

August 10, 2020

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

RE: Alvarado Specific Plan, Comment Letter 2

Dear Mr. Witt,

This letter provides staff's second review comments on the draft Alvarado Specific Plan (Plan). The efforts made to revise the 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 are appreciated. The document as revised is greatly improved and well on its way to be a tool to 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. The revisions requested in the first round of comments necessarily resulted in a document that is much revised, and in some ways more similar to a first submittal than a subsequent submittal given the scope of the changes made. The comments provided herein generally follow-up on previous comments, or react to new information or changes, and seek to further clarify and refine the document to ensure 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.

In addition to the following comments, various text revisions and minor edits are noted throughout the marked-up version of the Plan. General comments not tied to specific pages or exhibits of the Plan are provided first, followed by comments specified by page.

Specific Plan Content

1. The Plan needs to be an easily interpretable document that provides clear direction to future development and review of that development. The revised document is better, but too many instances remain where standards are not well enough defined but rather rely on determinations of conformance or future decision, leaving too many matters for future debate between project proponents and staff, and lacks the desired clarity. In general, standards and policies need to be clear, easily interpretable, and well-defined to facilitate future use of the Plan and development of the Plan area. Specific instances are addressed later in this letter.
2. Provide links in the TOC, list of tables, and list of figures to navigate to the appropriate section, table, or figure in the electronic version of the Plan.
3. To provide clarity to public, decision makers and staff on how the site will be filled to achieve elevations above the floodplain:
 - a. Revise existing conditions sheet in civil plans to have legible existing contours and spot elevations.
 - b. Provide site sections showing existing grade and proposed grade.

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4. The bicycle path needs to connect with a marked bicycle crossing to the westbound lanes at the east and west termini. The project needs to specify this connection on plan and in narrative. If this is not a part of the project, some of the statements about the bicycle facilities in the EIR cannot be supported.
5. It is preferable for the shared pedestrian and bicycle path to be referenced as such throughout, and not as a "sidewalk," which has a pedestrian connotation.
6. A public easement is required for the connection from the trolley station to the shared path.
7. Easements and agreements for shared access and facilities are required, e.g., for the pedestrian promenade. Full public access is highly desirable, but at least all residents of the Plan Area must have access to all portions of the Creekside promenade on both portions of the project.
8. The Plan in several instances mentions "abandoned sewer lines" and "raising and capping a manhole" in the creek area. No currently abandoned lines or the manhole are shown on any plans of the Plan. Identify the lines to be abandoned and the manhole on project plans. If the lines to be removed are the current active lines to be abandoned, that is addressed separately and the "abandoned sewer lines" references need to be removed.
9. Provide enhanced paving consistent with enhanced paving for internal streets for intersections at Alvarado Road and project access drives. Incorporate the enhanced paving into existing plans, drawings, and renderings. Provide a plan detail drawing showing a sample intersection with the proposed enhanced paving.
10. The Plan indicates that final project design will provide adequate space for delivery vehicles. Provide a concept for delivery space in the Plan.
11. Provide pedestrian-perspective renderings of the pool/deck areas, the ring road/pedestrian promenade, and Alvarado Road to illustrate how they would appear with implementation of the Plan.
12. Palm trees are not acceptable as City street trees. Trees along Alvarado Road need to be selected from the approved City street tree list.
13. 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.
14. The Plan should consider community gardens for the Plan area consistent with Health and Wellness Policy 2.1.3.
15. Text in many figures is quite small, in some instances illegible. Maximize font size in exhibits as much as is feasible throughout the document. Figures in many instances are 8.5 x 11 but need to be 11 x 17 to be readable and text to be legible.
16. The Plan identifies development standards relative to building siting, building height, and some degree of building setbacks. However, more details and information is needed relative

to open space and landscaping. The Plan should provide more information relative to uses (a use matrix) for residential, commercial, and mixed uses. Lastly, the plan should provide a description or narrative for site/street “furniture” so that the site is developed with consistency and uniformity relative to benches, lighting, bike racks, etc.

17. Clearly address parking standards for the project in the development standards. Provide definitive parking ratios for the project.
18. Include guidance on sign design in the Plan. The Plan needs to include sign standards specific to the project or needs to reference appropriate LMMC sections. Include standards for signage for project identification, wayfinding, and signage for nonresidential uses.
19. P. 1-9: Figure 6 is not necessary here. It is not referenced in the text.
20. P. I-20: Goal RO-1 mentions “a network of public parks.” It is not clear in what way the project complies with this goal. The project does not contemplate public access to the creek-side promenade. This goal would not apply unless it did. Recommendation is to allow public access. If not, this goal needs to be removed.
21. P. I-22: Goal HE-3 addresses “housing for lower income households.” It does not seem that the project supports this goal. There are no affordable units proposed, or any other mechanism to suggest that the units provided would be housing for lower income households. The possibility of the student housing being affordable is conjectural, anecdotal, and unsupported. The Plan and EIR cannot reference provision of affordable housing unless there is a commitment of the project to provide restricted affordable housing. The recommendation is to include rent-restricted affordable housing in the project. If not, support for this goal needs to be removed.
22. P. II-5: Figure 12 is too detailed here; can save for figure 37 in the development standards chapter. Replace with current Figure 6.
23. P. II-14: Make Figure 15c consistent in appearance with other Figures 15.
24. P. II-27 – 33: Add a note to all Figures 23 regarding design presented: BUILDING DESIGN FOR ILLUSTRATION PURPOSES ONLY.
25. P. II-34: Calculation of open space areas is to be consistent with Municipal Code requirements. The following need to be removed from open space calculation: driveways, parking areas, shared path area along street, street trees, and planting associated with the street.
26. P. II-54, III-25: “Consideration” and “intent” of promoting and encouraging transit is not sufficient. The Plan needs to demonstrate a commitment to support lowered parking ratios and unbundled parking by providing clear and substantive support of transit use by the project, such as free or substantially reduced cost transit passes or similar.
27. P. II-55 – 61: Figures should be ordered: 1) improvements site plan, 2) FEMA map, 3) flood channel plan, 4) flood channel section. More discussion of this in the markup.

28. P. II-63, IV-4: City nonconforming regulations do not allow improvements to be relocated as contemplated. If this is to be considered, "RV Resort facilities to be maintained and improved to the extent needed to provide the necessary operational facilities equivalent to their current conditions" needs to be specifically defined as to what is proposed to be relocated and what improvements are to be made.
29. P. III-1:
- a. The introductory paragraph does not seem to serve any purpose and should be removed.
 - b. It's contemplated that ministerial projects would be subject to a finding of substantial conformance with the Plan. Ministerial projects are those that require no discretion for approval but rather compliance with established standards. A finding requires a discretionary decision. This section should say that all ministerial permits must be consistent with the Plan and discretionary projects found to substantially conform.
30. P. III-2: The Plan development standards do not address the mix of uses or open spaces, but they are listed as addressed and they must be. Nonresidential uses are not addressed in the standards. The Plan needs to include clear standards for provision of open space and limits on size and location of nonresidential uses.
31. P. III-7 – 15: Figures 39 need to address open space and clear area between buildings.
32. Figure 40 shows a schematic view of the buildings but references it as a "view of the development envelopes." The building schematic is useful and could remain in the Plan, but should be moved to be with building renderings and images. Provide a schematic of the area defined by the building envelopes.
33. P. III-24: Unbundled parking needs to be well defined. Revise to include detail and definition, including the following provisions:
- a. Lessees must be associated with residential units or commercial uses on site.
 - b. No subletting.
 - c. No leasing for transit parking.
 - d. Stipulations and/or lease agreement about not utilizing a vehicle if a unit is leased without parking.
 - e. Limit the number of vehicles for any one lessee to the number of spaces leased.
 - f. Limit to number of spaces any one individual can lease.
34. P. III-26: Reference to sky decks is limited – language would easily allow dismissal of the amenity by future developers. Language should be strengthened to make the provision of sky decks required in future projects.
35. P. III-41 – 42: The design guidelines in the Plan are not sufficient to replace the Urban Design Program (UDP) and the project as proposed likely does not comply with the UDP. The Plan needs to include standalone design recommendations that supersede the UDP. Alternatively, the Plan needs to include language that states design recommendations therein supersede

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the UDP where there is conflict, and that consistency the design recommendations of the Plan and remaining UDP provisions constitutes consistency with the UDP.

36. P. IV-1 – 6: The implementation chapter is to be about implementing the Plan, not adopting it. Remove discussion that is about adoption or pre-adoption issues.
37. P. IV-3: Last sentence of first paragraph is too open-ended and leaves too much to interpretation and discretion. Replace with:

“Existing City policies, standards, and regulations, including but not limited to the La Mesa General Plan and Zoning Ordinance, apply to the Specific Plan Area. In situations where there is conflict between the policies, standards, and/or regulations of the Specific Plan and other City policies, standards, and/or regulations, the provisions of the Specific Plan shall prevail.”

38. P. IV-4: Portions of the nonconforming RV park could only remain on the easterly portion of the site while the westerly portion is developed in full compliance with the City’s nonconforming use regulations. Nonconforming amenities currently on the westerly portion may not be moved to the easterly portion. The Plan needs to specify how the use would remain in existence and how public improvements would be accomplished in that case.

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. 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