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Hon. Lorie Zapf
San Diego City Council Member, District 2
202 C Street
San Diego, CA 92101

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Re: Morena Corridor Specific Plan, Public Review Draft, June 2017
Comments concerning proposed specific plan

For the past two years I have served as the Chair of the Ad Hoc Subcommittee on the Morena Corridor Specific Plan (Committee) that was established by the Linda Vista Planning Group. In that role I have had substantial involvement in the review of the proposal of the Planning Department, although I am submitting these comment in my individual capacity.

There are some positive aspects in the proposed specific plan ("Plan") such as the reconfiguration of intersections into standard "T" intersections (pages 38, 40) and the development of mixed uses (page 54). However, these are greatly outweighed by the Plan's disregard of community input in its effort at social engineering.

1. The Plan Ignores Community Input

On February 16, 2016, the Committee unanimously adopted a "Vision Statement and Guiding Principles" that called for: (1) retention of the current height limits; (2) no worsening of traffic; (3) density compatible with the existing neighborhoods; and (4) infrastructure and parks for any increases in density. A copy of the minutes of that meeting is attached to these comments.

The Vision set out in the Plan includes none of these concerns, other than a reference to "adequate infrastructure." (Page 1.) The Guiding Principles in the Plan references improved mobility for all modes of transportation (page 2), but its implementation undermines it.

In contravention to the Committee's Vision Statement and Guiding Principles, the Plan (1) raises the height limit from its current 30 feet by right and 45 feet by discretion, to 45 feet by right and 100 feet by discretion near the Tecolote station, and to 45 feet by right and 65 feet by discretion near the Morena Station (pages 83, 84); (2) narrows Morena Boulevard southbound to one lane (page 37) and suggests the intersection of Morena and West Morena should be changed to a traffic circle (page 38); (3) increases density from its current 29 dwelling units to the acre to 109 dwelling units to the acre near the Tecolote station and 73 units to the acre near the Morena station (page 84); and (4) does not provide for

the infrastructure the increased density would demand (page 77). Each of these provisions raises serious concerns that will be discussed.

The clear contrast between what the Committee approved, and what the Plan proposes, gives a lie to the Plan's assertion that "community outreach was a collaborative process between community members and the City." Rather, the community outreach was a charade and the community input was ignored. The Plan is so at odds with the community input as to strongly suggest the Planning Department had a predetermined outcome, and the "collaborative process" was so much "checking the box" of public participation.

2. The Comment Period on the Plan Should Be Extended

The Planning Department has, for at least six months, promised to release a traffic study, but it has not done so. Instead it said the traffic study will be released some time in the fall. The community is now being required to provide its comments on the Plan without seeing the traffic impacts of the Plan.

It is not as though the traffic study does already not exist. Portions of the traffic study were selectively provided by the Planning Department at a meeting of the Clairemont Ad Hoc Committee on July 24, 2017. The limited information showed that the level of service would deteriorate on at least one road in Clairemont. When asked to explain this deterioration, even though no additional housing is contemplated by the Plan in Clairemont, the representative of the Planning Department admitted it was due to the planned increased density in Linda Vista.

No information was provided on density worsening traffic on Morena Boulevard, or the deterioration caused by the Plan halving the number of Morena's southbound lanes. However, because a southbound lane has been eliminated to facilitate trolley construction, residents can already observe that traffic is backed up on Morena, particularly during rush hours.

At that same Clairemont meeting, it was revealed that the entry speed for the proposed traffic circle at Morena and West Morena would be about 15 miles per hour (the Planning Department, using Orwellian phraseology, called it "traffic calming"). Traffic on Morena Boulevard is about 40 miles an hour. With the "traffic calming" circle slowing traffic on Morena to 15 miles per hour, traffic will be backed up in both directions

Why a traffic circle? Most likely it is derived from the San Diego Climate Action Plan (CAP). At page 38 of the CAP, Action 3.5 provides for implementation of a "Roundabouts Master Plan" to reduce vehicle fuel consumption. It calls for installing 15 traffic circles in San Diego by 2020, and 20 more by 2035. Whether it makes sense to install a traffic circle at this location (and I do not believe it does) is of no matter to the drafters of the Plan. Their marching order is to fill the quota for traffic circles, so they have dropped one here where it will back up traffic and increase fuel consumption and emissions.

The Plan's increased density will have traffic consequences. Full and complete comments on the Plan cannot be provided in the absence of the opportunity to review the traffic study. The comment period on the Plan should be extended to 60 days after the public release of the traffic study.

3. There Is No Ridership Study to Support the Plan's Extreme Densification

The Transit-Oriented Development Enhancement (TODE) program is used by the Plan to justify the extreme densification in the vicinity of the two trolley stations. (Page 84.) The Plan argues that the TODE program “creates transit-oriented development that supports the implementation of the CAP.” While unstated, the Plan assumes that residents of the high density areas will regularly use the trolley instead of vehicles. Indeed, at the December 2016 meeting of the Committee, a development concept was presented based on that theory to allocate less than one parking space per dwelling unit.

What is lacking is any study to show that residents in the TODE areas will rely on the trolley for basic transportation. No ridership study has been presented to support this. If it is not the case, then there is no justification to concentrate housing at the stations – densification could be anywhere.

Two things suggest the Plan's foundation is not valid. First, there is already densification along nearby Friar's Road where there is an existing trolley line. In this area of dense housing, the level of service of Friar's Road is deficient. This strongly suggests not only will extreme densification not only not reduce vehicle use, but it will worsen traffic. A second factor is that 100 foot dwellings in the TODE area require steel frame construction, which is an expensive type of building. Instead of affordable housing, the extreme densification with 100 foot buildings will create high rise, high cost housing. People who can afford high rents typically will own two or more cars per dwelling units. High rise housing will worsen traffic and not contribute to the goals of the CAP.

Until a ridership study can be presented that studies trolley usage by residents of comparable developments, such as those that are 100 feet in height, there is no way to justify the extreme densification proposed under the TODE program.

4. The Plan Does Not Provide for Needed Infrastructure

It is a fiction that in-fill development can be done on the cheap without providing the improved infrastructure it demands. San Diego has already paid for this fallacy. In-fill development was the mantra in the 1960s and 1970s, when single family units in Normal Heights and North Park were demolished to make room the multi-family housing, but water capacity was not increased. In 1985 a fire started in Mission Valley and raced up the canyon wall. Firefighters responded to the inferno, but found water pressure was lacking because of the increased number of dwellings using the same water pipes that were designed for single family homes. A significant part of Normal Heights burned.

The Plan acknowledges this need for increased water infrastructure, but does not resolve it. Instead, it says that “[i]mplementation of the Specific Plan *could* requires upgrades to the existing water system infrastructure to ensure adequate capacity and sufficient fire flow. (Page 77, emphasis added.) It does not show how the city would pay for the upgrades to the existing water system, nor does it impose a requirement that new development fund it. It leaves the community at risk both physically and fiscally.

5. The Plan Improperly Delegates the Council's Zoning Authority

The Plan purports to rezone the areas around the Tecolote and Morena stations to Community Village, which would allow 54 units to the acre and a maximum building height of 45 feet. (Pages 8, 24, 83.) However, it also allows, under the TODE program, density to be increased 109 units to the acre around the Tecolote Station and 73 units to the acre near the Morena station, and with respective increases of the height limits to 100 feet and 65 feet. This would be accomplished through Planned Development Permits. (Page 84.)

The more than doubling of permissible building height and density near the Tecolote station, and a significant up-zoning near the Morena station, would be subject to approval not by the City Council, but by discretionary action (presumably of the Planning Commission). The effect would be an improper delegation of the Council's legislative authority to an unelected body. If the Planning Department intends, as it clearly appears it does, to have the area dramatically densified and the height limit raised, it should identify the City Council as the only entity with the authority to authorize it.

6. The Plan Does Nothing to Alleviate the Shortage of Affordable Housing

San Diego has a lack of affordable housing for middle income people. There are subsidies available for low income individuals, and a plethora of housing for the elite, but the middle class is being forced out of the housing market. The trolley represents a billion-dollar investment of public funds, and the public should have something to show for it. The Plan does nothing to address the shortfall.

By way of example, a one-bedroom apartment in the transit oriented housing development at Napa and Linda Vista Road rents for about \$2,100 per month. Using the HUD standard that a family should not pay more than 30% of its income for housing, this requires an annual income of \$84,000. This is well above the San Diego median. Notably, this development is not the type of high rise, high-cost units called for by the Plan.

The Plan does not provide for affordable housing. As written, it would allow developers to buy out of the inadequate ten percent that they are required to provide. In fact, where there is such a large public investment as is going into the trolley, the affordability requirement should be raised to at least forty percent, and ways should be devised to prevent developers from buying out of it.

As previously discussed, high rise housing is high-cost housing that is unaffordable for most San Diegans. Instead, the Plan appears designed to have the trolley deliver a windfall to property owners in the vicinity of the two stations by monetizing an up-zoning of their property. The public deserves better for its billion-dollar investment.

7. The Plan Greenwashes Overdevelopment and Unaffordable Housing

The Plan purports to implement the CAP (see, for example, pages 1, 5, 67, 71, 72, 73) but, in fact, pays lip service to it while imposing over-development that violates the Vision Statement and Guiding Principles of "density that [is] compatible with the existing neighborhoods" and does not alleviate the

shortage of affordable housing. This greenwashing is evident from the Plan's failure to mandate sustainable design or conservation.

While the Plan is directory regarding increased density and height limits, it uses advisory language, at best, about sustainable design:

It encourages, but does not require, the installation of solar energy generation systems;

It encourages, but does not require, implementation of wind energy generations systems;

It encourages, but does not require, adaptive reuse of existing buildings to increase energy efficiency;

It discourages, but does not prohibit, the use of turf in new ornamental landscaping, and strongly encourages, but does not require, replacing ornamental turf with water-wise landscaping;

It encourages, but does not require, the use of graywater reuse systems for landscape irrigation.

(Pages 67-68.)

Similarly, in discussing conservation, the Plan also uses advisory language:

It encourages, rather than requires, adherence to LEED standards for construction;

It encourages, rather than requires, implementation of energy and water efficient measures for commercial uses;

It encourages, rather than requires, new development and building retrofits to incorporate as many water-wise practices as possible.

(Page 74.)

Implementation of the CAP requires sustainable design and conservation, not the "encourage" language of the Plan. The Plan appropriates the credibility of the CAP to impose overdevelopment and unaffordable housing. It is classic greenwashing.

8. Conclusion

The process that led to the Plan is a model of how community planning should not be conducted. It makes a mockery of community input and further convinces the public that its participation is futile. There is no publicly available traffic study to gauge traffic impacts, no ridership study to judge whether extreme densification in this area is rational, the plan ignores the needs for adequate infrastructure to meet increased demand, it improperly delegates the City Council's zoning authority, it fails to address San Diego's massive affordable housing crisis, but instead provides a bonanza to existing landowners, and misappropriates the CAP to greenwash these deficiencies.

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At a minimum there should be an extension of the comment period to consider the Plan in light of traffic and ridership studies. However, based on the faulty consultation process, the Planning Department should start over and truly engage the community in a collaborative process.

We understand that the trolley will change the area, and we want the change to be for the better. We welcome mixed use development, some additional density, infrastructure to meet the need that increased density imposes, and affordable housing. That is not what the Plan delivers. The public's billion-dollar trolley investment should provide benefits for all.

Sincerely,

HOWARD WAYNE

Attachment: Minutes