

October 18, 2019

David Witt
CD – CM Consulting, LLC
La Mesa, CA 91942

RE: Alvarado Specific Plan, Comment Letter 1

Dear Mr. Witt,

This letter provides staff review comments on the draft Alvarado Specific Plan (Plan). We envision a specific plan to be a concise, efficient, well-organized, regulatory document that presents policies, rules, and regulations in a format that is relatively easy to understand and navigate. It is important that the Plan, if adopted, provide clear regulation and guidance to current and future staff as well as to the property owner whether new or existing for development of the property and construction of the project. Since it is a regulatory document, according to the City Attorney, clarity and conciseness are paramount for successful enforcement in court, the same as any other zoning ordinance. These comments are provided with the intent of ensuring that the Plan is a functional document that serves the City and the property owner as a future development tool, as well as a viable tool for enforcement purposes, if necessary. Copies of recent, specific plans that were reviewed by staff in the course of review of the draft Plan and preparation of this letter will be provided for your reference at the next regularly scheduled Plan meeting.

Specific Plan Content

1. A specific plan does not typically include lengthy discussions of background or support for its adoption, which are more suited for the staff reports and supporting materials presented to decision makers during the adoption process. The proposed Plan would benefit from editing the background discussion to limit it to a page or two of succinct historical background and planning context. Discussion provided on the need for a specific plan and support for its adoption would be useful during the approval process, but would not serve a function in the adopted document. Please consider revising the Plan to limit the background discussion and removing the arguments in support of the Plan's adoption, while saving the edited discussion for use in staff reports in support of the Plan.
2. In several instances, the Plan discusses the process by which it will be adopted and/or reviews, consultations, or other interactions necessary from other agencies to adopt the Plan. Generally this discussion addresses processes that would be completed prior to adoption of the Plan and would not provide guidance or serve a function in the implementation of the Plan. The plan itself should be focused on the outcome of the reviews, consultations, and interactions with the other agencies. Additionally, pre-adoption coordination with these agencies will likely result in plans, objectives, goals, and policies that will need to be incorporated into the Plan. Please revise the Plan to reflect the outcomes of consultation with these agencies such that the text reflects post-adoption conditions as opposed to pre-adoption conditions.

3. The Implementation section should only address how the goals, policies, and objectives of the Plan will be implemented. Discussion of how the Plan will be adopted should be removed.
4. The Plan does not include any discernible development standards. Development standards need to be comprehensive and address all of the typical development standards including but not limited to height, setback, lot coverage, FAR, trash enclosures, open space, landscape minimums, plant palette, etc. Where current La Mesa Municipal Code (LMMC) sections could apply, they should be referenced.
5. The Plan does not include any design guidelines. Provide comprehensive design guidelines for the Plan area that supersede or augment the Urban Design Program. If the guidelines augment the Program, clearly explain the relationship between the Plan and the Program.
6. Include guidance on sign design in the Plan. Additionally, the Plan needs to include sign standards specific to the project or needs to reference appropriate LMMC sections.
7. Revise the “planning process” discussion to reflect specifically the planning process for development of the Plan as opposed to discussion of past planning efforts for the site or area.
8. Specify parking ratios clearly. If there is intent to provide an optional parking strategy/ratio if student housing is to be built, provide specific information on that option.
9. Provide justification/explanation of a parking ratio of 0.5 parking spaces per unit for Building 1. Additionally, provide justification/explanation of why unbundled parking is appropriate for the project. This is for background information only; it should not be included in the Plan.
10. The discussion of a parking management plan references LMMC Section 24.04.020 – 030. The specific text quoted applies to the downtown area only and in general these sections are not applicable in this instance. Any provisions for a parking management plan for the Plan need to be established in the Plan, with the parameters set in the Land Use Plan section and approval process identified in the Implementation section.
11. Provide parking information in a table.
12. The Plan indicates that final project design will provide adequate space for delivery vehicles. Provide a concept for delivery space in the Plan.
13. Provide a brief description/definition of a “liner unit” in the Plan.
14. Address whether individual units will have laundry facilities or there will be common laundry facilities. If there is a different solution for student housing, include that as well.
15. The Plan indicates in Section II-G-1 that the project is consistent with City’s Climate Action Plan (CAP) for several reasons, including that it would “(i)ncorporate solar-ready design into new construction. However, the design concepts and related discussion do not address any solar-ready design. Please address how the project would accomplish solar-ready design in the design concepts and guidelines, development standards, and related discussion.

16. The Plan notes that the buildings could provide a small scale “sky deck” on the fifth floor above the podium level. The Plan should commit one way or the other on the inclusion of such “sky decks.” Inclusion is strongly preferable.
17. Private balconies should be provided for each unit unless precluded by regulation, such as noise standards.
18. Figure 43e references an 8th floor, but the Plan contemplates five floors. Please revise accordingly.
19. The term “redevelopment” should be limited to referencing former California redevelopment law.
20. The Plan should provide information about the project site’s proximity to park and recreation areas.
21. The Plan should consider community gardens for the Plan area consistent with Health and Wellness Policy 2.1.3.
22. The Plan should address Police and Fire services similarly to the Belmont Village Specific Plan, Section 5.4, referenced with this letter.

Figures and Drawings

23. The figures in the Plan are difficult to read and appear to be reductions of plan-sized documents. To properly serve the Plan and its function, the figures should be created and formatted for the sheet size on which they will appear – 8.5 x 11 will work for some, while others will need to be 11 x 17 foldouts. All lines, labels, legends, text, etc. need to be legible when presented in the Plan. Please list page numbers for the figures in the list of figures.
24. The renderings of the buildings provide a relatively clear design theme. The public may expect that the design shown is the design for the project. If that is not the intention, it may be better to have the visual representations be only representations of form. In any case, the renderings need to be realistic. Current renderings show patio balconies for units on the freeway side of the building that are unlikely to meet noise criteria. Please revise the renderings to ensure that shown elements can be provided for the project consistent with applicable standards and regulations.
25. Show the project boundary on all aerial views and maps to provide proper context. Arrows used currently to identify the subject property do not provide any context as to the area proposed to be covered by the Plan.
26. Provide three maps for the introduction:
 - a. A regional map at the County level showing the City boundary and the project location
 - b. A local map at the City level showing the City boundary and the project location

- c. A plan area map showing the project boundary and surrounding area – Figure 6 would work for this map, but show the project boundary.
27. Show the location of guest parking spaces.
 28. Include detail drawings and/or renderings in the Plan for:
 - a. Intersections
 - b. Bulb outs
 - c. Enhanced paving areas
 - d. Ring road
 - e. Deck areas
 29. Provide sections developed for 8.5 x 11 sheets of Alvarado Road and the ring roads that circle behind the buildings, with one section occupying a full sheet.
 30. Arrange all 8.5 x 11 exhibits in landscape orientation with the top of the image at the spine and the bottom of the image at the outer page edge.
 31. Ensure property authority and citation for all images used.

Transportation and Transit

32. The project will not create a “mobility hub” as defined by SANDAG and the reference thereto needs to be removed.
33. The Plan discusses alternative transportation concepts that “can” be implemented. Revise this discussion to address alternative transportation concepts that will be implemented.
34. Provide supporting information for performance of the 70th Street Trolley Station from MTS. This is for background information only; it should not be included in the Plan.
35. Specify street standards in the Plan.
36. Provide bike lanes for the project frontage along Alvarado Road consistent with the Bicycle Facilities and Alternative Transportation Plan.
37. Intersections at Alvarado Road and project access drives should include enhanced paving consistent with enhanced paving for internal streets.
38. The Plan should consider public access to the pedestrian paths along the creek.

Public Works/Engineering

39. The Specific Plan addresses street landscaping to be placed between the curb and sidewalk, however, none of the exhibit sections reflect this. More detailed street cross-sections should be provided in the exhibits.
40. The proposed channel section as shown seems counterproductive to the intent of development:
 - a. The southern wall should begin at the top of slope to maximize the cross section in this area. As shown no net increase in channel cross-section is achieved along the south side.
 - b. If no net area is required above what is gained through the existing design/placement of the walls, moving the southern wall as indicated would allow the northern wall to be relocated, increasing the net gain in the property for development.
41. For construction of the underground parking and the channel it is suspected that ground water will be an issue. The developer should contact the City of La Mesa's Storm Water Manager, Joe Kuhn, at 619-667-1340 to discuss groundwater discharge permit options.
42. Section should show approximate preliminary locations of sub-drains in the proposed development.
43. The site boundary is missing curve information for curved segments; usually given as delta, radius, length of segment.

Mobile Home Park

44. The Plan indicates that the current mobile home park may be maintained on Parcel 4. The nonconforming use on Parcel 4 may be continued, but amenities not currently existing on Parcel 4 may not be shifted from the other portions of the mobile home park or added to Parcel 4.
45. The California Department of Housing and Community Development indicates that the mobile home park is an active park. Please provide information as to how and when the mobile home park has been or would be closed.

Organization and Format

46. Some of the topics in the Plan seem to be spread throughout the document, with some topics repeated. The functionality of the Plan would be increased with topics more precisely organized and covered once, with little repetition. For your use, a suggested organization and Table of Contents is attached (Attachment A). Copies of several of the specific plans reviewed have been provided for your reference.
47. Section titling should be clearly hierarchical, such as using the largest font for document title then stepping down in size at each level for chapters, sections, and subsections, or similar. Additionally, navigation of the Plan would be facilitated with tabs, colored sections, or some other method to clearly identify each chapter, section, and/or subsection.

48. Underlining and quotation marks are used throughout the document, but it is not apparent what function is served. Please limit the use of underlining and quotation marks to instances where their use is necessary to bring specific attention to the terms so marked based on editorial norms.
49. Separate the Development Standards section from the Implementation section.
50. Please be sure to refer to agencies by their correct title. For example, "Federal Fish and Wildlife Agency" should be "U.S. Fish and Wildlife Service."
51. Use block justification throughout the Plan.
52. List the adoption date on the title page.
53. Add "City of La Mesa" on the document cover and title page.
54. Acknowledgements should include City, Civic Solutions, and Helix Environmental.

Plan Consistency Discussions

55. Revise the General Plan consistency discussion to list the land use designation and the applicable goals and policies by element. Goals and policies that do not have applicability to the project should not be listed, for example many policies are listed that provide guidance to the City relative to ongoing operations that do not apply to implementation of the Plan. Additionally, the Plan is consistent with many other General Plan goals, policies and objectives that are not listed. Please see the redline markup of the Plan for specifics. For the items listed, please follow each with discussion of how the project is consistent with the land use designation, goal, policy, and/or objective. This section should be limited to discussion of consistency with the General Plan and should not include discussion that does not relate directly to such consistency.
56. Include in the consistency discussion of the Recreation and Open Space element a statement that the project will support parks through payment of park fees.
57. For the CAP discussion, list each applicable CAP measure and discuss how the project is consistent. Please review the CAP measures listed to ensure that the measure is applicable and that the Plan is consistent. Do not list measures that are not applicable. It is not clear from the Plan that it is consistent with Measure E-7 (solar ready construction) or T-5 (alternative refueling).

Outside Agencies

These comments were generated by the outside agencies and are provided for your information.

58. AT&T has existing aerial facilities that originate on Keeney St. and then proceed north down the hillside into the property at 7407 Alvarado Rd. The aerial facilities then branch out and head in both east and west directions. The facilities to the east appear to remain within the park. The facilities that head west continue out onto Alvarado Rd and provide service to the

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neighboring parcels west of the site. The developer will be responsible for costs associated with the relocation and rearrangement of the existing AT&T facilities; and be willing to grant easements for the relocated facilities to clear the project site for their intended construction as well as maintaining our network connectivity to those property owners and customers to the west of the development.

59. San Diego Gas & Electric Company has a 16-inch Gas Transmission Pipe on and adjacent to the properties (APN's 469-021-12, -17, -18 and -19) and possibly in conflict with the proposed grading and improvements for the project. Due to the nature of the facilities, any grading or other improvements that affect these facilities in any way will require review and perhaps written consent from SDG&E to ensure there are no unacceptable impacts to SDG&E facilities.

Other Items for Discussion

60. The Financing section will need to be revised to reflect the outcome of discussions related to the Development Agreement.

61. The existing billboards do not seem consistent with the project proposed by the Plan. The ultimate disposition of the billboards needs to be discussed.

Once you have had the opportunity to review the comments provided, we would like to meet with you to discuss them and next steps for review of the Plan. Additionally, we will be in touch with you soon regarding the proposed development agreement. Please feel free to contact me or Community Development Director Kerry Kusiak if you have any questions.

Sincerely,



Kirt Coury
Planning Consultant

CC: Kerry Kusiak, Director of Community Development
Leon Firsh, Director of Public Works

Referenced Specific Plans

- Belmont Village Specific Plan
- Downtown Lancaster Specific Plan
- Duarte Town Center Specific Plan
- South Centre City Specific Plan (Escondido)

Attachment A: Suggested Organization and Table of Contents

- I. Introduction
 - A. Site and Planning Area
 - B. Purpose
 - C. Planning Process
 - D. Overview
 - E. Relationship to General Plan
 - F. Consistency with Regional Plans
 - G. Environmental Review
- II. Land Use Plan
 - A. Multi-Family Residential Uses
 - 1. Parcel 1
 - 2. Parcel 2 – Student Housing
 - 3. Parcel 3 (combine with 4?)
 - 4. Parcel 4
 - B. Nonresidential Uses
 - C. Open Space
 - D. Landscaping
- III. Development and Design
 - A. Development Standards
 - B. Design Guidelines
 - 1. Site
 - 2. Buildings
 - 3. Landscaping
- IV. Infrastructure
 - A. Public Improvements
 - B. Circulation Plan
 - 1. Existing
 - 2. Alvarado Road
 - 3. Onsite Circulation
 - 4. Transportation Alternatives
 - C. Alvarado Creek
 - 1. Flood Channel Improvements
 - 2. Sewer Improvements
 - D. Community Services
 - 1. Police
 - 2. Fire
 - 3. Solid Waste
 - 4. Schools
- V. Implementation
 - A. Specific Plan Administration
 - 1. Processing and Review
 - 2. Amendments
 - 3. Nonconformities
 - 4. Enforcement
 - B. Improvements
 - C. Financing
- VI. General Plan Consistency
- VII. Climate Action Plan Consistency