

DATE ISSUED: October 11, 2007

REPORT NO. PC-07-156

ATTENTION: Planning Commission  
Agenda of October 18, 2007

SUBJECT: Initiation of an amendment to the Navajo Community Plan and the Progress Guide and General Plan to remove the Mobile Home Park Overlay Zone from an existing mobile home park site on 10.45 acres.  
Project No. 137391

OWNER/  
APPLICANT: ASN Mission Gorge, LLC

#### SUMMARY

Issue(s) - Should the Planning Commission INITIATE a land use plan amendment to the Navajo Community Plan and the Progress Guide and General Plan pursuant to Municipal Code Section 122.0103 to remove the Mobile Home Park Overlay Zone from an existing mobile home park site on 10.45 acres.

Mayor's Recommendation - INITIATE the plan amendment process.

Community Planning Group Recommendation – On September 17, 2007, Navajo Community Planners, Inc. voted 9-4 to deny the initiation request.

Environmental Impact - If initiated, the proposed plan amendment and future discretionary actions will be subject to environmental review.

Fiscal Impact – If initiated, processing costs would be paid for by the applicant.

Housing Impact – The proposed project is subject to the 1982 Navajo Community Plan. The Community Plan designates the subject property for Multi-family Residential development. There are currently 119 mobile home park units on the site. The request for a plan amendment to remove the Mobile Home Park Overlay Zone and to develop the site with 445 multi-family apartment units would result in the creation of 326 additional housing units in the Navajo Community. If initiated, the project would be subject to the City's 2003 Inclusionary Housing Ordinance. The applicant intends to provide 20 percent of the housing units as affordable onsite, which would vary in the range of affordability, subject to Housing Commission approval.

## BACKGROUND

The Navajo Community Plan area is located north of Interstate 8, northwest of the City of La Mesa, west of the cities of El Cajon and Santee, and southeast of the San Diego River. Adjacent communities include Mission Valley to the west, Tierrasanta to the northwest and the College Area to the south (Attachment 1).

The subject property is an approximately 10.45 acre site located on Mission Gorge Road and is designated for Multi-family Residential development (30-43 du/ac) in the Navajo Community Plan. The Community Plan also places a Mobile Home Park Overlay Zone over the subject site (Attachment 2). The property is currently developed with an existing mobile home park with 119 units. Existing development on adjacent properties includes portions of the San Diego River and a golf course to the west, industrial to the north, and residential to the east and south. Land use designations which border the subject property include Open Space to the west, Industrial to the north, Single-Family Residential to the east and Multi-Family residential to the south (Attachment 3).

The Navajo Community Plan contains a policy related to residential land use that requires mobile home park sites to be maintained as mobile home parks through the retention of the Mobile Home Park Overlay Zone. The Residential Element 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.' Given that the Mobile Home Park Overlay Zone is intended to implement the policy recommendations in the Community Plan, multi-family residential development other than a mobile home park requires the removal of the Overlay Zone. If this initiation request is approved, the applicant has indicated a desire to develop the site with 445 multi-family apartment units. The existing multi-family land use, density and residential zoning of the site would remain the same.

The City's 2005-2010 Housing Element of the General Plan also contains policies specific to mobile homes, stating that, 'to the extent feasible, the City shall preserve the affordability of existing mobile home parks for low-income owners of mobile homes'. Since policies in both the Community Plan and the Housing Element intend to preserve mobile home park sites as a form of affordable housing and as a component of contributing to the variety of housing types, the applicant has committed to providing 20 percent of the units as affordable onsite, or up to the number of existing mobile home park units onsite, should the proposed amendment be initiated. The level and range of affordability of the units will be evaluated through the plan amendment process, subject to Housing Commission approval.

While the proposed development project envisions build out of the site at the maximum density range with approximately 445 units, the project may be developed at a lower density range. The units that may be 20 percent affordable onsite may be significantly less than the number of existing mobile home park units. The intent of the Community Plan is to provide a more complete variety of housing types. In order to achieve that Plan policy, the number of affordable units onsite should be similar in number to the units that are existing onsite.

The City's Land Development Code Section 143.0630 contains Supplemental Development Regulations for Mobile Home Park Discontinuance and Tenant Relocation Regulations that detail the procedures that must be followed before a mobile home park closure and re-use of a site can occur. In addition, in accordance with Section 126.0504, a Site Development Permit is required for discontinuance of a mobile home park located within the Mobile Home Park Overlay Zone. Should the proposed amendment be initiated, the project would be required to comply with these requirements.

Currently, there are two other plan amendments proposed in the Navajo community. The Alvarado Creek Plaza amendment is intended to redesignate 3.2 acres from Industrial to Mixed Use that would allow a density range of 45-75 dwelling units per acre, located at 5801-41 Mission Gorge Road, and study up to 70 acres surrounding Mission Gorge Road, Mission Gorge Place and Alvarado Canyon Road. A plan amendment initiation for the preparation of a comprehensive master plan for Subarea A and B of the Grantville Redevelopment Project Area was initiated by City Council on June 12, 2007 (Attachment 4). Through the plan amendment process, the master plan is intended to address land use, circulation, parks and open space, public facilities and urban design.

The subject property is outside of the Grantville Redevelopment Project Area and not within Subareas A and B.

**This initiation request does not constitute an endorsement of the project proposal. A staff recommendation will be developed once the project has been fully analyzed. This action will allow the staff analysis to proceed.**

#### DISCUSSION

Before a community plan amendment can be initiated, Section 122.0104 of the Municipal Code requires that any one of three initial criteria or all four supplemental criteria specified in the code must be met. The Planning Department does not believe that any of the following three initial criteria can be met:

- (1) **The amendment is appropriate due to a mapping or textual error or omission made when the original land use plan or local coastal program was adopted or during subsequent amendments;**
- (2) **Denial of initiation would jeopardize the public health, safety or general welfare;**
- (3) **The amendment is appropriate due to a material change in circumstances since the adoption of a land use plan or local coastal program whereby denial of initiation would result in a hardship to the applicant by denying any reasonable use of the subject real property.**

The Planning Department does, however, believe that all of the following supplemental criteria can be met:

**(1) The proposed land use plan amendment is consistent with the goals and objectives of the Progress Guide and General Plan and the Navajo Community Plan.**

General Plan Housing Element policies state that development of new mobile home parks in San Diego are no longer recommended or likely due to high land prices and the greater efficiency of providing affordable housing at higher multi-family densities; while at the same time the General Plan recommends that the City shall preserve the affordability of existing mobile home parks for low-income owners of mobile homes. Although mobile home parks have historically represented a lower-cost housing alternative, the existing mobile home park on the site is not under any affordable housing restrictions. The proposed community plan amendment would instead provide 20 percent of the units as affordable onsite, or up to the number of existing mobile home park units onsite, subject to Housing Commission approval, which is more than the 10 percent requirement of the Inclusionary Housing Ordinance. Therefore the proposed plan amendment would be consistent with the City's long-range planning goal to increase housing affordability.

Primary goals in the Community Plan for residential development include providing a variety of housing types and retaining existing mobile home parks for low-income owners of mobile homes. While the proposed plan amendment would not retain the existing mobile home park use, the project would continue residential use of the site and provide 20 percent of the multi-family units onsite, or up to the number of existing mobile home park units onsite, to be restricted to tenants based upon income. Therefore, the proposed plan amendment would be consistent with these goals, since the proposed project would add to the variety of housing types in the community by providing multi-family units and dedicated affordable housing onsite. The income range of affordable units provided will be analyzed in more detail if this initiation request is approved.

The Community Plan designates the site for Multi-Family Residential development. The proposed project would provide approximately 445 multi-family apartment units on the site. The proposed plan amendment would increase the amount of multi-family residential opportunities in the community, and the increase in density on the site would implement the Multi-family Residential land use designation of the Community Plan.

**(2) The proposed land use plan amendment appears to offer a public benefit to the community or City.**

Removing the Mobile Home Park Overlay Zone from the existing mobile home park site to allow for multi-family development could provide more affordable units onsite than currently exist. At this time, the existing mobile home park provides 119 units. However, there is no requirement that any of these units be affordable. Additionally, the City's Mobile Home Park Discontinuance and Tenant Relocation Regulations do not require the replacement of affordable housing units in terms of income restrictions. The proposed plan amendment would provide a dedicated amount of affordable housing units onsite, as discussed in more detail above. Therefore, the proposed plan amendment could potentially provide a better affordable housing development than what currently exists.

**(3) Public services appear to be available to serve the proposed increase in density or intensity of use.**

Public services appear to be available to serve the proposed amendment, as Navajo is an urbanized community, and services are available for this and surrounding uses. However, the adequacy of all public services to serve the proposed increase in density will be examined in more detail if this initiation request is approved.

**(4) City staff is available to process the proposed land use plan amendment without any work being deferred on General Fund supported programs or ongoing plan updates.**

Staff is available to process this amendment request without delaying general fund programs or ongoing plan updates, as the Planning Department's work program includes staff time for non-general fund development projects. However, delays in processing the plan amendment could occur based on staff levels and workloads. The costs associated with processing this amendment will be paid for by the applicant.

CONCLUSION

As outlined above, the proposed plan amendment meets all of the supplemental initiation criteria; therefore, staff recommends that the proposed amendment to the Navajo Community Plan and the Progress Guide and General Plan be initiated.

The following land use issues have been identified with the initiation request. If initiated, these issues, as well as others that may be identified, will be analyzed and evaluated through the community plan amendment review process:

- Compatibility of the proposed development with surrounding uses
- Compatibility of the character and quality of the proposed development with the surrounding neighborhoods
- Analysis of current rents in the existing mobile home park
- Analysis of the level and range of affordability of the affordable housing units provided onsite
- Evaluation of adjacency issues to the San Diego River and compatibility with the San Diego River Park Master Plan, including interface of the proposed development with the river
- Evaluation of the necessity of additional Community Plan language/policies to include evaluation factors or development criteria for the provision of replacement of mobile home park units onsite with a similar number of affordable units

- Development of the site at the higher range of existing density
- Evaluation of traffic impacts of the proposed development and determination of circulation improvements
- Compatibility between the proposed General/Community Plan amendment and the City's General Plan and Strategic Framework Element
- Coordination with the master plan being developed for Subareas A and B of the Grantville Redevelopment Project Area to ensure compatibility and integration
- Adequacy and provision of public facilities to accommodate the added residential population in the community

Although staff believes that the proposed amendment meets the necessary criteria for initiation, staff has not fully reviewed the applicant's proposal. **Therefore, by initiating this community plan amendment, neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment.**

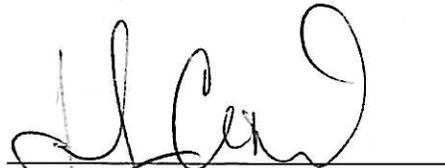
#### ALTERNATIVES

Find the proposed land use plan amendment does meet the criteria as described and deny the General/Community Plan amendment initiation request.

Respectfully submitted,



CECILIA GALLARDO, AICP  
Program Manager  
City Planning & Community Investment



JENNIFER CORDEAU  
Associate Planner  
City Planning & Community Investment

#### Attachments:

1. Navajo Community Location Map
2. Navajo Community Plan – Land Use Map
3. Aerial Map
4. Grantville Redevelopment Project Area Map
5. Ownership Disclosure Statement