University Community Plan Update Subcommittee

Final Report to the University Community Planning Group on the Community Discussion Draft of the University Community Plan

June 30, 2023

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Introduction

The Community Discussion Draft of the University Community Plan was introduced to the public at the April 11, 2023, meeting of the University Community Planning Group (UCPG). It is detailed, comprehensive and complex. A large share of it is material that the community and University Community Plan Update Subcommittee are seeing in detail with specific language for the first time. A copy of the Discussion Draft can be found here: https://www.planuniversity.org/

It has many strengths and also areas for improvement. It is a Draft.

The University Community Plan Update (UCPU) process has been ongoing for almost five years. The process began in October 2018 with a well-attended community workshop. The University Community Plan Update Subcommittee of the UCPG was selected in October 2018, and it began regular monthly meetings in January 2019. It has been working with the city to organize community feedback since then. The UCPU Subcommittee has held over 40 public meetings.

The process has been dynamic, including the involvement of two mayors, three city council members, three Planning Department directors, and three community planners, in addition to multiple planning section directors, urban designers, parks planners, traffic engineers and other city staff.

The UCPU Subcommittee has been the one consistent public body engaged with the process. Members are volunteers representing the interests of the University Community Planning Group, residents, businesses, community and business organizations, UCSD and MCAS-Miramar. Collectively, members of the Subcommittee have devoted thousands of hours to the future of the University Community during the last five years.

This Report reflects the recommendations of the UCPU Subcommittee in response to the Discussion Draft of the UC Plan. It includes Areas of Consensus achieved through public meetings in April, May, and June 2023, and approved by the Subcommittee on June 20, 2023, by a vote of 12 - 0.

The goal of this Report is to provide the Subcommittee's recommendations to the UCPG, which will prepare its own formal feedback and recommendations to the City of San Diego.

The city will use these recommendations to prepare a Revised Draft of the University Community Plan, which will undergo Environmental Review later this summer. The Environmental Impact Review process will include additional opportunities for public feedback, which may also be incorporated in the Plan. The Planning Department hopes to present the Revised University Community Plan and Final EIR for approval by the City Council before the end of 2023. That process will include final recommendations and a vote by the UCPG, the Parks and Recreation Board, and the Planning Commission before review by City Council.

The Report includes general principles and specific recommendations for revisions to the Community Discussion Draft of the UC Plan. It focuses on Urban Design and Land Use, Commercial Plazas, Affordable Housing, Displacement, Mobility, Parks and Recreation, Sustainability, and Implementation. This Report includes Alternative (or Dissenting) Views where there were differences of opinion among members of the Subcommittee.

This Report references specific pages and policies of the *Community Discussion Draft of the University Community Plan*, which can be found here: https://www.planuniversity.org/

Summary of Subcommittee Work and Recommendations:

The Discussion Draft of the University Community Plan includes the following **Vision** and **Guiding Principles**. The Subcommittee participated in drafting these in 2019.

Vision and Guiding Principles: (see Discussion Draft, p. 13).

Vision:

"A diverse and dynamic community with renowned higher education, healthcare, scientific research and technology institutions and businesses connected through a robust multi-modal transportation network to a vibrant, mixed-use urban core and varied residential neighborhoods, which protects its unique natural habitat and canyon systems."

Guiding Principles:

1) Renowned Institutions: The development of institutions that provide world leading research, higher education and healthcare which contribute to the built environment and support the economic growth and attractiveness of the community.

- 2) A Vibrant Mixed-Use Urban Core: A land use pattern that focuses growth into a vibrant urban core which contains regional transit connections and a distinct range of uses, character, streetscapes, places, urban form and building design as a leader in sustainability.
- 3) A Diversified Housing Inventory: A housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels.
- 4) A Center of Economic Activity: An employment center with scientific research, technology and office uses that provide jobs in proximity to residential, retail and visitor serving uses connected by transit that supports the economic viability and attractiveness of the community.
- 5) A Complete Mobility System: A mobility system that provides multi-modal options and a complete network for travel within the community and connectivity to the region, enhancing economic growth, livability and sustainability.
- 6) A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas: Preservation of open space, watershed protection and improvement, restoration of habitat, enhancement of species diversity, improvement of population-based parks and recreation areas, and provision of connections for wildlife and people, contribute to community character, enhance quality of life, and preserve unique natural resources.

Strengths of the Community Discussion Draft

The Discussion Draft includes significant steps to meet this Vision and Principles.

It Includes:

- Potential for significant new commercial and residential development. It reaffirms
 the goal of the CPU Subcommittee for fair and equitable housing with projects
 that will provide housing near transit and jobs, and importantly will include
 minimum requirements for on-site affordable housing.
- Robust new bike and pedestrian infrastructure, mostly in the street rights of way where it belongs, including protected bike lanes on key corridors.
- Improved interface between UC and UCSD East Campus
- Flexibility for development through new "Mixed Use" zoning, which allows property owners to respond to their estimation of the market at a given time.
- Progress toward the city's Climate Action Plan through greater density of development, potential for more people to work and live in the same community, and transit oriented development near the Mid-Coast Trolley.

- Improved open space protection. The Update proposes open space dedication
 for four parcels of city owned land in Rose Canyon and Sorrento Valley/Roselle
 Canyon, which have been a priority of the UCPG. The UCPG voted unanimously
 in July 2020 to support dedication of these parcels (see UCPG Minutes, July
 2020). The Draft also includes Supplemental Development Regulations to protect
 sensitive lands and open spaces adjacent to new development.
- Three new linear parks on Regents Road and Governor Drive and a pedestrian promenade on Executive Drive.
- On-site park requirements for residential developments
- On site Urban Public Space requirements for commercial developments
- Shopping centers revitalized but not replaced.
- Two alternative land use scenarios a Staff Preferred Scenario and a Community Planning Group Subcommittee Input Scenario.

All of these are things the UCPU Subcommittee has supported.

The Discussion Draft does not include:

- A proposal to rezone single family residential areas for townhouses.
- The very high density "Scenario 1."

Special Areas of Subcommittee Concern:

Subcommittee feedback has emphasized several key areas of concern.

New Housing

New housing has been an area of intensive discussion and debate. The proposed plan includes land use changes with potential for the development of new multi-unit housing. At full build out, the Staff Preferred Scenario (p. 31) would provide room for up to 32,500 new housing units and an estimated 59,000 new jobs. This is approximately a doubling of the residential and commercial intensity of the current UC Plan. The Community Planning Group Subcommittee Scenario ("alternate" p. 31, found after p. 201) provides room for approximately 22,500 new dwelling units and 55,000 jobs. These potentials are on top of more than 10,000 units of new housing ("beds") completed or under construction at UCSD since the start of the update in 2018. Under either scenario, there is potential for more new housing than any community plan area in the city.

¹ The UCSD student body was approximately 43,000 in 2023, an increase of approximately 14,000 students since 2010. Approximately 40 percent lived on campus in 2021, short of the University's goal of housing 65% of students on campus by 2035.

These potentials meet the goal established by the city and SANDAG in 2018 as part of a grant agreement that has supported the update process. This grant set a goal of 10,000-30,000 new units. The Discussion Draft meets or exceeds that target under both scenarios. The Staff Preferred Scenario envisions potential housing for up to 80,000 new residents, compared to approximately 74,000 existing residents today, including resident students on the UCSD campus. For context, the population of the City of San Diego grew by approximately 79,000 between 2010 and 2020 (U.S. Census).

Affordability and Diversity of Housing

A major concern of the Subcommittee, which the city has incorporated in the Discussion Draft, is the affordability of housing, new and overall. The Draft proposes a UC-specific inclusionary affordable housing requirement above and beyond the city requirement. This percentage is being studied, and we look forward to a robust proportion to ensure we have affordable housing where our jobs are.

Displacement

A second concern of the Subcommittee is the potential for displacement of existing housing and community serving retail and services. These concerns with transit-oriented gentrification and displacement reflect concerns raised by community groups and planners nationwide.

The Subcommittee has specific concerns with:

- Protections against the displacement of lower and moderate-income renters in the lowest priced housing in the Plan Area.
- Protection and expansion of community serving retail and services to meet the needs of the projected population.

One place where the issue of displacement comes into focus is in the principal community shopping area in north UC - the two commercial plazas adjacent to the Nobel Drive Trolley station west of I-5. The Subcommittee is concerned that the Draft's proposed mixed-use designation for these plazas unnecessarily puts housing and community-serving retail in competition with more competitive uses such as biotech and high-tech business. The community is mindful of the recent closure of grocery and other retail businesses adjacent to the Trolley terminus under just such pressure.

The Subcommittee believes that if the city is serious about housing in this plan, it should not lose the historic opportunity to redevelop the Nobel/Campus area plazas with community serving retail and housing. The plan provides abundant new space for research and development, industrial, and business commercial growth in other parts of the plan area. The Subcommittee recommends a land use designation of Community Village rather than Mixed-Use to protect these uses.

A second location where these concerns have drawn intensive community feedback are the commercial plazas in south University City. A top priority is to preserve the groceries, pharmacies, and other small service and retail businesses located there. These form the backbone of this part of the community. The Subcommittee supports community feedback regarding protection of community serving uses, lower overall densities, adequate building transitions including rear and side setbacks, step backs in building height, and height limits scaled to the surrounding neighborhoods.

A further concern, reflected in the Subcommittee Scenario, focuses on displacement of the most affordable housing and the people who occupy it. The plan's housing goal of a diverse and inclusive community (Guiding Principle #3) is undermined if affordability is compromised and the least expensive housing in the plan area – which is also the most socially diverse in population - is replaced with luxury high rises. Gentrification and displacement of a diverse community is a danger in University City as in other parts of San Diego. The Subcommittee has specific concerns with the Plan's potential for displacement of moderate-affordable rental housing at the southwest corner of Nobel Dr. and Genesee Avenue and to the west along Nobel Drive to Regents Road.

Density

For the Housing Element, the Subcommittee Scenario recommends a maximum of 143 dwelling units/acre in the University Community (compared to 218 du/ac in the Staff Scenario). By way of example, this density corresponds to the 6 to 12 story apartments in the Mesa Nueva section of the east UC San Diego campus and demonstrates that dense, attractive, and affordable housing with green space and a vibrant street life may be developed in a format that serves all housing types from studios to three-bedroom family apartments. This area serves as the Subcommittee's model for future land use intensity and urban design in the north UC area.

Parks

The Subcommittee and community are deeply concerned about the large parks deficit proposed in the Discussion Draft. Even with roughly 3,300 recreational value points attributed to urban public space requirements for redeveloped residential and commercial property, the plan proposes a final park points deficit of 4,900 – a shortage of facilities for 49,000 people. Subcommittee feedback includes many recommendations to address this failure of the Discussion Draft.

Sustainability

The Subcommittee believes that the Community Discussion Draft needs much stronger policies to protect, enhance, and restore the biophysical environment and to integrate nature throughout the University Community Plan Area – as the Plan's Vision and Guiding Principles establish. The University Community comprises some of the rarest and most fragile habitats in the most biodiverse metropolitan area in North America. The UC Plan must acknowledge and incorporate this critical status.

The Subcommittee recommends that the Revised Draft include greater emphasis on habitat and biodiversity, native landscaping and wildlife, riparian areas, and watersheds not just for lands in the Multiple Habitat Planning Area and Open Space Parks, but also community parks, mini parks, developed areas, urban design, and urban greening, street tree selection, medians, and other parts of the plan. This Report includes specific recommendations to integrate this concern throughout the University Community Plan.

Mobility

The Subcommittee supports robust, multi-modal transportation to help shift future transportation use and mode share, enhance public safety, and meet critical Climate Action goals. The Subcommittee supports protected bike lanes and pedestrian pathways along city streets that will make it safer to walk and bike through the community. The Subcommittee heard significant community concerns about the balance and practicality of planned roadway changes that may cripple existing auto and EV transportation – and community and commercial interests that rely on them - without commensurate increases in alternate transportation. The Subcommittee has expressed the need for transparent and up-to-date analysis to support any proposed roadway changes before their incorporation in the Plan.

Implementation

The Subcommittee remains deeply concerned that the Discussion Draft lacks a specific Implementation plan. A fundamental principle of planning is that growth must be supported by infrastructure; however, the Draft lacks a transparent framework for the provision of infrastructure and public facilities necessary for future growth and required by city policy. The Draft does not explain how needed infrastructure will be paid for – including Subcommittee priorities such as parks and recreation facilities and protected bike lanes.

The Subcommittee recommends that the Revised Draft outline a clear plan for implementation and that the city study and incorporate additional strategies for building needed infrastructure. These strategies may include the potential for a special supplemental development fee for infrastructure or additional Supplemental Development Regulations (SDRs).

Consensus Recommendations: UC Plan Community Discussion Draft

NOTE: Specific changes/additions are marked using bold (green) text with italics.

I. Consensus Recommendations: Commercial Plazas, South University City (University Square, Governor Dr and Genesee Ave – "Vons plaza"

University City Marketplace, Governor Dr and Regents Rd – "Sprouts plaza")

la. The Subcommittee supports the following general principles

(as compared to the Staff Land Use Scenario)

- Reduced height limits
- Rear/side setbacks and step backs
- Concentration of development along major streets and away from adjacent residential uses
- Use of public open spaces as a buffer between uses
- Reduced overall densities
- Protection of neighborhood commercial retail and services (e.g., grocery stores)
- Commercial plazas zoned for community serving retail with housing as a secondary use
- Provision of adequate off-street parking (one parking space per unit on site, no unbundled parking)
- Increased required square footage for commercial uses in redevelopment
- Guidelines for improved internal circulation pathways btn new housing and retail and neighboring uses e.g. library/schools

Ib. The Subcommittee supports the following **specific policies**:

- University Square (Vons Plaza): Reduce max. density to 54 du/ac. 50' height limit. 30' rear and side setbacks.
- UC Marketplace (Sprouts Plaza): Keep current **zoned density at 29 du/ac. 40' height** limit with **30' rear/side setbacks.**
- Three corner parcels at Governor/Genesee (SW, NW, NE): **Retain current zoning** and height limits 29 du/ac and require 30' rear and side setbacks.
- Southeast corner Governor/Genesee: **Density/height equivalent to adjacent plaza – 54 du/ac, 50' height limit.**
- Modify SDR-7, p 198 to include 30' rear/side set back and include building transitions for properties abutting low, low-medium, and medium density residential areas.

-Revise SDR-7 Building Transitions:

"Building height shall transition under an established 45-degree angled building envelope plane sloping inward from the first 30 feet of a structure to the maximum structure height, for properties abutting *Low Density*, *Low-Medium Density*, *and Medium Density* single family residentially areas designated in this community plan as shown in Figure 39. *Rear and side setbacks abutting residential uses should be a minimum of 30 feet*."

As written, the Draft is unclear that SDR-7 would apply outside of South University City (the only area zoned for low density residential 5-9 du/ac). Transition regulations should apply to the wider range of **low through medium density townhomes and condominiums** that adjoin commercial plazas in UC. Two/two-and-a-half story townhouse and condominium neighborhoods deserve similar treatment and transitions to higher rise buildings as the single-family zones of South UC. For instance, Low-Medium and Medium Density zoning/housing adjoins the University Square plaza (SUC Vons), La Jolla Village Square (Trader Joes), La Jolla Colony plaza and Renaissance Towne Centre, as well as the University Towne Center.

- Modify 1.2A, p 170 to require replacement of neighborhood services.

"Redevelopment of existing neighborhood services *must include* should consider replacement with a similar of same use.

- Modify Policy 2.4 D, p 173 to require open spaces as buffer between uses.

"Require Use open spaces, such as pedestrian plazas, paseos, greenways and courtyards, to serve dual functions as valuable community space and buffers between different uses.

- Modify Policy 2.19A, p 175 to retain groceries on large commercial sites.

"Retain g Grocery stores on large sites must be retained where feasible.

- Modify / Replace Policy 2.19D, p 175 to require off-street parking with housing.

Consider unbundled parking to offset development cost and encourage use of alternative transportation modes.

"New residents should be encouraged to use alternative transportation modes, but to limit impacts on surrounding neighborhoods, at least one parking space per dwelling unit must be required."

 Modify SDR-19, p 200 to apply to community commercial, community village and neighborhood commercial; Sites that are 50,000 sq ft or more, require 25% commercial or greater. Sites that are 100,000 square feet shall maintain a minimum of 30,000 sq ft for commercial use.

"SDR-19 Retail and Commercial Services Minimums:

- a) Sites designated community commercial, *community village, and neighborhood commercial* in this community plan that are equal to or greater than 50,000 square feet, shall maintain a minimum of 40 25 percent of the gross floor area for commercial services and retail sales uses. The calculation of gross floor area shall include all buildings within the premises, including any existing buildings that will remain; and
- b) Sites designated community commercial, *community village, and neighborhood commercial* in this community plan that are equal to or greater than 100,000 square feet, shall maintain a minimum of 45-30,000 square feet of gross floor area for food, beverages and groceries use."
- 1c. In addition, the Subcommittee supports the principles of
 - Limited development adjacent to MSCP (see Canyon Adjacent Development, below)
 - Specific requirements for outdoor space in new projects (see Parks Urban Public Spaces, below)

- A minimum affordable housing requirement (UC wide), on-site; no in-lieu (see Affordable Housing, V. below).
- The default zoning for places of worship should be Institutional unless otherwise requested by the congregation themselves. Places of worship should not be zoned to encourage them to leave the community.
- p. 160 Strengthen language on coordination with school district to reflect need for greater transparency and specificity in coordination w schools to service proposed growth.

Alternative views: (density, protection of groceries, zoning for religious institutions): Support policy to retain "community serving retail" but not to specify which uses. Market is changeable and we can't predict future needs. Support equivalent densities at Sprouts and Vons plazas. Sprouts is the more attractive for residential from a market perspective. Added housing in south UC gives more people access. New residents bring vitality to the community. Institutional zoning may limit flexibility of congregations to build housing on site or alternatively to sell and relocate.

II. Consensus Recommendations: Regulations for Commercial Plazas throughout the Plan Area.

- Support commensurate standards for commercial plazas in North UC and South UC.
 (LJ Village Square/Shops at La Jolla Village, La Jolla Colony plaza, Renaissance Towne Centre, Costa Verde Center)
- Adopt Height limits (not specified); rear/side setbacks and step backs (30').
- Concentrate development toward main streets and away from adjoining residential areas.
- Use open spaces as buffer between uses.
- Protect neighborhood commercial services i.e. grocery stores
- Provide adequate parking (one parking space per unit on site, no unbundled parking).
- Increase required square footage for commercial uses in redevelopment.

The Subcommittee supports the following specific policies (see details in section I):

- **Modify SDR-7**, **p 198** to include 30' rear/side setbacks.
- Modify Policy 1.2A, p 170 to require replacement of neighborhood services.
- Modify Policy 2.4 D, p 173 to require open spaces as buffer between uses
- Modify Policy 2.19A, p. 175 to retain groceries on large commercial sites.
- Modify/Replace Policy 2.19D, p 175 to require off-street parking with housing.
- **Modify SDR-19, p 200** to apply to community commercial, community village and neighborhood commercial; sites that are 50,000 sq ft or more must have **25**% commercial; sites that are 100,000 square feet shall maintain a minimum of **30,000** sq ft for commercial use..

Note:

The Subcommittee's recommendations reinforce the outline established in the city's published presentation materials, which formed the basis for public discussion for these commercial plazas.

The visual diagrams used by the Planning Department to depict redevelopment potential for the South UC plazas incorporate the same sensible features recommended by the Subcommittee.

These guidelines include height limits, setbacks, step-backs, massing of new buildings toward main streets and away from adjoining residential uses, preservation of community-serving retail and off-street parking.

The city has never presented nor taken feedback on redevelopment of these plazas that did not include these general features.

These same planning features should be applied to other commercial plazas in UC.

For reference, see below the images surveyed as part of the *Online Community Engagement Survey* (Fall, 2021) and presented as receiving support from 59% of respondents (Planning Department presentation, CPUS Meeting, February 2022). These figures depict redevelopment with clear height limits, setbacks, step-backs, massing away from adjacent residences, adequate parking, and preservation of groceries and other community serving uses at a rate higher than 15% of total sf... among other features.

In the first diagram, the top row depicts the UC Marketplace (Sprouts) with the **same footprint and setbacks as today** (Option A was selected for the city's Preferred Scenario). Both options include buildings of up to four stories, stepped back from the lot line and massed along Governor Drive and Regents Road with structured Parking.

Images in the bottom row and in the second diagram depict **University Square (Vons)** with buildings set back and stepped back from adjacent housing and massed along Genesee Ave and Governor Dr. The image shows a new **grocery** building with the same footprint as today, emblazoned with the sign, "Vons." Buildings rise to three-five stories with a five or six-story building on the corner of Governor and Genesee. Retail/Svcs are preserved on the ground floors, structured parking is provided.

- Please write these expectations into the CPU in Table 6 section 1, and SDRs, p 198-200.



SOURCE: (Planning Dept Presentation, Sept, 2021; Online Community Engagement Tool, Oct, 2021)



SOURCE: (Planning Department Presentation, Preferred Land Use Scenarios, CPUS Meeting, Feb 2022, p 31)

Alternative Views: Parking minimums are generally a bad practice that encourages reliance on automobile transportation. Prefer that we focus on strategies to encourage alternative transportation modes as a more effective step to climate action goals. Do not support the proposal to apply step-backs and add setbacks to SDR-7 for transitions between redevelopment and low-moderate to moderate density housing. Policy should apply to development adjacent to single family residence zones. No recommendation on setbacks but remain skeptical.

III. Consensus Recommendations: Nobel/Campus Commercial Plazas (LJ Village Square/Shops at La Jolla Village)

Support planning for development above City of San Diego Coastal Height Limit with following conditions:

- New maximum height limit range of 85-100'.
- Zone for housing and community serving retail (e.g., Community Village) NOT mixed use (avoid competition w biotech/high tech); preserve and expand community serving retail and housing on these two sites).
- Density at 143 du/ac (same as Staff Scenario)
- Adopt same general guidelines for UC commercial plazas, as above, sections I-II: similar setbacks, stepbacks; mass development away from neighboring residential uses; use urban open spaces to soften building transitions and minimize impact on adjacent residential uses; concentrate development away from Villa La Jolla Dr., Via Mallorca and condominiums to the south (all adjoining residential); protect community serving retail; preserve parking for residents/shoppers.
- Plan for community or neighborhood scale park as part of redevelopment.
- Improve bike and pedestrian safety Nobel/Villa La Jolla Dr/I-5
- Include a pedestrian bridge over Nobel Drive.
- Consider removing parking on all of Villa La Jolla Dr and on Nobel Dr. from Villa La Jolla to Genesee.

Recommendations:

p. 86, revise "Focused Enhancements: Growth Opportunities"
 No "street wall" on Villa La Jolla. Mass development away from adjacent residential on Villa La Jolla (also Via Mallorca and adjoining residences to south).

p. 86: "Orient buildings towards Nobel Dr. and Villa La Jolla Drive to create a consistent street wall."

Revise:

"Growth Opportunities" diagram to reflect this change, p. 86.

Alternative views. Proposed densities are too high and unsustainable at this site due to lack of access to/from I-5 north of Nobel. Congestion and bike/pedestrian safety at LJ Village Drive/Villa La Jolla/UCSD entrance are bad and will be worse. High density/high rise housing at this site will adversely impact adjoining residents to shopping centers.

IV. Consensus Recommendations: Nobel/Campus Area – General:

- Mixed uses and higher densities are appropriate for the parcels north of The Shops at LJ Village (Whole Foods plaza) and fronting on Holiday Ct and La Jolla Village Dr.
- Pedestrian/bike safety issues are a grave concern here.
- Villa La Jolla/La Jolla Village Drive/UC Campus intersection is a choke point for traffic with poor bike/ped infrastructure. Lack of freeway access from Nobel to I-5 south will focus traffic from commercial plazas on Nobel Dr to this intersection.
- Plan must pay special attention to safety and connectivity btn Campus and Nobel/Campus area along Nobel Dr, Villa La Jolla Dr. and La Jolla Village Dr.
- Recommend independent traffic study with up to date data to assess feasibility of mobility improvements planned with special emphasis on bicycle and pedestrian safety and accessibility to Campus.
- Recommend protected bike lanes to access these plazas.

V. Consensus Recommendations: Affordability and Displacement:

- Affordability and diversity of housing stock are essential goals of the Subcommittee (see Priority 3, p 24-5).
- The Subcommittee supports an inclusionary affordable housing regulation for UC Plan Area as a whole – above that of City of San Diego ordinance. Recommendation: minimum 15-20%.
- The Subcommittee supports a requirement that inclusionary affordable housing be built on-site; no in-lieu fees (see also section I). UC needs more – not fewer - affordable housing options.
- - Support *concept* of empirical analysis of UC Inclusionary Housing Requirement by Keyser Marston (see SDR-20, p 200).
- - Subcommittee requests a report of this study as soon as the analysis is complete
- - Subcommittee is equally concerned with displacement of existing moderate/affordable rental housing.
- Discussion Draft and Staff Preferred Land Use Scenario threaten future affordability and diversity of housing in UC by targeting the most affordable rental housing in UC for redevelopment and displacement of most vulnerable residents.
- Specific area of concern: apartment complexes at SW corner Nobel Drive/Genesee Ave (and west along Nobel Dr to Regents Rd). Minimize displacement, maximize affordable construction, and protect adjacent MHPA-open space.
- Recommendation that Keyser Marston be asked to analyze potential anti-displacement regulations scaled to rent/income levels in University Community.
- - Support for Community Planning Group Subcommittee Input Scenario, 143 du/ac (see alt p. 31) including lower du/ac at SW corner Nobel/Genesee.

Recommendations:

- Analyze and consider potential for anti-displacement regulations scaled to rent/income levels in University Community.
- Modify policy 1.1 D. Apply requirement for on-site inclusionary in Policies.

"Require Encourage affordable housing to be built on site and make units available to meet the needs of families, local employees, and students.

- Modify policy 2.19C. Apply requirement for on-site inclusionary in Plan Policies.

"Provide Mixed-use developments shall include affordable and inclusive housing options within mixed-use developments.

Alternative views: Different inclusionary housing standard in UC versus city as a whole may raise legal concerns. On displacement, it is unfair to single out/penalize a property owner that has provided low to moderate income housing in the past by restricting future redevelopment potential. Support uniform zoning among neighboring property owners.

Alternative views: Support higher densities (up to 290 du/ac) to maximize potential for new housing and jobs in the transit rich north UC area. Higher densities maximize transit/trolley investments, create opportunity for more walkable, mixed-use community, and support greater diversity and affordability of housing. Unlock potential for new homes for students and others who wish to live in the area. High rises can be more sustainable, more efficient, occupy less space, and can be architecturally more elegant if the heights vary. High density does not equal high cost.

VI. Mobility

A. Redesign of Thoroughfares (including Governor Drive, Genesee Avenue, Nobel Drive, and La Jolla Village Drive in Nobel/Campus area - entrance to UCSD Campus).

Specific Recommendations:

- The city should complete a new and independent traffic study to determine feasibility before any changes to Governor Drive or other major thoroughfares are formalized in the Revised UC Plan.
- Conditions of the study: that it include new traffic data (not only the 2015 study referenced in the plan); that it study the current mobility configurations in the Discussion Draft. That assessment take place when schools/University are in session, including during pick up/drop off times. Study should assume that new housing will have parking spaces (and cars), and not assume that new developments will not have parking.
- Traffic study with similar conditions should also be conducted before adoption of changes proposed for Genesee Ave, Governor Drive, Nobel Dr, and UCSD entrance in Nobel Campus area.
- Plan to reassess traffic conditions with regularity.
- Revised Draft should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not merely block by block).

B. Bicycle infrastructure:

- The Subcommittee supports protected bike lanes along major streets throughout the Plan area with the expectation that these will be continuous. Dis-continuous bicycle infrastructure is not safe and will not meet goals for increasing bicycle use and shifting transportation mode share.
- The Plan should include clear plans for how bicycle infrastructure in the mobility plan will be implemented.
- The Subcommittee recommends that the city include a policy to preserve setbacks in private developments sufficient to allow construction of future bike infrastructure.
- The Subcommittee recommends that because of expected costs and budget limitations, that the Plan should identify and prioritize bike infrastructure in critical streets/segments so that the ones needed most are built first (or built at all). The Plan

should include a path to bike/pedestrian infrastructure most likely to be built and most likely to work.

- Revised Draft should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not piecemeal).

C. New At-grade Connection: Genesee Ave to Campus Point Court

- The Subcommittee supports new at-grade connection between Campus Point Court and Genesee Ave. The property owner has endorsed this proposal and expressed a willingness to pay for it. This concept appears in Urban Design for Campus Point/Towne Centre Area.
- Include mention of this connection in Mobility section as well.
- Add a new policy in Table 6, Section 3, to reflect this priority. Include recommendation to work with property owners.

D. New Bike Connection between John J Hopkins Dr. and Science Park Road.

- The Subcommittee supports a new bicycle connection between John J. Hopkins Dr and Science Park Rd along the line of Cray Court or the new Spectrum Bridge. This route is parallel to but safer than Torrey Pines Road.
- This concept appears in Urban Design for North Torrey Pines Area. Include it in Mobility section as well .
- Add a new policy in Table 6, section 3 to reflect this priority. Include recommendation to work with property owners.

E. New Bike Connection: Connect Coastal Rail Trail/I-5 Bike Path with Carmel Valley Bike Path

- The Subcommittee recommends that the city complete the connection between I-5 bicycle path (Coastal Rail Trail) and the Carmel Valley bike path to increase bicycle ridership to and from UC from Carmel Valley and north. These northern communities are a primary source of commuters to UC.
- Although this connection would be completed just outside the UC Plan Area, it affects mobility in the UC Plan, and we encourage the city to include this priority in the UC Plan and adjoining community plans.

F. Pedestrian Bridges

- Subcommittee members have expressed support for additional pedestrian bridges to separate auto/non-auto traffic at major thoroughfares in the community.
- The city can address this concern by studying the potential for additional pedestrian bridges at Nobel Drive (west of I-5); Genesee Ave (at Governor Drive).

VII. Consensus Recommendations: Parks and Recreation

The Subcommittee is deeply concerned with the very large **recreational value or "parks points" deficit**. This deficit is projected to be 4,900 points at build out, which represents park facilities for 49,000 people.

The Subcommittee is equally concerned with the **proposed deficit in Recreation Centers and Aquatic Centers**, estimated at a shortage of ~2.5 recreation centers and ~ .8 aquatic centers short at build out.

The Revised Draft of the UC Plan must address and reduce these deficits and prepare plans for providing the Park and Recreation infrastructure necessary to serve a growing population and required by city policy (*Parks Master Plan*, 2021).

The Revised Draft should show plans for achieving the *Parks Master Plan* standard for University Community.

The Plan Update needs better balance between new growth and supporting Parks and Recreation infrastructure. The Community Land Use Scenario does a better job.

Recommendations:

A. Account for Recreational Value Fully and Transparently.

Overall, the Plan should **score** the recreational value of **UC parks accurately** and **transparently**. It appears that there are **missing points** in the current draft. The Revised Plan should ensure current points are counted accurately as basis for future planning and resolution of the points deficit. The Community needs opportunity to vet and offer suggestions.

Note, the Subcommittee list of recommendations for specific park facilities listed below includes several instances of potentially missing or miscounted points, including existing city park facilities, shorelines, and joint use parks. (e.g., Torrey Pines City Park, University City High School, Weiss Park – Lawrence Family Jewish Community Center, and "Montrose Park" at UTC Mall.)

Specific Recommendations:

- p. 137 Check and Correct "Community Summary" Table 5 on p 137. Confirm that the tally of Planned Additional Recreational Value (6,052 points, p 137) matches the sum of points listed for private residential redevelopment and upgrades to city parks (p. 130-35).
- Incorporate Subcommittee recommendations for Specific Park and Recreation Facilities listed in Section H discussion of Table 5 below.
- Make recreational value scoring sheets for specific parks publicly available so that community members can check that work and contribute.

B. Include plans for Recreation and Aquatic Centers to meet PMP standards.

See Table 5, p. 129

Specific Recommendations:

Add to Table 5, p 129, Recreation and Aquatic Center at JCC-Mandel Weiss-Eastgate Park.

Modify Policy 4.1 F, p. 180. "Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span. Meet Park Master Plan guidelines for recreation and aquatic facilities to serve the University Community."

Add Policy 4.1 F1, p 180. Assure public access to recreation and aquatic center facilities of the Lawrence Family JCC in Weiss Eastgate Park.

C. Clarify and Strengthen Policies for Urban Public Spaces.

Resolve inconsistencies in CPIOZ / SDRs for Urban Public Spaces. The requirements for commercial and residential development are different. These guidelines appear in different parts of the plan (Residential requirements appear in Table 5. The Commercial/General requirement appears in SDR-1). The Draft is confusing and not clear on which take priority and under what circumstances.

Specific Recommendations:

- The Plan should **outline requirements for Urban Public Spaces** in residential and commercial developments **in the same place** (in SDR-1).
- The Plan should **follow the same standard** for Urban Public Spaces for commercial and residential development. The general requirement for urban public spaces on parcels over 50,000 sf and developments over 75,000 sf is the better standard. It is clear, efficient, and will maximize the development of recreational facilities in residential redevelopments where they are most needed.
- p. 136. Confirm Consistency of SDR-1 criteria, on p. 136 and 191
- Be sure guidelines for SDR-1 [urban public spaces] that appear in Table 5, p. 136 also appear with the description of SDR-1 on page 191. These rules should be included in both locations.
- *Critically*, the Plan should clearly explain and quantify the **recreational value of Urban Public Spaces required for** *commercial* **development**.
- p. 137, Estimate and Include Recreational Value Points expected from Urban Public Spaces in commercial developments (the 5 Ps), pps 189-197. Include this tally with projected Recreational Value in "Community Summary" Table on p 137.

These proposed recreational values are missing from the Discussion Draft and could be a significant source of RV points.

Alternative Views: The CPIOZ and SDR requirements for urban public spaces are too detailed and rigid and don't belong in a planning document. E.g., for one specific large life sciences campus, these could require as much as 8.5 acres of public space at private expense in the middle of an R&D campus. Many firms try to accommodate public access to their campuses, but this is not feasible everywhere. Some restrictions are necessary – e.g., after hours and to meet tenant requirements for privacy and security. Recommend better balance between reasonable public access with needs of life science and R&D tenants.

D. Neighborhood Scale Parks

The Subcommittee recommends that the Revised Plan include plans for **new Neighborhood-Scale Parks** to serve the needs of new and existing residents – not just mini parks and 5Ps.

SDR-1 supporting Urban Public Spaces for residential and commercial developments is a creative approach, which the Subcommittee supports; however, "parks" of 3,000-5,000 sf (see pages 192-196 of the Discussion Draft) will not meet the future recreation needs of a UC community twice its current size. The Revised UC Plan must undertake the more challenging effort to ensure that **Neighborhood-Scale Park Facilities** are in our plan.

Recommendation:

- Include plans to create new Neighborhood Park-Scale Parks (PMP >3 ac). Parks "large enough to kick a ball, throw a frisbee, and let a three-year-old run to her heart's content."
- Consider and include a strategy for *scaling Urban Public Space requirements to the size of development* to ensure that Neighborhood Park-Scale Parks are built *in the places* where growth is occurring.
- Consider revised SDR-1 (pps. 136, 191) to include guidelines for residential/mixed use development of greater than X acres to provide Neighborhood-Scale Park facilities scaled to the size of the parcel.

E. Land Acquisition

The UC Plan should explain clearly how it will meet the *Parks Master Plan* for land acquisition and land area.

Note: The *PMP*, Appendix D, p. 19 states that "At least 20% (or 20 points per 1,000 residents) of a community's park standard <u>shall</u> be satisfied through increased land acquisition." The PMP indicates that this score as part of total recreational value will be "calculated and used during the community plan update process." (*PMP*, Appendix D, p 19).

The operative word is "shall."

However, the *PMP* is unclear about how this policy will be fulfilled. The Discussion Draft includes no discussion of how this mandate will be achieved.

As the second large plan update to approach completion since approval of the *PMP*, the UC Plan should lay out very clearly how the city will meet this mandate. This is an answer the city must have, and the UC Plan is the place to apply it.

Specific Recommendations:

- p. 137 Community Summary Include Land Area for future parks
- The UC Plan should explain clearly how this standard will be applied to UC Plan (and to community plan updates in general).
- p. 137, Table 5, Community Summary, should clearly state how many acres of land acquisition will be required to meet the city's points standard (and where these are planned).
- Note: fast math suggests as much as **336 additional new acres** of park space will be required to meet the *PMP* mandate: 411 total acres of park land in the UC Plan Area at build out (14,400 points needed. 20% of rec value points at ~7 points per acre). Subtracting the current 74.6 acres of community park (UC Community Atlas, 58) equals approximately *336 acres*.
- The Revised Draft should include this information and show clearly how the Plan and its proposed policies/SDR's will meet (or not meet) this standard. (Table, p 137)

F. Funding and Implementation Mechanism for Parks

The Subcommittee appreciates the creative effort to design SDR-1 for Urban Public Spaces; however, as noted, even with this effort, the Draft does not come close to meeting the required recreational values mandated by the *Parks Master Plan*. It cannot meet the land acquisition mandate. It cannot meet the requirement for Recreation Centers.

The Subcommittee recommends that the city develop additional strategies to build and finance future park and recreation infrastructure.

Specific Recommendations:

- Consider a **supplemental funding mechanism** such as Supplemental Development Impact fees ("Future Opportunities Fund") for Parks in UC (see section X below).
- Consider a revised or expanded SDR-1 to scale park facilities to the size of development with the goal of providing Neighborhood Scale Park facilities in developments of sufficient size (see above).

- Consider **other means to finance and support park development** to meet *PMP* standards.

G. Prioritize preserving unstructured, open green areas in current and future parks.

The Subcommittee recognizes many comments and concerns over the need for unstructured open green areas and play fields in our local parks.

- The Subcommittee recommends that the Plan **prioritize unstructured**, **open green areas and play fields** in current and future parks.

H. Specific Park Recommendations: RE Table 5: Park Inventory

- p. 130 - 133: Community Parks, Pocket Parks, Trailheads and Plazas

Column 4: Rows 6-32:

- Replace "Recommendations" for proposed parks in lines 6-32. Clarify that future park design will coordinate with the community. Note, many items have been on the unfunded list for years.

Substitute the following process statement for current lists of amenities:

"Work with the community to determine items needed and desired to be added to the park. Include on that list for consideration items on the city's Parks Unfunded Improvements list."

- p. 130 #9 Torrey Pines City Park
 - Update Project Description Many current facilities appear to be missing include existing facilities – overlooks, trails, beach, seating, cafe, deck, etc...
 - Fully score existing park facilities to ensure that recreational value tallies are accurate for current and existing points
 - Replace Recommendation in column 4: (see also Policy 5.13C, p.184):

"Implement the Torrey Pines City Park GDP (General Development Plan)."

Note: The General Development Plan for TPC park was completed in 2012.

Please confirm and follow up on the **legal agreement that led to this GDP**. There may be legal requirements outstanding that have not been met. See GDP: https://www.sandiego.gov/sites/default/files/tpgdp120621.pdf

- p. 134, Shorelines

Please confirm status of 1,000 yards of beach at Torrey Pines City Park.

Score and add to plan.

Clarify city vs state jurisdiction and assure points are scored.

- Please Add and Score - Old Route 101 Trail

3,800 LF of paved, publicly accessible walking/cycling path on City of San Diego land. The pathway runs from Torrey Pines Lodge/Callan Rd to South Fork Trailhead, Torrey Pines State Reserve on the west side of North Torrey Pines Road

- p. 130 #14 Mandell Weiss Eastgate Neighborhood Park:
 - Confirm the status of the *public* park facilities at Weiss Park/Lawrence Family JCC
 - **Clarify** what the public access is, including the cost for use of the JCC indoor and outdoor recreational facilities and the outdoor park
 - Clarify the intention that Weiss Park/JCC facilities are public

Note:

The 1981 lease between the city and JCC includes the expectation that the property "shall be developed, operated, and maintained as a public community center for park, recreational, cultural, and educational activities for the benefit of the citizens of San Diego".

(Source: https://docs.sandiego.gov/council_reso_ordinance/rao1981/R-254702.pdf)

The 1987 UC Plan includes Eastgate Park among population-based parks, "as a privately operated park and community recreation center open to the general public" 229.

The lease will expire before the term of the Community Plan

- p. 130-31, – line 14:

Confirm and Re-Score Mandell Weiss Park

("Existing Park Value") including JCC facilities.

Facilities listed in website include recreation center, fitness gym, tennis center and courts, theater, and aquatic center.

Note: The Draft recommendations (column 4) include outdoor amphitheater. JCC website lists: "an outdoor amphitheater"

p. 130, Change "Project Description," final sentence:

"The park *includes* the facilities of the Lawrence Family Jewish Community Center."

- p. 131, Change the acreage to 10.49 acres in column "Existing Size"
- p. 129, Acknowledge and Count the Recreation Center and Aquatic Center (add to Table 5, Park Inventory, p.129)
- Limit hardscape and development in open areas of Weiss Park. The open outdoor area of Weiss Park is very well used. It is crowded with limited Space for play fields.
- Universal change Replace column 4 recommendation:

"Work with the JCC and the Community to determine needs and priorities."

- Add policy 4.1 F1

"Assure public access to recreation and aquatic center facilities of the Lawrence Family JCC in Weiss Eastgate Park."

- Consider adding the **recommendation to explore potential for expanding Weiss Park in the future** through purchase or agreement with adjoining property owners. Note: utility property at NE corner of Regents Rd/Executive Dr. may not be needed for present purposes in the future. It would represent an opportunity for the city to expand park space in a critical location.

- p. 130 - Future Neighborhood Park Opportunities

- Town Park Villas Golf Course:

Consider potential for future **Neighborhood Park** at former golf course through acquisition or joint use agreement. Vet with community.

- La Jolla Village Square/Nobel Campus Area in general:

Consider recommendation for a Neighborhood Scale Park at/in vicinity of La Jolla Village Square.

- p. 132, #14-15 - Linear Parks at Regents Road North/South

- The subcommittee and community strongly support these Linear Parks. Thank you for including them in the plan.

The subcommittee has the following recommendations to meet its expectations for these important community spaces.

- Confirm transfer and management by Parks and Recreation Department (not Transportation and Storm Water).
- Add policy language that they will be developed as Parks and managed as such by the Park and Recreation Department.

-Correct Photos on p. 122-24

The Draft's images are reversed for Governor Drive pocket park and Regents Road North.

- Modify language, p. 122:

Please use "Linear Parks" (versus "greenway") to clarify the city's intention that these will be **PARKS**, planned, managed and maintained by Parks and Recreation Dept, and **not STREETS** managed and maintained by TSW.

"These three green-way Linear Park projects could provide fitness circuit nature exploration playgrounds, educational signage, pedestrian and bike paths for families and children as well as providing scenic overlooks into the canyon while maintaining and improving existing trails, habitat conservation and maintenance access. They also provide an excellent opportunity to educate the public on the native plants and animals that need the canyon to thrive and survive."

Note: If there is anything the community or subcommittee need to do to ensure that the Linear Parks will be managed *as parks* by Parks and Recreation Dept, please let us know now.

- correction p. 68, column 2, paragraph 3:

Cut erroneous reference to a Linear Park on Campus Point Drive?

- p. 132, #19 Eastgate Mini-Park 2,

- **Expand Eastgate Mini Park 2** on Towne Center Drive. Please implement concept presented to Subcommittee, May 17, 2022, including potential vernal pool restoration, elevated walkway, public access, and outdoor education space at Mini-Park 2.
- **Explore potential joint use agreement** with adjoining owner of this former building pad, which contains a natural vernal pool and tremendous potential for restoration, education, and stewardship.



(Source: Planning Department Presentation, CPUS Meeting, May 17, 2022)

- p. 132: # 20: Governor Drive Park

- Revise language:
 - Identify as a third "Linear Park"?
 - Clarify, location
- Confirm transfer and management by Parks and Recreation Dept.

- Update description:

"Existing rights-of-way at the west end of Governor Drive south of the Rose Canyon is planned to be converted into a pocket park under management by Parks and Recreation Department between Stresemann Street and at the entrance to the Coastal Sage Habitat Interpretive trail.

- p 132: #21: - Delete Eastgate Drive Pocket Park.

- Subcommittee recommends deleting this proposal for a joint use park. The area is maintained privately as a small park. City should not take on maintenance and costs of this space.

- p 132, #22 - Gullstrand St. Trailhead Pocket Park.

- There is strong community support for acquiring this 14-acre parcel **as open space park**. Multiple community group votes have supported this position. The UCPG voted 16-0 in July 2020, to recommend protection of this parcel *as open space*. (see UCPG Minutes, July 2020).

Clarify that the 14 acres would remain an **open space park** with a new trailhead, pocket park at Gullstrand Street.

-Specify potential for <u>acquisition through **purchase or land swap**</u> – which Public Utilities Department may have greater interest in and the city may be better able to afford.

Modify language: #22, column 4.

"Recommend acquiring 14 acres of vacant open space north of University Gardens Neighborhood Park from the Public Utilities Department (through purchase, land exchange or other means) for use as open space park. Design, and construct a pocket park consisting of a trailhead, trail, public art, educational/cultural elements, and seating."

- p. 134 #29 Montrose Park - UTC (aka "Torrey Trail")

The Subcommittee does not support the concept of a joint use park at this location. It does support the agreed development of this space as a privately owned and maintained park open to the public.

Westfield UTC is required to maintain this as a public park as a condition of the city's 2008 approval of the UTC mall expansion, which included the addition of residential development (corner Nobel/Genesee). The city should NOT enter into a joint use agreement for resources that should be provided by prior agreement, as that would shift the cost of park maintenance and operation from private owner to city.

Note: The **2008 MPDP for Westfield UTC** includes the following language:

- "Torrey Trail," 7.3 ac of designated open space, including steep slopes, and community facilities, plus usable park space of 2.10 ac to be "improved to satisfy population-based park requirements" as part of planned residential development on the UTC site (subsequently built).

"Westfield UTC proposes to improve Torrey Trail with park amenities open to the public..." (MPDP, 4:36) The space "shall be privately owned and maintained with a recreation easement to allow public use." (p. 3:12). Proposed improvements include: lights along the pathway, a tot lot, benches, picnic tables or other park amenities" plus off leash dog park...

"That portion of the existing Torrey Trail to be improved to satisfy population-based park requirements shall be developed consistent with Park and Recreation Department standards/guidelines, and shall be privately owned and maintained with a recreation easement to allow for general public use." (MPDP, 4:81)

- p. 134, #30. Consider Joint Use - SDUSD - Mission Bay Montessori.

Subcommittee supports concept.

- Delete recommendation for sports field lighting as this property adjoins the MHPA and a steep, unlighted canyon visible from I-5, etc. Avoid light pollution and habitat impacts.

- Revise recommendation:

"Work with the community to determine items needed and desired to be added to the park. Include on that list for consideration items on the city's Parks Unfunded Improvements list."

- p. 134 Joint Use Opportunities - UCHS

- Confirm status of Joint Use facilities at UCHS. We may be missing existing agreements.
- Consider future Joint Use opportunities at UCHS.

Note: Signage at UCHS – Tennis Courts - currently references management by SDUSD AND "City of San Diego Parks and Recreation Department."

Also, the North UC FBA formerly included funds for joint use at UCHS. This budget line was later deleted. Is there a joint use agreement with UCHS? If not, there could be, as this is currently a well-used recreational space by the community.



Tennis Courts at UCHS – Managed by SDUSD and "City of San Diego Park and Rec Dept"

p. 134 Consider Joint Use Opportunities – North UC: La Jolla Country Day School/Places of Worship?

- Consider possible joint use opportunities in North UC where the majority of residential development is planned and the greatest need is/will be.
- Explore potential for private/public partnerships for joint use with LJ Country Day School and NUC religious institutions.

- p. 134 #33 Rose Canyon Open Space Park

- Update Recommendation to meet MSCP/MHPA guidelines. Planning for Natural Resources should precede recreational planning in MSCP/MHPA areas such as RCOSP. The city is 25 years behind in this legal obligation:

- Revise recommendation:

"Complete a Natural Resources Management Plan to inform future uses."

- p. 134 - #37 Voigt Lane Overlook

Delete this park on the UCSD campus. UCSD parks are not counted in the Plan.

VIII. Consensus Recommendations: Sustainable Community – Guiding

Principle 6 ("A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas")

Recommendations for Urban Design, Urban Forestry and Urban Greening, Canyon Adjacent Development, MHPA Protection, Parks and Recreation, Open Space and Conservation, etc.

- **A.** Overall, the UC Plan Update needs **stronger policies on the protection, enhancement, restoration and integration of nature**, particularly native species, throughout the Community Plan area.
 - It needs more emphasis on **nature**, **habitat**, **biodiversity**, **native landscaping and native wildlife** not just for MHPA areas, but also for community parks, mini parks, developed areas, urban design, and urban greening, street tree selection, urban forestry, etc. See specific recommendations below.
 - The UC Plan should state the benefit of locally native plants to native wildlife, including native bees, other insects, and birds.
 - The Plan should include more words like "enhance," "manage," "protect," "restore," natural environments," "San Diego native biodiversity."

B. Native Trees and Landscaping:

The plan should prioritize **landscaping all projects and all areas throughout the Plan with plants specifically native to San Diego.** This includes streets, paseos, parks, public and private project landscaping, and stormwater infrastructure.

Recommendations:

- Prioritize native landscaping in the Torrey Pines and Campus Pt/Towne Centre Drive "Village" areas. Add urban design policies to this effect.

Development in the North Torrey Pines Employment Center, p 175

 Add Policy 2.15 G. "Prioritize native landscaping and design features sensitive to biodiversity.

Development in the Campus Point and Towne Centre Employment Village, p 175

- Add Policy 2.16 C. "Prioritize native landscaping and design features sensitive to biodiversity.
- Urban Greening: Prioritize native vegetation

Modify Policy 4.1 M. p. 180,

"Prioritize use of native vegetation in Green Streets"

Modify Policy 4.2 D, p. 181

"Retain and restore native vegetation where possible in open space areas."

Modify Policy 5.6 A. p 183

"Retain native vegetation where feasible-and revegetated disturbed areas and open space with *locally* native, non-invasive, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, *protect water quality,* and restore biological diversity. New development within or adjacent to the MHPA must comply with the MHPA Land Use Adjacency Guidelines."

- Urban Forestry: Prioritize Native Trees

Prioritize **native street trees** (e.g. Coast Live Oaks, Western Sycamores, Torrey Pines) adjacent to open space (parkways), on streets connecting open space areas (corridors), and at specific community entries (gateways).

Native trees help to define the community and region. They create sense of place, enhance biodiversity, reduce water consumption, and integrate the benefits of natural systems within the urban landscape.

UC is a regional leader in the emphasis on native landscaping. The UCPG has been a driving force behind this change. San Diego County recently passed a native landscaping ordinance (2022). This is the future. The UC Plan should lead.

Specific recommendations:

- p. 62, columns 1 and 2. Incorporate justification for use of native trees
- p. 68, column 1, paragraph 1, insert language
 - "...double the benefits when considering the community's mobility network as an additional opportunity to expand open space *and wildlife habitat.*"

a. Figure 12: Street Tree Plan, p 63-67: Identify the following street segments as:

"Native Tree Parkways": street segments adjacent to or between open space/canyon edges.

- Regents Road, north and south of Rose Canyon. Designate Linear Parks and road segments stretching from them north and south for native trees.
- Governor Drive from Linear Park to Regents Road
- Gullstrand St from Kantor Street to Florey Street/Rock Valley Ct
- Gilman Drive, I-5-UCSD

- **Nobel Drive**. Towne Centre Drive to Miramar Rd
- Campus Point Drive, Genesee to north end
- Towne Centre Drive, Eastgate Mall to north end (potentially south as well, see below)

- Eastgate Mall, Towne Centre Drive to Miramar Road
- Judicial Drive, Nobel Dr to Eastgate Mall
- La Jolla Colony Drive, I-5-Porte La Paz
- Torrey Pines Road, Genesee to TPSR. (Torrey Pines, please)
- b. Identify the following street segments as Native Tree "Corridors" to enhance connectivity between open space areas, especially for birds and insects
 - Regents Road, north and south of Rose Canyon. Use native street trees (Coast Live Oaks), and landscaping in medians and parkway to connect Marian Bear Park to Rose Canyon, Doyle Park, UCSD, and Campus Point Open Space.
 - Gullstrand Street, Kantor to Rock Valley Ct. Connect San Clemente Canyon with Rose Canyon via University Gardens Park and University Village Park.
 - **Judicial Drive**, Nobel Dr to Eastgate Mall. Connect Rose Canyon with Roselle Canyon/Sorrento Valley.
 - **Towne Centre Drive**, Nobel Dr to the north end. Connect Rose Canyon with Roselle Cyn/Sorrento Valley.
 - Gilman Drive, I-5 to UCSD. Connect Rose Canyon with UCSD
 - Torrey Pines Road, TPSR to Genesee Ave. Connect UCSD to TPSR
 - Torrey Pines Mesa area, Prioritize native trees and landscaping for all streets and public ROW.
- c. Identify the following street segments as: Native Tree Accent Gateways
 - Regents Road/Hwy 52, (sycamores and coast live oaks)
 - Genesee Ave /Hwy 52, (sycamores and coast live oaks)
 - Torrey Pines Road/Genesee (Torrey Pines)
 - Miramar Road/Eastgate Mall (CLO, Toyon, Ceanothus, Rhus)
- p. 64-67, Table 1: Street Tree Matrix:

<u>Please add native trees</u>: The matrix includes just **ONE** native tree (Western Sycamore, Platanus racemosa).

Add Coast Live Oak, Torrey Pine, Blue Elderberry, Fremont Cottonwood, and Arroyo Willow, other CA species. Consider Toyon, Lemonade Berry, and other trees. Consult California Native Plant Society for additional recommendations.

Please remove invasive trees from Street Tree Matrix:

I.e., Mexican Fan Palm (Washingtonia robusta)

C. Stronger MHPA adjacency policies are needed throughout the Plan.

The Discussion Draft projects a large amount of development near and adjacent to MHPA habitat, including habitat for rare species and threatened species listed under the Endangered Species Act.

Recommendations:

- **Add language** acknowledging and requiring projects, including parks, to follow MHPA land use adjacency guidelines.

-Add policy to 4.2, p 181:

"Adjacent to MHPA and in the coastal zone, prioritize scenic overlooks and overlook parks over trails in order to provide access to nature balanced with protection of habitat and biodiversity.

- Avoid new sports lighting in parks adjacent to MHPA/ MSCP lands... (See parks recommendations above)

D. Protect Watersheds:

The Plan needs language throughout to **recognize and protect the two coastal watersheds** (Rose Creek watershed and Los Peñasquitos watershed) **and three creeks** (Carroll Creek, Rose Creek, and San Clemente Creek) that drain from the UC Plan Area.

The Plan should recognize and apply the understanding that clean water in Mission Bay, Los Peñasquitos Lagoon, and Torrey Pines State Beach begins in University City.

Recommendation:

- Modify language, p. 68, column 2, paragraph 1

"Through landscape and street design strategies, stormwater facilities will help prevent flooding and urban runoff, *reduce erosion in canyons and riparian areas*, while enhancing water quality *in coastal watersheds, bays and beaches* (see Figure 13)."

E. Riparian Protection and Restoration:

The Plan must include language throughout about riparian protection and restoration.

Recommendations:

- Add policy to specify development setbacks from Riparian areas.

Recommendation - Establish a setback of 100'

which appears mid-range in a variety of published California plans.

- p. 184 Delete Policy 5.13 J: It is infeasible and unnecessary.

"Seek an easement from San Diego Unified along the north side of the University City Senior High School to permit public access through Rose Canyon and under the railroad track to the north."

Note:

- 1. Crossing under the tracks would require crossing under the entire width of the riparian area and creek as the tracks are in the riparian area.
- 2. North County Transit District manages the RR Right of Way and prohibits anyone (even contractors working on the rail line) from entering without a flagman present.
- 3.Unnecessary: The legal crossing of the canyon/railroad tracks is the bridge on nearby bridge on Genesee Avenue. The Plan Update calls for protected bike lanes the length of Genesee.

F. Protect, Manage, Restore Wildlife Corridors

The Plan should clearly **identify wildlife corridors** and include language about **protecting**, **managing and restoring them**.

Note: the University Community sits at the juncture of important MSCP-identified wildlife corridors that connect core habitat lands on MSCA-Miramar and Mission Trials Regional Park with coastal canyons – San Clemente/Rose – and the Los Peñasquitos watershed.

Recommendations:

Modify Policy 4.2 L, p 181 and 5.6 E, p 183 (to read)

"Preserve identified wildlife corridors and prevent habitat fragmentation between canyons by requiring conformance with the MSCP guidelines such as restricted development, buffers, landscaping, and barriers. Seek opportunities to enhance wildlife corridors through crossing structures, wildlife friendly fencing and other best practices.

Add policy 5.13 F.1. p. 184

"Protect and enhance wildlife corridors to assure safe, functional wildlife connections between MCAS Miramar and Rose Canyon/Rose Creek Watershed and Sorrento Valley/Carroll Creek/Los Peñasquitos Watersheds."

G. Community Gardens:

The Subcommittee recommends the Plan include space in University City for **community** gardens.

H. Canyon Adjacent Development

Add policies to address edge effects related to Canyon Adjacent Development, including lighting, bird strikes and bird safe glass, noise and other human impacts. Use native landscaping, protect sensitive habitat, address adjacency threats to MHPA/MSCP, and support biodiversity.

Recommendations:

Edit p 48: Context-Sensitive Design Near Open Space, p 48, para. 2:

- "Development should recognize the value of *these and other local open spaces* to both support habitat and wildlife and serve as a community resource.... Buildings adjacent to and facing canyons in the community should step back from the canyon edge with terraces and upper story stepbacks. Wherever possible, tThe long side of the building should face inward and away from the canyon open space. Reflective glazing that produces glare and light onto the canyon should be avoided, *outdoor lighting should be shielded and face downward, away from canyon edges,* and buildings should be articulated with a pattern of forms and massing that *eliminates bird strikes and* provides a diverse and varied façade along the open space edge. *Balance public access to open space, where appropriate, with protection of sensitive natural resources through* Public access to open space should be maintained with paseos, paths, *and* terraces, and other openings in the development along the canyon edge."

Edit pps 48, 175 and SDR-21, p 201:

- Clarify definition of "canyon" and "canyon edge" for the purposes of this regulation. (Is it based on slope? Designation as Environmentally Sensitive Lands? Designation as Open Space?). Please use clear and consistent language to make sure it is clear where specifically this regulation applies. (Note: Discussion Draft uses "Canyon Adjacent" on pp 48 and 174, 201; "Abutting Open Space" in SDR-21 p 201, "abutting an open space area designated in this plan" in SDR-21, p 201).
- It appears from the specific language in the SDR-21 that this policy applies to development adjacent to designated open space, however, this understanding, if correct, only dawns on the reader on the last page of the Draft. The Revised Draft should clarify language earlier in the plan where the concept is introduced.
- Be sure to show canyon/open space edge setback line on map p 81.
- p. 201, please **refer specifically to maps** on pps 73, 77, 93 (and/or Land Use on p 31?)
- Modify/Add to Policies under 2.9 p. 174,
 - 2.9B, p 174. Strengthen policy outdoor lighting to specify fully-shaded

lighting turned away from open space, following best practice for ESL and MSCP:

2.9 B. "Outdoor lighting near or adjacent to the MHPA or canyon edge should be designed to eliminate light impacts on the MHPA or canyon. All outdoor light fixtures should have hoods that extend below the level of the lighting element to avoid intrusion into MHPA."

- Modify 2.9 C and D, p 174.

Policy Language should balance responsible access with protection of wildlife and other sensitive resources. Specify type and location of appropriate activities on mesa top to the canyon edge – which will depend on whether the adjacent canyonlands are in the MHPA or not. Clarify that trail access into canyons should take place at approved trailheads only.

2.9 C. Replace with:

"For MHPA adjacent development and other sensitive habitat, signs should notify people that access is prohibited and where official public access is available."

2.9 D. Replace with:

"For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should be located away from the canyon or other MHPA edge and on the other side of buildings from the canyon or other MHPA edge."

2.9 D2, Add new policy:

"Balance responsible access with habitat protection. Canyon development adjoining MHPA lands shall follow city LUAG to minimize edge effects due to noise, lighting, and impacts of humans and domestic animals, including use of buffers, fencing, and signage."

- 2.9 E. Add Policy on Bird Strikes

"Design buildings adjacent to open space and MHPA areas to eliminate bird strikes."

- 2.9 F. Add Policy on Native landscaping

"Prioritize use of native landscaping to maximize biological value and minimize habitat impacts of canyon adjacent development. Avoid planting species on the California Invasive Plant Council's list of invasive plants for Southern California."

- Edit SDR-21, p 201, Building Design abutting [Canyon?] Open Space,

provisions a) and d).

- "Development on sites directly abutting an open space area designated in this community plan shall conform with the following requirements:
- a) For a premises greater than 300-feet in depth from the street, pProvide a 50-foot building setback from the open space area [OR "canyon rim"?].

Rationale for strikeout - as stated on p 201, "the purpose and intent of these supplemental development regulations are ... to lessen the effect of buildings developed adjacent to open space areas designated in this community plan."

This justification applies to sites of every size and width.

Match language on p 48 and maps, p 73, 77, 93.

d) "Design buildings to eliminate bird strikes and intrusion of light and glare into adjacent canyons." The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

I. Integrate/Strengthen Language RE Environmental Protection in Parks and Recreation Modify Parks and Recreation Goal 6, p. 117:

"Protect, preserve and restore natural areas and sensitive biological resources."

- Modify language, Parks and Recreation Goal 7, p. 117

"Promote sustainability by utilizing "green technology" and other sustainable practices, such as "green streets" that double as pedestrian amenities and stormwater infrastructure, and ecological enhancements.

- Add language, p. 118, par 1 - Introduction to Parks and Recreation:

"The community's open space lands also form a critical part of the city's Multiple Habitat Planning Area, including protected habitat and wildlife corridors for sensitive species."

- Modify language, p. 120 - paragraph 4,

"This open space is intended to preserve and protect native plants and animals, while providing for compatible public access passive recreation and enjoyment."

- -Modify language, p. 126 paragraph 2... insert "natural and scenic value"
- Correct language in Figure 26, University Community Open Space, p 147.

Clarify use of "designated" and "dedicated" open space – it is confusing.

Note: All of the land in Rose Canyon Open Space Park is "Dedicated Parkland." This is also true for community and neighborhood parks and for a share of Open Space in Roselle Cyn/Sorrento Headlands and the University Open Space in South UC. The Update proposes to add four additional parcels to this list of Dedicated Open Space. Consider avoiding the complexity w/ a key that shows "Open Space" and "Open Space Proposed for Dedication."

J. 4.2 Trails, Overlooks and Pocket Parks, p 181

- Revise Policy 4.2 A, p 181: Priority for Overlooks adjacent to MHPA

"Adjacent to open space areas and to the MHPA and in the coastal zone, prioritize scenic overlooks and overlook parks over trails in order to provide access to nature balanced with protection of habitat and biodiversity.

This policy is a **win-win that balances recreational goals** with legal imperatives, such as protection of sensitive habitat, MSCP and coastal guidelines, etc.. Note recreational value points represent functionally equivalent recreational experiences. Scenic overlooks within a ½ mile walk of residential neighborhoods or mixed use areas are equal to similarly situated trailheads – 7 points each. (see PMP, Appendix D, p 20).

IX. POLICY RECOMMENDATIONS – Parks and Recreation – Open Space and Conservation:

RE: Table 6: Plan Policies, 4.0 Parks and Recreation Policies

Recommendations [changes in bold green with italics]

4.1 F. Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span. *Meet PMP guidelines for recreation and aquatic facilities to serve the University Community.*

Add new policy 4.1 F1.

Assure public access to recreation and aquatic center facilities in Weiss Eastgate Park.

Modify/split

- **4.1 J.** Separate the two ideas conflated in 4.1 J.
 - **4.1 J1.** Promote open space conservation *and restoration* of natural lands.
 - **4.1 J2.** Provide open space linkages where appropriate, *including* trailheads and *for* bike and pedestrian access with appropriate, visible, and clearly marked entrances.
- **4.1 M.** Promote the greening of streets using vegetated swales, *rain gardens, permeable pavements*, and *other* alternative compliance stormwater design features as well as through investments in a robust urban forest. *Protect water quality in coastal watersheds by minimizing storm flow leaving developed areas*.
- **4.1 O.** Coordinate with Caltrans to plant trees *and native shrubs* in landscape areas within freeway rights-of-way to improve air quality and provide visual relief.
- **4.1 S.** Maintain natural drainage systems and minimize the use of impervious surfaces to protect open spaces and *coastal* water*sheds*ways. Concentrations of runoff should be adequately controlled through pervious areas, vegetated swales, and retention basins to prevent an increase in downstream erosion.
- **4.1 U.** Emphasize native landscaping and design features sensitive to to enhance bio-diversity.
- 4.2 Trails, Overlooks and Trailhead Pocket Parks

Add New policy 4.2A1. Adjacent to open space areas in the MHPA and coastal zone, prioritize scenic overlooks and overlook parks over trails and trailheads to provide access to nature balanced with protection of habitat and biodiversity.

4.2 B. Preserve and protect city-owned open space canyons and hillsides by providing *landscaped buffers, rustic fencing,* overlooks, kiosks, interpretive signage, and wayfinding elements to educate users on the sensitive natural and cultural habitats and unique biologic, *cultural*, and scenic qualities of these areas. Note: Features shall be in conformance with existing MSCP and MHPA guidelines.

- **4.2 C.** Connect adjacent communities to trails and trail-adjacent parks by extending improving existing trails or providing new ones, where appropriate and in conformance with Parks Master Plan and all applicable limitations, such MSCP consistency findings, ESL regulations, Natural Resource Management Plans.
- **4.2D.** Retain and restore native vegetation where possible in open space areas.
- **4.2F.** Work cooperatively with property owners to p**P**reserve and manage vernal pools in accordance with the Vernal Pool Habitat Conservation Plan. **Seek opportunities to restore vernal pools where appropriate, including working cooperatively with property owners.**
- **4.2 G.** Implement applicable requirements of the Environmentally Sensitive Lands regulations, Biology Guidelines, *Natural Resource Management Plans*, and MSCP Subarea Plan for preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources.
- **4.2 J.** Repair and retrofit storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration. *Use green infrastructure in developed areas to reduce flows into the storm water system.* Storm drain outfalls should limit the use of concrete in favor of more natural, vegetated designs, *including streambed bioengineering.*
- **4.2** K. Ensure "buffer zones" sufficient to protect environmentally sensitive habitat areas for new development are determined through the criteria contained within the Environmentally Sensitive Lands regulations, and *MHPA Land Use Adjacency Guidelines*.
- **4.2 L.** Preserve identified wildlife corridors and prevent habitat fragmentation between eanyons by requiring conformance with the MSCP guidelines such as restricted development, buffers, landscaping, and barriers. Seek opportunities to enhance wildlife corridors through man made crossing structures, wildlife friendly fencing and other best practices.

Add a policy - 4.2 X- to specify riparian setbacks. Recommend 100'.

Table 6, Policies on Open Space and Biological Resources, Sections 5.6-16

5.6 Biological Resources

- **5.6 A.** Retain native vegetation where feasible and revegetated disturbed areas and open space with native, non-invasive, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity. New development within or adjacent to the MHPA must comply with the MHPA Land Use Adjacency Guidelines.
- **5.6 D.** Preserve identified wildlife corridors and prevent habitat fragmentation between eanyons by requiring conformance with the MSCP guidelines such as restricted development, buffers, landscaping, and barriers. Seek opportunities to enhance wildlife corridors through crossing structures, wildlife friendly fencing and other best practices.

5.12 Coastal Resources

A. Ensure buffer zones sufficient to protect environmentally sensitive habitat areas, **special status species and wildlife corridors** from new development as determined by criteria contained within Environmentally Sensitive Habitat Areas (EHSA).

5.13 Area Specific Conservation and Open Space Policies

- 5.13 A. Preserve the open space areas of Torrey Pines Mesa and coastal area, Sorrento Valley, *Roselle* and Soledad Canyon hillsides and canyons, Rose Canyon, San Clemente Canyon and areas most severely impacted by aircraft overflights.
- 5.13 B. Preserve the scenic qualities of the surrounding coastal and canyon viewshed areas within scenic overlooks in Rose Canyon, San Clemente Canyon/Marian Bear Memorial Park, *Sorrento Valley*, and *Roselle Canyon* the canyon area between Campus Point Drive and Towne Centre Drive.

Add a policy on Ocean scenic views:

5.13 B1. Preserve the scenic value of ocean views from public areas and street rights of way.

- C. Develop a park in accordance with the Torrey Pines City Park in accordance with the Torrey Pines City Park General Development Plan to enhance unique recreational opportunities, such as beach access and gliding activities, while preserving existing biological and archaeological resources and topographic features.
- * Clarify policy language in 5.13 E and F. Floating prepositional phrase makes it unclear. Note: Most of Soledad Canyon slopes are already protected by MHPA guidelines.
- Modify 5.13 E. Avoid Mitigate any disturbance of the hillsides in Soledad Canyon Open Space and adjoining MHPA areas. Outside of MHPA, mitigate hillside disturbance with contour grading and revegetation with native species in Soledad Canyon Open Space.
- **Modify 5.13 F.** Preserve steep hillsides facing the canyons *in Soledad Canyon Open Space* by establishing *conservation easements and dedications* in conjunction with new development in Soledad Canyon Open Space.

Add policy 5.13 F.1. Protect and enhance the wildlife corridor in Soledad Canyon Open Space area to assure safe wildlife connection between MCAS Miramar, Rose Creek and Carroll Creek/Peñasquitos Watersheds.

Add a general policy to require local habitat mitigation.

- 5.13 XX. Perform required habitat mitigation for projects in the University Community within the Plan Area, with a preference for mitigation within the same watershed.
- **5.13 H.** *Protect and r*Restore Rose Canyon ecosystems and creek and watershed habitats.
- 5.13 I. DELETE and REPLACE language.

Language is unclear and suggests a focus on opening Rose Canyon Open Space Park for "major grading and construction" and other uses than passive recreation. This is inappropriate for MHPA and open space parks and counter to consistent community feedback.

I. Consider the topography, vegetation and scenic value of Rose Canyon for future uses. Passive recreational uses are recommended rather than active uses requiring major grading and construction. Protect and restore Rose Canyon Open Space Park for education, research, stewardship, and passive recreation.

Delete Policy 5.13 J: This is infeasible and unnecessary. RR is in the riparian area. Nearby bridge on Genesee Avenue is an appropriate connection.

"Seek an easement from San Diego Unified along the north side of the University City Senior High School to permit public access through Rose Canyon and under the railroad track to the north."

* Modify/Add new policy 5.13 J2 to pursue direct means of connectivity between East UC and UCHS/Genesee Ave.

Seek an easement from San Diego Unified along the north side of the University City Senior High School to permit public access *through University City High School between Robbins Street and Genesee Avenue*. Rose Canyon and under the railroad track to the north.

Delete Policy 5.13 K. Policy is unsafe and lacks a specified use. Human access in RR ROW is proscribed except with a flagman.

5.13 K. Pursue an open space easement with access along the north side of the AT & SF Railroad between I-5 and I-805.

5.13 M. "Preserve the three four branches of San Clemente Canyon which extend northward into South University City as open space by retaining existing open space dedications and easements. These areas include 19.47 acres between Stadium Street and Tulane Street, approximately X acres extending from Standley Community Park through the SR-52 undercrossing to Marian Bear Park; approximately three acres west of Kantor Street and 15.47 acres east of Gullstrand Street developed as a golf course. "

Pursue re-use of Town Park Villas golf course as community park

Add policy 5.13 M1 "Pursue acquisition or joint use agreement for former Town Park Villas golf course as a community park."

5.13 P. Enhance the visual quality and continuity of the Gilman Drive slopes open space corridor through completion of the Coastal Rail Trail and landscaping and site design on private properties abutting the street and adjacent to the canyon.

5.14 Sustainability

5.14 C. Utilize sustainable design that reduces emissions, pollution, and dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates **best practices in green building** and sustainable landscaping, water use, and storm-water management. **Prioritize building all-electric buildings and Net Zero construction.**

5.15 Energy Conservation:

5.15 D. Incorporate measures to increase energy-efficient forms of transportation for commercial and industrial developments. Supply bicycle racks, showers, priority parking for carpools, bus stops with support facilities, *charging stations for electric vehicles and bicycles*, and other incentives.

5.16 Water Conservation:

5.16 B. Utilize *native*, drought-tolerant plants and efficient watering systems as part of landscaping plans. In addition, as health laws allow, "Gray Water" or water reuse systems should be explored for application within the community.

X. Implementation

The Subcommittee has serious concerns over the lack of a clear plan for Implementation in the Discussion Draft, and in particular the provision and financing of infrastructure and public facilities.

Recommendations:

- The Subcommittee recommends that the Revised Draft provide a clearer, more transparent and more robust explanation of how infrastructure and public facilities will be provided and paid for in support of projected growth.
- This should include a **clear explanation of how parks and bike infrastructure will be paid for**, how infrastructure at large will be paid for, and how land for parks will be acquired.
- The Subcommittee recommends that **city study funding and implementation strategies** for infrastructure similar to the Keyser Marston analysis of affordable housing.
- This study should evaluate **supplemental strategies to provide infrastructure**, including: the potential for **Supplemental Development Impact fees** (a "Future Opportunities Fund" for parks and other infrastructure), **enhanced SDR's** for parks, bike infrastructure, or other needed public facilities, as well as **other potential land value capture tools** to provide infrastructure.

Alternative Views: Support supplemental development fees or FBAs. However, the idea of capturing a portion of land value increase for city/government is of great concern. Will it be applied equitably across development types and sizes? E.g., Will condominiums and single-family houses be assessed for increases in value because their community got bigger/stronger?

Alternative Views: Greater density of development may be a means of raising revenue for infrastructure. A study by Urban 3 suggests that higher density housing raises more tax revenue than single family housing. Bringing more taxpayers to the community through higher density where it makes sense (such as near the Trolley) will bring more revenue to support infrastructure. We should support higher densities to support higher tax revenues.