

Comments on the Land Use element

Robert C. Leif, Ph.D.	Maria Riveroll	Reynaldo PISAÑO
3345 Hopi Place,	P.O. Box 740903	P.O. Box 740903
San Diego, CA 92117-3516	San Diego, CA 92174	San Diego, CA 92174
Tel. (619)582-0437)	Tel. (619)264-5373	Tel. Cell (619)405-0352
Email rleif@rleif.com	Email taxqueen25@cox.net	Email rpisano5@cox.net

Introduction

Quotations from the Community Plan Update are indented. Text inserts are in red. My comments start at the left margin. This documents employs Word's styles for formatting. My suggested additions and replacements are in red.

There were significant omissions in the Community Plan Goals

Quotations from the Community Plan Update are indented.

Goals:

LAND USE ELEMENT

1. A vibrant and pedestrian-oriented community that provides residential, commercial, office, institutional, industrial and civic including governmental uses.
2. A compatible mix of land uses that promote a healthy environment.
3. Stable base sector employment uses and supportive commercial and industrial services.

These need to be measured and reported annually

4. A diverse mixture of residential opportunities including affordable rental and market rate for sale housing, senior and multi-generational housing and small lot townhome development **that conforms to MF3000 where applicable in the neighborhood.**

What is the size of a small lot and the FAR for the townhouses. Do these differ from a standard residential lot?

5. Well-designed and aesthetically pleasing neighborhood and community-serving commercial and institutional uses which meet the daily needs of the residents.
6. Special districts and villages that address the unique commercial needs of the community including the Villages at So. 43rd Street, 25th Street/and the western part of Commercial Street. The eastern part of Commercial St. to remain industrial **without recycling.**
7. A vibrant, pedestrian-oriented village with a mix of residential, commercial, industrial and civic facilities. uses for the enjoyment **and economic betterment** of community residents with unique, local character.

{I agree with product; however, I believe that economic betterment includes product sales and production, as well as being more general.}

8. Preservation of the present employment opportunities and expansion of these opportunities through education.
9. Make improvements, maintain, and stimulate investments in this area.

These need to be measured and reported annually

Figure 2-1 still has the problem of having 16 solid colors delineate the land uses. We believe that this is somewhat beyond the capabilities of a normal person. A reasonable, inexpensive means to accomplish this is to differentiate by the combination of stippling and color. I believe that this is available from SANGIS. SanGIS also has Interactive Maps that include data layers. Please see Technical Comments

The southeastern village district has an irregular outline, which is reminiscent of a gerrymandered electoral district.

Table 2-2: EXISTING LAND USES IN SOUTHEASTERN SAN DIEGO

Industrial Uses and Utilities 133 (7%)

Table 2-4: LAND USE CLASSIFICATIONS IN SOUTHEASTERN SAN DIEGO

Proposed Light Industrial 88 acres (4%)

Table 2-2 and Chart 2-1 need to be modified to separate out Light Industrial from Utilities or Table 2-4 needs to have a column added showing the differences between the existing plan and the new plan. Dr. Leif has previously suggested this. The planning department or some other city agency needs to compile the data on the relationship of industrial land in a planning area to jobs and median wages. This is of particular

significance to Southeastern in that there is not any public rapid transit North and South. Multi-hour public transport is not rapid.

Buildout

The designation of a site for a certain use also does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development will depend on property owner initiative **and the local economy**.

Since most development will depend on property owner initiative and the property owners are major customers of this plan update, why was not their opinion on how they would like to develop their properties solicited? A questionnaire could have been sent out and put on the Planning Department's web site. The Planner said that since the chair of the SSDPG, Dr. Leif, was a property owner, he had a conflict of interest! This process has been skewed toward affordable housing because of the Planning Department personnel's interests in this subject.

Table 2-5: POTENTIAL DEVELOPMENT UNDER THE SOUTHEASTERN SAN DIEGO COMMUNITY PLAN

NET NEW needs to include the percentage of NEW. Industrial and Utilities which need to be placed in separate categories.

The future lack of water will be a severe impediment to further increases in population in Southeastern and other parts of San Diego. The coming water shortage should be mitigated without the use of fossil fuels. Existing reverse osmosis and desalinization technology may soon be in use to mitigate the current draught. Since systems based on fossil fuel to power reverse osmosis units would be bad for the environment and there probably will be a long period of litigation, it is necessary to find and permit the locations for future sources of renewable energy to power these future reverse osmosis units. The location of potential sites for air turbines or solar farms should promptly occur. These sites should be located and permitted before any serious amount of new construction and/or change in density, except replacement should occur.

Southeastern Village

The Southeastern Village includes the Commercial/Imperial Corridor from Interstate 5 to 28th Street, and is centered on the trolley stops at 25th Street and 32nd Street.

Since 32nd Street is east of 28th Street, it appears to not be a part of the Corridor.

Preserve ~~some~~ of the present and if possible create future industrial jobs.

Table 2-6: ADDITIONAL STANDARDS AND INCENTIVES IN VILLAGES

VILLAGE DISTRICT: ~~Density may be transferred within the Village District boundaries or to sites within 1/4 mile radius of trolley stops or major mass transit stations.~~

If this means that within 1/4 mile radius of trolley stops or major mass transit stations, the density can be changed to that of the highest build in Southeastern, it should be removed! What about the area between 1/4 to 1/2 mile radius?

How many parking spaces will be lost if the rules of Table 2-6 are followed? One simple solution would encourage landlords to provide smaller parking spaces for small cars, such as a Mercedes Smart Car, Fiat Millecento or even smaller autos.

Since the Southwestern USA is becoming more arid and San Diego has a surfeit of flammable vegetation, what is the minimum height to permit profitable private construction of a fireproof and earthquake resistant building? This height should decrease if modular or reasonably prefabricated buildings could be constructed in San Diego without excessive City imposed costs.

Structured parking shall not be counted as part of building floor area ratio.

Given San Diego's parking problems, Structured parking that is for tenants, employees, or customers should not be included in the building floor area ratio. However, Structured parking that is open to the general public where there is a charge should have a building floor area ratio bonus and a reduction in property taxes.

Establishments that increase employment at wages above the median should be given a tax credit on their real estate taxes

Figure 2-3: Areas of Change

In the area of the Commercial/Imperial Corridor, all of the residential multifamily properties except those near trolley stops should have the same zoning. Publicly funded housing should not be given an advantage over privately funded housing.

2.8 Environmental Justice

Additionally, the State of California has an expectation that local governments will adopt policies to ensure the provision of the equitable distribution of new public facilities and services, and to expand opportunities for transit-oriented development, among other considerations.

This includes access to North-South public transportation, such as the I-15 Bus Rapid Transit. This access would be provided by intermodal service between the I-15 Bus Rapid Transit, the trolley Orange line and the Imperial Ave. bus. If the I-15 Bus Rapid Transit continues on SR 94, a pedestrian station should be built for it in the vicinity of 25th St.

In some areas, communities with these attributes also feature a concentration of contaminated sites or industrial uses that pose health risks to residents. In Southeastern San Diego, this condition is most notable along the Commercial Street corridor, where recycling facilities and industrial uses are located in close proximity to homes.

Where are these sites located and what proof is there of these charges? What actions has CAL/EPA or US EPA taken to clean them up? What sites still exist that have not been mitigated? Are any of these sites in the light industrial areas? If so where? Are there any reports by degreed, qualified individuals that substantiate these charges or are they just hearsay. If these charges lack sufficient documentation, they are disgraceful and unfit for consideration for legislative changes or appearing as being true in government documents. The government has an obligation to provide adequate surveillance of pollutants. If there is pollution, it should be mitigated.

To improve health and the built environment, some businesses have already made an effort to soften and screen the facades on the sidewalk edge through the introduction of vines and planting, or by painting large walls with murals.

These are not environmental improvement; they are esthetic improvements.

Noise

The Noise Ordinance specifies maximum one-hour average sound level limits at the boundary of a property

Does the City have the equipment and trained staff to do this? It is now easy to record this data with a tablet PC. Their microphone system can input the raw data. However, this inexpensive approach requires calibration of the system.

Motor Vehicle Traffic

Because commercial trucks generate more noise than cars and light trucks, they can have a proportionately greater noise impact.

The City and state have every right to demand the use of sound deadening technology and speed reduction modalities in residential neighborhoods, schools, etc.

If the noise level is above the acceptable limit, operating hours of the enterprise should not include any time before 7:00 AM and after 6:00 P.M.

5.1 Market Conditions & Demand

Projections

The sales are “leaked” out of the Planning Areas on retail goods and services

in ~~three~~ general categories: convenience goods; general merchandise and home improvement; and eating and drinking; construction services and goods, automotive repair, and health. **The products of light manufacturing are primarily exported to other parts of the U.S.A. and the rest of the world.**

There is strong potential for commercial, **industrial, research, software** and retail expansion in the coming years.

{Retail expansion has the challenge of the internet. A possible indicator is the price to earnings ratio of Amazon compared to major retailers. Amazon makes little money but has a high share price. The first step is to help our existing retailers, many of whom appear to have a marginal existence. The restaurant business, as has been demonstrated in Pacific Heights can easily morph into the bar business. This results in sufficient social problems to result in families leaving Pacific Beach. Southeastern already has a Walmart food store and a COSTCO. Planning may wish to get help on this from Vince Noto and Jerry Brent Moss, Sr. or other members of the group.

but given its central location and proximity to transit and freeways, **the area has the potential** ~~is expected~~ to grow in the coming years

There is sufficient political resistance to entitlements in Congress, that expansion of affordable housing is problematic. Although the actual present costs of each affordable housing unit has not been published, it appears that the actual high cost will create sufficient resistance. The definitive data is planned to be published in the fall of 2014 (http://www.hcd.ca.gov/2012_affordable_housing/2012_AffordableHousingCostStudy_timeline.pdf).

This plan neither includes real smart growth or zoning to permit the construction of market rate buildings. Has Planning received any input from one or more developer on this subject? If so, it should be shared with the Group. Do any of the members of the planning staff, who are working in our area have any relationship with an affordable or market rate housing developer?

The Light Industrial designation, applied along Commercial Street, allows a wide variety of industrial uses such as repair, light manufacturing, biotechnology, warehousing, storage, and wholesale distribution, in addition to uses allowed in Business Park areas. One very important job generator would be apprentice training for occupations, such as skilled mechanics, repair personnel, plumbers, electricians, welders, programmers, etc. This training could lead to an associate's degree.

5.4 Financial Feasibility

These paragraphs admit that with the proposed zoning and the City's present zoning and permitting structure that further development by the private sector is not feasible. This can be remedied by:

1. A realistic zoning plan
2. Improving the City's permitting process preferably to follow the model of Civic San Diego or subcontracting the permitting process to Civic San Diego. However care should be taken to prevent Civic San Diego from controlling the area. It is never a good idea to allow a third party issue permits.
3. The municipal code should permit the use of fire and earthquake resistant modular (Pre-manufactured) housing including multifamily units.
4. Plants that engage in modular housing should be encouraged to locate in San Diego or at least have a showing space.

Land Use Policies

Text inserts are in **red**. Comments are at the left margin. Policies are indented. P-LU-? Are new Land Use Policies.

P-LU-1: Provide a variety of land use types to maintain the existing balance of land use[s] **classes, such as residential, commercial, industrial, etc.** (refer to General Plan Policy LU-H.7)

General Plan Policy LU-H.7 should have a URL reference.

Taken literally, this means for every car repair, recycler, etc. displaced a replacement must be found.

P-LU-2: Foster development of neighborhood structure around existing **and future** elements such as the Educational Cultural Complex **which is located on Ocean View Blvd;** Chollas Creek, 43rd and Logan node; **the proposed rapid transit multimodal station;** and National Avenue. Include a center in the neighborhood structure, as well as other elements such as a spine, a gradation of density, or clearly distinct use areas.

Existing can be parsed as meaning presently existing; rather than existing at some future time. I would have considered adding **or planned**.

The "Educational Cultural Complex" is not the Logan Heights Library, which already lacks sufficient parking? **The ECC is located on Ocean View Blvd. across from Home Depot.**

P-LU-? Land Uses Amenities around Chollas Creek and Puleta Creek should be implemented and maintained.

P-LU-3: Focus the highest intensity development (residential and non-residential) on both **the western part of** Commercial Street and Imperial Avenue around the trolley stops to capitalize on access to transit, boost transit ridership, and reduce reliance on driving, **as well as increase the economic viability of the area.**

The limited parking and traffic carrying capacity of Commercial Street and Imperial Avenue need to be considered in the amount of density increase. The present and future water supply should also be considered.

P-LU-4: Refer to the Sherman Heights Historic District and Grant Hill Historic District for development and rehabilitation ~~guidelines~~ standards.

P-LU-5: Promote Cesar E. Chavez Parkway and 25th Street as the Village's primary ceremonial street as described in the Mobility Element.

P-LU-6: Orient street frontages towards Imperial Avenue and 25th Street, and provide space for outdoor seating and for retailers to display their wares.

This space is neither to be used for the sale or use of alcoholic beverages nor cannabinoids nor other drugs that have been prohibited by either the US or California Governments.

Because of the necessity for maintenance of traffic flow and adequate parking, this encroachment is unwarranted. In the case of Commercial St. either the parking or the trolley tracks would probably have to be removed to permit this.

Presently, there is no room and insufficient parking for this increase in customers and no room on the existing sidewalk for these uses. The possible setbacks on existing buildings cannot be increased; except in the case of a complete demolition and rezoning, which would provide a sufficient increase in revenue as to justify a major capital investment, preferably by private enterprise.

P-LU-7: Provide sidewalks that are 15 feet wide (minimum) along Cesar E. Chavez Parkway, 25th Street, and Imperial and Commercial avenues to enhance pedestrian and commercial activity. **The setbacks on existing buildings cannot be increased.**

This would require narrowing of Imperial Ave and require more parking to be created in the vicinity. It certainly would interfere with parking or future bike paths and traffic flow.

Since Commercial St. has a pair of trolley tracks, sidewalks this wide would require cars, bikes and the trolley to share the same lanes. There is no compelling reason for wide sidewalks in the Eastern industrial area of Commercial St.

P-LU-8: ~~Require~~ **Permit** ground-floor commercial uses, such as retail spaces and small businesses, in the Neighborhood Mixed Use designation near the 25th Street trolley stop, as shown by the symbol “Commercial Frontage Required” on the Land Use Diagram.

Where will commercial customers park? How far will they have to walk and carry their purchases?

P-LU-9: Work with Caltrans to eliminate the freeway structure in order to redevelop the parcels for a variety of community serving uses.

This is unclear. Where is this freeway structure and what will replace it including as a means of transportation? What are these proposed community uses? The freeway will eventually need to be enhanced, particularly to replace the left-lane off-ramps. In the future, the trolley tracks conceivably could be either elevated on Commercial Street or moved to be part of the SR-94

~~P-LU-10: Promote 43rd Street as a higher density mixed use spine through the Village with 15-foot wide sidewalks (minimum), corner popouts, shade-producing street trees, and pedestrian-oriented lighting.~~

The locations of these actions need to be specified and evidence provided that they are feasible and consistent with the Land Use Goals specified by the SSDPG. There is a visibility problem with corner popouts. They need stronger contrast to the street and sidewalks. Is there any data on the utility and safety of corner popouts? Please document the positive and negative effects of pop-outs.

P-LU-11: Promote and encourage the full participation in the implementation of this plan of private capital including that of the present owners including inviting all owners to any discussion of improvements to their property. ~~Achieve a diverse mix of housing types and forms, consistent with allowable densities and urban design policies.~~

P-LU-12: Balance new development with the rehabilitation of high-quality older residential development. **Renovate existing streets and sidewalks**

P-LU-13: Promote construction of larger housing units suitable for families with children by utilizing density bonus incentives.

P-LU-14: Provide housing development that incorporates universal design standards **including A.D.A.** for persons with physical challenges.

P-LU-15: Support rental and ownership opportunities in all types of housing, including alternative housing such as companion units, live/work studios, shopkeeper units, small-lot housing typologies, and for-sale townhomes **where they conform to the zoning regulations.**

Is there any documentation concerning where is the money going to come from?

P-LU-16: Encourage preservation and renovation of culturally and historically significant residential units and provide incentives to retrofit or remodel units in a sustainable manner.

Since these are privately owned, the responsibility for the preservation and renovation of the property should rest with the owner.

P-LU-17: Preserve existing single-family homes that provide affordable housing and contribute to Southeastern San Diego's unique character in particular in the Sherman Heights and Grant Hill Historic Districts.

What is this unique character and how is it measured? What makes it different from other areas of the City and State?

P-LU-18: Rehabilitate existing residential units that contribute to the historic district's character and fabric. Encourage adaptive reuse of historically or architecturally interesting buildings in cases where the new use would be compatible with the structure itself and the surrounding area.

Who pays for this? Does this expenditure have to be voted on by the City Council and signed by the Mayor? What is the process to determine if the building contributes to the historic district's character and fabric? What are the qualifications of the individuals who make this decision?

P-LU-19: Support development of companion housing units in lower density areas to provide additional residential units and opportunities for co-generational habitation.

What is the legal definition of co-generation. Is it limited to first degree relatives? How is it determined that the inhabitants of the companion housing units are co-generational?

P-LU-20: Discourage parcel consolidation over 14,000 square feet in the lower density ~~and~~ historic district areas to maintain the historic building pattern of smaller buildings.

This consolidation should be possible in other Southeastern areas. What is the percentage of historic buildings in the Southeastern community plan area? Since tax funds are limited, the amount of the plan area with specially decreased taxes has to be kept under control. Presently in Southeastern, what is the total tax loss due to special tax treatment of historic buildings and what percentage is this of the total real estate tax in the area.

Affordable Housing Policies

P-LU-21: Develop larger sized (three bedrooms) affordable units; housing with high-quality private open space; and residential units that are adaptable to multi-generational living. Define “high quality” and what is the difference between that and “standard”.

P-LU-22: Enable in-law units for existing single-family homes to accommodate growing families and provide an opportunity for rental income.

To whom does this rental income go? Rental leases can contain a clause against a tenant subletting a property or needing the landlord’s permission to do so.

P-LU-23: Promote the ~~production~~ **rehabilitation** of very-low and low income affordable housing in all residential and multi-use neighborhood designations and use these for affordable housing.

P-LU-24: Create affordable home ownership opportunities for moderate income buyers.

This is too nebulous. What will the City do to create these opportunities and how much will it cost? What is/are the funding source(s)?

P-LU-25: Encourage the development of moderately priced, market-rate (unsubsidized) housing affordable to middle income households earning up to 150% of area median income.

What about the middle class with incomes above 150% of median income? These taxpayers also should be able to live in the City.

Is median income that in San Diego City, San Diego County, California, or the United States?

The City should assist to our university engineering departments that are relevant to construction. They should be asked for suggestions and the City should endorse their grant applications that are relevant construction cost reductions that are relevant to an earthquake prone, flammable, and termite ridden environment.

The City has permitted poor practices of fire prone construction and subsequent termite infestation. Four story wooden apartment house should be banned.

P-LU-26: Promote homebuyer assistance programs for moderate-income buyers.

Where will the City find the money and how will it select the meritorious homebuyers?

P-LU-27: Utilize land-use, regulatory, and financial tools to facilitate the development of housing affordable to all income levels.

Employment and Industrial Land Uses

P-LU-28: Provide transparency on the street with active uses such as ground-floor lobbies, offices, and retail areas.

This policy is not industrial and thus does not belong here. It also has little to do with employment. It is for the benefit of external entities including the police. In high-tech and the military, there is a necessity to maintain secrecy.

P-LU-29: Incorporate plazas, courtyards, and outdoor places into new development for employees to gather and recreate.

It is essential that employees have a designated area to relax and get away from the work environment during their breaks. Rest, recreate and recharge. This policy in its totality needs to be limited to large corporations. For small entities, this should be limited to a table and chairs, which can serve as the entities meeting room.

P-LU-30: Provide multi-modal access through the integration of transit within employment areas and the creation of safe and direct bicycle and pedestrian connections (refer to General Plan Policies UD-D.1 through D.3).

This requires the transit junction between the I-15 Bus Rapid Transit and the Trolley Orange Line, as well as the Imperial Ave. bus, which has been previously proposed to be integrated in Section 3 MOBILITY.

P-LU-31: Focus light industrial uses in one portion of the Commercial Street corridor—between **25th** 28th and 32nd streets—to minimize potential conflicts with residential and other sensitive uses and to concentrate industrial activities, including freight and truck loading/unloading.

P-LU-? Do not allow any variances for new construction within or adjacent to this area that would be affected by its industrial nature.

P-LU-32: Treat building facades along Commercial Street that face the rail road right-of-way as primary façades. Promote use of quality materials on the facades, and screen the service and loading areas from the right of-way.

P-LU-33: Ensure that truck and auto ingress and egress are taken from alleyways rather than the front of buildings to minimize impacts. Make curb cuts as minimal as possible if no alley exists.

This could be construed as prohibiting customer access and employee parking on Commercial St. It along with many items has not been discussed with the property owners.

P-LU-34: Ensure that industrial land uses minimize conflict with surrounding incompatible uses through building design, truck and design restrictions.

This includes ensuring that residential land uses minimize conflict with surrounding incompatible industrial uses through building design and location. Business and residential types of buildings should not be categorically prohibited. Appropriate designs and monitoring although often costly can often sufficiently mitigate a use as to make it acceptable. For instance, recycling companies are unpopular because of noise, odor, pollutants and esthetics. However, if they closed their air-space, operate in negative pressure with the appropriate filtration and are soundproofed, it would be possible to have them near residential or commercial building. Presently, in this case this solution is probably not cost-effective.

P-LU-35: Create neighborhood centers and corridors lined with neighborhood-serving retail, restaurants, cafés, and places for gathering.

This should not interfere with industrial uses.

The number of restaurants serving hard liquor should be limited and rules on beer and wine consumption that lead to intoxication strictly enforced. Restaurants should be required to serve food until one hour before ceasing the service of alcoholic beverages. It is imperative that the crime rate statistics per capita (as determined by the Alcohol Beverage Control Board) be enforced when granting any sort of liquor license.

P-LU-36: Retain and enhance existing quality neighborhood-serving commercial uses.

P-LU-37: Develop shopkeeper units and live/work units that allow residents to own and operate office, professional, and retail uses.

P-LU-38: Mitigate potential negative effects where industrial uses are located through zoning performance measures (such as glare and noise standards), landscaping and/or screening to reduce noise, dust, toxins, **controls on the hours of operation** and unattractive presence along streets and sidewalks.

This will only work if the City or County provides technologically trained and well equipped inspectors. Unattractive needs to be defined. Toxins are controlled by US Government Occupational Safety and Health Administration (OSHA) and Cal/EPA. The County of San Diego Hazardous Materials Division is “responsible for regulating hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, aboveground petroleum storage and risk management plans. HMD is also responsible for regulating medical waste.”

(http://www.sdcounty.ca.gov/deh/hazmat/hazmat_permits.html) What expertise and

equipment does the City of San Diego have to presently control toxins? How does Planning interface with HMD?

P-LU-39: Locate smaller buildings and less intensive uses within an industrial development site closer to adjacent residential uses, rather than larger or more intensive uses **or buffers placed between the two uses, besides the required set-back.**

Institutions

P-LU-40: **The City should** coordinate with the San Diego Unified School District to develop joint-use park facilities on school campuses throughout the community and City-wide **including permitting San Diego's schools to use the municipal parks.**

P-LU-41: Evaluate remnant cemetery properties for opportunities for additional open space and parks.

P-LU-42: Work with community institutions such as the Sherman Heights Community Center, the Boys and Girls Club, and the YMCA to maximize availability and programming of the respective facilities in the community.

Collocation of Uses

P-LU-44: Protect public health by evaluating the effects of noise and air pollution from freeway traffic **on and through** community land uses. Reduce, or eliminate where feasible, impacts on sensitive land uses, including housing, schools and outdoor athletic areas, through appropriate buffers, barriers, and best-practice construction measures.

In the case of noise, even with the availability of inexpensive loudness instrumentation, the city does not enforce its present laws on very loud motorcycles and automobiles that drive through residential areas with their radios on full blast and their windows open at all hours.

In the case of air pollution, the City did not copy Los Angeles and accelerate the change-over of old polluting to new nonpolluting diesel engine systems mandated by CAL/EPA. Fortunately, this changeover should be completed in the early 2020s.

P-LU-45: Avoid siting of new sensitive receptors—schools, homes, and other community facilities—adjacent to freeways, truck distribution centers, dry cleaners, and gas stations.

The City and/or County should consult with the chemistry departments at the local, San Diego, Universities and acquire the instrumentation to accurately measure pollutants.

Landscaping Treatments

P-LU-46: Use natural landscape materials (trees, shrubs, and hedges) to buffer differing land uses, and provide a transition between adjacent properties.

P-LU-47: Require screening walls **with sufficient height to hide the uses and prevent theft should be located on** the interior lot lines of industrial uses abutting residential uses. Screen the view of any parking or storage area, refuse collection, utility enclosures, or other service area visible from major streets, alley, or pedestrian area and meet City Standards.

P-LU-48: Use screens of attractive high-quality materials and/or landscaped screening such as vines, mesh, and livings walls (e.g. concrete wall with green creepers) of consistent height and design.

P-LU-49: Educate and encourage property owners to apply for Encroachment Maintenance and Removal Agreement with support from City staff to approve planting and irrigation within the public right of way and to plant vines on industrial fences to screen industrial sites from adjacent sidewalks and properties.

Community Health

P-LU-50: Increase availability of fresh healthy foods by actively engaging such businesses, and undertake measures to decrease the density of liquor stores in the commercial corridors.

P-LU-51: Enable and encourage the development of one or more full-service grocery stores with healthy food options and easy access for community members.

P-LU-52: Prioritize healthy food outlets in economic development efforts, especially in areas more than a quarter to half a mile away from a healthy food outlet, farmer's market, farm stand, or corner store/market with healthy foods and fresh produce.

P-LU-53: Encourage the development of healthy food establishments in areas with an existing high concentration of fast food establishments, convenience stores, and liquor stores.

P-LU-54: Encourage development projects to include a healthy food outlet, or be located within a quarter to a half mile of a healthy food outlet, where feasible and appropriate.

P-LU-55: Discourage fast food outlets and liquor stores from locating near schools.

P-LU-56: Strive for a majority of residents to be within a quarter to a half mile walking distance to a grocery store or other healthy food retail establishment. Consider farm stands and community gardens for underserved areas where retail is not feasible.

The above is nothing but a commercial for health food stores and is having the City do things that are not in its purview. Low incomes and lack of education are in large part the cause of consumption of unhealthy foods. If there is real demand, the profit motive will force the present stores to sell healthy foods.

P-LU ? Possible locations for Planned Parenthood should be planned.

A major omission is the apparent lack of a Planned Parenthood office in Southeastern San Diego. This group supplies excellent healthcare for women including cancer screening, family planning, venereal disease detection, education, and counseling. The health and Economic Prosperity sections of this plan update are badly flawed by the lack of data or even mention of the incidence of teenage pregnancies. These unwanted pregnancies often can ruin a woman's life, particularly her earning capability, her educational possibilities, and her self-esteem.

Noise

Policies

P-LU-57: Utilize the Community Plan and the Airport Land Use Compatibility Plan noise contours when making land use planning decisions.

P-LU-58: Reduce the effect of noise through the following techniques:

- Use building setbacks to increase distance between the noise source and receiver;
- Orient buildings to shield outdoor spaces from noise sources;
- Locate parking lots, and other non-habitable uses between the noise source and receptor;
- Incorporate forced-air ventilation systems to allow windows and doors to be closed;
- Use double-paned or sound rated windows;
- Incorporate sound insulating exterior walls and roofs;

- Use attic vents to minimize sound intrusion into structures.
- P-LU-59: Ensure that future residential uses above the 60 dBA CNEL aircraft noise contour include noise attenuation measures to create an interior noise level of 45 dBA CNEL and provide an avigation easement to the airport operator for SDIA.

Definition: Avigation easements are the process whereby counties to acquire "airspace or air easements through eminent domain proceedings, in airspace above property if the taking of such is necessary to protect the approaches to airports.

P-LU-60: Reduce the effect of commercial activity noise through site planning and integrating noise attenuation measures in new buildings to reduce interior sound levels. (Refer to General Plan Policies NE-E-1 through NE-E6.) **URL please**

P-LU-61: Minimize exposure of commercial and industrial noise to noise-sensitive land uses.

P-LU-62: Reduce excessive rail, truck and other motor vehicle traffic noise levels that impact noise-sensitive land uses.

The state of California has the authority to do so for all of these transport modalities. One of the most important is to reduce train horn noise in residential areas. This has probably been done downtown. If there is sufficient reduction in noise downtown, the City should employ the same technique in other residential areas.

P-LU-63: Control noise impacts at the source through dampening, buffering, or active cancelling, particularly on sites that abut residential development or other sensitive receptors.

Active cancelling in large areas may be prohibitively expensive particularly in energy costs

P-LU-64: Reduce potential noise impacts, particularly from the trolley, by orienting windows and openings away from noise sources or developing mitigations for noise and vibrations.

P-LU-65: Minimize noise impacts on sensitive receptors by discouraging multi-family housing development within the 65 db CNEL noise contour (generally west of 22nd Street and east of 33rd Street).

P-LU-66: Establish a specific time frame for each step in the implementation of each Policy and Goal, as well as perform a yearly audit to determine if these steps have been achieved.

Unfulfilled Land Use Goals

It is unclear how the Land Use Policies proposed above will fulfill the following goals specified by the SSDPG.

3. Stable base sector employment uses and supportive commercial and industrial services.
8. Preservation of the present employment opportunities and expansion of these opportunities through education.
9. Make improvements and stimulate investments in this area.

Legend Corrections/Clarifications:

Junction of National Avenue & So. 43rd St. = on National Avenue & south on So. 43rd Street and from Newton to Alpha shows "Community Commercial Residential Permitted" recommend change to "Neighborhood Commercial".

Technical Comment

Because of global warming, all new construction should be high enough to withstand floods that are above the 100 year and 500 flood plains.

Recommendations for future specific land uses

1. Gateway Center West: Retain I-1 Zoning – on 32nd Street to Rt.15 & Market Street to Rt. 94.
2. Gateway Center West: Retain I-1 Zoning or office use – between 32nd and 33rd Street, on the south side of Market Street and the immediate adjacent alley.

3. On the south side of Market Street, recommend correcting the I-1 Zone to MF-3000 between 33rd Street and Chollas Creek, & Market Street to the adjacent alley.
4. NEC, Market Street and 27th Street, there is a building that is in question as to being a legal building. If not legal, recommend that the zoning be changed to low density.
5. Otto Square Shopping Center: retain existing Commercial Zone and no future residential development on the site. Owners in recent years have renovated and added new businesses to the Center. Otto Square is located between So. 35th & So. 36th Streets from National to Logan Avenues.
6. 25th Street to 18th Streets, both of sides of Market Street, do not increase density as adjacent properties do not have sufficient off-street parking. This is part of the Sherman Heights Historic District.
7. Between National Avenue & So. 43rd Street to Alpha, recommend Neighborhood Commercial, NO residential development.
8. On So. 43rd Street & National, on both sides of So. 43rd should be Community Commercial and NO residential development.
9. Site between Newton & Alpha, Keeler Court to Southcrest Park, retain MF-3000. Keeler Court is a narrow street, between Alpha & Newton, NOT designed for Community Mixed Use. Keeler Court is not a through street, but a cul-de-sac.
10. Site Recommendation: between Cesar Chavez Parkway & Dewey, and Julian & Kearney, Zoning should be Residential Medium Density as it is adjacent to low-density on the east and residential medium to the north.

11. Along Market Street, from I-805 to Rt. 15, retain Neighborhood Commercial.
12. National Avenue: Do not increase existing density. Increase street lighting, with a minimum of 4 lights per block to encourage evening family walks. Increase traffic signals.
13. Commercial Street: 25th to 32nd, recommend I-1 Light Industrial.
14. Infrastructure Improvements (area-wide):
15. Install combined electric and solar power wherever possible.
16. Improve existing dirt alleys with concrete and a minimum of 3 lights/4 lights as dictated by topography.
17. Create and implement a Maintenance Plan for sustainability.