



August 31, 2020

Mayor Kevin Faulconer
Council President Georgette Gomez
Members of the City Council
Planning Director Mike Hansen
City of San Diego
202 C Street
San Diego, CA 92101

Subject: Comments on the Complete Communities Initiative

Dear Mayor Faulconer, City Council President Gomez, City Councilmembers, and Planning Director Hansen:

Established in 1961, Citizens Coordinate for Century 3 (C-3) is a 60 year old citizen planning organization whose mission is to preserve and improve the region's built and natural environments. We have influenced and advocated for smart growth policies for 60 years and are respected in our efforts to influence land use planning decisions, create more affordable housing, ensure excellence in park planning, and improve mobility.

We are contacting you concerning the Complete Communities initiative and urge you to consider our input as we have decades of experience and a membership that includes some of the region's most respected experts in the field of planning. We applaud the City's work on the Complete Communities initiative as it aims to shape the future of the City of San Diego. However, we strongly believe Complete Communities deserves a more thorough review and discussion than it has received to date.

We respectfully ask that this initiative not be placed before the City Council for approval until a more inclusive outreach process is undertaken and the recommendations below are considered.

Citizens Coordinate for Century 3 (C-3) has reviewed the Complete Communities initiative, and while we support its overall goals, we are writing to express concerns in the following areas. (A more detailed description of these issues is described later in the letter.)

1. Although the Complete Communities Public Engagement Summary contains an extensive list of stakeholders, there has been a lack of information presented to and lack of significant engagement of community planning groups and other community-based organizations, thereby creating concerns within the communities that the initiative will greatly impact.
2. The Complete Communities Housing Solutions component of the initiative aims to "create more housing options for everyone, particularly those at low and middle-income

levels.” However, when fully examined, the specific requirements and incentives of the program and ordinance do not achieve the stated goal and will likely negatively impact the population the plan is intended to serve. (See our detailed concerns described below.)

3. The substitution of a points system for parks in place of population-based park requirements as proposed in Complete Communities Play Everywhere (the Parks Master Plan) could result in a diminishment of outdoor recreation and open space in areas where much higher densities are proposed.

The Complete Communities initiative fact sheet laudably states that, "The City of San Diego is delivering on its vision of creating equitable, healthy and sustainable neighborhoods that are diverse, walkable, connected, safe and inclusive. It also states that "Complete Communities is an initiative to set us on a path to achieve our goals and shape a future that works for all of us with a focus on four key areas: housing, mobility, parks, and infrastructure."

These Complete Communities statements and goals align well with C-3's vision for the City and larger region, as expressed in the 1974 report by two internationally renowned land planners, *Temporary Paradise?* Three of the report's key planning principles, which are still relevant today and relate to Complete Communities include:

- Redirecting growth to the existing urban neighborhoods. Restoring and enhancing the special character of each one.
- Reducing dependence on the automobile, and encouraging all forms of non-polluting light-weight transportation.
- Sharing the region's amenities more equitably among all its people.

While the goals of C-3 and the Complete Communities initiative are generally in alignment, C-3 recommends that further work be undertaken to ensure that Complete Communities achieves these goals without negatively impacting existing communities and residents as discussed in more detail below.

1. Undertake a more inclusive public outreach process to allow a more thorough review and development of the programs and ordinances associated with the Complete Communities initiative.

This initiative is the newest in a number of citywide planning efforts over the past 40+ years whose goals have been to shape the future of the City of San Diego. Like those that have come before it, Complete Communities deserves a more thorough discussion than it has received to date. C-3 joins the Community Planners Committee (CPC) (made up of the city's community planning group chairs), individual planning groups, and a number of community-based organizations in requesting a more thorough public/community engagement process to ensure that the proposed programs, policies and ordinances meet these goals and do not result in unintended negative consequences.

2. FARs are too high and have been applied too broadly in Complete Communities Housing Solutions.

Proposing an FAR of 8.0 in areas where much of the city's "naturally occurring affordable housing" stock is located, e.g. Mid-City, Linda Vista, Barrio Logan, Logan Heights, Golden Hill while proposing an FAR of 4.0 in places like Mission Valley and 3.0 in the Sports Arena area (Midway-Pacific Highway Community Planning Area) is of concern for a number of reasons.

The proposed downtown-type densities (FAR 8.0) outside of downtown San Diego and North University City seems excessive. The financial feasibility analysis prepared by Keyser Marston Associates, Inc. (KMA) states that the initiative "affords greater FAR than is likely to be utilized in the near-term" and the bonus scenarios of the financial pro-forma methodology "ranged in density from 0.68 to 5.22." FARs of 8.0 are unnecessary and create problems ranging from alarming affected communities, to worsening infrastructure deficits, to raising expectations of higher land values. Applying FARs of 8.0 to large swaths of the urban communities goes against well-established land use planning principles that tailor land use intensities to local conditions, a principle that seems ignored by Complete Communities Housing Solutions.

In addition, stronger design standards are needed to transition between higher density multifamily and lower density areas. A visualization of what these communities might look like from a design perspective under complete or partial implementation of the initiative should be undertaken and provided to the public prior to finalizing the proposed initiative.

3. Calculate the inclusionary requirement based on the total number of units proposed, and calculate the replacement units separately from the inclusionary requirement.

Gentrification will likely be accelerated by implementation of Complete Communities Housing Solutions thereby negatively affecting many of the older, urban areas where a significant percentage of the residents are low income and people of color. Stronger affordable housing requirements should be included to prevent or significantly mitigate the displacement of current residents from their homes and neighborhoods.

The affordable and replacement housing requirements should be strengthened. The inclusionary requirement should be calculated based on the total number of units proposed, not the number of units allowed by the base-density. Calculating the inclusionary requirements on the base-density as now proposed will result in a significantly lower percentage of affordable housing than the 10 percent for lower income households and 10 percent for moderate income households called for in the program. Consideration also should be given to calculating the replacement units separately from the inclusionary requirement.

4. Complete Communities Housing Solutions should consider ways to increase multifamily housing capacity in the more suburban northern areas of the city.

These are areas where jobs are plentiful, and although they may not have a high level of transit service (now or in the future), they are close to jobs. Providing more housing capacity (particularly multifamily housing) in these areas would help provide more balanced communities, a long-time goal of the city's general plan. Although people living in these areas may not have access to transit, they may be able to live closer to their jobs and therefore, vehicle miles travelled and GHG emissions could be reduced.

5. The Complete Communities initiative should apply to the Transit Priority Areas (TPAs) currently served by transit. In areas where transit is planned in the future, properties should not be able to "opt-in" to Complete Communities until the transit and other related infrastructure is provided.

Complete Communities allows increased housing density and provides incentives within designated Transit Priority Areas (TPAs) (areas within a specified distance of "High Quality Transit"). Many of the designated TPAs are located where high quality transit has been proposed in a long-range plan, but may be years off or never actually constructed.

For these older neighborhoods the infrastructure improvements that will provide efficient transit should come first and the denser housing after, not as currently proposed. Infrastructure must

be upgraded so that high-quality transit can operate before housing is built. To implement high-quality transit, and for dense housing without parking to attract its intended tenants, infrastructure such as utilities, sidewalks, and especially streets or other transit corridors must first be brought up to standard so traffic congestion and other quality of life issues are not worsened. Complete Communities does not recognize this situation and should be modified accordingly.

In addition, to help the City meet its 14 percent bike ridership goal in the Climate Action Plan, strong, safe bike connections between all communities -- both Transit Priority Area (TPA) communities and non-TPA communities should be prioritized in the implementation of Complete Communities.

6. Prioritize the acquisition of more land for parks in areas targeted for redevelopment.

The substitution of a points system for parks in place of population-based park requirements as proposed in Complete Communities Play Everywhere is likely to result in a diminishment of outdoor recreation and open space in areas where much higher densities are proposed.

The City's goal to address the park inequities between the older more urban communities and the newer more suburban communities is laudable. However, the City should prioritize the acquisition of more land for parks in these areas being targeted for redevelopment to meet our housing and climate action goals. Giving points for park infrastructure (such as play equipment and basketball courts for example) should not be a substitute for providing adequate green and open space areas, which are important to human health especially in higher density areas. Complete Communities Play Everywhere and the Parks Master Plan should not leave future generations of San Diegans without adequate park space to the detriment of their physical and mental well-being.

7. The Infrastructure component of the Complete Communities initiative should be more fully developed and explained prior to approving the other three components (Mobility, Housing Solutions, and Play Everywhere).

The City of San Diego is considering implementing a system to share impact fees citywide to take the place of the community-based development impact fees and facility benefit assessment programs currently in place, with one of the goals being to provide more equitable infrastructure spending in the city. This is a laudable goal. A nexus study is noted as being in development. This study, however, has not been made available to the public. A well-thought out and implemented infrastructure program will be important to the success of Complete Communities, and thus should not be treated as an afterthought.

In closing, C-3 calls on the City of San Diego to take the time necessary to ensure that the vision laid out by Complete Communities is implemented to its full potential. More community engagement and more attention to the issues we and other organizations have raised are of paramount importance in these challenging, changing times.

Sincerely,



Kate Goodson, President
Citizens Coordinate for Century 3
c3sandiego.org