contradicts Policy LUEP 4.80 which calls for the creation of new roadways to break up superblocks and thus creates more intersections for pedestrian and bicycle conflicts with vehicles as well as adversely impact the flow of traffic on existing streets. Suggest keeping LUEP 4.102 and deleting 4.80.

#### *Parking*

LUEP 4.105 Locate structured parking below-grade, behind or wrapped by a building.

Comment. I would add to the end" . . . where feasible." This policy is not always possible.

LUEP 4.107 Break large parking areas into smaller parking areas in an effort to avoid large expanses of surface parking.

Comment: Is the question on issue of adequate landscaping or is it to create more vehicular circulation drive aisles that make the parking lot less efficient and more awkward for customers to navigate. Is this something that is more easily appreciated from an aerial view than on the ground.

#### *Rose Creek/ Canyon Industrial District*

LUEP-4.113 Design rooftops to protect views from adjacent hillside development. Rooftop design should screen mechanical structures and rooftop storage areas. There should be some variations in roof tops to avoid the appearance of flat roofs looking like a parking lot. Perspectives of the proposed project from vantage points from the adjacent hillsides should be submitted as part of the permit application.

Comment: There is no existing code regulation to address this. This goes to private views versus public views. What we are trying to promote in the economic prosperity is new base sector industry. This concept was created in the General Plan to keep property values and costs down to encourage these uses. I recommend that this policy be deleted.

LUEP 4.114 Incorporate setbacks with successive building floors on sloping sites to follow the natural line of the slope.

Comment: I think that this policy should be deleted. It is trying to be regulatory without adequate criteria. This policy could lead to an interesting design solution, but may not be necessarily for a specific project. On a case by case basis, you may find that the relationship of the setback to the existing slope is not even visible from the public right-of-way.

LUEP 4.115 Set the rear of the buildings into the slope to blend the structures into sloping sites to help preserve the canyon environment.

Comment: First of all, cutting into the slope of the canyon to accommodate the building may not be best for the canyon environment. It quite likely will impact drainage flow, potentially brush management, and potentially slope stability. The project now has to address how the building will support the surcharge of the canyon wall. Often industrial projects need a rear drive aisle for fire truck as well as delivery truck access. Recommend deleting this policy.

#### *Clairemont District-Milton Street/ Morena Boulevard Commercial Node*

LUEP 4.117 Encourage mixed-use development that incorporates a diverse range of housing product types and building designs that provide compatible transitions to the residential neighborhoods. Comment: Excellent policy but why does B and C below only address Denver Street?

B. Encourage multi-family housing and compact/condo between the alley and Denver Street with private and shared open space and pedestrian connections throughout.

Comment: Is this the alley on the west side of Denver? I assume that the pedestrian connections throughout is meant for residents and not the general public. These should be clarified.

C. Encourage the use of small lot single-family development east of Denver Street to create a compatible interface to the neighborhood.

Comment: *A small lot subdivision is the subdivision of multi-family zoned land, consistent with the density of the zone, for the construction of single dwelling units. SDMC §143.0365 Supplemental Site Development Permit Regulations for Small Lot Subdivisions.*

Is the community plan proposing to rezone land east of Denver to multi-family zones? If so, there is no guarantee that it will be turned into small lot subdivisions.

LUEP 4.118 Connect Denver Street from Milton Street to Mayo Street to improve mobility access through the site.

Comment: Worthwhile goal to consider, but it could reduce the flexibility of future redevelopment of the site for mixed-use development.

#### *Community Plan Implementation Overlay Zone*

Draft is being developed and comments will follow once draft is released.

Table 2-1 Needs to be reviewed based on proposed rezoning.

Mobility Element (in general excellent section)

Mobility Element Gals:

- Develop an accessible, balanced multi-modal network that incorporates a “layered network” strategy, which creates viable travel modes for people to use throughout the community.

Comment: Excellently worded goal. LUEP policies should reflect the balanced approach in this goal instead of only pedestrian oriented and maybe bicycles.

ME-6.3 Encourage the repurposing of on-street parking for alternative uses (i.e. placemaking opportunities, corrals for micromobility, etc.

Comment: I would recommend adding at the end “. . . where sufficient on-street and off-street parking is available.”

#### Urban Design Elements

Comment: Several components and figures are still needed to be able to review. Urban Forestry, Public Views,

#### 4.6 Building and Site Design

Comment: Several good phrases: *acknowledge the need for balance and compatibility. . . promote transitions between new and older buildings. . . not ignore existing scale.*

#### Urban Design Policies(Comment in general—good policies)

#### Sidewalk and Pedestrian Orientation

UD-2.2 Create a strong sense of edge along streets and open spaces by incorporating a continuous row of trees, landscape buffers, and or by providing consistent building setbacks especially along Clairemont Mesa Boulevard, Clairemont Drive, and Genesee Avenue.

Comment: What is meant by consistent building setback? Is this just along the major shopping centers or is this the entire length of the streets?

#### 9.0 Historic Preservation Element

HP 3.1 fifth through seventh policies should have been done as part of the Community Plan Update process. Identify and evaluate potential historic properties. Conduct a Reconnaissance Survey. Most of Clairemont is not historic. If these surveys were done as part of the Community Plan Update, most of Clairemont would not need to spend money doing historic studies for every remodel of a single family home or commercial center. This would have promoted more redevelopment in the community.

I want to recognize the hard work and effort over the last several years that has gone into Update. However, as you can see I have serious concerns that I hope that can be addressed. This is an important community plan update and it needs to move forward. Thank you for the opportunity to participate and comment.

Respectfully,



John Ziebarth AIA, LEED AP

Cc: Susan Mournian, Chair CCPU Subcommittee