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VIA E-MAIL: bfulton@sandiego.gov

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**Subject: Comments on Morena Boulevard Station Area Planning Study (Final Report, February 2014)**

Dear Mr. Fulton:

As a resident, property owner, and business owner in Bay Park and as a former planner assigned to Clairemont dating back to 1968 and former Chair of the Clairemont Mesa CPG, I have a strong professional and personal interest in the Morena Boulevard Station Area Planning Study. Therefore, I have reviewed the study and offer the following constructive comments. Hopefully, they will be of value in preparing a revised final study and/or in preparing future planning documents for the area.

#1 Reference – Cover and all subsequent pages

#1 Comment

The Final Report is dated February 2014, even though the Draft Report was dated March 2014. At least one of the figures (Figure ES-5) is dated 4/22/2014. Thus, the final report should be dated April 2014.

#2 Excerpt – Acronyms, page ix

SANDAG San Diego Council of Governments

#2 Comment

The correct nomenclature for SANDAG is “San Diego Association of Governments.”

#3 Excerpt – Executive Summary, ES.2, Previous Planning Efforts, page ES-1  
Introduction, 1.3, Previous Planning Efforts, page 1

The MBAP is a continuation of efforts that have been ongoing in the study area for many years. While the MBAP is an independent effort that starts with no preconceived ideas, it also recognizes the work that precedes it. Several of the previous planning efforts undertaken related to mobility and land use within the study area include:

- New School of Architecture (NSA) Student Input
- University of San Diego (USD) Real Estate Class Input /Sherm Harmer
- City of San Diego Pedestrian Master Plan
- City of San Diego Bike Master Plan
- Clairemont Ad-Hoc Community Plan Update
- Mid-Coast LRT Trolley Extension
- Linda Vista Community Plan
- Clairemont Mesa Community Plan

#3 Comment

Please advise how I may obtain a copy of the planning efforts undertaken for the first two bullets.

#4 Reference – Executive Summary, Figure ES-1: MBAP Study Area, page ES-2

#4 Comment

A number of non-existent (“paper streets”) are shown in Tecolote Canyon southeast of September Street.

#5 Reference – Executive Summary, Figure ES-1: MBAP Study Area, page ES-2  
and all figures thereafter

#5 Comment

The boundary line between Clairemont Mesa and Linda Vista is incorrect. The southern boundary line that extends northeast along Tecolote Road should continue along Tecolote Road and not jog northward to Knoxville Street. The San Diego Tennis and Racquet Ball Club occupies the area in question, which is in Clairemont Mesa. This error continues throughout the report.

The following graphic, which is identified as “Morena Boulevard Station Area Study Map”, shows the correct boundary:

[http://www.sandiego.gov/planning/community/profiles/clairemontmesa/pdf/gplan\\_landuse\\_map\\_morena\\_station\\_area.pdf](http://www.sandiego.gov/planning/community/profiles/clairemontmesa/pdf/gplan_landuse_map_morena_station_area.pdf)

**#6 Excerpts** – Executive Summary, ES.4 Community Outreach, page ES-3 and  
1.0 Introduction, 1.7 Community Outreach, page 18

**Public Workshop 1** – Introduction: initial input on vision, goals, and objectives, as well as concerns and issues that will need to be addressed. The workshop was held at USD in Linda Vista. (emphasis added)

**Public Workshop 2** – Analysis: land use trends, market opportunities and constraints, mobility conditions and options, existing zoning and land use flexibility and transit supportive planning policies. The workshop was held at Canyon Ridge Baptist Church in Linda Vista. (emphasis added)

**Public Workshop 3** – Concepts: solutions for mobility issues, suggestions for land use changes and design guidelines to protect current uses and users in the area. The workshop was held at the San Diego Humane Society in Linda Vista. (emphasis added)

**#6 Comment**

Please note that three workshops were in Linda Vista; no workshops were conducted in Clairemont/Bay Park. The first two workshops were in the southernmost part of the study area, and the third workshop near the center of Linda Vista (6866 Linda Vista Road) was not even near the study area. This may account for the reaction by many Bay Park residents that they were not aware of the study.

**#7 Excerpts** – Executive Summary, ES-5.1 Land Use, page ES-4

Land uses bordering the study area on the east exhibit a strongly residential character. The land falling within the Clairemont planning area is almost exclusively single family detached residential, while the land in the Linda Vista planning area is a mix of single family (attached and detached), multi-family, and mobile home, (emphasis added) especially between Linda Vista Road and Friars Road.

**#7 Comment**

Mobile home parks are located in Clairemont Mesa planning area, not Linda Vista.

**#8 Excerpt** – Executive Summary, ES-6.1 Proposed Land Use Scenario, page ES-8 and  
2.3 Proposed Land Use, page 39

The resulting preferred land use scenario proposed the following:

- Residential: approximately 5,800 dwelling units (Increase of approximately 4,800 from existing)

**#8 Comment**

These are the same numbers as used in the Draft study. How is that possible given the following statements made in the Foreword on page ES-1?

- Maintain the existing Clairemont Mesa Height Limit Overlay Zone as outlined in the community plan and in Municipal Code Chapter 13, Article 2, Division 13.
- Re-evaluate recommended residential densities in light of community concerns related to traffic and view shed impacts associated with new development.

#9 Excerpt – Executive Summary, ES-6.2 Fiscal Impact Analysis, page ES-11

The development program for the Project . . . would result in an increase of 4,718 dwelling units of various types of residential . . .

#9 Comment

As stated above, these are the same numbers as used in the Draft study. How is that possible given the statements made in the Foreword?

It must be noted that the projected 1,500<sup>1</sup> new dwelling units in Clairemont Mesa would exceed SANDAG's 2050 Regional Growth Forecast for 2035 for new multi-family units by 798<sup>2</sup> (1,500 – 702) or more than double. Will there be a comparable reduction elsewhere in Clairemont Mesa? Absent a comprehensive community plan amendment versus this micro-community plan amendment we may not know the answer for several more years.

#10 Excerpt – Executive Summary, ES-6.2 Fiscal Impact Analysis, page ES-11 and 2.3.2 Market Assessment, page 41

Most of the commercial space that would be demolished is economically obsolescent, and therefore is not generating the level of fiscal revenues, employment, and other economic benefits possible based on current market trends.

#10 Comment

It is unclear how the term “economically obsolescent” is defined for purposes of the study, and whether any analysis was done regarding the value of the existing businesses. Specifically, did the analysis include any industry-based assessments that showed a reduced demand for the services/products offered by the “economically obsolescent” businesses?

Please provide the studies used in Appendix G that substantiate the commercial space is “economically obsolescent”, and define the term “economically obsolescent” as used in this study.

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<sup>1</sup> E-mail from Michael Prinz, 5/29/14.

<sup>2</sup> Study area projections for the Clairemont Mesa portion were based on SANDAG's 2050 Regional Growth Forecast for Census Tracts 91.03, 91.04, and 91.06 (portion). The projection of 1,314 multiple family units for 2035 was extrapolated using projections for 2030 and 2040. The excel spreadsheet is available upon request.

#11 Excerpt – Executive Summary, ES-6.2 Fiscal Impact Analysis, page ES-11

It is worth noting that while the study area would experience a decrease in commercial square footage, this does not impact the ability of the City to retain and increase its office-based employment and taxable retail sales; this activity would be expected to shift to other parts of the City based on the availability of sites elsewhere to accommodate these uses.

#11 Comment

Please provide the studies that substantiate that sites are available elsewhere to successfully accommodate the small businesses and that it would be economically feasible for them to relocate.

#12 Excerpt – Executive Summary, ES-6.2 Fiscal Impact Analysis, page ES-11

It is reasonable to expect that net revenues from other more intensive commercial areas of the City, such as Mission Valley and Downtown, could more than offset the negative fiscal impact that could occur in the study area at build out. The study area could be complementary to these areas by offering more housing choices to employees who work in these areas.

#12 Comments

Please provide the studies that substantiate this “reasonable” expectation.

It might make more sense to provide more housing in Mission Valley and Downtown to accommodate these employees, thus reducing their need to travel.

#13 Excerpt – 1.0 Introduction, 1.5.5, Council District Boundaries, page 6

The study area lies entirely within Council District 2 (former councilmember Kevin Faulconer), although its southern boundary is the boundary between Districts 2 and 7 (Scott Sherman) (see Figure 1-5). Council District 6 (Lorie Zapf) is also near the northern boundary of the study area, Councilwoman Zapf has historically held an interest in Morena Boulevard, although it is technically not a part of her district.

#13 Comment

Given that the study area lies entirely with Council District 2, it is only proper that the current Councilmember, Ed Harris, should be included. He took office before the report was finalized in late April.

#14 Reference – 2.0 Land Use, Zoning, and the Built Environment, 2.1.1 Built Form and the Perceived Environment, Districts, page 19 and Figure 2.1: Built Form Observations, page 20

Reference is made to two RV Parks – Morena Bend Multi-Family/RV Park and Knoxville RV Park.

#14 Comment

The referenced RV Parks also include mobile homes and are designated as Mobile Home Parks in the adopted Clairemont Mesa Community Plan. This should be noted and corrected for future studies and reference.

#15 Reference – 2.0 Land Use, Zoning, and the Built Environment, 2.1.1 Built Form and the Perceived Environment, Districts, page 19 and Figure 2.1: Built Form Observations, page 20

Reference is made to Milton Car Lot and Automobile Dealership.

#15 Comment

In addition to new and used auto displays, the site also includes a showroom and offices, service bays, and storage of autos (in the existing RS-1-7 Zone and allowed by a CUP).

#16 Reference – 2.0 Land Use, Zoning, and the Built Environment, Figure 2-1: Built Form Observations, page 20

#16 Comment

The figure should also include views of Mission Bay and the Pacific Ocean from Bay Park. See Figure 3 in the adopted Clairemont Mesa Community Plan.

#17 Excerpt – 2.0 Land Use, Zoning, and the Built Environment, 2.1.1 Built Form and the Perceived Environment, Corridors, page 21

**Clairemont Mesa Drive (coming down off the mesa up to the crest over I-5)**

#17 Comment

Change “Clairemont Mesa Drive” to “Clairemont Drive”.

#18 Excerpt – 2.0 Land Use, Zoning, and the Built Environment, 2.1.2 Existing Development Intensity, Development Level, page 22

Development Level

As previously mentioned, the study area is completely urbanized and has been for many years. Its current level of development is typical of a commercial and industrial corridor that has seen more robust activity in the past, but still serves an important role in an increasing urbanized context. Because there has been limited new development in the area, some properties have become dilapidated, (emphasis added) while other structures have been demolished, although fairly rare. While economic activity continues in the existing buildings, there is not sufficient demand to consolidate or densify properties within the corridor. (emphasis added)

#18 Comment

Merriam-Webster defines dilapidated as decayed, deteriorated, or fallen into partial ruin especially through neglect or misuse.

Please identify which properties have become “dilapidated” and have “seen more robust activity in the past.”

Please provide the analysis used to make the determination that “there is not sufficient demand to consolidate or densify properties within the corridor.”

#19 Excerpt –2.1.2 Existing Zoning, page 27

In addition to the base zones displayed in Figure 2-6, there are two (emphasis added) overlay zones which provide additional regulation of development within the study area:

#19 Comment

There is a third overlay zone which provides additional regulation of development within the study area – the Community Plan Implementation Overlay Zone) (CPIOZ) (MC Ch 13 Art 2 Div 14).

The West Clairemont Plaza, which is referred to as Bayview Plaza in this study, is a “Type B” CPIOZ which requires a Site Development Permit/Process Three.

And although the draft plan recognized the CPIOZ in the Morena area of Linda Vista (Figure 3-7), the final plan does not include the CPIOZ in Morena.

#20 Excerpt –2.2.1 Existing Vision, page 27

*Encourage the Morena District to be a mixed-use area that has a strong restaurant component, grocery store, and thoughtful (emphasis added) density that includes affordable housing.*

#20 Comment

Please define “thoughtful” as it relates to density.

#21 Excerpt –2.3 Proposed Land Use, page 38 and Figure 2-14: Proposed Land Use (Date: 4/22/2014), page 40

The land use quantities as proposed in the Proposed Land Use alternative are:

- Residential: approximately 5,800 dwelling units (Increase of approximately 4,800 from existing)

### #21 Comment

A table showing existing units, proposed units, and increase in units for selected geographic areas would be very helpful. A suggested breakdown follows:

- Clairemont Mesa
- Linda Vista
  
- Sub Areas
  - Morena Boulevard between Gesner Street and Milton Street
  - Morena Boulevard between Milton Street and split of Morena Boulevard and West Morena Boulevard
  - Morena Boulevard between West Morena Boulevard and Tecolote Road (including area shown as Community Village and the two mobile home parks)
  - Area shown as Neighborhood Village and generally bounded by Tecolote Road, West Morena Boulevard and Morena Boulevard
  - Area shown as Community Village and bounded by Tecolote Road, West Morena Boulevard, Buenos Avenue, and Proposed Light Rail Extension
  - Area shown as Community Village located in the “V” between Morena Boulevard and Linda Vista Road
  - Area shown as Community Village located southeast of Linda Vista Road

The text and/or Figure 2-14 should also include a density range for the proposed residential and mixed-use areas.

Is “Residential-Medium High”(30-44 du/ac) still feasible in Clairemont Mesa given the statement in the Forward that the 30-foot height limit would be maintained in the area?

I assume that the designation of “Residential-Low” shown on the properties immediately south of City Chevrolet is an error. These properties are currently developed with multi-family residential and offices and are zoned CC-4-2.

### #22 Reference–2.3.1 Considerations, Tecolote Road RV Park, page 41

Reference is made to development of mixed use on the site because of its proximity to the Tecolote Trolley station.

### #22 Comment

Development of any kind on this site should require the construction of a bridge across Tecolote Creek to provide direct vehicular, pedestrian and bicycling access to Tecolote Road. This would also minimize traffic impacts on Knoxville Street and Morena Boulevard. A bridge was required for the Tecolote Tennis and Racquet Club to the northeast.



#23 Reference and Excerpt—Figure 3-2: District Types, page 45 and 3.2.3 Neighborhood Mixed-Use District Overview, pages 49 and 50

Figure 3-2 depicts “Neighborhood Retail” at two locations: the area around Bayview Plaza at Clairemont Drive and the Ashton-Napier area.

District Building Context

**Typical Height:** Two to six (emphasis added) stories

The section also discusses building guidelines.

**Building Articulation:** Blank walls or facades are not acceptable. Building facades must include horizontal and vertical articulation.

- If the difference between the new development and existing building is more than 3 stories, (emphasis added) the building must step back from the existing building through the use of balconies and designed step backs.

#23 Comment

The reference to “six stories” and “difference between the new development and existing building is more than 3 stories” are not consistent with the statement in the Foreword regarding retention of the 30-foot height limit in Clairemont.

The two designated “Neighborhood Retail” areas are very different in character. Building Guidelines appropriate for one area will not be appropriate for the other area. As a general statement, the building/development guidelines presented in the Study are “off-the-shelf” generic guidelines. Guidelines tailored to the specific sites would be more useful.

#24 Reference and Excerpt –Figure 3-2: District Types, page 45 and 3.2.4 Restaurant Row District Overview, page 51

Figure 3-2 depicts a “Restaurant Row” in the Morena area.

**3.2.4 Restaurant Row District Overview**

Restaurant Row District is an area of Morena Boulevard supportive of restaurant uses.

#24 Comment

There is a substantial collection of restaurants located to the north between Asher Street and Ingulf Street as well including:

- High Dive
- Baci’s
- Bay Park Fish Company
- Offshore

- Old Trieste
- Dan Diego's
- New York Giant Pizza

These restaurants, some of which also have a regional draw, are an asset to the community and every effort should be made to see that they remain.

#25 Excerpt – 3.2.6 Overarching Study Area Guidance, Transit Facilities, page 57

- For transit stops with more than three bus routes, a mid-block bulbout plaza shall be provided.

#25 Comment

There are no transit stops within the study area that serve more than three bus routes. Are there any planned for the future?

#26 Reference – Figure 4-7: Existing Sidewalk Network, page 78

#26 Comment

This figure grossly exaggerates the lack of sidewalks in the study area and adjacent area. Some of the incorrectly identified as missing include:

- Alleys
- Non-existent (“paper streets”) in Tecolote Canyon
- Internal lanes or driveways, such as at Coastal Trailer Villa
- Roads in Mission Bay Park where there are sidewalks more appropriately located in adjacent green areas away from the heavily traveled roads

#27 Reference – Figure 4-10: Existing and Proposed Bicycle Facilities, page 82

#27 Comment

A Class 2: Bike Lane already exists on Clairemont Drive east of Erie Street.

A proposed Class 3: Bike Route on Illion Street is questionable given the extreme steepness of the street north of Gardena Street. The extension of this route along Hartford Street is also questionable given grades and narrowness of the street between Kane and Jellett streets.

#28 Reference – 4.4.1 Routes/Stops/Frequency of Service, Bus Routes, page 86; Figure 4-12: Existing Transit Network, page 87; Figure 4-13: Bus Boardings, page 87; Figure 4-14: Bus Alightings, page 90

### #28 Comment

Route 105A is not described in the next nor is it properly showing in the referenced figures. The following, or something similar, should be added to the text on page 87. The figures should also be revised accordingly.

- Route 105A: Route 105A originates in Old Town and travels north via Morena Boulevard to Ingulf Street where it heads east to Denver Street and then north to Clairemont Drive, east and north to Clairemont Mesa Boulevard, Regents Road and Genesee Avenue, terminating at the UTC Transit Center. Route 105A provides service on Sunday only.

### #29 Excerpt – 4.6.5 Land Use Framework, page 103

Based on input provided by the community (emphasis added) and city staff, land use alternatives were merged to produce a scenario that decreases non-residential uses while providing a significant increase in multi-family residential/mixed-uses.

The land use quantities as proposed in the preferred land use alternative are:

- Residential: approximately 5,800 dwelling units (Increase of approximately 4,800 from existing) (emphasis added)
- Non-residential commercial, retail, office, and industrial uses: 2.7 million square feet (Decrease of approximately 700,000 square feet from existing)

### #29 Comment

Based upon my experience, many residents and businesses knew nothing about this study until it was in draft form in February. Please provide more specific information about “the input provided by the community” and include how many business owners were notified in advance of the draft study. For example, were there any direct mailings to the residents or businesses actually located in the study area?

The land use quantities as proposed are the same numbers as presented in the Draft. Is this statement consistent with the following statements made in the Foreword?

- Maintain the existing Clairemont Mesa Height Limit Overlay Zone as outlined in the community plan and in Municipal Code Chapter 13, Article 2, Division 13.
- Re-evaluate recommended residential densities in light of community concerns related to traffic and view shed impacts associated with new development.

### #30 Excerpt – 4.7.5 Recommendations for a Tecolote Creek Trail, page 106

Tecolote Creek is an under-appreciated (emphasis added) creek system that has been mostly channelized.

#30 Comment

Tecolote Creek is under-appreciated because it is mostly channelized in this area.

Recommend that hydrology studies be conducted to determine if the creek can be returned to a more natural state. As an alternative, recommend that hydrology studies be conducted to determine if the creek can be decked over, providing an even greater opportunity for pedestrian and bicycle trails.

#31 Reference – 4.7.6 Recommended Clairemont Bridge Crossing Plan, page 106 and 107

#31 Comment

Are the proposed improvements compatible with the Clairemont Drive Station Concept Plan as shown in the following link:

[http://www.sandag.org/uploads/projectid/projectid\\_434\\_16075.pdf](http://www.sandag.org/uploads/projectid/projectid_434_16075.pdf)

#32 Excerpt – 4.8.1 Adopted Community Plan, page 121

**4.8.1 Adopted Community Plan**

The analysis of Adopted Community Plan conditions is based on Year 2035 conditions assuming buildout of adopted land uses within the study area, as described in Chapter 2 Land Use . . .

#32 Comment

There is no description of or figure showing land uses proposed by the adopted Clairemont Mesa Community Plan in Chapter 2 or elsewhere.

#33 Excerpt – 4.8.1 Adopted Community Plan, page 122

The analysis of this scenario assumes that land uses outside the study area will be consistent with buildout identified in the SANDAG Series 12 model . . .

#33 Comment

According to SANDAG, “the 2050 Regional Growth Forecast represents a combination of economic and demographic projections, existing land use plans and policies, as well as potential land use plan changes that may occur in the region between 2030 and 2050. In general, growth between 2008 and 2030 is based on adopted land use plans and policies, and growth between 2030 and 2050 includes alternatives that may, in some cases, reach beyond existing adopted plans.” (emphasis added)

Therefore, the projections do not represent the buildout of the adopted Clairemont Mesa Community Plan.

The Clairemont Mesa Community Plan, as adopted in 1989 and with subsequent amendments, states the following on page 27:

### **PROJECTED GROWTH**

In summary, Clairemont Mesa is an urbanized community and for the most part is built out. Future development of the vacant residential land and redevelopment opportunities could result in an addition of 1,100 dwelling units (not including mixed-use development), totaling 33,000 (emphasis added) dwelling units or a three percent increase over the existing stock in the next 15 years.

According to SANDAG, the estimated total housing units in Clairemont Mesa on January 1, 2013 was 32,915, and the forecast for 2020 is 33,824.

SANDAG's forecast for 2030, 2040 and 2050, are 36,901, 38,300, and 38,349, respectively. As stated above "growth between 2030 and 2050 includes alternatives that may, in some cases, reach beyond existing adopted plans."

Therefore, land uses outside the study area cannot be consistent with the adopted community plan and "buildout identified in the SANDAG Series 12 model . . ." at the same time.

Based on my knowledge of the adopted Clairemont Mesa Community Plan and development in Clairemont, it is very likely that the land uses for the truly adopted community plan are very similar to the existing land uses.

Clearly there is the need for detailed information on the so-called adopted plan, including text, a table of land use, and a figure showing land use.

#34 Reference – Table 4-7: Trip Generation Comparison – Adopted Community Plan and Preferred Land Use Plan, page 122

#### #34 Comment

Why does the Preferred Land Use Alternative exclude traffic associated with University of San Diego? The University's traffic is all the more important based on statements within the Study that the University is considering expansion, including property (shown as Institutional on Figure 2-14) within the Study Area. This exclusion distorts (downward) the total trips for the Preferred Land Use Alternative.

#35 References – Daily Traffic Volumes and Segment Level of Service – Adopted Community Plan, page 123; Table 4-7: Adopted Community Plan – Daily Traffic Volume Comparison, page 124; Figure 4-77: Adopted Community Plan Daily Volumes, page 126; Figure 4-48: Adopted Community Plan Segment Level of Service, page 127; Peak Hour Level of Service – Adopted Community Plan, pages 128 – 130; Table 4-8: Adopted Community Plan – Peak Hour Level of

Service Comparison (Signalized Intersections), page 131; Table 4-9: Adopted Community Plan – Peak Hour Level of Service Comparison (Stop-sign Controlled Intersections), page 131; and Figure 4-49: Adopted Community Plan Intersection Level of Service, page 132

#35 Comment

In view of Comment #33 above, all of the Daily Traffic Volumes and Segment Level of Service and Peak House Level of Service for the adopted Community Plan are disputed.

#36 References – 4.8.2 Proposed Land Use Alternative with Mid-term Mobility Plan, Daily Traffic Volumes and Segment LOS – Preferred Alternative (Mid-term), pages 133 and 134; Table 4-10: Mid-term – Daily Traffic Volume Comparison, page 135; Peak Hour Level of Service – Preferred Alternative (Mid-term), pages 139 – 142; Table 4-11: Mid-term - Peak Hour LOS Comparison (Signalized Intersections), page 143; and Table 4-12: Mid-term – Peak Hour LOS (Stop-sign Controlled Intersections), page 143

#36 Comment

In view of Comment #33 above, comparisons to Adopted Community Plan are disputed.

#37 Excerpt- 4.8.2 Proposed Land Use Alternative with Mid-term Mobility Plan, Daily Traffic Volumes and Segment LOS – Preferred Alternative (Mid-term), pages 133

- **Clairemont Drive:** traffic volumes would increase from 30,800 daily under Existing Conditions to 39,300 daily under the Mid-term Mobility Plan -- an increase of 27 percent over existing conditions, but a reduction from the forecast of 43,100 daily vehicles (representing a 40 percent increase over existing volume) under the Adopted Community Plan. (emphasis added)

#37 Comment

Please explain how the Mid-term traffic volumes would be less than the Adopted Community Plan.

#38 Excerpt - 4.8.2 Proposed Land Use Alternative with Mid-term Mobility Plan, Daily Traffic Volumes and Segment LOS – Preferred Alternative (Mid-term), pages 134

- **Morena Boulevard (south):** South of West Morena to Napa Street: the travel demand predicts a substantial decrease, from 29,000 daily vehicles under existing conditions to 22, 000 daily vehicles under the Mid-term – a significant reduction from the forecast of 36,000 daily vehicles under the Adopted Community Plan. South of Napa to Linda Vista: volumes are forecasted to remain constant at approximately 23,000 daily vehicles – no change from existing conditions, although higher than the forecast of 21,000 daily vehicles under the \_\_\_\_\_.

#38 Comment

Last sentence is incomplete.

#39 Excerpt - 4.8.3 Preferred Alternative (Long-Term) – Extended Roadway Grid. page 145

The analysis of the Proposed Land Use Alternative with Long-term Recommended Mobility Plan assumes that land uses outside the study area will be consistent with buildout identified in the SANDAG Series 12 model . . .

#39 Comment

That's the same assumption that was used for the so-called Adopted Community Plan analysis. See Excerpt #33.

#40 References – 4.8.3 Preferred Alternative (Long-Term) – Extended Roadway Grid. Daily Traffic Volumes and Segment LOS – Preferred Alternative (Long-term), pages 145 and 146; Table 4-13: Long-term – Daily Traffic Volume Comparison, page 147; Intersection Level of Service – Preferred Alternative (Long-term), pages 151 – 152; Table 4-14: Long-term - Peak Hour LOS (Signalized Intersections), page 154; and Table 4-15: Long-term – Peak Hour LOS (Stop-sign Controlled Intersections), page 154

#40 Comment

In view of Comment #33 above, comparisons to Adopted Community Plan are disputed.

#41 Excerpt – 4.8.3 Preferred Alternative (Long-Term) – Extended Roadway Grid, Daily Traffic Volumes and Segment LOS – Preferred Alternative (Long-term), pages 145

- **Clairemont Drive:** Traffic volumes would increase from 30,800 daily vehicles under Existing Conditions to 37,800 under the Long-term Mobility Network a substantial reduction from 43,100 daily vehicles under the Adopted Community Plan (emphasis added) and 39,300 daily vehicles under the Mid-term Mobility Network.

#41 Comment

Please explain how the Long-term traffic volumes would be less than the Adopted (the true adopted) Community Plan.

#42 Excerpt – 4.8.3 Preferred Alternative (Long-Term) – Extended Roadway Grid, Daily Traffic Volumes and Segment LOS – Preferred Alternative (Long-term), pages 146

- **Traffic volumes at key gateways:** Traffic volumes entering and exiting the study area from the south, via Morena Boulevard, would remain around 38,000 daily vehicles, with little change from existing conditions. Traffic volumes entering and existing the study area from the north, via Morena Boulevard, would decrease from 13,500 daily under existing conditions to 12,400 daily under the long-term scenario. (emphasis added)

#42 Comment

What accounts for this decrease?

#43 References – Table 4-13: Long-term – Daily Traffic Volume Comparison, page 147; Figure 4-54: Preferred Alternative (Long-term) Roadway Classification, page 148; Figure 4-55: Preferred Alternative (Long-term) Daily Volumes, page 149

#43 Comments

In regards to Napa Street between Morena Boulevard and Linda Vista Road, Table 4-13 states “Segment Removed”, and this is reflected in Figure 4-54. However, Figure 4-55 shows this segment of Napa Street as having daily traffic volume of 14,800. Why the discrepancy? What happens to those 14,800 trips?

Shouldn't Figure 4-55 reflect the roadways as presented in Table 4-13 and Figure 4-54?

#44 References – Figure 4-54: Preferred Alternative (Long-term) Roadway Classification, page 148; Figure 4-57: Preferred Alternative (Long-term) Intersection Level of Service, page 155

#44 Comment

Again, shouldn't Figure 4-57 reflect the intersections as shown in Figure 4-54?

#45 Excerpt – Intersection Level of Service – Preferred Alternative (Long-term), page 153

The Preferred Alternative (Long-term Mobility Network) would improve operations at the following intersections that would operate at LOS E-F under the Adopted Community Plan:

- Clairemont Drive / Denver Street would operate at LOS D during the peak hours, an improvement from LOS F conditions under the Adopted Community Plan, reflecting the reduction in traffic volumes on Clairemont Drive.

#45 Comment

Please explain the improvements that would result in reduced traffic volumes on Clairemont Drive.

#46 Excerpt/Reference – 4.8.3 Long-Term Recommendations for Pedestrians, page 158; Figure 32 Street Improvements: Segment 5 Plan, page ?

Intersections that have been reconfigured from skewed angles to right angles are:

- Morena Boulevard at Napa Street
- Napa Street and Linda Vista Road



#46 Comment

As shown in Figure 32, there would be no intersection of Morena Boulevard and Napa Street.

Napa Street and Linda Vista already intersect at a right angle.

#47 Excerpt – 5.1.3 Land Use Intensity Requirements, page 166

Taking the compatibility analysis one step further, Figure 5-2 shows the zoning capacity that will be required of parcels that were identified as needing, or potentially needing, a zoning change. The figure shows proposed intensity in terms of DU for residential uses and FAR for non-residential uses. On some parcels, there is only one of these uses, while on others, there are both. It should be noted that these measures of intensity are ratios, and that the total amount of development possible would be determined by the combination of the parcel size and the ratio. As such, changes in use or intensity might not require building heights in excess of 30'. (emphasis added)

#47 Comment

The underlined sentence doesn't give assurance that building heights in Clairemont Mesa will not exceed 30 feet as stated in the Foreword.

#48 Reference – Figure 5-1: Composite of Compatibility Factors, page 167 and Figure 2-14: Proposed Land Use (date 4/22/2014), page 40

#48 Comment

Figure 5-1 is the same figure as used in the Draft. The figure shows that the current zone, which is RS-1-7, will need to be replaced on the rear portion of City Chevrolet. This is inconsistent with Figure 2-14 which shows the rear portion of City Chevrolet as "Residential – Low."

#49 Reference – Figure 5-1: Proposed Land Use Intensity Factors, page 168 and Figure 2-14: Proposed Land Use (date 4/22/2014), page 40

#49 Comment

Again, there is an inconsistency between Figure 5-1 and Figure 2-14 in regards to the rear portion of City Chevrolet.

#50 Excerpt – 5.1.3 Land Use and Zoning Implementation Recommendations, page 166 and Table 5-1: Zoning Incompatibilities and Recommendations, page 169

Table 5-1 below lists specific incompatibilities between the Proposed Land Use and existing zoning. The incompatibilities are listed first, with applicable recommendations following.

**Incompatibility Issue C:**

Properties currently zoned for residential are being proposed for Commercial/Residential Mixed use.

**Recommendation C1:**

For parcels currently zoned single family residential (this only occurs on City Chevrolet and the RV parks, which are not single-family), consider applying the RM-3 designation with revisions to the allowable use table to include most retail sale categories, dining establishments, and possibly office uses.

#50 Comment

Again, the statement in Table 5-1 is inconsistent with Figure 2-14 in regards to the rear portion of City Chevrolet.

#51 Excerpt –Table 5-1: Zoning Incompatibilities and Recommendations, page 169

**Incompatibility Issue D:**

Parking reductions may be necessary to accommodate higher density development

#51 Comment

The study fails to recognize the serious parking deficiency along Morena Boulevard.

The seriousness of the parking problem and a solution worthy of further consideration can be found in the following Clairemont Mesa Community Plan Amendment adopted by City Council on December 5, 2005:

5. Supplemental Off-Site Parking - Morena Boulevard/Chicago Street

With the existence of severe parking deficiencies for commercial properties in the area between Morena Boulevard and Chicago Street, south of Ashton Street and north of Littlefield Street, it is recommended that supplemental off-site parking areas be allowed to develop on the west side of Chicago Street between Ashton Street and Littlefield Street. This allowance should be granted if the following standards are followed:

- a. The primary use of the property must continue to be Residential.
- b. Access to the supplemental parking should only be provided via the alleyway.
- c. Parking areas should be well screened from the adjacent residential uses. Trees and other landscaping should be used for shade, screening and storm water runoff.
- d. Parking areas should provide lighting for safety. The light fixtures should shape and deflect light into a layer close to the ground in order to prevent stray light from impacting adjacent residences.
- e. A Planned Development Permit (PDP) be processed in conjunction with each proposed off-site parking area.

As background, On April 17, 2003 the Planning Commission considered an initiation for an amendment to the Clairemont Mesa Community Plan and the Progress Guide and General Plan to develop policies which address the provision of supplemental off-site parking areas for commercial establishments on properties between Morena Boulevard and Chicago Street, south of Clairemont

Drive and north of Littlefield Street. The Planning Commission voted 7-0-0 to approve the initiation of the amendment requesting that a staff analysis include several additional issues.

The Community Plan Amendment attempted to address parking deficiencies acknowledged in the Clairemont Mesa Community Plan, which states that many of the older commercial properties were developed under older commercial zoning which required minimal off-street parking. Please see Report No. PC-54-339 (PC Agenda of November 10, 2005) for more information. Also suggest a discussion with Brian Schoenfisch, Senior Planner responsible for the Plan Amendment.

This supplemental parking option should be considered for other areas along Morena Boulevard.

#52 Excerpt –Possible Development Incentives, page 179

- Parking reductions- waiving or reducing required parking spaces to allow for a desired project or type of development

#52 Comment

Please see Comment #51.

#53 Reference – 5.5.4 PROJECT “D” – Knoxville Street Extension Project, pages 187 and 188

#53 Comment

The costs on page 188 do not reflect the estimated 6- to 8-foot difference in elevation between the terminus of Knoxville Street and Morena Boulevard. Fill and buttressing would likely be required.

#54 Reference – 5.5.5 PROJECT “E” – Tecolote Creek Trail Project, pages 189 and 190

#54 Comment

Please see Comment #30.

#55 Excerpt – 5.5.6 PROJECT “E” – Tecolote LRT Station Area Improvements, page191

**Primary Justification and Value:** The primary goal of transit is to get people out of their vehicles by providing choices. If people need to drive to the stations, then they are likely to keep driving past the station. (emphasis added)

#55 Comment

Suggest the last sentence be deleted.

### Compliance with CEQA

Any plan proposed for the Morena Boulevard Transit Station will, of course, be subject to CEQA. Following are comments that should be considered in scoping the EIR.

#### *Alternatives*

It has been reported that a 60-foot height limit would be one of the alternatives considered in the Morena Boulevard Station Area Plan EIR. In the Foreword it states:

. . . the following recommendations are to be carried forward through the implementation process:

- Maintain the existing Clairemont Mesa Height Limit Overlay Zone as outlined in the community plan and in Municipal Code Chapter 13, Article 2, Division 13.

If the proposed project maintains the 30-foot height limit, then an alternative addressing a 60-foot height limit would be contrary to Section 15126.6 of the State CEQA Guidelines, which reads as follows:

#### **Section 15126.6. Consideration and Discussion of Alternatives to the Proposed**

**Project.** (a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, (emphasis added) and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (*Citizens of Goleta Valley v. Board of Supervisors*(1990) 52 Cal.3d 553 and *Laurel Heights Improvement Association v. Regents of the University of California*(1988) 47 Cal.3d 376).

An alternative addressing a 60-foot height limit would not avoid or substantially lessen any of the significant effects of the project maintaining the 30-foot height limit, and therefore would not be in compliance with the Guidelines.

*No Project Alternative*

The State CEQA Guidelines require an analysis or evaluation of a “no project” alternative, which in this case would be the existing Clairemont Mesa and Linda Vista community plans. The Guidelines read as follows:

**Section 15126.6 (e)(3)(A)**

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

As noted above in Excerpt and Comment #33, utilizing the land uses outside the study area consistent with buildout identified in the SANDAG Series 12 model would not be appropriate. According to SANDAG’s 2050 Regional Growth Forecast “growth between 2030 and 2050 includes alternatives that may, in some cases, reach beyond existing adopted plans.” (emphasis added) Therefore, the “no project” alternative can only consider the proposed land uses and policies of the adopted Clairemont Mesa and Linda Vista community plans.

If you would like to discuss these comments, please contact me at (619) 275-5120.

Sincerely,



David A. Potter, AICP  
Principal

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