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*--A community organization dedicated to preserving the character, charm and historical resources of the Mission Hills neighborhood.*

July 17, 2015

Marlon Pangilinan, Senior Planner  
Development Services Department-Planning Division  
The City of San Diego  
1222 First Avenue, MS-413  
San Diego, CA 92101

Re: Uptown Community Plan Update – June 2015 DRAFT

Dear Mr. Pangilinan:

Mission Hills Heritage has begun its review of the Draft June 2015 Uptown Community Plan Update. At this time we would offer our comments on the Land Use and Urban Design elements and some preliminary comments on the Implementation Element.

#### **LAND USE ELEMENT**

Excerpt – 2.1 Physical Environment, Physical Context, Land Use Distribution, page LU-23, provides in part:

“The Community Plan Land Use Map is intended to guide development and represent a diagrammatic illustration of land use policies. The map also shows opportunity areas where density bonuses can be applied as a development incentive for the provision of public amenities (emphasis added) . . .”

Comment: See following Comment.

Reference – Figure 2-1: Community Plan Land Use Map, page LU-24; Figure 2-2: Community Plan Land Use Map – West, page LU-25; and Figure 2-4: Community Plan Land Use Map – South, page LU-27.

Comment: These figures designate Reynard Way between Curlew Street and Eagle Street as Medium Density Residential (16-29 Du/Ac) with a *Density Bonus of 30-45 Du/Ac*.

As stated in our letter of January 23, 2015 we cannot support a density bonus for this area at this time. As previously discussed, currently City regulations allow density bonuses only for the purpose of providing affordable housing. While there may be other reasons for allowing density bonuses in certain circumstances, the Land Use Element fails to articulate any specific public amenities that are needed or sought. What is the public benefit or amenity that is needed in this area? And is this the only tool that could achieve the benefit or amenity? And if density bonus is the only or best tool, does the increase really have to be an additional 15 units per acre?

We asked the same questions in our letter of January 23, 2015 and have been provided with no additional information or justification for including “density bonuses” in the plan. Based on what we have seen to date, it would appear that the only reason to include a “density bonus” would be to allow increased density in these areas. Thus, we will oppose the inclusion of “density bonuses” within Mission Hills.

Reference – Figure 2-1: Community Plan Land Use Map, page LU-24; Figure 2-2: Community Plan Land Use Map – West, page LU-25; and Figure 2-4: Community Plan Land Use Map – South, page LU-27

Comment: These figures should be revised to include “Reynard Way Neighborhood Park” as shown in the Draft June 2015 Recreation Element on Figure 7-1: Parks, Recreation Facilities and Open Space, page RE-109 and as discussed in Table 7-1: Population-Based Parks and Recreation Facilities, page RE-110. The “Reynard Way Neighborhood Park” was also shown on the Draft September 2014 Proposed Land Use Map.

Excerpt – Table 2-2: Uptown Community Plan and Land Use Designations, Footnote 1, page LU-29.

A density bonus to the next highest residential range is available within the same General Plan Land Use Category as an incentive for public benefits.

Comment: Will the traffic study consider density bonuses? If so, what would be the traffic counts with and without density bonuses?

Excerpt – 2.1 Physical Environment, Physical Context, Demographics, page LU-30  
Dwelling units are expected to increase to 26,483 during the horizon of this plan.

Comment: Does the increase in dwelling units assume density bonuses? If so, how many units would be the result of density bonuses?

Excerpt – 2.2 Land Use Framework, 1988 Community Plan, page LU-30

Areas were also identified in the community as opportunity areas to apply density bonuses in exchange for public amenities as means to allow increased housing opportunities.

Comment: Please cite specific statements in the 1988 Community Plan that corroborate the above statement.

Excerpt – 2.2 Land Use Framework, Specialized Commercial, page LU-33, bottom of first column

Comment: Text appears to be missing.

Excerpt – 2.3 Villages, Village/Neighborhood Centers, second paragraph, page LU-35

Community and neighborhood village locations are shown on Figure 2-4.

Comment: Community and neighborhood village locations are shown on Figure 2-5.

Excerpt – 2.4 Community Plan Implementation Overlay Zone, Incentive Zoning Program, Page LU-41, provides:

#### **INCENTIVE ZONING PROGRAM**

Policy LU-F.3 of the General Plan encourages the creation and application of incentive zoning measures to achieve the desired mix of land use and public benefits. An incentive zoning program is being implemented through the CPIOZ as a voluntary program for private development to provide public infrastructure and amenities such as parks, plazas, additional public parking within business districts for increased residential density or additional building height. These community benefits would exceed any related requirements for new development. Within an urban community, opportunities for creating public amenities are been limited. Implementation of an incentive zoning program can provide public amenities with new infill development and further the General Plan's City of Villages Strategy which calls for the inclusion of public space within mixed-use village areas.

Comment: Mission Hills Heritage expressed reservations regarding density bonus in our letter of January 23, 2015. For the reasons stated above, we cannot support the inclusion of density bonuses. Additional comments will be provided along with our complete review of the Implementation Element.

#### **URBAN DESIGN ELEMENT**

We note that the Urban Design Element has been drastically reduced from the previous draft. We assume that much of the Element has been shifted to the Implementation Element.

#### **IMPLEMENTATION ELEMENT**

Mission Hills Heritage has conducted only a preliminary review of the Implementation Element. Based on this preliminary review our initial concerns are:

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- In some cases the proposed zone would allow a greater density than the Land Use Map shown in the Land Use Element.
- The proposed Community Plan Implementation Overlay Zone (CPIOZ) would allow exceeding height limits and deviations from other regulations.
- The Implementation Element does yet not include guidelines or recommendations for Historic Districts .

More detailed comments on the Implementation Element will be forthcoming in a subsequent letter.

Sincerely,

Mission Hills Heritage,



Laura Largey, President



Barry E. Hager, Board Chair

CC: Jim Mellos, Chair, Uptown Planners  
Mike Zdon, President, Mission Hills Town Council