ATTACHMENT A

The City of San Diego
SUMMARY OF MAJOR IMPACTS AND SUGGESTED MODIFICATIONS
to the Land Use Compatibility Policies in the Draft San Diego County ALUCP

The following key policies proposed in the Draft Airport Land Use Compatibility Plan (ALUCP) would have major impacts to the City of San Diego. City staff's recommended revisions are included after a discussion of the impact:

1. Prohibition of Residential Uses Adjacent to the San Diego International Airport (SDIA)

The proposed Draft ALUCP policies prohibiting non-single family residential uses above the projected 60 dB CNEL contour and the proposed ALUCP Compatibility Zones B1 and C for SDIA will have significant impact to the City's capability in providing housing mandated by the state including housing units for people in the low and very low-income categories. Within the SDIA airport influence area, the City is estimating that approximately 17,000 potential future non-single family residential dwelling units would not be allowed by the proposed ALUCP. It is likely that the lost of these potential housing units could affect other areas of the City and the region, which could include the shifting of housing supply and associated traffic to other areas of the City and the region. The areas affected are presently zoned for some of the highest allowable residential densities within the City and the region.

Based on the draft compatibility criteria, compatibility zones and projected noise contour maps in the draft ALUCP, the proposed Compatibility Zone C for SDIA closely represents the 60 dB to 65 dB CNEL, but the compatibility criteria does not allow for any residential uses unlike other urban airports. State and Federal regulations clearly allow residential uses within the 60 dB to 65 dB CNEL. The State's airport land use planning handbook also allows residential in those decibel ranges and even this proposed ALUCP Appendix C page C-4 recognize that the 70 dB CNEL level is acceptable with noise attenuation measures to reduce the interior noise level of structure. This is especially true in noisy urban residential communities that are already affected by rail, street, and freeway noise.

Allowing residential uses in areas that exceed the 65 dB CNEL is consistent with the adopted 2004 ALUCP and supported by proposed 2005 ALUCP Appendix C, the California Department of Transportation Division of Aeronautics *Airport Land Use Planning Handbook,* California Code of Regulations Title 21, Section 5014, the Governor's Office of Planning and Research *California General Plan Guidelines*, and US Code of Federal Regulations - Title 14 Part 150 Appendix A, which all condition allow these uses above the 65 dB CNEL with sound attenuation measures ensure an interior CNEL of 45 dB or less.

The proposed ALUCP infill policy would be very difficult to implement in the communities surrounding SDIA due to the complex criteria required to determine and implement infill parcels and the varying land uses, parcel size, densities, and intensities that occur on single blocks as part of larger areas within many of the affected urban communities. The proposed infill policy may be appropriate for areas with contiguous similar land uses that contain a few large sporadic

undeveloped and underdeveloped parcels in newer or suburban planned areas. Within the complex and highly variable existing older urban environment surrounding SDIA, it would result in new developments on varying parcel sizes and at varying density and intensity levels, potential on the same block or across the street from each other. The resulting development pattern would not be advantageous from an urban design, community form, and redevelopment potential. This would create a complex parcel based zoning and tracking system, which could be challenged.

Recommendation – City staff recommends the following:

a Revise the compatibility criteria for SDIA to find that that residential land uses within the proposed Compatibility Zone C are conditional compatible, up to a maximum density of 44 units per acre, except for Centre City. Within Centre City, find that residential uses subject to the existing density limits by the Centre City Planned District Ordinance's Floor Area Ratio are conditional compatible. All uses would be conditionally required to provide proper noise attenuation construction techniques to bring interior noise levels to the 45 dB CNEL or less. It should be noted that the 2000 U.S census reported that the City had 2.2 persons per multifamily households, which if multiplied by 44 units per acre would only equal 96 persons per acre, which is less than the maximum number of people allowed by the proposed Compatibility Zone C.

b Revise the compatibility criteria for SDIA to determine that residential land uses within the proposed Compatibility Zone B1 up to the projected 70 dB CNEL contour are conditional compatible up to a maximum density of 29 units per acre, except for Centre City Within Centre City, find that residential uses subject to the existing density limits by the Centre City Planned District Ordinance's Floor Area Ratio are conditional compatible. All uses would be conditionally required to provide proper noise attenuation construction techniques to bring interior noise levels to the 45 dB CNEL or less. Based on the 2000 U.S census for the City, 2.2 persons per multifamily households multiplied by 29 units per acre would equate to 63 persons per acre.

c Revise the infill policy criteria for SDIA to allow the City of San Diego to designate infill areas up to 6.0 net acres that contain at least 50 percent similar existing uses. Determine the average existing residential density or non-residential intensity of the existing uses within the area, and apply the average existing density or intensity to the infill area for all future development actions. This would meet the intent of the proposed ALUCP policy without the need for a difficult method to identify, designate, zone, track, numerous individual infill parcels at varying densities within a complicated urban planning environment. This method would identify and designate a uniform density within use areas based on the average existing density. The recommended infill policy would meet the intent of the proposed ALUCP infill policy without the implementation complexities and uneven development that would result from the implementation of the draft ALUCP infill policy.

d Add a policy that encourages the airport operator to purchase available property in Compatibility Zone A since no development is allowed in this zone. This should be considered as an option in addition to obtaining avigation easements.

- e Adjust compatibility zone boundaries. Please refer to Attachment D, which graphically indicates City staff's recommended changes.

The proposed alternatives included herein would result in development or redevelopment less than the existing zoned density for certain areas and future housing opportunities may still be affected. As a compromise, City staff feels that these recommendations could help to minimize the impacts to housing while still addressing the safety issues contained in the draft ALUCP. As such, these recommendations could mitigate the most significant land use, housing, population, and traffic impacts, and removes the most significant impacts for the City to provide housing opportunities near SDIA that would result from the implementation of the ALUCP by the City.

2. Applicability to Projects under the Review Process

The draft ALUCP policy for determining an "Existing Land Use" places a financial and economic burden on project applicants that started the entitlement process prior to the draft ALUCP release and may not be in a realistic position to receive entitlements prior to the ALUCP adoption date.

Recommendation – City staff recommends the following:

Revise the draft ALUCP policy and definition for "Existing Land Uses" to exempt for compliance any development project that has a permit application (ministerial or discretionary) deemed complete by the local jurisdiction at the time of adoption of the ALUCP. The City is currently processing projects that would be significantly affected by the proposed requirements. This recommendation is consistent with "grandfathering" policies that the City uses when proposing changes to land use plans or regulations.

3. Establishment of Restrictive Intensity Standards for Non-Residential Uses

A. All Airports, (except SDIA)

The proposed ALUCP policies limiting non-residential intensities within the proposed ALUCP Compatibility Zones B1 and C for urban airports in the City will have significant impacts to the City's capability in providing opportunities for major employment land uses, which primary include office, research and development, and manufacturing. In addition, the proposed ALUCP Compatibility Zone B2 intensities for City owned airports would affect the City's ability to lease land for industrial and commercial development, which would provide revenue needed to support the City's municipal airports.

Given the General Plan goals of the City, including the draft Economic Prosperity Element and economic development programs, the proposed ALUCP limitations in these compatibility zones will potentially result in significant long-term economic impacts to the City. The proposed limits, as shown in the table below, within Compatibility Zones B1, B2, and C for urban airports would limit future growth of office, research and development, and manufacturing uses within the City.

Zone	**Draft ALUCP Non-Residential Intensity Standards for Urban Airports**		
	Average Acre	Single Acre	With Bonus
B1	60	120	180
B2	150	300	450
C	100	250	375

The following generalized examples help to demonstrate typical manufacturing/R&D and office use intensities and how future developments could be impacted by the proposed ALUCP requirements. The intensities used are based on citywide adopted parking requirements, which were developed from studies that analyzed occupancies for different types of uses. The examples use a Floor Area Ratio (FAR) of 1.0. This is 50 percent less than the maximum FAR of 2.0 presently allowed.

- Example A: A two-story industrial building located on a 2-acre parcel comprised of two 43,560 square feet (s.f.) (1 acre-sized) floor plates stacked would equal 87,120 total s.f. At a typical manufacturing/R&D use intensity of 400 s.f. per person or 2.5 persons per 1,000 s.f. (based on City parking requirements) would have 218 total persons with 109 persons per average acre and a Floor Area Ratio of 1.0.

- Example B: A three-story office building located on a 2-acre comprised of three 43,560 s.f. (1 acre-sized) floor plates stacked would equal 130,680 total s.f. At a typical office use intensity of 303 s.f. per person or 3.3 persons per 1,000 s.f. (based on City parking requirements) would have 457 total persons with 228 persons per average acre and a Floor Area Ratio of 1.0.

The proposed ALUCP intensity restrictions would limit the future development of employment-designated lands in portions of Mira Mesa, Sorrento Valley, Sorrento Mesa, Kearny Mesa, and Otay Mesa to warehouse/distribution or self-storage uses. The future development of manufacturing, research and development, and office uses would be substantially limited.

Recommendation – City staff recommends the following:

Revise the compatibility criteria for all airports in the City, except for SDIA to increase the allowable intensity maximums in Compatibility Zones B1, B2, and C to the following:

Zone	**Recommended Non-Residential Intensity Standards for Urban Airports**		
	Average Acre	Single Acre	With Bonus
B1	100	200	300
B2	200	400	600
C	180	360	540

The recommended intensity of 100 persons per average acre with the 200 persons per single acre for Compatibility Zone B1 would represent a FAR of 0.92 for industrial uses. That would be 55 percent less than the typical citywide FAR of 2.0 for industrial use zones. Similarly, the

recommended intensity of 180 persons per average acre with the 303 persons per single acre for Compatibility Zone C would represent a FAR of 1.25 for office uses. That FAR is 38 percent less than the typical citywide FAR of 2.0 for industrial and office use zones. Structure heights would still be subject to height restrictions as discussed in the following height recommendation. Although there could still be impacts to future employment land development, as a compromise, City staff feels that these recommendations could help to minimize the impacts while still addressing the safety issues contained in the draft ALUCP.

B. SDIA

The proposed ALUCP intensity limits for SDIA would affect the City's economic development and redevelopment activities to create high paying jobs and remove blight within many of the older commercial and industrial areas near SDIA. The proposed limits, as shown in the table below, within Compatibility Zones B1, B2, and C for SDIA would limit future growth of office, research and development, and manufacturing uses within the City.

Zone	**Draft ALUCP Non-Residential Intensity Standards for SDIA**	
	Average Acre	Single Acre
B1	60	120
B2	150	300
C	100	250

Within the older, highly urban neighborhoods surrounding SDIA such as Little Italy and Bankers Hill, the proposed ALUCP intensity restrictions would limit a typical 60,000 s.f. block to a single story 17,000 s.f., retail use within Compatibility Zone B1 and 27,000 s.f. retail use with the remaining area of the block for surface parking within Compatibility Zone C based on 200 s.f. per person. Although this type retail development maybe appropriate for neighborhood serving commercial uses in low density, single family, suburban neighborhoods; however not in the higher intensity urban core of the City.

Recommendation – City staff recommends the following:

Revise the compatibility criteria for SDIA only (except within the Centre City Community Planning Area) to increase the allowable intensity maximums in Compatibility Zones B1, B2, and C to the following:

Zone	**Recommended Non-Residential Intensity Standards for SDIA**	
	Average Acre	Single Acre
B1	140	175
B2	280	350
C	260	325

The recommended intensity of 140 persons per average acre with the 303 persons per single acre for Compatibility Zone B1 would represent a FAR of 0.97 for office uses. That is 52

percent less than the typical FAR of 2.0 for office uses zones. The recommended intensity of 260 persons per average acre for Compatibility Zone C would equate to a FAR of 1.81 for office uses, which is less than the typical FAR of 2.0.

The structure heights would still be subject to the height restrictions as discussed in the following recommendation, but would still allow for the development of a full 60,000 s.f. block. The recommended average acre intensities are greater for SDIA due to the typical 60,000 s.f. (1.4 acres) full block size, which limits the ability to have sites with more than 1.4 acres or a full single block. Within the Centre City Community Planning Area, allow non-residential uses subject to the existing intensity limits by the Centre City Planned District Ordinance's Floor Area Ratio. As mentioned above, City staff feels that these recommendations could help to minimize the employment, economic, and redevelopment impacts while still addressing the safety issues contained in the draft ALUCP.

4. Establishment of Brown Field as Suburban Airport

The proposed ALUCP policy that establishes Brown Field as a suburban/rural airport is not supported by the current and future land use and noise conditions within the Otay Mesa community. The suburban/rural airport criteria, which is more restrictive than the proposed urban criteria, will preclude any future development of manufacturing and research and development uses on lands designated for industrial uses within the Otay Mesa community planning area. The proposed intensities would only support warehousing and vehicle storage. As discussed previously, this will detrimentally affect the City's ability to provide enough land for future industrial employment uses and will affect the City ability to attract high paying jobs for the residents of the Otay Mesa and surrounding communities. In addition, the proposed reduction of development intensity will reduce the amount of facility benefit assessment fees collected by the City for facilities being built in Otay Mesa and exactions obtained through the subdivision process. This will negatively affecting the City's ability to provide facilities that are identified in the Facilities Financing Plan for the Otay Mesa Community Planning Area. These potential regional serving facilities include, but are not limited to Heritage Road, Otay Valley Road, and La Media Road.

It is the understanding of City staff, based on the comments from the Airport Authority staff, that the suburban/rural finding is based on existing land use conditions surrounding Brown Field. For areas south and east of Brown Field, the existing land use is industrial and the adopted community plan contains policies, which support developing Otay Mesa into a major industrial center for the City and region. The proposed ALUCP assumes that suburban/rural areas have a lower background noise level of 55 dB CNEL. With the development of State Routes 125 and 905 through Otay Mesa, it is highly likely that the background noise levels will exceed the 55 dB CNEL due to an increase in truck traffic. In addition, the area is already affected by aircraft noise from Tijuana International Airport and military aircraft that still use Brown Field for takeoff and landing exercises.

Overall, Otay Mesa has a higher level of intensity than the other communities that have suburban/rural airports placed in this category as well as others in the urban category. City staff recognizes that Otay Mesa has many opportunities for future uses and that while industrial uses

will need to be at higher intensity levels than the suburban criteria, but they may not need to be as high as City staff is recommending for the urban intensity criteria (Comment/Recommendation #3).

Recommendation – City staff recommends the following:

a Revise the designation for Brown Field to an Urban Airport. The existing and planned industrial uses within its environs exceed the intensities of the suburban/rural airports, and are similar to the intensity of other urban airports. The increase in background noise from State Routes 125 and 905 will make the application of the suburban/rural category to this airport inappropriate.

b Revise the compatibility zone boundaries based on the urban criteria. Compatibly Zone D should represent the 55 to 60 dB CNE and Compatibly Zone the 60 to 65 dB CNEL.

As stated previously, although there could still be impacts to future employment uses, City staff believes that this recommendation, along with the recommendations for the urban intensity criteria, could help to minimize the impacts while still addressing the safety issues contained in the draft ALUCP.

5. Establishment of Restrictive Height Restrictions

A. All Airports, (except SDIA)

The proposed ALUCP policies limiting structure heights to three floors in Compatibility Zone B1 and four floors Compatibility Zone C for urban and military airports and three floors within Compatibility Zones B1 for SDIA are overly restrictive. The draft ALUCP indicates that lower structures can be evacuated more rapidly than taller structures in case of an emergency (aircraft crash). All new structures however, must meet stricter building code requirements for fire protection and exiting, so the proposed restrictions may not result in a significant safety enhancement. The height limit may be a moot point given the density restrictions discussed above, but if the density limits are increased as proposed by City staff, the height limits would serve as a method of further restricting intensity, rather than minimizing obstructions to aircraft. For example, a three-floor 50-foot building may not be any less difficult to evacuate than a four-floor 50-foot building with the same number of people.

Recommendation – City staff recommends the following:

Revise the ALUCP height limits for all airports, except SDIA to limit structure height based on a specific measurement of distance from existing ground level and not number of floors. Height limits should be determined based on FAR Part 77, Terminal Instrument Procedures (TERPS), or other applicable FAA established standard for determining the safety and operational impacts of a proposed structure. Project applicants should be allowed to demonstrate, with an aviation study, that their proposed structure would not penetrate any of the FAR Part 77 critical surfaces.

B. SDIA – Simplified TERPS

It is the understanding of City staff, based on discussions with ALUC staff, that the height restrictions for SDIA as proposed by the draft ALUCP were established based upon a simplified TERPS surfaces, which is associated with the various instrument approach and departure procedures for SDIA and the City's existing Airport Approach Overlay Zone (AAOZ) criteria to resemble FAR Part 77 surfaces. The existing topography adjacent to the runway penetrates many areas of the FAR Part 77 surfaces; therefore, the FAR Part 77 standard for determining safety is not applicable for SDIA. It has been mentioned previously that the AAOZ restriction criteria based on FAR Part 77 with a 50 vertical buffer area between the "20:1 runway approach surface" and the "7:1 transitional surface" may place restrictions on structure heights that could be located both outside and below the actual airspace operational criteria as established by FAA's TERPS. This issue needs further discussion and analysis before being incorporated into a new method.

Recommendation – City staff recommends the following:

> For SDIA, height limits should be determined based on the FAA established TERPS, which establishes the maximum height that objects on the ground can reach without potentially creating constraints or hazards to the use of the airspace by aircrafts. The draft ALUCP states that the rational for using the modified TERPS surfaces to resemble FAR Part 77 is because of the high degree of complexity of the TERPS surfaces, simplification is necessary for policy purposes. Respectfully, Airport Authority staff should assume that the City has the technical ability to review development projects using the TERPS surfaces. This simplification for policy purposes will, when implemented, unnecessarily limit the height of future structures and intensities of uses in structures. Project applicants should be allowed to demonstrate, with an aviation study, that their proposed structure would not penetrate any of the TERPS critical surfaces.

6. Prohibition of Community-Serving Facilities

The proposed ALUCP policies prohibiting public use community-serving facilities (schools and libraries) above the projected 65 dB CNEL contour and the proposed Compatibility Zones B1 and C for all airports will limited the expansion of existing or development of new facilities. This will affect the ability of the City and school districts to provide public services to residents living in the primarily airport influence areas. As mentioned previously, state and federal regulations allow these types of uses above the 65 dB CNEL constructed with sound attenuation measures to ensure an interior CNEL of 45 dB or less.

Recommendation – City staff recommends the following:

> Revise the compatibility criteria for all airports to conditionally permit community-serving facilities within ALUCP Compatibility Zones B1 and C up to the projected 70 dB CNEL contour. All uses would be required to provide proper noise attenuation construction techniques to bring interior noise levels down to ensure an interior CNEL of 45 dB or less.