

LA MESA PLANNING COMMISSION

DATE: August 17, 2022

SUBJECT: Project 2018-08 (Alvarado Specific Plan) – Consideration of an application for the Alvarado Specific Plan for the development of approximately 900 dwelling units in four apartment buildings, which may include student housing and commercial uses, on an approximate 12-acre site located at 7407 Alvarado Road (APN 469-021-20-00 to -25-00, 469-130-43-00 and -44-00) in the CM-F-D (Light Industrial and Commercial Service / Floodway Overlay / Urban Design Overlay) Zone.

ISSUING DEPARTMENT: Community Development

SUMMARY

Issues:

1. Is the Alvarado Specific Plan (“Plan”) an appropriate zoning overlay for the subject site and is the proposed Plan consistent with the goals and objectives of the Land Use Element and the General Plan?
2. Is the proposed Plan compatible with the area and surrounding neighborhoods in terms of use, size and scale? Is the area suitable for high-density residential development?
3. Is the proposed Plan consistent with the City’s unique community identity and its historical image as a distinct suburban community? and satisfy requirements for overall design and neighborhood and area compatibility?

Recommendation:

1. Staff recommends that the Planning Commission consider the proposed Alvarado Specific Plan (“Plan”), the staff report with attachments, evidence on the record, and testimony received, and provide direction to staff to return with a resolution reflecting the Planning Commission’s findings to:
 - a. Determine that the Plan is compatible with the area, neighborhood, and the City’s unique community identity and that the Plan is consistent with the goals and objectives of the Land Use Element and General Plan, and the Urban Design Program, and recommend adoption thereof to the City Council; or
 - b. Determine that the Plan is not compatible with the area, neighborhood, and

the City's unique community identity and that the Plan is inconsistent with the goals and objectives of the Land Use Element or General Plan, and recommend denial of the application.

Environmental Review:

In compliance with the California Environmental Quality Act (CEQA), the City has prepared a Program Environmental Impact Report (PEIR) for the proposed project. The PEIR was circulated for a 45-day public review period from September 9, 2020, to October 26, 2020. The PEIR concluded that the project would not have an adverse impact on the environment due to mitigation measures which reduce potential impacts to below a level of significance.

BACKGROUND:

Project Site:

The Alvarado Specific Plan ("Plan") area encompasses an approximately 12-acre site along the south side of Alvarado Road generally between 70th Street on the west and Guava Avenue on the east in the western portion of the City. The site is relatively level with a slight topographical variation as it slopes downward from east to west to the degree of approximately 10 feet. The site is bound by the 70th Street Trolley Station to the west, the Green Line trolley corridor to the south, a car dealership to the east, and Alvarado Road and Interstate 8 (I-8) to the north. The site is developed and currently contains a recreational vehicle (RV) resort facility with paved access roadways, RV spaces, a clubhouse, a swimming pool, other ancillary buildings, and three billboards. The subject property has operated as a recreational vehicle campground since 1998. Prior to this change in use, the site was operated as a mobile home park since the 1950's when Interstate 8 (I-8) was constructed.

Alvarado Creek enters the site at the intersection of Alvarado Road on the east and continues southwesterly and westerly along the southern boundary of the western portion of the site until it enters an underground storm drainage facility. The Creek flows through a box culvert underneath a bridge on Alvarado Road and then a trapezoidal channel with concrete-lined banks and a natural channel bottom aside from the concrete aprons near the Alvarado Road overcrossing and at the western end of the site. Much of the channel supports vegetation including native and non-native species at varying vegetative cover, and water regularly flows through this section.



Three freeway-oriented billboard signs are located within the project site along the Alvarado Road frontage. One is located at the eastern boundary of the site and is a single-sided sign oriented for viewers traveling along eastbound I-8. The other two signs occur in the western portion of site and are double sided. The billboards signs are proposed to remain on-site. Overhead utility lines also cross over portions of the site that connect to 15 utility poles located throughout the site.

General Plan Designation and Zoning Classification

The City of La Mesa Zoning Ordinance, Title 24 of the La Mesa Municipal Code, serves as the primary implementation tool of the General Plan. Whereas the General Plan is a policy document and sets forth direction for development decisions, the Zoning Ordinance is a regulatory document that establishes specific standards for the use and development of all properties in the City. The Zoning Ordinance regulates development intensity using a variety of methods, such as specific regulations regarding the use of land; the minimum lot size for subdivisions; limitations on location, height, and bulk of buildings on lots; and other regulations such as off-street parking standards. According to state law, the Zoning Ordinance must be consistent with the General Plan. In addition to development regulations established by the City's base zones, several overlay zones have been applied to particular areas of the City where supplemental permitted use and development standards are merited.

The project site currently has a General Plan designation of Regional Serving Commercial and a Zoning designation of CM-F-D (Light Industrial and Commercial Service with Floodway and Urban Design Overlays). The Light Industrial and Commercial Service zone (CM) is applied in areas that are generally removed from residential uses such as along Alvarado Road. The CM zone is intended to include heavy commercial activity and light industrial services.

The Floodway Overlay Zone (Overlay Zone F) is intended for application in those areas of the City within floodways or water courses in which flood control structures and facilities are either required or planned to be installed or improved. The construction of buildings and structures within areas in Overlay Zone F are prohibited until adequate flood protection facilities are constructed or guaranteed to be constructed and temporary alternate arrangements are made to protect persons and property.

New development and major renovations or remodeling of property within the Urban Design Overlay Zone (Overlay Zone D) is subject to the requirements of the Urban Design Program and approval by the Design Review Board and City Council. This overlay zone is used to supplement the required land use regulations that are reviewed under the standard provisions of the Zoning Ordinance. Projects developed within Overlay Zone D are evaluated on their compliance with both the unique design criteria that pertain to the visually sensitive areas and the general development guidelines established by the Urban Design Program.

The project proposes a zoning amendment to establish the Plan as a zoning overlay for the Plan area. A zoning amendment requires a finding of consistency with the Land Use Element and the General Plan by the Planning Commission, whom provides a recommendation on the amendment to the City Council. A Planning Commission recommendation that an amendment is consistent with the Land Use Element and the General Plan is set for consideration by the City Council in a noticed public hearing. A Planning Commission recommendation that an amendment is inconsistent with the Land Use Element and the General Plan results in an automatic denial unless appealed to the City Council within five (5) days.

The proposed Plan is included as **Attachment A** of this report. **Attachment B** includes an updated and revised Chapter III and development and design standards. The final PEIR for the project is included as **Attachment C**.

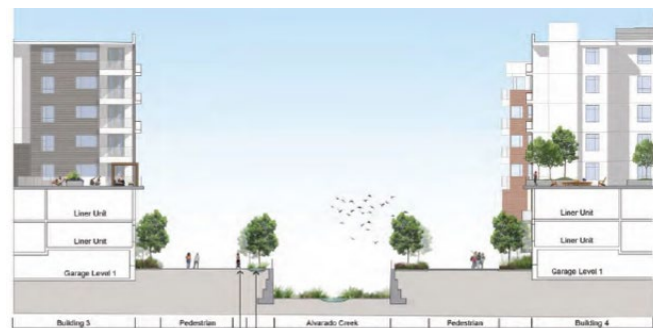
PROJECT DESCRIPTION:

The proposed Alvarado Specific Plan ("Plan") entails a master development plan for a phased

transit-oriented development and associated public improvements. The Plan would include four development parcels that would be constructed in two phases. Phase 1 includes the parcels (Parcels 1-3) west of the intersection of Alvarado Creek and Alvarado Road. Phase 2 includes the parcel (Parcel 4) east of the intersection of Alvarado Creek and Alvarado Road. Each parcel would be developed with a multi-family residential building, which may include ground-floor commercial uses.



Phase 1 would feature two multi-family residential buildings built on a podium deck over multi-level parking in the central portion of the site and a smaller-scale building in the western-most parcel. Phase 2 would include one building in the eastern portion of the site similar in size and scale to the two larger buildings constructed in Phase 1. The buildings would include up to five stories of residential units and one to three levels of parking. Each building would include a mix of housing types and sizes. In total, an estimated 850 to 950 residential units would be constructed at buildout. In addition to the residential uses, the project may include ground floor, resident-serving commercial uses. The project would also include improvements to the Alvarado Creek channel within the project site, improvements to Alvarado Road, relocation of utilities, and pedestrian connection to the 70th Street Trolley Station.



Under current zoning, multi-family residential units are not permitted and the project would not comply with the allowed uses, standards, and requirements established by the City of La Mesa Zoning Ordinance for the project site. The Plan is proposed to establish the planning goals, policies, and objectives, and design guidelines and development standards for the development of the site. Building design and site development of the project would be established through a form-based approach of the Plan, intended to guide design with text and diagrams to illustrate ultimate development of the site. Development on each parcel will require the approval of a Site Development Plan and Design Review application prior to construction. The Design Review application will be subject to ratification by the City Council.

DISCUSSION:

The General Plan is a policy document adopted by City Council Resolution. In order to implement its policies, other plans and programs must be adopted. A variety of these plans and programs have been used in La Mesa to implement Land Use Policy; including, but not limited to, Specific Plans, redevelopment project areas, etc. Specific Plans are used to establish a link between implementing policies of the General Plan and the individual development proposals in a defined area. The content of a Specific Plan must remain consistent with the General Plan, and will usually include an examination of current conditions, a forecast of future conditions, a list of goals and policies, needed public improvements, and a set of development regulations tailored to the unique characteristics and planning issues in an area.

A Specific Plan should 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 a Specific Plan provide clear regulation and guidance to current and future staff as well as to the property owner 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.

Staff review suggests that the Plan does not reflect the desired attributes of a Specific Plan and exhibits many inconsistencies with the objectives, goals, and policies of the General Plan. Staff provided direction to the applicant in two review letters (**Attachments D and E**) with the intent of ensuring that the Plan would be 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, and ensuring consistency with the General Plan. The applicant did not address the majority of the concerns presented in the review letters. The Plan in its current state would not function properly as a regulatory tool as discussed herein.

The proposed Plan contains extensive background discussion and support and rationale for the Plan. 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. A Specific Plan does not typically include lengthy discussions of background or support for its adoption or the processes that would be completed prior to adoption of the Plan, which are more suited for the staff reports and supporting materials presented to decision makers during the adoption process. The excessive background discussion and processing narrative would not provide guidance or serve a function in the implementation of the Plan.

The Plan states that only objective standards may be adopted and applied in compliance with state law. The Plan also states that future projects would be subject to a finding of substantial conformance with the Plan. A finding of substantial conformance relies on the discretion of decision makers, who decide based on their opinions. The plan also references being subject to the Urban Design Program, which establishes a subjective, discretionary process for consideration of projects. The Plan is internally inconsistent and contradictory in indicating both that subjective standards apply and that only objective standards may be applied.

Development and design standards initially requested of the applicant in May 2019 were provided to staff in June 2022 (**Attachment B**). The proposed objective design standards provide insufficient guidance for design of the project and describe design that is far less articulated and varied than shown in the illustrations in the Plan. A project with much less detail than shown could be found to be consistent with the proposed development standards and design guidelines. The Plan inaccurately portrays a level of architectural detail in the provided drawings compared to the

text to the extent that it could mislead decision makers and the public to expect future construction to be similar to what is shown.

The Plan states that the intent would be to enter into a Development Agreement with the City related to its implementation. However, the applicant stated in their letter dated December 29, 2021 (included as part of **Attachment F**) that they decided to discontinue pursuit of a Development Agreement.

Staff requested several times that the applicant perform community outreach to introduce the Plan to La Mesa residents and business owners. The applicant declined to do any outreach whatsoever. The only notification to the community was the legally required notification for the draft PEIR. The applicant has insisted that the project site has no significant adjacency to other neighborhoods and therefore cannot possibly be the subject of community interest.

As noted in the staff reviews of the Plan, there are many other concerns with the document in its current state. These include exhibits with text or graphics too small to be readily legible, poor organization, extraneous and/or repetitive text, and lack of needed detail. Together these issues make the Plan a poor regulatory tool for guidance of future development for the property owner, decision makers, and the residents of the City. The applicant has declined to work with City staff to make the document viable and have consistently demonstrated the expectation that the Plan be accepted as they propose, without input from City staff or community and without consideration of any modifications or adjustments to ensure the Plan works for the City.

General Plan Consistency:

The proposed Plan does address many requirements and is consistent with many General Plan policies relating to provision of housing and transit-oriented development. However, staff is concerned that many other important General Plan policies are not adequately addressed or supportive of the project as discussed below.

- Policy LU-1.1.1: The City shall exercise its police powers related to land use in the best interest of the City to protect the general health, safety, and welfare of all citizen.

The Planning Commission should consider whether the Plan and the development therein proposed is in the best interest of the City.

- Policy LU-2.1.5: Implement the Mixed-Use Overlay Zone by promoting the rehabilitation of properties and new development that fits into the context of the existing neighborhoods while meeting the City's Urban Design Objectives for infill development.

The City's Urban Design Objectives are established in the Land Use & Urban Design Element of the General Plan, and elucidated through the Urban Design Program. The three large buildings would be among the largest in the City of La Mesa. are proposed of similar size and massing with no transitioning from the street or adjacent development, and are divergent from the existing neighborhood character. The Planning Commission should consider the Plan's consistency with the City's Urban Design Objectives of the Land Use & Urban Design Element and as expressed through the Urban Design Program. The General Plan's Urban Design Objectives are addressed and analysis of the Plan in relation to the Urban Design Program is provided below.

- Policy LU-2.2.1: Create a superior living environment for multi-family dwellings.

The Plan would site all of the proposed units within 500 feet of I-8, and between I-8 and the trolley tracks. CARB recommends that housing units not be sited within 500 feet of a freeway due to air pollution and particulate matter risks. The exterior sound environment is heavily impacted by noise created by traffic on I-8 and by the trolley. The Planning Commission should consider whether these factors reflect consistency with creating a superior living environment for multi-family dwellings.

- Policy LU-4.1.1: Opportunities for affordable housing should exist in all residential areas to support the policies and programs of the City's Housing Element.

The Plan does not provide any affordable housing.

- Policy LU-4.3.1: Promote citizen involvement and partnerships between residents, community organizations, and agencies, such as school districts.

Community involvement is an important and integral part of the planning process. During processing of the Plan, the applicant declined to perform any outreach to the community about the proposed development.

- Policy LU-6.1.4: Provide incentives for Transit-Oriented and Mixed-Use development, such as a parking reduction consistent with Regional Standards, for more intense development and higher density residential uses along major transportation corridors or in areas accessible to transit use.

Although the Plan is identified as a Transit-Oriented and Mixed-Use development, no specific details are provided or outlined relative to transit oriented incentives or ridership. Necessary detail to determine how incentives will be applied (i.e. reduction in rent for transit ridership, discount transit passes, etc.) is not provided. There is only general discussion relative to transit discount programs and a definition and brief discussion regarding "unbundled parking" as a transit-oriented strategy.

- Policy UD-1.1.1: The visual quality and continuity of the community will be enhanced through consistent circulation patterns, definition of community edges and boundaries, distinct gateways and nodes, and removal of visually disruptive elements.

The Planning Commission should consider whether or not the development proposed in the Plan enhances the visual quality and continuity of the community. The large, clustered buildings would be substantially larger than any development in the vicinity, and would visually dominate the area. The project site sits at the western gateway to the City and would largely define the character of La Mesa to travelers on I-8. The proposed Plan and massing of the large buildings could be construed as adding a visually disruptive element that does not enhance the visual quality and continuity of the community.

- Policy UD-1.2.2: Commercial signage should improve rather than detract from the quality of the surrounding neighborhood. New billboard structures are prohibited.

The proposed Plan would retain the multiple billboards on the project site. Illustrations in the Plan show the billboards in relation to the proposed buildings. The Planning

Commission should consider whether the billboards are compatible with the Plan and the proposed development, and whether they improve or detract from the quality of the surrounding neighborhood.

- Policy UD-2.1.1: Give careful attention to Urban Design Standards related to building scale, architectural materials, landscaping, and other elements to emphasize attractive building and site design in new developments and redevelopments.

The City's Urban Design Standards were established by the City Council as the Urban Design Program, which is intended to ensure that development is consistent with the City's commitment to design excellence and is compatible with the surrounding uses and neighborhoods, and the community as whole. The Planning Commission should consider the Plan's consistency with the City's Urban Design Standards as expressed through the Urban Design Program. Analysis of the Plan in relation to the Urban Design Program is provided below.

- Policy UD-2.1.4: Building setbacks and step-backs should be evaluated to maintain La Mesa's pedestrian emphasis and character.

Proposed building scale and special form are not consistent with surroundings and existing development or in scale with existing neighborhoods nearby. Illustrations and standards within the Plan identify buildings up to eight stories in height and in excess of 80-feet, thus proposing buildings amongst the largest in the City of La Mesa. The buildings rise to their full height in close proximity to pedestrian thoroughways with no or little step-back. The Planning Commission should consider whether the Plan in this respect maintains the City's pedestrian emphasis and character.

Urban Design Program Consistency:

The City's Urban Design Program (UDP) states that the City of La Mesa enjoys a beautiful natural setting. As such, the City of La Mesa has had a long-standing commitment to excellence of design. This commitment concerns not only the appearance of specific buildings, but also to the community as a whole. In order to assure the future quality of the City's appearance and to enhance the beauty of La Mesa, the City Council decided to strengthen the community's commitment to design excellence through the establishment of various land use and design policies within the Urban Design Program. In addition to the established policies, the UDP also identifies a series of questions in which proposed projects should meet certain criteria for the context of the development. Below are a some, but not all, of the UDP's policies and questions:

- Will the project improve the quality of life and special form of La Mesa?
- Will the project fit in La Mesa on an urban scale as well as the proposed site?
- Will the project be a good neighbor?
- Does the project attempt to incorporate the basic principles of urban design?
- Is there an overall La Mesa design theme?
- Are new proposals or remodeling required to match surrounding existing developments?

Staff has concerns with the Plan's consistency with the policies of the UDP as described below.

- Enhance the visual quality and continuity of the community through consistent circulation patterns, definition of community edges and boundaries, distinct gateways and nodes, and removal of visually disruptive elements.

The Planning Commission should consider whether or not the development proposed in the Plan enhances the visual quality and continuity of the community. The large, clustered buildings would be a drastic change to the site recognized in the UDP, would be substantially larger than any development in the vicinity, and would visually dominate the area. The project site sits at the western gateway to the City and would largely define the character of La Mesa to travelers on I-8. The proposed Plan and massing of the large buildings could be construed as adding a visually disruptive element that does not enhance the visual quality and continuity of the community.

- Ensure high quality community design for new construction and renovation, and conservation of historically and architecturally important districts, groupings, streetscapes, and structures.

The project proposes a form-based approach, however insufficient detail, standards and graphics to define the project, site, buildings, and products to be used have been incorporated to ensure that a high-quality design will be achieved.

- Continue the recognition of the hills and vegetation as dominant physical features and elements of the city.

The proposed building height and scale challenges the surrounding topography as a dominant feature. From all directions, the buildings will obscure views of nearby and distant hills and skylines.

- Provide programs and plans that give direction and guidelines for the preparation, review, and establishment of specific design areas within the community.

The UDP encourages specific guidelines for specific areas. As a form-based Specific Plan, specific guidelines are not definitive. As previously mentioned, very little detail and graphics have been incorporated to ensure high quality design will be the finished product.

- Views along hilltops should be preserved. The visual skyline of hills generally should not be broken by structures.

From all directions, the buildings will obscure views of nearby and distant hills and skylines

- When new construction is proposed near existing structures, the new work should fit with the old.

Proposed building scale and special form are not consistent with surroundings and existing development. The Specific Plan illustrates and describes buildings up to eight stories in height and in excess of 80-feet which is out of scale within the immediate area.

- All building design should reflect a sense of human scale and proportion. The City of La Mesa is a relatively small community in relation to the metropolitan area and relies on the scale of the residential neighborhoods and the commercial areas for a significant portion of the image. Careful attention should be given to new development so that this image is promoted.

The proposed buildings would be among the largest in the City of La Mesa. The project is not in scale with existing neighborhoods nearby. The Plan promotes a significantly different image than what currently exists.

- All proposed buildings or structures should be compatible with the neighborhood character.

The proposed project is a divergent from the neighborhood character. The proposed buildings are larger and bulkier in size and scale compared to buildings in the area, and the proposed residential use is inconsistent with the commercial nature of the area.

- Projects containing many buildings generally should provide variety in building size and massing. A transition from low buildings on street frontages to larger and taller structures on the interior of the properties is generally encouraged.

Three of the four large buildings are proposed of similar size and massing with little to no transitioning from the street.

- In multiple-family residential developments, individual dwelling units generally should be architecturally expressed.

This is not expressed within the Plan as proposed. Rather, there is a deferral in design and theme to later application submittals.

The Plan in its current form has inconsistencies with General Plan policies and Urban Design Objectives and Standards as expressed through the recommendations and guidelines of the Urban Design Program. The Plan does not present a concise, efficient, regulatory document of the policies, rules, and regulations applicable to the Plan area and would not provide the clear regulation and guidance desired for current and future staff, as well as the current and any future property owners, for development of the property and construction of the project.

Public Notice

Notification of the August 17, 2022, public hearing to consider the project was published in the San Diego Daily Transcript on August 5, 2022 and mailed to all property owners within 1,000 feet of the subject property and interested parties on August 5, 2022.

Environmental Review

In compliance with the California Environmental Quality Act (CEQA), the City has prepared an Environmental Impact Report (EIR) for the proposed project. The EIR was circulated for a 45-day public review period from September 9, 2020, to October 26, 2020.

The Program EIR evaluated the potential project-related environmental impacts: aesthetics, agriculture resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/circulation, tribal cultural resources, utilities and service systems, wildfire, and mandatory findings of significance. Of the twenty potential impacts evaluated, the PEIR identified four environmental factors that are “potentially significant”: Biological Resources, Cultural and Tribal Cultural Resources, Hazards and Hazardous Materials, and Paleontological Resources. Mitigation measures have been provided and included in the Mitigation Monitoring and Reporting Program for the four potentially significant impacts, thereby reducing the project impacts on the environment to a “less-than-significant” level. The evaluations, impacts, and mitigation measures are described in detail in the PEIR and is provided as **Attachment C**.

RECOMMENDATION:

1. Staff recommends that the Planning Commission consider the proposed Alvarado Specific Plan (“Plan”), the staff report with attachments, evidence on the record, and testimony received, and provide direction to staff to return with a resolution reflecting the Planning Commission’s findings to:
 - a. Determine that the Plan is compatible with the area, neighborhood, and the City’s unique community identity and that the Plan is consistent with the goals and objectives of the Land Use Element and General Plan, and the Urban Design Program, and recommend adoption thereof to the City Council; or
 - b. Determine that the Plan is not compatible with the area, neighborhood, and the City’s unique community identity and that the Plan is inconsistent with the goals and objectives of the Land Use Element or General Plan, and recommend denial of the application.

Submitted by:



Kerry Kusiak
Director of Community Development

Attachments:

- A. Alvarado Specific Plan
- B. Alvarado Specific Plan revised Chapter III and development and design standards
- C. Final Program Environmental Impact Report
- D. Staff review letter dated October 18, 2019
- E. Staff review letter dated August 10, 2020
- F. Correspondence from the applicant
- G. Public comments received
- H. Conceptual grading plans