



THE CITY OF SAN DIEGO

## REPORT TO THE PLANNING COMMISSION

**DATE ISSUED:** October 2, 2008 **REPORT NO. PC-08-084**

**ATTENTION:** Planning Commission, Agenda of October 9, 2008

**SUBJECT:** ARCHSTONE MISSION GORGE PROJECT - PROJECT NO. 142570  
PROCESS FIVE

**REFERENCE:** Planning Commission Resolution No. 4330-PC (Attachment 12).

**OWNER/  
APPLICANT:** ASN Mission Gorge LLC, a Delaware Limited Liability Company

### SUMMARY

**Issue(s):** Should the Planning Commission recommend City Council approval to demolish an existing 119 unit mobile home park and construct a 444 unit residential rental condominium complex on a 10.2-acre site located at 6850 Mission Gorge Road in the Navajo Community Planning area?

### Staff Recommendation:

1. Recommend the City Council **CERTIFY** Environmental Impact Report No. 142570, **ADOPT** the Mitigation Monitoring and Reporting Program, and **ADOPT** the Findings and Statement of Overriding Considerations; and
2. Recommend the City Council **ADOPT** amendments to the General Plan and the Navajo Community Plan No. 498721; and
3. Recommend the City Council **ADOPT** the Rezoning Ordinance No. 586364; and
4. Recommend the City Council **APPROVE** Vesting Tentative Map No. 498719, Site Development Permit No. 498703, and Easement Abandonment No. 589137.

**Community Planning Group Recommendation:** On September 15, 2008, the Navajo Community Planners Inc. voted 9-3-0 to recommend denial of the project as presented (Attachment 31).

**Environmental Review:** Environmental Impact Report No. 142570 has been prepared for the project in accordance with State of California Environmental Quality Act (CEQA) Guidelines. A Mitigation Monitoring and Reporting Program has been prepared and will be implemented which will reduce, below a level of significance, some of the potential impacts identified in the environmental review process. The applicant has also provided Draft Candidate Finding's and Statement of Overriding Considerations to allow the decision maker to adopt the project with a significant and unmitigated impact for traffic/circulation.

**Fiscal Impact Statement:** None with this action. All costs associated with the processing of this project are paid from a deposit account maintained by the applicant.

**Code Enforcement Impact:** None with this action.

**Housing Impact Statement:** The project site is located in the Navajo Community Plan area, and is designated as Multi-Family Residential, 30 to 43 dwelling units acre. The proposed project site, occupying 10.2-acres, could accommodate 307 to 444 dwelling units based on the community plan.

The proposed project would conform to the Inclusionary Housing Ordinance and Council Policy 600-27(A) criteria for the Affordable/In-Fill Housing Expedite Program by setting aside at least 10 percent of the total rental condominium units on-site for households with an income at or below 65 percent area median income (AMI). However, the applicant is proposing an additional 10 percent of the total rental condominium units on-site for moderate income households (rents at 110 percent AMI and income up to 120 percent) for a total of 20 percent on-site affordable rental condominium units affordable for 55 years.

An existing mobile home park (Mission Valley Village) on the property would be closed. All of the qualifying tenants of the park shall be provided compensation and relocation assistance as outlined in the Relocation Impact Report prepared in conformance with California Government Code (Section 65863.7), California Mobile Home Residency Law (Civil Code Section 798.55), the City's Mobile Home Park Discontinuance and Tenant Relocation Regulations (Municipal Code, Section 143.0610), and the City's Housing Commission Relocation Standards and Procedures.

## **BACKGROUND**

The proposed project site is located at 6850 Mission Gorge Road (Attachment 1), at the intersection of Mission Gorge Road and Greenbrier Avenue, and southwest of Old Cliffs Road (Attachment 2). The 10.2-acre site is in the RM-3-7 Zone (Attachment 3) within the Navajo

Community Planning area (Attachment 4), Community Plan Implementation Overlay Zone (CPIOZ) Area B, Mobile Home Park Overlay Zone (MHPOZ), and the Federal Aviation Administration (FAA) Part 77 Noticing Area for Montgomery Field. The community plan designates the site as Multi-Family Residential. This residential element of the Navajo Community Plan (NCP) contains five allowable dwelling unit densities (Very low, Low, Low-medium, Medium, and Medium-high). The project is designated for Medium-high density residential (30-43 dwelling units per acre), which comprises the underlying zoning designation of RM-3-7 that allows one dwelling unit for each 1,000 square feet of lot area. The proposed project site, occupying 10.2-acres, could accommodate 445 dwelling units based on the underlying zone and 307 to 444 dwelling units based on the community plan. The project site is not located within the boundaries of the Grantville Redevelopment Project Area (Attachment 5).

The project site is a trapezoid shaped lot with frontage on Mission Gorge Road that is currently developed with a mobile home park. On July 22, 1959, Conditional Use Permit No. 2632 was approved for the construction and operation of a 108-space mobile home park (Attachment 6). The property was rezoned from R-4 (residential-one dwelling unit per 400 square feet of lot area) to R-3 (residential-one dwelling unit per 1,000 square feet of lot area). The R-3 zoning designation was re-titled to R-1000, and in 2000 re-titled RM-3-7. On August 23, 1968, Conditional Use Permit No. 181-PC was approved for an additional 12-spaces to the existing mobile home park (Attachment 7). On July 12, 1982, the City Council incorporated the existing mobile home park (Mission Valley Village) into the MHPOZ pursuant to Ordinance No. O-15774 (Attachment 8).

The project site is surrounded by urban development in the form of single-family residential to the east and southeast, multi-family to the south, and commercial-industrial and multi-family to the north. The property along the western property line is developed with a golf course owned by the US Navy (Admiral Baker Golf Course) and the San Diego River. The community plan designates the property to the east and southeast as Single-Family Residential, Multi-Family Residential to the south, Industrial to the north, and Park to the west. The western portion of the property is located within the 100- year floodplain and covers approximately 2.26-acres of the site.

## **DISCUSSION**

### **Project Description:**

The project proposes to demolish an existing 119-space mobile home park and construct a 444-unit rental condominium complex of two-, three-, and four-story buildings, leasing facility, fitness facility, and club room that would wrap around a 5.5-level parking structure on a 10.2-acre site (Attachment 10- Project Plans and Photo Simulations). The project will contain 203 one-bedroom units (approximately 45.7-percent of the total number of units), 211 two-bedroom units (approximately 47.5-percent of the total number of units), and 30 three-bedroom units (approximately 6.8-percent of the total number of units).

Unit Type	Size (Sq. Ft.)	Quantity	%	Total (Sq. Ft.)
1A	723	124	27.9%	89,652
1B	726	49	11.0%	35,574
1D	681	16	3.6%	10,896
1E	837	12	2.7%	10,044
2C-mod	760	2	0.5%	1,520
2A	1,037	48	10.8%	49,776
2C	1,092	117	26.4%	127,764
2D	1,033	35	7.9%	36,155
2E	1,043	2	0.5%	2,086
TH-2F	1,246	9	2.0%	11,214
3A	1,374	30	6.8%	41,220

The proposed architectural style of the project can be characterized as a modern interpretation of Irving Gill architecture, which is known for its precise expression of simple and elegant forms. Traditional hipped roofs would be infused with modern forms and strategically positioned to create a sense of movement, organization, and order to the building elevations. The mass of the two-, three-, and four-story buildings would be further articulated vertically and horizontally with the use of arches, roof overhangs, canopies, and trellis. The planned colors of the building would include a range of earth tones, with color-blocking techniques used to break up the building mass.

As a component of the application, the proposed project would conform to the Inclusionary Housing Ordinance and Council Policy 600-27(A) criteria for the Affordable/In-Fill Housing Expedite Program by setting aside at least 10 percent of the total rental condominium units on-site for households with an income at or below 65 percent area median income (AMI). However, the applicant is proposing an additional 10 percent of the total rental condominium units on-site for moderate income households for a total of 20 percent on-site affordable rental condominium units.

Several sustainable building concepts and practices have been incorporated into the design of the proposed project. These design elements serve to reduce or avoid potential effects associated with water and energy consumption, consumption of nonrenewable or slowly-renewing resources, and urban runoff. While the proposed project is not seeking a US Green Building Council's Leadership in Energy and Environmental Design (LEED) certification, it would include several of the siting and design prerequisites and credits awarded under the LEED rating system. These design elements include Smart Location and Linkage, Compact Development, Proximity to Water and Wastewater Infrastructure, Diversity and Affordability of Housing, Bicycle Parking and Network, Reduced Parking Footprint, Access to Outdoor and Active Spaces, Construction Activity Pollution and Waste Prevention, Comprehensive Waste Management, Energy Efficiency in Building, Decreased Reliance on Fossil Fuels, Reduced Water Use, and Heat Island Reduction (LEED Design Elements - Attachment 11).

Development of the proposed project requires the approval of a Process 4 Site Development Permit (SDP) for deviations from the applicable development regulations, for development on a premise containing environmentally sensitive lands (i.e. floodplains), for development within the CPIOZ Area B, and for discontinuance of the mobile home park within the MHPOZ; a Process 4 Vesting Tentative Map (VTM) for condominium development; Process 5 for Amendments to the General Plan and NCP, and a Rezone to remove the site from the MHPOZ; a Process 5 Easement Abandonment to vacate the existing easements.

**Community Plan Amendment Initiation:**

As outlined above, the project site is designated for Medium-high Density Residential development (30-43 dwelling units per acre) in the NCP. The project proposes a 444-unit rental condominium complex on the 10.2-acre site, resulting in a density of 43.44. In accordance with the rounding rules of the General Plan, the density of the proposed project would be 43 dwelling units per acre. The proposed project falls within that density range of the NCP. The project site is overlain by the MHPOZ and is currently developed with a mobile home park.

On October 18, 2007, the Planning Commission held a public hearing to consider the initiation of an amendment to the General Plan and the NCP to remove the MHPOZ from an existing mobile home park (Mission Valley Village) located at 6850 Mission Gorge Road. The Planning Commission initiated the request pursuant to Resolution No. 4330-PC and included 16 items to be considered as part of the community plan amendment analysis as identified within the resolution (Attachment 12). The analysis of the 16 items has been included as a separate attachment (Attachment 13).

**General Plan/Community Plan Analysis:**

As outlined above, the project site is designated for medium-high density residential development (30-43 dwelling units per acre) by the NCP. At 43 dwelling units per acre, the proposed project falls within this density range. The NCP also designates the project site as a Mobile Home Park. A community plan amendment is proposed to remove the Mobile Home Park designation and develop according to the underlying medium-high density designation.

In order to ensure quality site design along Mission Gorge Road, the NCP recommends that the Type B Community Plan Implementation Overlay Zone (CPIOZ) be applied to the residential properties generally located between Old Cliffs road and Zion Avenue and abutting Mission Gorge Road. This area is identified as Area 1 on the Grantville/Mission Gorge Road Planning Area Map included in Attachment 14. Type B CPIOZ has been applied to this area because the development regulations of the underlying zone will not implement the specific objectives and proposals of the community plan. This application will ensure that these objectives can be achieved. The specific issues to be addressed through CPIOZ include Architectural Design, Building Heights, Roof Treatment, Setbacks, Landscaping and Noise Walls, Traffic and Access, Parking, and Streetscape Improvements. A detailed analysis of how the project achieves these objectives has been provided in Attachment 14.

A comprehensive update of the City's General Plan was recently adopted on March 10, 2008, and was based on a new planning strategy for the City developed in the 2002 Strategic Framework Element. Known as the City of Villages strategy, the General Plan aims to redirect development away from undeveloped lands into already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development within areas that have available public infrastructure.

An updated version of the Strategic Framework comprises the introductory chapter of the new General Plan, followed by 10 elements including: Land Use & Community Planning, Mobility, Urban Design, Economic Prosperity, Public Facilities, Services & Safety, Recreation, Conservation, Noise, and Historic Preservation. The Housing Element is separate companion document which serves as a comprehensive plan to address the City's housing needs. Provided below is an analysis of how the project is compatible with the City's recently updated General Plan and Navajo Community Plan.

The Land Use & Community Planning Element contains policy direction for implementing the City of Villages strategy, provides citywide land use policies and designations, and establishes community plans as integral components of the General Plan. The Element includes goals for balanced communities, equitable development, and environmental justice. A goal is to have diverse and balanced communities with a variety of housing. The Element relies on community plans for site-specific land use and density designations and recommendations.

The project site is designated as Multi Family Residential, 30-43 dwelling units per acre, on the Navajo Community Plan Land Use Map. Additionally, the project site is within the Mobile Home Park Overlay Zone. According to the Community Plan, the overlay zone provides protection for the residents of the mobile home parks against development of the site for other uses and ensures the availability of varied housing types to create a more balanced community. A proposal of the Community Plan states: "To provide a more complete variety of housing types, the Mobile Home Park Overlay Zone should be retained on the existing mobile home park sites".

The proposed project would result in the loss of 119 mobile home spaces. Although the mobile home park does not provide any designated affordable housing units, the current space rent and/or the price of existing coaches may fall within affordable levels. By developing the property as a 444 unit multi-family apartment complex with 20 percent of the units offered as affordable, the project will help meet the goals of both the General Plan and NCP to ensure diverse and balanced neighborhoods with housing available for households of all income levels.

The Mobility Element strives to improve mobility through development of a balanced transportation system that addresses walking, bicycling, transit, and roadways in a manner that strengthens the City of Villages land use vision. Goals of the Mobility Element include creating walkable communities with pedestrian-friendly street, site and building design.

The proposed project will develop walkable, tree-lined streets, both internally and at the property boundaries. Internal streets and pathways will be landscaped and provide easy access to all portions of the site. A trail along the western boundary of the project site will allow residents to enjoy views of the Admiral Baker Golf Course and San Diego River. This river trail is to be continued to the north connecting to the proposed redevelopment of properties within Subarea B of the Grantville Redevelopment area. The project proposes pedestrian and vehicular linkages to the property just north of the project site when that property is redeveloped. The project will be lushly landscaped, with a street tree plan that is consistent with existing street and median landscaping. This consistency will facilitate a cohesive neighborhood character and contribute to overall community quality.

The Urban Design Element establishes a set of design principles from which future physical design decisions can be based. Policies call for respecting San Diego's natural topography and distinctive neighborhoods; guiding the development of walkable, transit-oriented communities; providing distinctive public places; and implementing public art.

The project site is a completely developed site that is surrounded by urban development on three sides. Its design will create an aesthetic edge along Mission Gorge Road, a heavily traveled roadway connecting the Navajo community with Santee to the north and central areas of San Diego to the south. The Landscape Development Plan reflects not only the natural elements that have influenced development of San Diego, but also its historical, geological and agricultural heritage by providing six themed courtyards for both active and passive open space use by the residents of the project. Additionally, the project will address and enhance the San Diego River, showcasing this natural feature of San Diego as a prime project amenity by providing a walking/biking trail and seating areas looking out over the river and Admiral Baker Golf Course. The project also includes landscaped internal pathways and non-contiguous sidewalks along its frontage to help encourage walkability.

As mentioned above, specific issues to be addressed for residential development through CPIOZ include Architectural Design, Building Heights, Roof Treatment, Setbacks, Landscaping and Noise Walls, Traffic and Access, Parking, and Streetscape Improvements. In order to accommodate the proposed number of units and achieve the design objectives of the CPIOZ, the project is requesting deviations to building height, retaining wall height, side yard setback, vehicular use planting area and floor area. A detailed analysis of how the project achieves these objectives has been provided in Attachment 14.

The Economic Prosperity Element includes policies aimed at supporting an innovative and sustainable local economy, and achieving a rising standard of living for San Diego's workforce.

The project would provide a mixture of market rate and affordable housing in an area within close proximity to both commercial and industrial employment uses. The site is also located between Subareas A and B of the Grantville Redevelopment which are both undergoing significant planning efforts that could result in the provision of additional employment opportunities.

The Public Facilities, Services and Safety Element includes policies on the prioritization and provision of public facilities and services, evaluation of new growth, guidelines for implementing a financing strategy, and guidelines for the provision of specific facilities. Policies call for new growth to pay its fair share, with the City and community-at-large responsible for remedying existing facilities deficiencies.

Project impacts to park and recreation services would be less than significant and payment of the required Development Impact Fees in accordance with the Public Facilities Financing Plan for the Navajo Community would offset the project's incremental impacts to population based park requirements. Impacts to schools would be less than significant and payment of school fees in accordance with SB 50 would offset the project's incremental impacts to local schools. No new fire, police or library facilities would be required as a result of the proposed project.

The Recreation Element establishes a population-based park standard of 2.8 acres of population-based parks to be provided for every 1,000 residents; seeks to acquire, develop, operate/maintain, increase and enhance public recreation opportunities and facilities throughout the City; recognizes that park facilities should take a variety of forms in response to the specific needs and desires of the residents served; and while the City's primary goal is to obtain land for park and recreation facilities, alternative methods of providing recreation facilities need to be available.

The proposed project would result in an increase in the number of residential units and would place additional demand on park and recreation services. Based on the General Plan guidelines, a total requirement of 2.25 useable acres of public parkland would be required for the proposed project. Since no public population-based park acreage is proposed as part of the project, the applicant will pay a per-unit Development Impact Fee at the time of building permit issuance to support the provision of park and recreation facilities for the community.

Although no public population-based park acreage is proposed, on-site recreational uses in the form of seven open space areas for active and passive uses are provided as well as provision of a public pedestrian and biking trail along the western boundary with seating and overlook areas towards Admiral Baker Golf Course and the San Diego River.

The Conservation Element calls for the City to be a model for sustainable development, to address climate change impacts, and to preserve quality of life in San Diego. Includes policies to: reduce the City's carbon footprint; promote sustainable development; promote clean technology industries; conserve natural resources; protect unique landforms; preserve and manage open space and canyon systems, beaches and watercourses; and prevent and reduce pollution. Sustainable conservation practices will help ensure that future generations will be able to meet their needs and enjoy a high quality environment.

The proposed project addresses the San Diego River in its site design and is compatible with the San Diego River Park Draft Master Plan. The Draft Master Plan requires a 25-foot path corridor along the San Diego River, and a preferred 100-foot water quality buffer along the river. The project proposes a 26-foot river path corridor. Within this corridor, a 10-foot wide multi-purpose path will be provided. Relative to the water quality buffer, the San Diego River occurs adjacent



to a small portion of the project site. The 100-foot water quality buffer occurs off-site westerly of the project's western border.

The project is also consistent with the Draft Master Plan's Path and Trail Design guidelines. To aid in pedestrian connectivity and to embrace the San Diego River as a project amenity, the project proposes a public multi-use path along the southern, northern, and western boundaries of the property. This path is consistent with the San Diego River Park Master Plan's multi-use path designation. The 10-foot wide path will allow for pedestrian and bicycle travel around the project, connecting to the Bradley-Garver site to the north and Mission Gorge Road on the east, and providing for a future pedestrian connection to the existing condominiums to the south. Park benches and pop-outs for overlooks will be provided along the public trail with trash recycling receptacles.

As mentioned previously in this report, several sustainable building concepts and practices have been incorporated in the design of the proposed project which serve to reduce or avoid potential effects associated with water and energy consumption, consumption of nonrenewable or slowly-renewing resources, and urban runoff. These design elements include Smart Location and Linkage, Compact Development, Proximity to Water and Wastewater Infrastructure, Diversity and Affordability of Housing, Bicycle Parking and Network, Reduced Parking Footprint, Access to Outdoor and Active Spaces, Construction Activity Pollution and Waste Prevention, Comprehensive Waste Management, Energy Efficiency in Building, Decreased Reliance on Fossil Fuels, Reduced Water Use, and Heat Island Reduction. (LEED Design Elements - Attachment 11

The Noise Element contains policies addressing compatible land uses and the incorporation of noise abatement measures for new uses to protect people from living and working in an excessive noise environment. It includes a matrix that identifies compatible, conditionally compatible, and incompatible land uses by noise decibel level.

As discussed in section 4.6 of the project's Environmental Impact Report, exterior noise levels are not projected to exceed 65 decibels at the recreation/pool area or the courtyards included as project open space. Thus, residents would not be exposed to noise levels in excess of the significance criteria for exterior useable areas. However, interior noise levels could exceed 45 decibels for buildings on the eastern half of the project site due to its adjacency to Mission Gorge Road and could be considered significant without mitigation. As such, mitigation is required for this area to ensure interior noise levels do not exceed 45 decibels.

The Historic Preservation Element strives to guide the preservation, protection, restoration and rehabilitation of historical and cultural resources so that a clear sense of how the City gained its present form and substance can be maintained.

As part of the environmental analysis, a records search and field survey identified no prehistoric or historical cultural material on the project site. The project site has been heavily impacted by previous grading and terracing of the natural landform to accommodate the mobile home park in 1959. While the western half of the project site has also been heavily disturbed by grading for

the existing mobile home park, it remains in a more natural state than the eastern half of the project site. Due to the location of the project site within San Diego River valley where known prehistoric and historic resources exist, there is a potential for subsurface cultural resources to exist in the western portion of the project site. Because of the possibility of existence of subsurface cultural resources, a qualified archaeological monitor and Native American monitor shall be present during construction in the western portion of the project site.

The Housing Element serves as a comprehensive plan with specific measurable goals, policies, and programs to address the City's critical housing needs. The Housing Element was adopted by the City Council under separate cover from the rest of the General Plan on December 5, 2006.

The Housing Element has five goals: 1) provision of sufficient housing supply for all income groups, 2) maintain and upgrade the quality and safety of affordable housing stock, 3) minimizing governmental constraints while retaining a quality review process and consumer protection, 4) providing affordable housing opportunities to renters and low/mod homebuyers, and 5) facilitate compliance with applicable federal, state & local laws

State law lists mobile homes, not mobile home parks (MHP's), as an example of a category of housing type to consider when making provision for all economic segments of the population, along with rental housing, factory-built housing, emergency shelters, etc. Mobile home parks have in the past provided affordable housing units both for rent and for sale. In San Diego, mobile home parks are regulated through the Mobile Home Park Overlay Zone. High land costs and lack of vacant land now make it infeasible to construct new mobile home parks in San Diego and pressure to convert existing mobile home parks to more intensive uses has increased in recent years as remaining residential land can house more people and provide more affordable units if developed with multifamily housing.

The proposed project would result in the loss of 119 mobile home spaces of which approximately 85 are occupied. Although the mobile home park does not provide any designated affordable housing units, the current space rent and/or the price of existing mobile homes may fall within affordable levels. By developing the property as a 444 unit multi-family apartment complex and providing 20 percent of the units as affordable (89 units), the project will help maintain on-site affordability and meet the goals of the Housing Element and NCP to ensure diverse and balanced neighborhoods with housing available for households of all income levels.

### **Project-Related Issues:**

Mobile Home Park Overlay Zone (MHPOZ) - The project site is overlain by the MHPOZ and is subject to the requirements of the LDC Chapter 13, Article 2, Division 7, Sections 132.0701 through 132.0705. The purpose of the MHPOZ is to provide adequate sites for mobile homes consistent with the City's goal of accommodating alternative housing types. The MHPOZ was intended as a process that guarantees an open hearing and discussion of the policy issues as they relate to the discontinuance of the overlay zone on each property, and to provide supplemental regulations for the discontinuance of the mobile home parks and the relocation of the mobile home park tenants. The permitted uses within the MHPOZ includes mobile homes intended for

use as a single-unit dwelling and limited accessory uses such as recreation buildings, game courts, swimming pools, and other similar facilities intended only for the use of the tenants of the mobile home park and their guests.

There are currently 260 mobile home parks within San Diego County, which includes the existing mobile home park (Mission Valley Village) located at 6850 Mission Gorge Road, and the Cliffs Mobile Home Park which is located approximately 0.35 miles from the project site. There are approximately 34,975 mobile home spaces contained within these mobile home parks and there are approximately 152 available mobile home spaces, and approximately 575 mobile homes for sale. There are currently 30 mobile home parks within the City of San Diego (includes the Mission Valley Village) containing approximately 4,162 mobile home spaces.

The project proposes the discontinuance of the existing mobile home park for the development of the multi-family residential development. The California Government Code (Section 65863.7) and the California Mobile Home Residency Law (Civil Code Section 798.55) together establish a comprehensive plan regulating the procedures, notice provision and mitigation measures required to close a mobile home park in California. Government Code Section 65863.7(e) specifies and limits the nature on mitigation measures that can be required by local agencies as a condition of approving a park closure (Attachment 15 - Government and Civil Codes). The purpose of the City's Mobile Home Park Discontinuance and Tenant Relocation Regulations (Section 143.0610 of the LDC) is to set forth procedures for the conversion of an existing mobile home park or spaces to another use (Attachment 16). These regulations are intended to benefit the general public by minimizing the adverse impact on the housing supply and on the displaced persons by providing certain rights and benefits to the tenants and by requiring tenant relocation assistance whenever an existing mobile home park is converted to another use.

In accordance with the regulations and the City's Housing Commission Relocation Standards and Procedures, the project applicant is following the established process for the discontinuance of the existing mobile home park. A Mobile Home Park Relocation Impact Report was prepared and reviewed by the City's Housing Commission for conformance with California Government Code, California Mobile Home Residency Law, the City's Mobile Home Park Discontinuance and Tenant Relocation Regulations, and the City's Housing Commission Relocation Standards and Procedures. This report is located within the Appendixes to the EIR (Appendixes M).

The Relocation Impact Report (RIR) provides for mitigation of any adverse impacts of the closure of the mobile home park, consistent with the adopted standards and regulations. The RIR offers the following relocation assistance for tenants willing and able to relocate their existing mobile home: reimbursement of the actual cost to disassemble and reassemble the mobile home and all legally constructed additions; payment of new utility connections; reimbursement of previously paid security deposits, payment of temporary lodging expenses; payment of moving costs associated with moving all personal property; payment for necessary modifications to a replacement location to accommodate a handicapped or disabled person; and provision of a relocation consultant's services.

In the situation where it is not feasible to relocate an existing on-site mobile home, the RIR contains provisions for the following assistance to displaced tenants: payment over 48 months of the difference between current space rent for a comparable apartment unit of a size appropriate to accommodate the displaced household; reimbursement of previously paid security deposits; payment of moving costs associated with moving all personal property; payment for necessary modifications to a replacement location to accommodate a handicapped or disabled person; and provision of a relocation consultant's services.

In addition to the relocation assistance described above, each displaced tenant would be given first priority to rent a unit in the proposed development. This priority would be for any unit within the proposed development, provided however, that if a tenant wishes to rent a low-income unit, the tenant must meet the requirements of a low income household in order to qualify and comply with the Housing Commission process.

Floodplain - The project site is located adjacent to the eastern bank of the San Diego River, and its 100-year floodplain extends onto the western edge of the site, covering approximately 2.26-acres of the 10.2-acre site (Attachment 17). The site is completely within an urbanized area and is developed with an existing mobile home park. However, this area within the floodplain would be classified as environmentally sensitive lands and the proposed project would be subject to the Environmentally Sensitive Lands Regulation within the LDC. The proposed project incorporates grading and retaining walls that would raise the western portion of the site out of the floodplain, thus removing the flood hazard from the property.

Building Height Deviation - The project site is located in the RM-3-7 Zone which allows a maximum 40 foot building height (Table 131-04G of the LDC). Height is measured vertically from the existing grade or proposed grade, whichever is lower (Section 113.0270 of the LDC). The existing site is characterized by a terraced topography, ranging in elevation of approximately 114 feet above mean sea level (AMSL) on the upper portion and 81 feet AMSL on the lower portion of the site. The upper and lower portions of the site are separated by an approximately 2:1 (horizontal: vertical) manufactured slope, which has a grade differential of 33 feet. As stated above, the western portion of the site is located within the 100-year floodplain and the proposed project incorporates grading (entire site to be graded) and retaining walls that would raise this portion of the site out of the floodplain, thus removing the flood hazard from the property.

The site improvements will establish new proposed grade over the entire property, and some of the proposed grade will be lower than the existing grade. When measured from the new proposed grade, most of the residential buildings propose a height less than 50 feet; architectural features, elevator, or stair towers propose a height of 55 feet; and the Clubhouse portion of the complex will be 59 feet. However, since height is measured from the lowest grade, which in this case is the existing grade, the maximum proposed building height for the residential building will be 73 feet from existing grade at its lowest point (Attachment 18- Building Height Deviation Exhibit).

Retaining Wall Height Deviation - As stated above, the western portion of the site is located within the 100-year floodplain and the proposed project would raise this portion of the site out of the floodplain, and would necessitate the construction of a retaining/crib wall up to 12 feet in

height. Within the side yard and rear yard, two retaining walls are allowed with a maximum of 6 feet each that are separated by a minimum horizontal distance equal to the height of the upper wall (Section 142.0340(d)(1) of the LDC). However, a retaining wall outside the setbacks is allowed to a maximum height of 12 feet.

The deviation request is to omit the horizontal distance requirement between the walls and allow for one 12 foot high plantable retaining/crib wall within the 5 foot rear yard and the 36 foot side yards (Attachment 19- Retaining Wall Elevation/Section). This wall would be interrupted at regular intervals with stone veneer traditional retaining walls providing tree pockets and overlooks. The retaining walls would provide for a fire lane to serve the proposed project and a public river-front bike and walking path overlooking the existing Admiral Baker Golf Course and the San Diego River Park. This path would connect to potential future river park trails to the north and south, as well as provide access back to Mission Gorge Road. The landscaping at the bottom of the retaining wall and along the wall would contain a minimum of 75 percent native and 25 percent drought-tolerant non-native plant material providing 80 percent screening of the wall within two years.

Side Yard Setback Deviation - The required side yard setback is a minimum of 5 feet or 10 percent of the premises width, whichever is greater (Section 131.0443(f)(2) of the LDC). The project site is approximately 800 feet in width and would require an 80 foot side yard setback. The deviation request is to allow for a 36 foot side yard setback. The building would be setback 44 feet and 54 feet from the northern property line, and approximately 42 feet from the southern property line. This request would allow for optimal site utilization and still provide for a fire access road, a public river-front bike and walking path from Mission Gorge Road, and function as a view corridor to the San Diego River.

Vehicular Use Area Planting Requirements Deviation - The LDC requires one tree to be planted within 30 feet of each parking space on the upper level of the parking structure (Table 142.04D). The deviation request is to install shade structures instead of the trees. The proposed shade structures would provide the same function as the required trees by providing shade for the surface parking area of the upper deck. Alternatively or additionally, the applicant is evaluating the incorporation of solar trees or a canopy of photovoltaic panels on the upper level of the parking structure for the generation of the projected energy consumption for all common areas and facilities for the complex.

Floor Area Ratio Deviation - The project site is located within the RM-3-7 Zone which allows a maximum floor area ratio (FAR) of 1.80 percent (Table 131-04G of the LDC); however, 33 percent of the FAR is required to be reserved for parking (Section 131.0446(f) of the LDC). The deviation request is to allow for a 27 percent FAR reserved for parking and the remaining 6 percent to be reallocated to non parking uses. The project incorporates a 5.5-level parking structure that is wrapped around the proposed residential buildings with a separation between the structures to allow for green space. The project meets all of the parking requirements and the “wrapped” parking structure design provides for a maximum efficient use of the project site and reduces the need for additional surface parking.

Access and Circulation - The main access/entrance to the project site would be taken from the Mission Gorge Road at the intersection of Greenbrier Avenue and Mission Gorge Road. From this point, a security gate with telephone keypad would restrict access to residents, visitors, and emergency services personnel. A new traffic light and left-turn pocket would be installed off-site at the intersection of Greenbrier Avenue and Mission Gorge Road to facilitate access to the project site. Adequate stacking distance would be provided to allow access without queuing on Mission Gorge Road.

*In Phase 1*, an emergency access only road would be provided off Mission Gorge Road at the northeast and southeast corners of the project site. The emergency access road would continue around the perimeter of the development within a 26 foot wide fire access lane. This road would be a modified road system (grasscrete) that meets the Fire Department Policy A-96-9M, and will incorporate a public river-front bike and walking path overlooking the existing Admiral Baker Golf Course and the San Diego River Park. This path would connect to potential future river park trails to the north and south, as well as provide access back to Mission Gorge Road.

*In Phase 2*, a second public access to and from the site would be provided through a future connection point/public right-of-way along the northern property line as requested by the City in the preparation for a future internal road system for the community. The applicant shall provide a 26 foot wide irrevocable offer of dedication (IOD) along the northern property line for this future connection, and the project site would be modified in the future to accommodate a one-half width of a public road (Attachment 20). The design of the road and connection point could be located any where along the northern property line, and has been designed to be flexible for the future internal road system. This connection and public access would only be built when or if the adjacent property is developed in the future. The building facades, entries, and landscape have been designed to meet the LDC requirements for a streetscape in preparation if the connection is built.

Federal Aviation Administration (FAA) - The project site is located within the Federal Aviation Administration (FAA) Part 77 Noticing Area for Montgomery Field, but is located outside of the adopted Airport Influence Area for Montgomery Field. Therefore, the project does require a determination by the FAA, but would not be required to be reviewed by the San Diego County Regional Airport Authority, as the Airport Land Use Commission, for a consistency determination. On July 28, 2008, the FAA issued a Determination of No Hazard to Air Navigation for the proposed project (Attachment 21).

San Diego River Park Draft Master Plan and the Mission Trails Design District - The project site is located within the City's Draft Master Plan for the San Diego River Park (SDRP) Upper Valley area (Attachment 22). The proposed project has incorporated several features into its design in consideration of the SDRP Draft Master Plan general and specific recommendations, including coordination with the Master Plan to preserve additional open space along the river and collaboration with the Navy Planners of the Admiral Baker Golf Course, and the Grantville Redevelopment Project Area planners to create a continuous multi-use trail near the river. The project incorporates a design theme within on-site open space areas that complements the river and provides on-site educational opportunities regarding the historical and ecological

significance of the river. Special periphery design measures which include setbacks, building elevations, architectural treatments, landscape screening, landscaping with native plants and water quality measures (detention and biofiltration, grasscrete, and porous surfaces) have been incorporated into the project design to act as a good neighbor to the River Park and be in conformance with the Master Plan recommendations. The project site is not located within the Mission Trails Design District (MTDD), but by the incorporation of the river sensitive design features, as described above, the proposed project generally conforms to the intent of the MTDD guidelines.

Grantville Redevelopment Project Area - The project site is not located within the Grantville Redevelopment Project Area (GRPA). However, the southern extent of Subarea B of the GRPA lies immediately adjacent to the site along the northern property line, and the northernmost portion of Subarea A lies immediately adjacent to the site on the west (Attachment 5). The proposed project has incorporated several features into its design in consideration of the Draft SDRP Master Plan general and specific recommendations, the MTDD guidelines, and has incorporated river sensitive design features that would not impact the MHPA and open space area to the west of the property. The proposed project would be compatible with the adjacent land uses of the GRPA and would not preclude the success of the Redevelopment Plan.

Fire and Police Services – Fire and Police protection services are currently available within the NCP area. Fire Station 45 provides primary fire protection and advance life support to the project site and surrounding area, and is located approximately 2.6 miles southwest of the project site at 9499 Friars Road, within the parking lot of Qualcomm Stadium. The initial fire suppression unit would arrive within 4.8 minutes (i.e., below the maximum five minute standard) and the effective fire force would arrive within eight to nine minutes (i.e., below or at the maximum nine minute standard).

The project site is located within the boundaries of police Beat 322 of the San Diego Police Department, Eastern Division Substation. The Eastern Division Substation is located approximately four miles northeast of the project site at 9225 Aero Drive. The average response times for Beat 322 exceed the citywide average and the Police Department’s goals for emergency and priority one calls, but are less than the citywide average and goal response times for priority two, three, and four calls. The following table is a breakdown of Response Times:

Call Types	Beat 322 Average Response Times	Citywide Average Response Times	Department Goal Response Times
Emergency	8.26	7.22	7
Priority One	13.41	13.62	12
Priority Two	21.94	25.38	30
Priority Three	48.24	65.53	90
Priority Four	62.05	52.43	90

Source: City of San Diego Police Department, Operational Support Division

## **Environmental Analysis:**

The Environmental Impact Report (EIR) analyzed the environmental impacts of the proposed Archstone Mission Gorge project. Implementation of the proposed Mitigation, Monitoring and Reporting Program (MMRP), which is included in the EIR as Chapter 10, would reduce the environmental effects of the project to below a level of significance with the exception of significant, unmitigated impacts related to traffic and circulation (direct and cumulative). Implementation of the proposed MMRP would reduce the impacts to below a level of significance in the following categories: Land Use (Biological Resources), Transportation/Circulation, Historical Resources (Archaeology), Public Utilities, Noise, and Biological Resources.

**Traffic and Circulation (Mitigated Impacts)** – The proposed project is located along Mission Gorge Road, between Old Cliff Road and Greenbrier Avenue, in the NCP. The project is estimated to generate net Average Daily Trips (ADTs) of 2,670 with 215 AM peak hour trips and 267 PM peak hour trips. With the removal of the existing 119 mobile homes as part of the redevelopment, the net trips generated by the proposed development is estimated to be 2,075 ADTs with 160 AM peak hour trips and 195 PM peak hour trips.

Due to degraded existing traffic conditions in the community, the additional traffic generated from the proposed project direct (Near-Term Year 2010) and cumulative (Horizon Year 2030) would result in project-level significant impacts to the following intersection, roadway, and arterial segments for both Near Term Year (2010) and Horizon Year (2030) scenarios:

### *Near Term Year (2010)*

- Intersection of Mission Gorge Road/Greenbrier Avenue/Project Access
- Friar Road between Rancho Mission Road and I-15 North Bound (NB) Ramps
- Friar Road between I-15 NB Ramps and I-15 South Bound (SB) Ramps
- Mission Gorge Road between Friar Road and Rainier Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue
- Mission Gorge Road between Fairmount Avenue and Interstate West Bound (WB) Ramps

### *Horizon Year (2030) without Tierrasanta Boulevard and Santo Road Extensions plus Project*

- Intersection of Mission Gorge Road/Greenbrier Avenue/Project Access
- Mission Gorge Road between Greenbrier and Zion Avenues
- Mission Gorge Road between Zion Avenue and Friar Road
- Friar Road between Mission Gorge Road and Riverdale Street
- Friar Road between Riverdale Street and Santo Road
- Friar Road between Santo Road and Rancho Mission Road
- Friar Road between Rancho Mission Road and I-15 NB Ramps
- Friar Road between I-15 NB Ramps and I-15 SB Ramps



- Mission Gorge Road between Friar Road and Rainier Avenue
- Mission Gorge Road between Rainier Avenue and Vandever Avenue
- Mission Gorge Road between Vandever Avenue and Twain Avenue
- Mission Gorge Road between Twain Avenue and Mission Gorge Place
- Mission Gorge Road between Mission Gorge Place and Fairmount Avenue
- Mission Gorge Road between Fairmount Avenue and Interstate WB Ramps

*Horizon Year (2030) with Tierrasanta Boulevard and Santo Road Extensions plus Project*

Same road sections listed in “*Horizon Year (2030) without*” except for the following road section that would not be impacted:

- Friar Road between I-15 NB Ramps and I-15 SB Ramps

To mitigate significant direct (2010) and cumulative (2030) traffic impacts to a level below significance, the applicant is required to install a traffic signal at the intersection of Mission Gorge Road, Greenbrier Avenue, and the project’s access driveway. The new signal would be coordinated with the existing signal at Mission Gorge Road and Old Cliffs Road for improved traffic progression and operation. The applicant would also provide a median break, along the existing raised median, to facilitate full access to the project driveway at Mission Gorge Road; provide a 250 foot left turn pocket along the eastbound Mission Gorge Road approach for the inbound project traffic to turn left into the project driveway from eastbound Mission Gorge Road; and provide on inbound and one outbound lane along the project driveway.

Significant traffic impacts to seven of the roadway segments identified in the EIR can not be mitigated to a level below significance, and therefore would be considered significant and unmitigated. To mitigate potential impacts to these roadway segments would require the applicant to widen Friars Road between Ranch Mission Road and I-15 SB Ramps from its current configuration of three lanes in each direction to four lanes, and widening Mission Gorge Road between Friars Road and I-8 WB Ramps from its current configurations of two lanes in each direction to three lanes. However, these mitigation measures are financially infeasible for this project alone to complete due to the presence of various rights-of-way and other physical constraints in the vicinity of I-15/Friars Road interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. The project will be required to make a monetary fair-share contribution calculated at 5.5 percent towards the improvements to seven roadway segments that are not built to the ultimate classification.

Traffic and Circulation (Significant Unmitigated Impacts) – As described above, significant impacts to roadway segments in the near term (2010) and horizon year (2030) can not be mitigated to a level below significance since it would be infeasible to widen Mission Gorge Road/Friars Road. These mitigation measures are financially infeasible for this project alone to complete due to the presence of various rights-of-way and other physical constraints in the vicinity of I-15/Friars Road interchange and on Mission Gorge Road between Friars Road and I-8 WB Ramps. The project will be required to make a monetary fair-share contribution calculated at 5.5 percent towards the improvements to seven roadway segments that are not built to the ultimate classification.

Project Alternatives – In order to fully evaluate the environmental effects of the proposed project, CEQA mandates that alternatives to the proposed project be analyzed. The CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project;” and the evaluation of the comparative merits of the alternatives. The alternative discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

The alternatives identified within the EIR are intended to further reduce or avoid significant environmental effects of the proposed project. The EIR addresses the No Project Alternative and the Reduced Project Alternative. Each major issue area included in the impact analysis of the EIR has been given consideration in the alternative analysis. Alternatives to the proposed project are evaluated in full in Chapter 9 of the EIR.

*No Project Alternative* – This alternative would be two-tiered: 1) maintenance of the site as a mobile home park and 2) future redevelopment of the site with the maximum of 444 multi-family units consistent with the underlying land use designation in the NCP (Residential, Medium-high Density) and underlying zone (RM-3-7). Maintenance of the site as a mobile home site would be equivalent to the existing environmental setting. In this case, however, preservation of the site as a mobile home park cannot be assured; thus, it is reasonable to assume that there may be a future proposal to develop the site consistent with the community plan and zoning.

*Reduced Project Alternative* – This alternative would reduce the number of units to a level that would avoid significant unmitigated impacts associated with the proposed project. Based on the traffic report, this would entail 200 multi-family units and a density of 19.5 dwelling units per acre, which would be below the density range associated with the land use designation and zoning. While the proposed project would exceed the City’s Inclusionary Housing Ordinance by providing a minimum of 20 percent affordable units on-site; in this case, the alternative would be unable to accommodate these affordable units on-site. This alternative would reach compliance with the City’s Inclusionary Housing Ordinance by providing 10 percent affordable units on-site or by paying a fee in lieu of this requirement.

By design, this alternative would eliminate significant roadway impacts under near term and horizon year conditions, both with and without the Tierrasanta Boulevard and Santo Road extensions. While other impacts would be similar to the proposed project, there would be a 55 percent reduction in the number of units, resulting in a reduction in impacts related to visual effects and community character, air quality, noise, public services, and utilities.

**Conclusion:**

Staff has determined the proposed Archstone Mission Gorge project, with the adoption of the General Plan and Navajo Community Plan Amendments, and Rezone Ordinance, complies with the applicable sections of the Municipal Code, the City’s Housing Commission Standards and

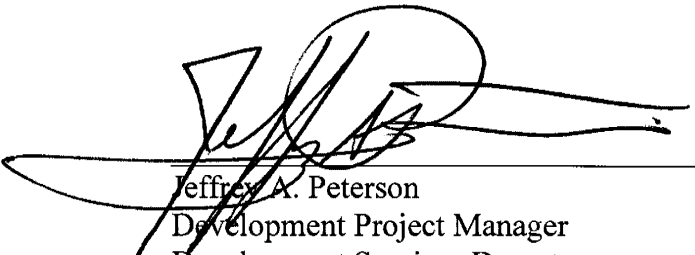
Procedures, adopted City Council policies, and the California Government and Civil Codes. Staff has determined the required findings would support the decision to approve the proposed project's Vesting Tentative Map and Site Development Permit (Attachments 23 and 24). An Environmental Impact Report has been prepared for this project and the mitigation required would reduce any potentially significant impacts to a level below significance (except for traffic). Staff recommends the Planning Commission recommend that the City Council adopt the General Plan and Navajo Community Plan Amendments, and Rezone Ordinance; and approve the Vesting Tentative Map and Site Development Permit. Findings and Statement of Overriding Considerations must be made to certify the Environmental Impact Report for potential impacts which are direct, cumulative, and unmitigated.

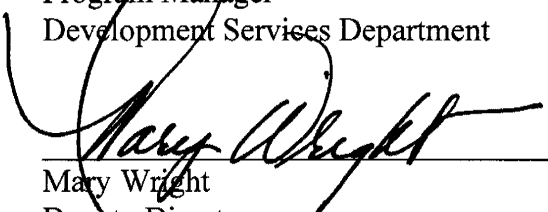
**ALTERNATIVES**

1. A. Recommend the City Council **Certify** the Environmental Impact Report No. 142570; **Adopt** the Mitigation Monitoring and Reporting Program, and the Finding and Statement of Overriding Consideration; and  
B. Recommend the City Council **Adopt** the resolution amending the General Plan and the Navajo Community Plan No. 498721, and Rezone Ordinance No. 586364; and **Approve** Vesting Tentative Map No. 498719, Site Development Permit No. 498703, and Easement Abandonment No. 589137 with modifications; or
2. A. Recommend the City Council **Not Certify** the Environmental Impact Report No. 142570; **Not Adopt** the Mitigation Monitoring and Reporting Program, and the Finding and Statement of Overriding Consideration; and  
B. Recommend the City Council **Not Adopt** the resolution amending the General Plan and the Navajo Community Plan No. 498721, and Rezone Ordinance No. 586364; and **Deny** Vesting Tentative Map No. 498719, Site Development Permit No. 498703, and Easement Abandonment No. 589137, **if the findings required to approve the project cannot be affirmed.**

Respectfully submitted,

  
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Mike Westlake  
Program Manager  
Development Services Department

  
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Jeffrey A. Peterson  
Development Project Manager  
Development Services Department

  
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Mary Wright  
Deputy Director  
City Planning and Community Investment Department

## WESTLAKE/JAP

### Attachments:

1. Project Location Map
2. Aerial Photograph
3. Zoning Map
4. Community Plan Land Use Map
5. Grantville Redevelopment Project Area Map
6. Conditional Use Permit No. 2632
7. Conditional Use Permit No. 181-PC
8. Ordinance No. O-15774
9. Project Data Sheet
10. Project Plans and Photo Simulations
11. LEED Design Elements
12. Planning Commission Resolution No. 4330-PC
13. City Responses to Initiation of Community Plan Amendment Analysis Issues
14. CPIOZ Area B Analysis
15. Government and Civil Codes Sections
16. City's Mobile Home Park Discontinuance and Tenant Relocation Regulations
17. Site Plan with the 100-year Floodplain
18. Building Height Deviation Exhibit
19. Retaining Wall Elevation/Section
20. Future Connection Point/Public Right-of-Way
21. FAA Determination of No Hazard to Air Navigation
22. San Diego River Park Map
23. Draft VTM/EA Conditions and Subdivision Resolution
24. Draft SDP Resolution with Findings
25. Draft SDP with Conditions
26. Draft Rezone Ordinances
27. Rezone - B Sheet (No. B-4271)
28. Draft Resolution GPA and NCP Amendment
29. Draft NCP Amendment Documents
30. Draft Planning Commission Resolution
31. Community Planning Group Recommendation
32. Ownership Disclosure Statement
33. Project Chronology