



NORTH PARK PLANNING COMMITTEE
Draft Minutes: July 19, 2016 – 6:30 PM

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I. Call to order: 6:34 pm

II. Attendance Report:

Member	Robert Barry	Howard Blackson	Dionne Carlson	Steve Codraro	Daniel Gebreselassie	Robert Gettinger	Vicki Granowitz	Peter Hill	Brandon Hilpert	Sarah McAlear	Roger Morrison	Dang Nguyen	Rick Pyles	Melissa Stayner	Rene Vidales
Attendance		1	2		3	4	5	6	7 (left 8:50)	8		9	10	11	12
Late															
Absences	2	1	1	1					1		1		1		1

III. Consent Agenda Items:

- a. **Map Waiver – 2129 El Cajon Blvd.** (Process 3) Map Waiver for the creation of 12 residential condominium units (under construction). PTS 491832**. Presenter: Terry Strom. DSD Project Manager: Renee Mezo Rmezo@sandiego.gov **MOTION: Recommend denial of the map waver because of inability of the NPPC Board to participate in design input of complex located at 2129 El Cajon Blvd. PTS 491832, but commend applicant for quality of design. Carlson/UDPR 12/0/0 (On Consent)**
- b. **MOTION: Add to comments from Mobility and Transportation to Consent Agenda. See Motion 1 Below** Carlson/Blackson 12-0-0
- c. **MOTION: Approve Consent Agenda.** Carlson/Vidales 12-0-0
- d. **MOTION: Adopt July 19th Agenda.** Vidales/Carlson 12-0-0

IV. Approval of Previous Minutes

- a. **MOTION: Approve June 21, 2016 minutes with modifications. Gebreselassie/Vidales 12-0-3 (Blackson, Pyles, Hilpert abstain)**

V. Treasurer’s Report – Brandon Hilpert

- a. Current balance \$908.88. Issued check this month for \$150 to reimburse for use of NP Fellowship for monthly meetings.

VI. Non-Agenda Public Comment:

- a. **Dionne Carlson.** Relayed results from contentious Historical Resources Board (HRB) appointments made at last City Council meeting on July 12, 2016.
 - i. The following board members were appointed/reappointed to HRB: Courtney Coyle, Amy Strider Harleman*, Tim Hutter*, David McCullough, Todd Pitman, Matthew Winter, Dr. Ann Woods, Carol Niedenberg (delayed appointment until September)

- ii. The following were NOT reappointed but will continue to serve until replaced (slated for September): Dr. Mike Baksh, Tom Larrimer (both received community complaints regarding conduct while in office), and Priscilla Ann Berge

VII. **Announcements & Event Notices:** none

VIII. **Elected Official's Report**

- a. **Special visit from Honorable US Congresswoman Susan Davis, District 53; accompanied by Jessica Poole, representative for the congresswoman**, 619.208.5353 Jessica.Poole@mail.house.gov
Supporting Bill allowing school district to tap funding within Department of Justice to give teacher training to respond to human trafficking issues. Participating in a Community Forum on Human Trafficking through NPCA on July 20th from 6-8 at Plymouth Church). Gun safety legislation did not move forward (no fly list restrictions and regulations for gun shows and other private sales).
 - i. Question from audience about the CPU: Davis supports community plan update in concept, hasn't had time to review current plan (trusts local representatives to successfully guide this project so she can focus on state-wide matters).
- b. **Chevelle Newell, Hon. Toni Atkins, State Assembly Dist 76**, 619-645-3090 chevelle.newell@asm.ca.gov
- c. **Sarah Fields, Hon. Marty Block State Senate District 39**, 619-645-3133 hilary.nemchik@sen.ca.gov
Upcoming legislation in August. Human Trafficking Bill that vacates sentences for petty crimes. SB14 clarifies CalGrant programs at community colleges that provide 4-year degrees (\$10k for a bachelors). State issues within the CPU can be brought to this office.
- d. **Adrian Granda, Hon. Todd Gloria, City Councilmember District 3**, AGranda@sandiego.gov
Georgia St Bridge seismic retrofit and rehabilitation is ready to start. Minimum wage increase went into effect July 11th, and is now \$10.50 in San Diego. \$1.5 million bond for Botanic building in Balboa Park approved. City Council today approved plastic bag ban. Coffee with your Councilmember from 11-12:30 July 23rd at Lestat's Coffee House (3343 Adams Avenue).

IX. **Chair's Report/CPC**

- a. **CPC – Tuesday, May 28, 2016, 7-9 pm**. 9192 Topaz Way, Kearny Mesa Auditorium. (For more info: <http://www.sandiego.gov/planning/community/cpc/agendas/index.shtml>).
- b. City has requested the NPPC hold a special meeting on September 6, 2016 to approve the NPCPU. Discussed timeline (City slating it will go to Commission September 15 and City Council October 18), and if necessary/will have quorum. A September 6 meeting will be tentatively scheduled.
- c. Observatory would like to take a portion of the parking lot at the rear of the building, which was meant to be a public park.

X. **Social Media Report, Brandon Hilpert**. No update.

XI. **Subcommittee Reports:**

- a. **Urban Design/Project Review (UD/PR)**, Peter Hill (chair) – North Park Rec Center, 6:00pm 1st Monday. Worked on Historic Preservation portion of EIR.
- b. **Public Facilities & Transportation**, Daniel Gebreselassie (chair) – North Park Rec Center, 6:00 pm, 2nd Wednesday. No July meeting. Next meeting, August 10

XII. **Liaisons Reports**

- a. **Balboa Park Committee, Rob Steppke**. Pershing Bikeway, approved based on our recommendation. Rock and Roll came to discuss 2017 marathon. Plaza de Panama/Irwin Jacobs plan discussed.
- b. **Maintenance Assessment District, Peter Hill**. New member Steve Aldana (long time member of ECB BIA). Repainting El Cajon Blvd sign bid accept. MAD transferring to NPPC discussion in Sept.
- c. **North Park Main Street, Steve Codraro**. Taste of North Park coming up. NP signage project, including twinkle lights, ceremony on August 5 at 7:30pm. Saw presentation about Georgia St Bridge improvement project.
- d. **NP Mid-City Regional Bike Corridors, Gebreselassie**. Nothing on calendar.
- e. **Adams Ave BIA, Dionne Carlson**. No update since last month.
- f. **El Cajon BIA, Vicki Granowitz**. No update within North Park.

XIII. **Planner's Report**, Lara Gates, 619.236.6006; lgates@sandiego.gov

- a. PEIR comments due by July 28th

XIV. **Information / Discussion Items:**

- a. **Georgia St. Bridge Update.** Presented by Nikolas Kennedy from CityWorks.
Seismic retrofit and rehabilitation (will look more like original bridge, and give back some of the features lost over the last 100 years including lighting). This bridge is on the National Historic Register, and will retain historicity. The bridge was covered in gunite over 20 years ago when concrete was falling from the structure. Reyes Construction is the contractor. Construction starting August 3rd, will be closing University and performing construction at night (10pm-5am), single lanes on westbound side, and sidewalk on south side will be closed. Up and over access will remain open. The work will switch sides, but should always have one side open. The lower sidewalks may not be open. Project estimated to last one year. There is a small amount of work that will be done to the ramps leading up, but it isn't part of the bridge. Northern sidewalk will not really be improved to "continue", it is there to buffer vehicles from the arch. Ramp roadway will always be open, but parking along both ramps will likely be limited. Email distribution list giving construction updates is being formed. Dovetails with UAMP (not in construction yet, but will be coordinating) and water main replacement. Reyes is working with University pipeline team to coordinate
- b. **Historic Preservation Element of the Community Plan Update (CPU).** Presented by Kelly Stanco, SD Planning Dept. Overlay zone has been nixed. Attempting to apply protections based on proposed regulations (see Fact Sheet). Created draft of Prioritization.
 - i. Carlson. Question re: Multiple Property Listing (MPL) properties (bungalow courts). These cannot be addressed here because they are separate property types. There is no current plan to fit these in. The City does not have a process or procedure for this, and that would need to be created. But they are still being identified through 45-year review for redevelopment (City is being very conservative in requiring historic reports for these properties). Carlson doesn't agree that this is adequate protection for bungalow courts (particularly within areas where there is high density).
 - ii. Would proposed LDC changes would apply to MPL? No, this is looking at it from a district perspective.
 - iii. PUBLIC COMMENT:
 - 1. Lia Baron/Steve Lassingham. HRB had a quorum in all but one meeting last year (currently 10 members of possible 11, with 6 needed for quorum and simple majority). For certain actions there was not a majority for historic designation (as happened in Caliente mural).
 - 2. Carlson. Supplemental regulations aren't applying to Commercial Districts. Difficult to apply quantifiable regulation in these areas that would allow for tenant improvements; some areas are the focus of increased density which would be hampered by this.
 - 3. Carlson. Why aren't we just applying Secretary of Interior (SI) standards instead of 1/3 2/3 back/front regulations? Because SI Standards are easy to read, but still require professional discretion at City Staff level. New guidelines should provide easier to interpret guidelines for property owners looking to develop (many appear to disagree with this assertion from the City). Because these aren't designated and aren't eligible for benefits it is unfair to apply the standards. Could we apply just to front 1/3 for historic main streets? Are there ANY other ideas that will help protect? Staff put areas near these places higher on the prioritization. New Deputy Director "will be looking at the community priorities and can revisit; adding more consultants wouldn't decrease the burden on the HRB, but if additional staffing is needed is also being considered based on community needs and City Council review." We've been willing to take density and other City desires within our community but we're not seeing the protections we have asked for 8+ years.

XV. Action Items:

- a. **NPCPU Programmatic Environmental Impact Report due July 28, 2016**
Comments are for Review include but are not limited to:

1. **Mobility & Transportation** – Draft Comment Attached (These are basically the same comments discussed at the June NPPC meeting, but with the requested edits) Moved to Consent Agenda. See Motion 1
2. **Urban Design & Land Use** – Howard Blackson presenting on EIR research done by ad hoc committee (Blackson, Codraro, Gettinger, Hill, Stayner).
 - a. **BLACKSON:** If we don't have reliable mitigation analysis in the PEIR (that will be used to develop our plan), it opens everything up to new analysis in the future. We have nothing to legally enable zoning to match our policies. Found 3 policies from Land Use that align, but didn't find any for many other policies from the CPU. Items like these need to be in the MMRP (mitigation monitoring and reporting program – the only legally enabling thing to get us from policy to implementation because we are a charter City) so we have the accountability and protection for complete streets, sustainability, pedestrian safety. By us not studying mitigation with VMT (instead using car-centric LOS), it is opening us up to analysis in future projects.

MOTION: Approve the North Park PEIR Urban Design and Review Subcommittee recommendation as presented. Motion 2 Blackson/Vidales 12-0-0

- a. **Public Comment:** Kate Callen. Inconsistent with General Plan; meaningful review and comment are precluded. Endorses NPHS assessment.
- b. **Alyssa Muto New Planning Deputy Director** –continues to keep an eye on what the State is doing with VMT. San Diego needs to look at the threshold of significance for VMT (and Bike Master Plan, Pedestrian Master Plan); State revised their initial plan to 15% or whatever your regional average is. There are places in San Diego that will never be able to meet these metrics. Pasadena and San Francisco have already tried to implement VMT but will likely need to revise significantly once the State finalizes.
- b. **HILL:** Checked specific section for legitimate associations within Land Use table. First issue addressed by Blackson. Other two issues indicate incomplete analysis of NPCPU, as are referencing outdated documents. **MOTION: Approve two comments identifying factual errors, see Motion 3 below.**
- c. **GRANOWITZ:** Misc. Comments document.
 - a. **MOTION: Approve first comments with edit to flip the Resident unit and Household population text, which was stated backwards. See Motion 4 below. Vidales/Carlson 12-0-0**
 - b. Impact Fee Study (IFS): Should be considered significant new information that hasn't been provided, but was listed in mitigation measures. IFS is listed in table 3.1 as an "important project component." We'd like to request mitigation representation for multi-modal ("Find a significant error and plan should be geared toward including projects we want..."). Gates: IFS has been presented and approved later in other plans (Encanto for example). Disagrees that it would be qualified as a deal-breaker. Blackson: Recommends the committee give significant comments and give City a chance to remedy this. Muto: These studies aren't required to be circulated. You can only include in MMRP what there is a nexus for under CEQA to mitigate for the IMPACT of the CPU. The CIP list has not been presented, it was sent to the Chair, and was not publicly noticed. **MOTION: Approve the comment See Motion 5 below (Carlson/Hill 12-0-0**
 - c. Greenhouse Gas Emissions: Downtown mobility plan included quantitative analysis. **MOTION: Request that North Park be provided a analysis on the order of the quantitative greenhouse gas analysis that was done for the Downtown Mobility Plan See Motion 6 below. Granowitz/Gettinger 12-0-0**

Muto: A GHG emissions threshold approved by City Council, and it was applied

to our CPU. Planning Committee believes the analysis was performed on outdated versions of the plan and density, and wasn't quantitative it was qualitative. Given the amount of density NP will be given over the next 30 years, we believe this should be done.

3. **Historic Preservation** – Granowitz presented, see handout covering three arguments to why the document doesn't provide meaningful mitigation to protect historic resources, and adjusted motion.
 - a. Discussion about #7 where City is proposing new guidelines, asserting that the Secretary of Interior Standards are unclear to developers.
 - b. **MOTION: See Motion 7 below. Approve Carlson/Blackson 11-0-0**

XVI. **Unfinished and Future Agenda Items:**

- a. Approval of the NPCPU
- b. MAD to become part of the NPPC
- c. Bylaws Update – Limited to Election Procedures & the MAD

XVII. **Adjourn: 9:15 pm**

Minutes submitted by Sarah McAlear

MOTION 1

Section 6.3: Transportation and Circulation

Whereas the State of California Office of Planning and Research (OPR) released a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (the "Paper") on January 16, 2016 based on Senate Bill 743;

Whereas the OPR's suggested changes to move away from analyzing impacts and mitigation using Levels of Service (LOS) and instead adopting Vehicle Miles Traveled (VMT) will trigger an update to the state CEQA Guidelines and subsequent local CEQA Guidelines;

Whereas the Traffic Impact Study for the North Park Community Plan Update (NPCPU) analyzed impacts and mitigation using LOS instead of VMT;

Whereas the OPR's Paper lists potential measures to reduce VMT, most of which are already included in the North Park Community Plan Update (NPCPU) policies (shown in brackets), such as:

- a. Improving or increasing access to transit [*ME-2.3, UD-2.12*]
- b. Increase access to common goods and services, such as groceries, schools, and daycare [*ME-1.1, ME-1.5, ME-1.6*]
- c. Incorporate affordable housing into the project [*LU-4.6 thru LU-4.11*]
- d. Incorporate neighborhood electric vehicle network [*ME-5.18, SE-1.13*]
- e. Orient the project toward transit, bicycle and pedestrian facilities [*ME-2.9, UD-3.18, UD-3.19*]
- f. Improve pedestrian or bicycle networks, or transit service [*ME-1.8, ME-1.16*]
- g. Provide traffic calming [*ME-1.12, ME-3.13*]
- h. Provide bicycle parking [*ME-1.8, ME-2.3*]
- i. Limit or eliminate parking supply [*ME-5.8, ME-5.19*]
- j. Provide car-sharing, bike sharing, and ride-sharing programs [*ME-1.19, ME-5.17, SE-1.14, SE-1.27*]
- k. Provide transit passes [*ME-2.12, SE-1.14*]

Whereas OPR's Paper lists examples of project alternatives that may reduce VMT, most of which are already included in the NPCPU policies (shown in brackets), such as:

- a. Locate the project near transit [*LU-3.4, LU-4.5, LU Density Bonus Program*]
- b. Increase project density [*LU-5.11, LU Density Bonus Program*]
- c. Increase the mix of uses within the project, or within the project's surroundings [*LU-3.10, LU-5.12*]
- d. Increase connectivity and/or intersection density on the project site [*ME-1.5, ME-3.17*]

- e. Deploy management (e.g. pricing, vehicle occupancy requirements) on roadways or roadway lanes [ME-2.1, ME-2.2]

Whereas the NPCPU goals and policies will not only reduce VMT, but will also implement alternatives that may reduce VMT;

Therefore, the un-mitigated impacts that resulted from using LOS methodology listed Section 6.3 (Transportation and Circulation) of the Draft PEIR could be mitigated through other measures that do not involve road and intersection widening to accommodate single occupancy vehicles.

Whereas, Environmental impacts under section **6.3 Transportation and Circulation** are deemed by the Draft PEIR to be cumulative, significant, and un-mitigable;

Whereas the City of San Diego completed traffic analysis for this Draft PEIR using LOS (Level of Service) methodology rather than the soon-to-be-implemented VMT (Vehicle Miles Travelled) methodology currently under review by the State of California Office of Planning and Research as more appropriate for such analyses,

Whereas, **Mitigation measures TRANS 6.3-1 thru 6.3-6, 6.3-8 thru 6.3-12, 6.3-14 thru 6.3-26 as identified in sections 6.3.5.1 & 6.3.5.2 under 6.3 Transportation and Circulation** are unreasonable, unfunded, infeasible, undesirable to the community, do not meet the clearly stated goals of the North Park Community Plan Update (NPCPU) and would, in many cases, engender significant and immitigable environmental impacts of their own to historical resources, sustainability, parking, pedestrian safety, etc.;

Reasoning: These mitigation measures are all contrary to goals and policies contained in the Mobility and Sustainability Elements of the NPCPU and are contrary to the City of San Diego’s recently enacted Climate Action Plan

Therefore, the NPPC suggests inclusion in the Draft PEIR of the following reasonable & feasible mitigation measures which DO meet the stated goals of the Greater North Park Community Plan, which would NOT engender further significant and un-mitigable impacts to Transportation and Circulation, and which would constitute more reasonable mitigation under a VMT analysis:

Street and Traffic Signal Improvements

- 1) **Implement enhanced updated signalization technology at all present and future signalized intersections within and directly adjacent to the Greater North Park Planning area failing to meet an LOS score of C or higher; so as to allow for time-of-day appropriate flexible signal timing and to implement more efficient circulation for all transportation modes.**

Reasoning: This would mitigate impacts to all modes of transportation from projected increases in motor vehicle traffic, meet the mobility and sustainability goals of the NPCPU and support the City of San Diego’s recently enacted Climate Action Plan

- 2) **Coordinate with CALTRANS & SANDAG to implement Improvements and enhancements to all freeway on-ramps/off-ramps serving the Greater North Park Planning area so as to reduce automobile “stacking” and facilitate smooth transitions for transit, while preserving pedestrian and bike safety in these areas with pedestrian activated crossing enhancements.**

Reasoning: This would mitigate impacts to motor vehicle and transit delays from projected increases in traffic, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego’s recently enacted Climate Action Plan

- 3) **Modify Mitigation TRANS 6.3-18, Madison Avenue from Texas Street to Ohio Street to remove dysfunctional median chokers at Madison Avenue and Utah Street and implement Road Diet with bike lanes similar to Segment of Madison Avenue between Texas Street and Park Boulevard.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego’s recently enacted Climate Action Plan.

- 4) **Modify Mitigation TRANS 6.3-6 to implement the University Avenue Mobility Plan, including appropriate maintenance, tree planting and public art.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego's recently enacted Climate Action Plan

- 5) **Increase North/South multimodal access-opportunities (e.g. bikeways, pedestrian elevators, skyways, more frequent MTS service with later hours from Mission Valley Trolley Stations) from Mission Valley to other adjacent planning areas (Uptown, Normal Heights, Kensington), thus reducing traffic pressure on Texas Street**

(One of the two most impacted streets in North Park per the Draft PEIR traffic analysis).

Reasoning: Currently Texas Street is one of very few access points from Mission Valley up to the Mesa on the South side. This mitigation measure meets the mobility connectivity and sustainability goals of the NPCPU as well as those of the adjacent planning areas, supports the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability; thus reducing motor vehicle trips. This mitigation measure is feasible, and parts are already funded as part of SANDAG's 2050 Regional Transportation Plan. (Note: See SANDAG Bikeway Projects:

<http://www.keepsandiegomoving.com/RegionalBikeProjects/SR15.aspx>

- 6) **Increase I-805 Freeway access from the Civita development in Mission Valley by implementing a northern ingress/egress route to Civita from the I-805 freeway via Phyllis Place, so as to lessen traffic pressure on Texas Street & Qualcomm Way and provide more efficient emergency evacuation for that very large development.**

Reasoning: This mitigation measure has been studied and identified by the City of San Diego for inclusion in Mission Valley's IFS, meets the mobility and sustainability goals of the NPCPU and that of Mission Valley, and would reduce motor vehicle trips on Texas Street. Potential traffic from the Civita Development has already be identified as having significant impacts to North Park in the areas of traffic and circulation by that Development's own Draft PEIR, and creating multimodal bike and pedestrian access up Texas Street has already been accepted by North Park and the City as reasonable mitigation for those impacts.

Sidewalk, Pedestrian, and Bicycle Improvements;

- 7) **Implement Bike and pedestrian safety improvements to all intersections within and directly adjacent to the Greater North Park Planning area failing to meet an LOS.**
- 8) **score of C or higher, including bike-permeable curb extensions to reduce pedestrian exposure to increasing traffic and appropriately designed to accommodate future bike lane infrastructure in all 4 directions.**

Reasoning: This would mitigate impacts to pedestrian and bike safety from projected increases in traffic, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

- 9) **Improve sidewalk safety and enhance pedestrian environment in the Public Right-of-Way (PROW) by removing trip hazards, repaving where necessary, proper PROW maintenance, relocating or burying intruding utility appurtenances, planting trees and appropriately locating public art.**

Reasoning: Enhancing the pedestrian environment encourages walking and biking, thus reducing automotive trips, meeting the mobility and sustainability goals of the NPCPU and supporting the City of San Diego's recently enacted Climate Action Plan

- 10) **Pedestrian and bike mobility, safety and aesthetic environment enhancements to the following bridges: Adams Avenue over the I-805, Adams Avenue over Texas Street, Howard Ave over the I-805 (ref: SANDAG bike lane project), Fern Street Bridge on 30th Street over Switzer Canyon.**

Reasoning: These mitigation measures have been identified by NPPC for inclusion in the North Park IFS, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

- 11) **Implement multimodal traffic & circulation enhancements in the area of Upas and 30th Street, as identified by NPPC for inclusion in the North Park IFS.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the North Park IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego's recently enacted Climate Action Plan

12) **Modify Mitigation TRANS 6.3-19 to increase SANDAG & other funding for community requested multimodal improvements, art, landscaping, and maintenance along the 3 identified SANDAG East/West bike corridors.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, and supports the City of San Diego's recently enacted Climate Action Plan. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

13) **Modify Mitigation TRANS 6.3-4 to enhance all intersections along the 30th street corridor to be bike and pedestrian safe and friendly.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, & supports the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

14) **The Transportation and Circulation Section the Draft PEIR (Section 6.3.6) only includes three (3) mitigation measures as feasible because they are included in the Impact Fee Study (IFS) and discards the rest of the mitigation measures:** *"It is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure within the mobility goals of the proposed North Park CPU."* In addition, those three (3) mitigation measures may not be implemented in time before the impact occurs: *"Full implementation of these measures cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring.*

Thus, impacts 6.3-7, 6.3-13, and 6.3-18 would remain significant and unavoidable."

Therefore, the analysis using LOS not only was inconsistent with the goals and policies of the NPCPU, but also produced mitigation measures that could not be implemented before the impact occurs using the same analysis;

The NPPC therefore requests an analysis using VMT, with mitigation measures that are consistent with the goals and policies of the NPCPU.

- 15) The NPCPU supports the implementation of Complete Streets as mandated by AB 1358. However the LOS analysis included in the PEIR only provides an analysis for single occupancy vehicles and circumvents other modes of transportation such as walking, bicycling, and riding mass transit. Therefore, both the analysis in the traffic study and the mitigation measures in the Draft PEIR do not support the policies of the NPCPU.
- 16) The City should now prepare regulations relating to Vehicle Miles Travelled (VMT) to eliminate the Level-of-Service (LOS) standard of traffic engineering. The CA Office of Planning and Research (OPR) is currently preparing VMT regulations to comply with AB 743; however, there is no reason that the City could not promulgate its own, prior to the OPR 2018 deadline and be ahead of this curve. The City of San Francisco has already adopted its own VMT regulations and there is no reason San Diego could not follow suit. The VMT standard would end the business as usual LOS standard and offer opportunities for the City to implement creative planning within North Park.
- 17) NPPC requests mitigation measures that are in full support of the policies that are contained in the NPCPU [such as ME Goal 6, ME- 3.2, SE-1.1, SE-1.27] and that will be consistent with the Climate Action Plan (CAP). Therefore the NPPC hereby requests Analysis under VMT possible recirculation of the Draft PEIR because the Draft PEIR could have included feasible mitigation measures considerably different from those previously analyzed; mitigation measures that would clearly lessen the environmental impacts of the project.
- 18) Some of the policies listed in Table 6.1-1 (Applicable CPU Policies Related to Land Use) DO NOT match the policies listed in the June 2016 Draft of the NPCPU, specifically from "Parks and Open Space" onward for example, UE-2.17 in the Draft PEIR reads *"Preserve and encourage the continued enhancement of the Adams Avenue "Antique Row" and commercial node"* and UE-2.17 in the NPCPU reads *"Locate and design utilities outside of the sidewalks to maintain a clear path of travel"*. Therefore, due to the inconsistencies in the information provided during public review, correction of these substantive errors recirculation of the Draft PEIR might be warranted.

- 19) Mitigation Measure TRANS 6.3-6 should be re-worded to identify that the I-805 northbound on-ramp is located at the intersection of University Ave. & Wabash Ave. This is a factual description error.
- 20) Mitigation Measure TRANS 6.3-21a should be re-worded to clarify that Texas St. is not an at-level intersection with Adams Ave. within the segment from Adams Ave. to El Cajon Blvd. This is a factual description error.

MOTION 2

Urban Design Comments

The proposed North Park CPU is supposed to provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), **the local street and transit network**, the prioritization and provision of public facilities, community and site specific **urban design guidelines**, and recommendations to preserve and enhance natural open space and historic and cultural resources within North Park.

The PEIR is supposed to include recommended **mitigation measures**, which—when implemented—**would lessen project impacts** and provide the City with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. The PEIR should further serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the CPU areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, **the City can approve the activity as being within the scope covered by this PEIR**, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR

PEIR Mitigation Monitoring and Reporting Programs (MMRP) assist future projects to building what Community Plan outlines under this EIR. The absence in this parent document of reliable mitigation analysis and enforceable measures, such as Complete Streets improvements impact on traffic Level of Service and Vehicle Miles Traveled impact on Greenhouse Gas emissions, equates to subsequent projects needing new analysis and studies.

The Draft North Park Community Plan’s policies explicitly request Complete Streets and improvements to pedestrian, bicycle, and transit mobility facilities to be built in the public realm. In our Charter City, which does not require vertical conformance between its policies statements and implementing regulations, the city is legally held accountable for its public realm improvements responsibilities found in Mitigation Measures in the PEIR’s MMRP.

Verify that the analysis sufficiently addressed minor modifications, such as travel lane reductions, future bicycle track lanes, removal of on-street parking, and curb extensions for added pedestrian capacity, to ensure that no additional traffic impact studies are required for these public improvements independently or associated with private development applications.

3.2 Relationship to the General Plan (page 3-2 – 180)

The proposed CPUs would build upon the vision, goals, and strategies of the General Plan. *The proposed CPUs are intended to further express General Plan policies through the provision of site-specific recommendations* that implement Citywide goals and policies at the community plan level, address community needs, *and guide zoning*. The General Plan and Community Plans work together to establish the policy framework for growth and development in the CPU areas. *The Land Development*

Code within the Municipal Code implements the community plan policies and recommendations through zoning and development regulations.

Provide analysis and determination on the ability of city-wide zoning to implement the location specific Community Plan policies as opposed to the former Mid-Cities Planned Development Ordinance zoning tool crafted specifically for the 1986 updates.

CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan’s Land Use Element; amendments to the LDC to remove North Park from the Mid-City Communities Planned District Ordinance (MCPDO); amendments to the Land Development Code (LDC) to rezone the area located in North Park Community Planning Areas from the Mid-City Communities Planned District to Citywide zoning; adoption of LDC amendments to allow for implementation of the community plan policies; amendments to the Neighborhood Development Permit (NDP) regulations to include Supplemental Design Regulations for Potential Historic Districts; and a comprehensive update to the existing Impact Fee Studies (IFS) (formerly known as Public Facilities Financing Plans) resulting in a new impact fee for each community.

3.4.1.3 Urban Design Element (pg 3-14, pg 192)

The proposed North Park Urban Design Elements describe existing community character and identify and provide goals and policies related to urban form, including public spaces and village design, neighborhood and community gateways and linkages, building types and massing, streetscape and pedestrian orientation, public views, urban forestry, and other unique aspects of the communities. These elements present the proposed urban form of the plan areas and highlight opportunities for urban design in the community.

Urban Design Element is more than Visual Effects & Neighborhood Character.

Recommendation:

Update our citywide CEQA Thresholds to Include Measures for Mixed-Use, Walkable Vertical Mixed Use Private Buildings as outlined in the city’s General Plan PEIR MMRP.

Consider utilizing the area identified as Traditional Character Neighborhood (pg. 81 CPU) as a mitigation measure for future Historic Preservation Districts. These areas are identified for their ‘historic character’ to be preserved in this plan. However we need to be mindful that “Community Character” is defined by more than just density, as some individuals and organizations seem to be trying to say.

3.4.3.1 Citywide Rezoning (3-20)

Citywide zoning will be applied in all areas. Proposed densities will be consistent with existing zoning with the exception of Community Enhancement Areas in the North Park CPU area where increased density and modified development regulations would be allowed with processing of a PDP.

Recommendation:

Create a city-wide Mixed-Use CC Zone that better fits the need for vertical mixed-use development on El Cajon Boulevard

Table 6.1-1 Applicable CPU Policies Related to Land Use (pg. 6.1-8, pg. 287)

Urban Design Element

Issue:

An outdated version of the Draft NPCPU was used by City Staff in the preparation of the PEIR leading to errors in the text. The following are the ones we caught however there are likely others we missed.

Solution:

Make the following corrections:

Public Realm

1. UE-2.2 Consider plazas, courtyards, pocket parks, and terraces with commercial and mixed-use buildings.

[The correct UE-2.2 policy states: Accentuate key focal points and entrances, and corner of a development with art, signs, special lighting, and accent landscape] – Remove this Incorrect Reference

2. UE-2.5 Encourage the creation of public plazas at gateways, nodes, and street corners with transit stops to help activate street corners and provide a foreground to building entrances.

[The correct UE-2.5 policy states: Provide continuous and consistently designed right-of-way improvements, so that a development project reads as one unified project. Create a seamless connection of landscape improvements between properties and across the streets.] – Remove this Incorrect Reference

Core and Mixed-Use Corridors

3. UE-1.8 Preserve and encourage the enhancement of the Adams Avenue “Antique Row” and commercial node.

[The policy reference is now located at UD-3.33] – Remove this Incorrect Reference

Consistent Character Area

4. UE-1.21 Preserve and retain the single-family character created by small lots along Mission Avenue. –

This Policy does not Exist. Remove this Incorrect Reference.

Gateways and Nodes

5. UE-2.17 Preserve and encourage the continued enhancement of the Adams Avenue “Antique Row” and commercial node.

[The correct location of policy is UD-3.33] – Remove this Irrelevant Land Use Reference.

Replace the above Incorrect Policy Reference sited above with these Recommendations:

1. UD-2.1 Create publicly accessible plazas and paseos as part of new development.

(The intention is to enable these public space types to count towards our Park and Recreation Deficits outline in MMRPs as they are required on all new development)

2. UD-2.13 Improve pedestrian environments in the community with wider sidewalks where needed, enhanced crosswalks and paving, and better access and connectivity, shaping-producing street trees, street furnishings, and amenities that support walking.

3. UD3.22 promote a strong pedestrian and bicycling orientation along ECB (a-c)

(Enable these on Pedestrian-Orientation policies in TOD Enhancement Program Streetscapes)

MOTION 3

Economic Prosperity Element Section

Issue:

Table 6.1-1, in its Economic Prosperity Element portion, incorrectly refers to the June 2015 draft of the North Park Community Plan Update (NPCPU). The Economic Prosperity element has since been revised in the current (June 2016) draft NPCPU.

Conclusion:

The errors, while unlikely to have impacted the conclusion of “less than significant impact” for Issue 1, represent incomplete analysis of the NPCPU.

Correction:

Revise the Impact Analysis as needed to reflect the current June 2016 draft NPCPU.

Noise and Light Element Section

Issue:

Table 6.1-1, in its Noise and Light Element portion, incorrectly refers to Policy “NE-3.3”. Although the policy then cited is conceptually appropriate, the Policy number is “NE-3.2” in the current (June 2016) draft NPCPU.

Conclusion:

The error may either be a typo, or indicate that a prior version of the NPCPU was referenced. It is unlikely to have impacted the conclusion of “less than significant impact” for Issue 1, although would indicate an incomplete analysis of NPCPU if an incorrect version was used.

Correction:

As appropriate, correct the typo or revise the Impact Analysis as needed to reflect the June 2016 NPCPU.

MOTION 4

3.0 Project Description: Land Use Distribution at Build Out (page 3-36)

Issue:

Table 3-12, (Residential Development Existing and at Proposed Community Plan Update (CPU) Build-out) is Unclear & confusing to the general community with regard to the difference between number of units proposed at Plan Build Out vs. Household Population proposed to be served at Plan Build Out..

Solution:

Table 3-12 should be re-formatted by changing the column heading to clarify that 73,170 represents proposed increase in Household Population for North Park and NOT number of proposed Residential Units.

MOTION 5

Section 6.5.5 Mitigation Framework - Impact Fee Study

Issue:

An Impact Fee Study (IFS) is cited in Table 3.1 (Project Components), Section 6.3.5, Mitigation Framework, Mitigation Measures TRANS 6.3-7, 6.3-13, AND 6.3-18, however no such study has been released to date by the City for Public Review.

At the April 19, 2016 NPPC Board Meeting, the public was noticed that an overview of the Greater North Park IFS would occur. However no viable details were provided by City Staff. The presentation lacked any substantive information about how the report would be compiled, what was to be contained in the report, how projects would be prioritized, how the NPPC and the public could provide input, or when an IFS would be made available for public review, among other issues. Subsequent requests for release of the Impact Fee Study meet with silence on the part of the City.

On June 29, 2016 (less than one month before the comment period for the PEIR is to close) a two-page list of projects (“The List”) was sent to Vicki Granowitz, Chair North Park Planning Committee, with a comment: “...to share the List with the NPPC Board...”

“The List was never made available for public for review, provides no substantive information, lacks prioritization, contains errors, and appears to be incomplete. It provided no information to assist the Board in evaluation of the Transportation & Circulation Mitigation Framework (pg 6.3.44) or any other element that would be expected to be contained in an IFS; including but not limited to Public Facilities, Parks and Recreation and Libraries.

More importantly, a “List” is not a “Study” (“The List” includes no analysis) and since the PEIR cited the “Impact Fee Study”, such a study including accompanying analysis should have been made available to the NPPC and the public for review and analysis to coincide with our review of the PEIR.

Conclusion:

The NPPC finds this is a significant and unmitigable error.

Correction:

This error should be corrected by immediately releasing the IFS and accompanying analysis, and either extending the public review period by 30 days or possibly recirculation of the PEIR.

MOTION 6

Section 6.5: Greenhouse Gas Emissions

Issue

The City’s Climate Action Plan (CAP) is meant to play a significant role in reducing greenhouse gases (GHG). This is a significant endeavor and essential to the future of not just North Park but the City of San Diego.

6.5.5 Greenhouse Gas Mitigation Measures concludes that, “All impacts to GHG emissions would be less than significant. Thus no mitigation is required” pg 6.5.13

The NPPC finds this to be a significant error for the following reasons:

The PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide. The 2016 Draft North Park Community Plan along with the just adopted new city standards for the affordable housing bonus density program will lead to significant increased density at build out.

The PEIR includes no quantitative data or analysis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. It offers no mitigation to deal with the probable increase in GHG.

Because of errors in the PEIR data, the actual proposed increases in densities outlined in the 2016 Draft NPCPU were not included, making the analysis even more questionable. Data that was included in many parts of the PEIR are from prior drafts on the NPCPU and do not match the current draft NPCPU out for review.

In addition, the Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan SCH #2014121002, April 26, 2016, pages E-8-9 includes quantitative modeling (proving that the City of San Diego has this capability), therefore the same standard of quantitative analysis needs to be provided for North Park. Failing to

provide this analysis for North Park and Golden Hill does not meet the Goals of the City's Climate Action Plan, nor the Analysis Standards required under CEQA.

Conclusion:

In the Coast Law Group's comments, on behalf of the CAP, to the City dated July 8, 2016 they conclude:

“The current CPU EIRs fail to meet applicable CEQA mandates. The CPU EIRs must assess quantitative compliance with the Climate Action Plan, its reduction targets and goals. As drafted, the EIRs demonstrate a lack of compliance with Climate Action Plan goals because all four CPUs result in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035. Climate Action Campaign urges the City to conduct the requisite analysis and recirculate the EIRs for further public comment.”

The NPCPU is one of the four CPUs referenced in the Coast Law Group's letter. The NPPC agrees with this assessment & questions whether a recirculation might be necessary.

Solution:

Consistent with the on-going request by the NPPC, the City should provide quantitative analysis of how the NPCPU meets the strategic targets for multi-modal transit and VMTs in the CAP.

MOTION 7

Section 6.7: Historic Preservation

Mitigation Measure HIST 6.7-21 merely re-states the current (and inadequate due to lack of enforcement and implementation) City Policy regarding application of the Secretary of the Interior Standards, and does not provide meaningful mitigation that will continue to protect North Park historic resources during implementation of the NPCPU. Citing a General Plan policy does not constitute a mitigation measure.

Mitigation Measure HIST 6.7-21 states that *“to further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation”*.

- 1) Because the above cited Proposed Draft Historical Resources Regulations (PDHRR) being amended in the Land Development Code (LDC) have neither been finalized, received an appropriate public noticing or vetting, nor have they been analyzed in this PEIR as is required under CEQA.
- 2) These PDHRRs were presented for the first time to the public on July 19, 2016 (less than a week before the end of the public comment period for this PEIR), precluding the possibility of their analysis in this document, therefore rendering these proposed PDHRR no mitigation at all under CEQA.
- 3) The explanation given by City staff that “this PDHRR is no different from the original draft zoning ordinance proposal” is nonsensical, inaccurate, and specious. The NPPC and the North Park Community have consistently placed Historic Resources Protection at the level of very highest importance in their input to the City during this Community Plan Update process. The NPPC and the North Park community have worked hard and unceasingly for 8 years to assist City Staff to meet this most important CPU planning goal. It is entirely unacceptable and un-analyzable under CEQA to have this last-minute change sprung on the community after the community has agreed to accept density increases in exchange for promised increased protections for North Park’s unique historic resources including but not limited to the North Park Main Street commercial area, A Bungalow Court Multiple Listing District and implementation of community identified Historic Districts.
- 4) The content of the proposed amendment of the Historical Resources Regulations has not been finalized or received appropriate public noticing, is not analyzed in this PEIR, therefore cannot be cited as a mitigation.
- 5) There was a lack of information readily available during the public review period and a total lack of analysis of feasible mitigation for impacts to Historic Resources.
- 6) A substantial increase in the severity of an environmental impact such as reduction in historic resources will result unless mitigation measures are adopted that reduce the impact to a level of insignificance. Appropriate and Feasible mitigation measures meeting the goals of the CPU and considerably different from those previously analyzed would clearly lessen the environmental impacts of the project, and should be analyzed and considered.
- 7) The potential Draft Regulation Amendments to the LDC regulations (143.0210) represents a mitigation strategy that is unanalyzed in this PEIR. The NPPC finds it to be substantially deficient and fundamentally problematic. An implementation timeline was presented for the first time at the July 19, 2016 NPPC meeting, it is inadequate and has not been committed to in any official City action. Additionally, funding is inadequate for the task. The NPPC finds these the proposals as presented do not adequately meet the Historic Preservation goals of the NPCPU; there is significant public concern that the PEIR and NPCPU do not provide adequate community-specific protections for historic resources.

The NPPC requests inclusion for analysis in the Draft PEIR the following proportional, reasonable & feasible mitigation measures which DO meet the stated goals of the June 2016 Draft North Park Community Plan, and which would NOT engender further significant and un-mitigable impacts to historic resources:

- 1) Accelerate the implementation schedule for Historic Districts that are identified in Figures 10-3 and 10-4 of the NPCPU. Eight years is an unacceptably long period of time to create eleven (11) historic districts, six (6) of which fall in the “small” range
- 2) of 50 properties or less and three (3) in the “medium” range. Further, 8 years is an unacceptably long period for a newly updated community Plan to be entirely without community-specific Historic Resource protections;
- 3) Increase funding for the Historic Districts that are listed in Figures 10-3 and 10-4 of the NPCPU;
- 4) Amend the NPCPU to Exclude historic resources from development calculations for floor area ratio, to allow additional density when retaining a historic resource; This would meet the General Plan’s goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.
- 5) Exclude historic resources from parking calculations to provide a reduced requirement when retaining a historic building. This is particularly important in the preservation of bungalow courts; This would meet the General Plan’s goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not

have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.

- 6) Include city-wide transferable development rights (TDR), enabling property owners to buy/sell rights so growth will result in appropriate areas, near transit and amenities. This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.
- 7) Remove the "1/3 option" in the proposed Land Development Code (LDC) & replace with protections consistent with the Secretary of Interior Standards for Historic Review for all community proposed Historic Districts, including Commercial districts and the proposed Multiple Listing Bungalow Court District. The proposed "1/3 option" is not only not analyzed in this document, it has no precedent or analysis Stat- wide; whereas the Secretary of the Interior Standards for Historic Review are well documented and analyzed under CEQA as providing mitigation protections, and provide a more consistent and well understood framework, thereby providing greater developer certainty.

Further, the term "original footprint" with regard to the "1/3 Option" is not clearly defined and could lead to trivial disputes. Also, the 2/3 rule does not adequately protect corner properties and will facilitate obtrusive and odd-shaped rear additions, which will be detrimental to a potential district. This provision is confusing and likely difficult to implement, and it's potentially very negative impacts to Historic Resources are unanalyzed in this PEIR document.

Solution: Remove "original footprint" language. Include language stating that additional stories and structural changes shall comply with the Secretary of the Interior Standards. Small additions (less than 300 square feet) and façade changes shall be limited to side and rear facades, and be minimally visible from the public rights-of-way.

- 8) In order to effectively protect potential districts from incompatible change, i.e. scale, bulk, rhythm, and materials, for parcels that do not include a historic resource, but are located within a potential district; comprehensive infill guidelines for these potential districts are needed. Infill guidelines are necessary to ensure the potential historic district remains intact until such time when the district is brought forward. Without such guidelines and an analysis thereof, this PEIR fails to analyze potential mitigations to historic resources.
- 9) Because no permit is currently required for so doing, the potential Draft Regulation Amendments to the LDC regulations (143.0210) do not adequately protect historic resources from the installation of replacement doors and windows when placed within the same opening, This lack is detrimental to any potential Historic district, could render the historic asset no longer contributing or eligible for a district, and therefore language should be developed and included in the CPU and LDC requiring such permits. Current City of San Diego General Plan and LDC provide no such protection, thus the PEIR's contention that these documents protect North Park is unsubstantiated.

Solution: All window and door replacements that fall within the proposed Land Development Code must require a building permit. Accordingly, add to Table 132-16B of Section 132.1602, for improvements consisting of replacement windows: (i) replacement windows that do comply with Section 132.1603 will require a

Construction Permit/Process One decision process, and (ii) replacement window that do not comply with Section 132.1603 will require a Neighborhood Development Permit/Process Two decision process.

- 10) To effectively protect the potential district from inappropriate change, infill design guidelines should be created:
- 11) Survey and implement the multiple listing for Bungalow Courts as a stand-alone district: Preservation of these historic affordable housing units meets the goals of the City's Climate Action plan, and their loss to infill development due to inadequate protection would constitute a significant and unavoidable impact under CEQA that an accelerated district implementation would prevent.
- 12) Provide adequate enforceable protections for the potential historic districts. Due to inadequately funded and supported code enforcement, the City has not provided adequate code enforcement for Historic Resources in all areas of the City. City must provide a plan and funding for adequate code enforcement to ensure there is not a loss of historic fabric, rendering buildings no longer contributing to potential districts

Solution: Code Compliance issues within potential historic districts should be near the top of the priority list. In addition to higher monetary penalties, any features removed in violation shall be reconstructed. Residents of potential districts should be provided a direct number to contact officials when work occurs on weekends, evenings, and holidays to ensure against loss of historic fabric by illegal demolition.

- 13)** Offer rehabilitation loans and grants, including low- and moderate-income housing loans and grants, and commercial façade improvements grants for both documented and potential historic resources.