

November 15, 2012

**MATRIX OF COMMUNITY COMMENTS FROM
DECEMBER 2010 TO MARCH 2011 AND STAFF RESPONSES**

In the fall of 2010 city staff presented the draft San Diego River Park Master Plan and associated amendments to the Community Plans (Mission Valley, Navajo, Tierrasanta, and East Elliot) and land development codes (Mission Valley PDO, Navajo CIPOZ, and the Mission Trails Design District Ordinance) to the community planning groups and park advisory bodies. The following is a matrix of the comments received and staff responses. Note all responses in ‘italics’ will be incorporated into the final public hearing draft documents.

Definitions:

CPIOZ: Community Plan Implementation Overlay Zone, M.C. 132.1401 - 132.1403

ESL: Environmentally Sensitive Lands Regulations, M.C. 143.0101 - 143.0160

LDC: Land Development Code

Master Plan: San Diego River Park Master Plan

MHPA: Multi-Habitat Planning Area

MSCP: Multiple Species Conservation Program/Subarea Plan

Parking Regulations: M.C. 142.0501- 142.0560

3-4-11 Comment No./ Comment From	Comment	Staff Response
A1/Navajo	<p>Comment 1: <u>The SDRPMP should differentiate its policies between natural and urbanized reaches of the river.</u></p> <p>The SDRPMP creates a single set of policies and recommendations for the entire length of the river. Within the various geographic reaches of the river there are areas that are lightly used, as well as areas where dense populations currently, or in the future, will live and work. Policies appropriate in one context may not be optimum in another.</p> <p>The SDRPMP identifies as the purpose of the River Corridor Area to “reclaim the valley as a common gathering place for all San Diego”. The permitted uses within the Path Corridor (page</p>	<p>Acknowledged</p> <p>In general uses within the Path Corridor, as described in Section 4.3.2, must be consistent with the City’s Multiple Species Conservation Program (MSCP) and</p>

	<p>97); however, are limited to vegetation, a pathway, and passive recreation. This limited range of uses is appropriate for those portions of Navajo, such as Mission Trails Regional Park, where the river’s natural character should be maintained and enhanced. Other portions of the community, such as in Grantville and in the future the Superior Mine site, reflect an urbanized condition where people should be encouraged to access and explore the river. Where the river satisfies part of the neighborhood park requirement in such urbanized areas, uses within the Path Corridor should include, for example, sand volleyball courts, fountains with seating, and children’s play equipment. Appropriate uses should be enumerated and added to those listed on page 97.</p>	<p>Environmentally Sensitive Lands Regulation (ESL). In addition uses will be subject to the State and Federal Resource Agency regulations and will be determined on a case by case basis. Staff will add language with additional types of passive uses consistent with MSCP and ESL. Staff to add language about what kind of uses can occur when a public park is located adjacent to the River.</p>
<p>A2/Navajo</p>	<p>Comment 2: <u>The SDRPMP should more clearly encourage human use of the river.</u></p> <p>The SDRPMP lacks an essential balance between creating a natural and restored river environment for biological purposes and a recognition that the San Diego River is – for the most part – an urban resource within the city of San Diego. Although you have acknowledged the potential economic value of an improved and enhanced river as it relates to adjacent development and redevelopment, the SDRPMP does not reflect the important relationship of human use and activities in areas adjacent to the river. Revisions to the plan are necessary to better balance the reality and value of human interface with protection and enhancement of the wildlife habitat.</p> <p>The SDRPMP’s “Vision” is to “Reclaim the valley as a common, a synergy of water, wildlife and people”. NCPI supports and shares this vision, particularly the concept of reintroducing “people” to the river. The Vision is supported, however, by five principles which reflect an emphasis on the <u>natural</u> functions of the river; none reflects the Vision’s identification of people as having a role in enjoying the river.</p>	<p>Change Principle Five to “Reorient development toward the river to create value <u>and opportunities for people to embrace the river.</u>”</p>

We believe an additional principle should be added: “Provide opportunities for people to access and utilize the river”.

In portions of the Navajo Community, such as in Grantville, the river is not currently perceived as an amenity. Its isolation from development, impenetrable vegetation, and restricted access create a haven for undesirable activities and a diminished sense of security. The SDRPMP should encourage activities which will reengage people with the river. Page 79 of the SDRPMP lists activities in potential Grantville parks along the river. The activities are all passive and habitat-related. Additional activities, designed to activate the river’s edge, should be encouraged. These might include observation decks, outdoor dining in close association with the river, push carts, mobile vendors, Frisbee golf, picnicking areas, and rental boat concessions. Of great value as well would be the opportunity to enjoy the river directly and unobtrusively on personal non-motorized water craft such as kayaks and row boats. Such activities would encourage people to consider the park as a desirable amenity, and their presence would be an effective deterrent to inappropriate activities occurring presently. (Note: in contrast to the narrow language of the SDRPMP, **page 77** of the NCP includes a slightly broader range of activities in the River Corridor Area, such as fitness stations and educational exhibit areas).

We suggest the SDRPMP’s regulations for the 35-foot path corridor be revised toward the goal of facilitating greater human use of the river. The Plan requires a 35-foot path corridor along the river beginning at the edge of the floodway. A wider path corridor would be more inviting for park users and would provide for a greater variety of uses and designs within the corridor. Widening the path corridor might be accomplished in two ways: 1) the path could be widened, at a property owner’s initiative, farther into the non-river side of a parcel. A land owner might find it advantageous to do so if, for example, the

Staff to add language that list opportunities for recreational activity such as fishing, non-motorized boating, with resource agency approval. Outdoor dining, push carts, and mobile vendors are commercial uses and can be provided within the River Influence area.

The 35’ River Corridor is a minimum width, the width could be enlarged per the proposed development and if the increased area provides for ‘useable’ recreation then it could be counted towards park requirements.

	<p>City were to offer marketable (saleable) park credits, offsets to impact fees, or additional development intensity in exchange for a wider path; and 2) the path could be widened toward the river. Widening into the floodway would likely be a concern of the resource agencies and in some locations may not be appropriate. However, there are areas within the floodway with non-native invasive species, disturbed land, or other conditions of no habitat or recreational value. In such circumstances a compelling argument could be made for expanding the path corridor into the floodway for a distance to be determined by site-specific conditions.</p> <p>A widened path corridor could follow a more meandering route – as the SDRPMP seeks. Otherwise, the 10-foot hardscape pathway would only weave within a 25-foot portion of the 35-foot corridor (since 10 feet are required to be a buffer between the pathway and the floodway). Expanding the width of the path could accommodate the vendors and mobile carts mentioned above. By enhancing the experience where the path takes the user, and the sights and activities to be encountered, more users would tend to seek to use the river.</p>	
<p>A3/Navajo</p>	<p>Comment 3: <u>The SDRPMP should provide flexibility for varying site conditions along the river.</u></p> <p>The SDRPMP’s design guidelines fit best when applied in a wide, undeveloped reach of the river where ample space is available between water and the first urban feature. The Plan’s provisions appear reasonable and achievable, for example, in upper Grantville, including the Superior Mine site. Where existing development or roadways have encroached into the natural floodplain, the distance between water and urban features may be so restricted as to make it infeasible to implement the SDRPMP’s policies.</p> <p>In Grantville, for example, much of the existing development between Camino del Rio North and Friars Road is bounded on</p>	<p>All properties along the river are subject to the current city regulations for river front property, including MSCP and ESL (which mandate a wetland buffer between development and wetlands). In addition the existing CPIOZ for Navajo states that all properties adjacent to the river will provide a 20’ foot setback from the existing floodway and that within this 20’ setback will be a 10’ wide ped/bike path. The draft Master Plan builds on the existing regulations and has increased the 20’ setback to 35’ to allow for a 14’ wide pedestrian/bike path that will counts towards transportation requirements and allows for passive recreation amenities to be provided along the path so that this area can be counted towards population-based park requirements. Typically development along the river will be processed through a discretionary action that</p>

	<p>the west by the river and on the east by Fairmount Avenue. Few of these properties are developed in a manner which reflects the objectives of the SDRPMP. The community, and the river, would be enhanced by redevelopment consistent with the Plan.</p> <p>The SDRPMP envisions that redevelopment will generally occur at the initiative of the property owner. Where a property, redeveloped in accordance with the SDRPMP, cannot yield at least the same economic return as the existing uses, an owner would have little reason to consider redevelopment.</p> <p>Page 33 of the Plan states, encouragingly, that “The master plan’s single overarching recommendation is one of flexibility; seeking and pursuing opportunities as they arise with property owners to implement the master plan’s vision ...”. Other than this singular reference, the remainder of the SDRPMP does not provide guidelines to identify the circumstances under which flexibility might be anticipated and administered. The Plan should identify the manner and circumstances under which its design guidelines can be flexibly applied to ensure that all properties have an incentive to redevelop and incorporate the SDRPMP’s concepts. The SDRPMP should be revised to specifically accommodate the land use plan envisioned for the Grantville Redevelopment Area, and then guidelines developed to reflect what can realistically be anticipated with redevelopment of Grantville.</p>	<p>allows for flexibility. During this process development can propose alternatives that show how the intent of the code and the master plan are being achieved. See Regulatory Framework, Section 6.0.</p>
<p>A4/Navajo</p>	<p>Page 160 envisions that the Planned Development Permit process will be used to exact park land from property owners (“The PDP can also require ... reserving some of the site as protected open space or park land ...). The SDRPMP should recognize that exacting land from a property owner may be possible on large undeveloped parcels. However, in more constrained situations public purchase of park land will likely be necessary. Page 75 states, regarding Grantville, that “Public</p>	<p>Staff to revise language to ‘Public parks to serve new residential uses along the river should be located adjacent to the river where possible and provide connections to the river pathway.’</p>

	<p>parcs required of the new residential use will be located adjacent to the river”. This statement should be revised to read “Public parks acquired to serve the new residential use should be located, where possible, adjacent to the river”.</p> <p>In some areas land available for development or redevelopment is physically constrained, with the river on one side and a public street on the other. In these situations there may be more land area and an increased opportunity to develop a park within the adjoining community, but not necessarily along the river. Wouldn't a public park within walking distance of the river and connected with well designed access trails be of value to the community? The Plan should encourage flexibility to ensure that parks are developed where feasible, rather than foregoing park opportunities over a sometimes infeasible requirement that they be located adjacent to the river.</p>	
A5/Navajo	<p>Page 162 envisions “on private land, the river pathway will be built as part of new development or redevelopment”. The SDRPMP should address the implementation and financing mechanisms to be used to construct a pathway where redevelopment does not occur. Otherwise, completion of the river pathway may not be realized.</p>	<p>See Implementation Section, Sections 5.2.1 Funding Sources, 5.2.3.4 Land Acquisition, 5.2.3.5 Transfer of Development Rights.</p>
A6/Navajo	<p>Page 59 recommends, “Through in-fill development and redevelopment of a site, access to the river should be provided either through the building or by a pedestrian path from the nearest public street through the site to the river”. How will pathways and connections be accomplished in areas where redevelopment does not occur or is precluded by constraints established by the SDRPMP?</p>	<p>Where redevelopment does not occur the pathway could be built by the landowner to connect to the overall transportation corridor of the river pathway as a benefit to the users of the site. In addition the State River Conservancy or a non-profit organization could build the pathway for the landowner if requested.</p>
A7 /Navajo	<p>Page 77 anticipates: “If the river corridor in these areas [Grantville] can be expanded to the east, the San Diego River Park Pathway can be best accommodated on the east side of the</p>	<p>This is only a recommendation on where the river pathway could be located due to the topography of this area. The exact location of the pathway will be determined</p>

	<p>river”. Is there a means of accommodating an expanded pathway other than a public acquisition of the land between the river and Fairmount Avenue? There is not sufficient space between the river and Fairmount Avenue to accommodate redeveloped urban uses, the pathway, a habitat buffer, development setbacks, and an expanded river corridor.</p>	<p>through the redevelopment and discretionary permit process.</p>
A8/Navajo	<p>Page 94 discusses the River Corridor, the Multi-Habitat Planning Area, and the Wetland Buffer and says “Once the boundaries are mapped, the largest mapped boundaries will prevail”. This language requires that a wetland buffer be preserved even when a development project does not disturb existing jurisdictional area. State and Federal resource agencies require the buffer only when habitat is being directly impacted. The language of the SDRPMP should be revised to clarify that a buffer will be required only where habitat is being disturbed for development. Similarly, page 77 of the NCP stipulates, “within the River Corridor Area a wetland buffer will be required per the Land Development code ...”. The LDC only requires a buffer for “development that proposes encroachment into sensitive biological resources”. The NCP should clarify that if the habitat is not touched then a buffer is not required.</p>	<p>The City’s ESL requires all development to provide a buffer between development and sensitive lands (wetlands), regardless of impacts to sensitive biological resources, see LDC 143.0101 and 143.0141.</p>
A9/Navajo	<p>Page 126 provides that: “Public parks may extend non-native turf areas to the non-river side of the river pathway”. This language precludes a public park that occurs on both sides of the river pathway (i.e., designing a linear park feature with the river pathway within the park). One can envision a wonderful public park where the actual river path is moved more inland and sandwiched on both sides with turf areas as part of a river park. This would allow for viewing areas, park benches, and picnic space along the river, providing for a unique and pleasant river experience. The river trail would still be realized; it would simply meander a bit farther inland and then back to the river’s edge. Flexibility should be provided in the Plan to allow for</p>	<p>Staff to add language that allows for lawn areas on the river side of the pathway within public park areas as long as the lawn areas is outside the MSCP and wetland buffer and does not drain directly to the river.</p>

	innovative park designs along the river.	
A10/Navajo	<p>Several revisions proposed in the NCP reflect provisions of the SDRPMP. But in some instances, the goals of these two documents seem to be unattainable. For example, page 75 of the NCP suggests that, within Grantville, a natural river channel be created to “separate the river flow from the old mining ponds”. This is an understandable recommendation in wide sections of the floodplain close to Mission Trails Regional Park. It is not clear how this can be accomplished in lower Grantville without consuming the land needed to provide the minimum area necessary for redevelopment. Page 75 also suggests that, within Grantville, redevelopment be coordinated to “preserve additional open space along the river”. Land cannot be exacted from a property owner when regulatory constraints do not promote redevelopment. This language should be revised to state “redevelopment should be coordinated to purchase additional open space along the river”.</p>	<p>Separation of ponds from the river is desirable throughout the river corridor; however the Master Plan acknowledges that constraints of space and cost may make this goal impractical in some locations. In areas where the corridor is narrow, such as in lower Grantville, separation could potentially be achieved by reconfiguring ponds to allow space within the mapped floodway of the river. However, it is likely necessary to deepen the ponds to preserve floodwater storage capacity. Any reconfiguration of the river corridor will require hydrologic study to ensure flood control is maintained or improved in addition to providing human and habitat benefits.</p> <p>There is no intent to ‘exact’ land from property owners.</p>
A11/Navajo	<p><u>Comment 4: The regulatory provisions of the SDRPMP and CPIOZ are so restrictive as to discourage redevelopment.</u></p> <p>The Navajo community will not benefit if owners of older industrial and office properties along the river perceive burdensome obstacles to improving or redeveloping their property.</p> <p>As per page 76 of the NCP, all projects in the River Park Subdistrict (i.e., within the 200-ft wide River Influence Area) must be discretionary. The often onerous and protracted nature of the discretionary process could encourage property owners to forego even minor remodels and modest improvements to their facilities. The Plan should provide criteria under which ministerial permits could be processed.</p>	<p>See M.C. 132.1402 ‘Where the Community Plan Implementation Overlay Zone Applies, Table 132-14B. The Navajo CPIOZ for the River Subdistrict allows interior building improvements that do not involve a change in use or provide additional floor area, or improvements that do not require a construction permit. This would include exterior improvements and maintenance of facilities that do not require a construction permit. Any development within the boundaries of the River Subdistrict would require a Site Development Permit. This type of discretionary permit allows applicant flexibility in meeting the code requirements, whereas a ministerial permit requires a development to meet all of the code without exception.</p>

A12/Navajo	Page 82 of the NCP provides that off street parking not be visible from the river. Page 138 of the SDRPMP includes a graphic which reaffirms this concept, illustrating parking located adjacent to the public street. The design objective of minimizing inappropriate parking solutions on the river is laudable, but it is not a solution to propose creation of a dreary streetscape by placing the parking where it would be visible to many more people -- those driving by a property. The result would be the creation of an outdated street scene, with parking along the street, rather than sitting buildings to address the street. While this may be common in suburban communities, redevelopment within urban areas should employ state-of-the art planning and design techniques to encourage pedestrian scale developments. The Plan should construct its design guidelines in a manner that considers both the river side as well as the street side of a project. The community should expect that the street side of a property will be treated with equal consideration as the river side.	Off street surface parking design adjacent to a street is guided by the Community Plan language and the LDC for off street parking.
A13/Navajo	Page 162 of the SDRPMP stipulates that a “public access easement will be required for the river pathway and will be part of permit conditions”. The landowner would be responsible to improve and maintain the easement. The SDRPMP should provide that liability will be assumed by the City; otherwise few property owners would be willing to redevelop and accept this risk. Also, the Plan should include options for improvements and maintenance that could be accomplished through a community-wide assessment district.	Private landowners are statutorily protected from liability from the use of public recreation trails located on their property under California Civil Code section 846, ‘Recreational Use Immunity.’ Options for improvements and maintenance are describe in Implementation Section 5.3.1.
A14/Navajo	The NCP, on page 153, identifies financing methods for Navajo’s parks. Financing for the San Diego River Park is indicated as “CIP, Private”. This should be revised to read “CIP, Grants”, to make clear the Plan’s intent is not to exact park land from property owners.	Staff to add ‘Grants’ to list on page 153 of the Navajo Community Plan.

<p>A15/Navajo</p>	<p>The draft amendments to the Navajo CPIOZ propose to retain the permitted Floor Area Ratio of 1.0. Has this been tested against Land Use Alternative D (the alternative being evaluated by the Grantville Stakeholders and City staff) to determine whether an FAR of 1.0 will accommodate the envisioned intensity of use when the criteria of the SDRPMP are assumed? Success of redevelopment within Grantville is dependent on just that – redevelopment. If redevelopment cannot occur due to limitations placed on areas along the river, then the SDRPMP’s Visions will not be achieved.</p>	<p>River Subdistrict CPIOZ is silent on Floor Area Ratio, this would be found in the Community Plan under Grantville.</p>
<p>B1/Grantville</p>	<p><u>GENERAL COMMENTS</u></p> <p>1. More Specificity within River Reaches Is Needed. A constraint of the SDRPMP is the manner in which it is organized around “reaches” of the river. This approach limits the Master Plan’s ability to address the unique characteristics of the natural, existing, and future built environments within individual reaches of the river.</p> <p>The Grantville Redevelopment Area is contained within a reach of the Navajo community. The presence of the river and how development responds to and interacts with the river differs between Subarea A and Subarea B within the Grantville Redevelopment Area, although both redevelopment subareas are within the same reach and afforded the same goals and recommendations in the SDRPMP. The SDRPMP should recognize the urban nature of the community (and the narrowed floodway) through Grantville. Understanding the river from this perspective allows the development of specific guidelines that address the unique circumstances within each Subarea, which will aid in realizing the Plan’s overall Vision and Principles. Specific guidelines will also benefit property owners interested in redevelopment by knowing what will be</p>	<p>The Master Plan has recommendations, based on community workshops in 2004 and 2008, that provide guidance for future redevelopment goals. Subarea A and B are noted as being different and specific guidelines are written for each area, see pages 76-77 for Subarea A and pages 82-83 for Subarea B. The Design Guidelines have been written for the entire river area.</p>

	<p>required in relation to implementing the SDRPMP through the redevelopment process. The Grantville Stakeholders Committee would like to be involved in preparation of any Grantville-specific guidelines.</p>	
<p>B2/Grantville</p>	<p>2. Lack of Balance between Natural River Environment and Urban Interface. The SDRPMP lacks an essential balance between creating a natural and restored river environment for biological purposes and a recognition that the San Diego River is – for the most part – an urban resource within the City of San Diego. As such, the SDRPMP does not reflect the important relationship of human use and activities in urban areas adjacent to the river, such as Grantville. For example, page 43 states: “Development should relate to the natural landscape and the special character of the river.” This statement implies that the natural characteristics of the river override the multifaceted importance that the river plays in an urban setting. Revisions to the plan are necessary to better balance the reality and value of human interface with protection and enhancement of the wildlife habitat. In support of the SDRPMP’s Vision to “Reclaim the valley as a common, a synergy of water, wildlife and people”(emphasis added), a principle should be added that provides opportunities for people to access and utilize the river, particularly where the river and urban environments meet. Additionally, a principle allowing the urban environment to embrace the river would avoid the perception that there is a barrier between the more developed portions of the community and the river.</p>	<p>Change Principle Five to “Reorient development toward the river to create value <u>and opportunities for people to embrace the river.</u>”</p>
<p>B3/Grantville</p>	<p>3. Lack of Specific Guidelines that Support the Master Plan’s Overarching Recommendation. Page 33 of the Plan states, encouragingly, “The master plan’s single overarching recommendation is one of flexibility; seeking</p>	<p>All properties along the river are subject to the current city regulations for river front property, including MSCP and ESL (which requires a wetland buffer between development and wetlands). In addition the existing</p>

	<p>and pursuing opportunities as they arise with property owners to implement the master plan’s vision ...”. Other than this singular reference, the remainder of the SDRPMP does not provide guidelines to identify the circumstances under which flexibility might be anticipated and administered. The Master Plan should identify the manner and circumstances under which its design guidelines can be flexibly applied to ensure that all properties have an incentive to redevelop and incorporate the SDRPMP’s concepts. The SDRPMP should be revised to specifically accommodate the land use plan envisioned for the Grantville Redevelopment Area, and then guidelines developed to reflect what can realistically be anticipated with redevelopment of Grantville.</p>	<p>CPIOZ for Navajo states that all properties adjacent to the river will provide a 20’ foot setback from the existing floodway and that within this 20’ setback will be a 10’ wide ped/bike path. The draft Master Plan builds on the existing regulations and has increased the 20’ setback to 35’ to allow for a 14’ wide pedestrian/bike path that will counts towards transportation requirements and allows for passive recreation amenities to be provided along the path so that this area can be counted towards population-based park requirements. Typically development along the river will be processed through a discretionary action that allows for flexibility. During this process development can propose alternatives that show how the intent of the code and the master plan are being achieved. See Regulatory Framework, Section 6.0</p>
<p>B4/Grantville</p>	<p><u>BRUSH MANAGEMENT</u> Development projects which are adjacent to native brush are typically required to prepare brush management plans that implement the City’s Landscape Ordinance (Land Development Code Section 142.0412). This usually requires the creation of two zones: Zone One and Zone Two. The SDRPMP should address how brush management requirements are to be accomplished along the river interface. For example, if the SDRPMP creates a River Corridor and 35-foot pathway, will developments adjacent to the river vegetation then be required to also implement the City’s brush management regulations? If so, this will likely increase the amount of setbacks required and reduce the area left for redevelopment.</p>	<p>Brush Management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation and regulated by the Land Development Code (LDC), Section 142.0412. Brush management activity is permitted within environmentally sensitive lands (except for wetlands) that are located within 100 feet of an existing structure in accordance with LDC, Section 143.0110(c) (7). Brush management in wetlands may be requested with a development permit in accordance with LDC, Section 143.0110 where the Fire Chief deems brush management necessary in accordance with LDC, Section 142.0412(i).</p>
<p>B5/Grantville</p>	<p>Also relative to fire management, the SDRPMP should address if the river pathway can be constructed in a width and manner that it can serve as both a fire access road (to access both the river and adjacent development) and the river path. This could then preclude the need for development to provide for fire access roads between development and the river, which</p>	<p>The river pathway, overall 14’ width, is the minimum standard per the Design Guidelines. On a case by case basis projects can propose a wider pathway.</p>

	<p>otherwise would reduce the amount of development area. Additionally, this would allow people and developments more direct access to the river, rather than having to cross a fire access road to get to the river path and river amenities (lookouts, interpretative signage, picnic tables, etc.).</p>	
B6/Grantville	<p><u>ALVARADO CREEK</u> Staff has stated that the SDRPMP does not pertain to Alvarado Creek. However, pages 78 – 79 of the Master Plan address Alvarado Creek in detail. Since Alvarado Creek is not a part of the Master Plan, all discussion relative to its treatment should be removed from the Master Plan. How Alvarado Creek is treated should be part of the redevelopment of Grantville and, therefore, should be addressed as part of the Amendment to the Navajo Community Plan for Grantville.</p>	<p>The Navajo River Subdistrict CPIOZ does not apply to Alvarado Creek. The Alvarado Creek is discussed in the Master Plan per the community workshop input in 2005 and 2008, where the community stated that Alvarado Creek was very important to the San Diego River in that this is the largest tributary to the San Diego River and plays an important role in water quality and habitat. These are recommendations only and are not regulations.</p>
B7/Grantville	<p><u>ROADS ALONG THE RIVER</u> Public access leading to the river should be wide enough to allow views toward the river.</p>	<p>Acknowledged</p>
B8/Grantville	<p><u>PUBLIC ART</u> 1. There should be a greater focus on public/private art within the River Corridor and River Influence areas. For example, developers could be encouraged to paint murals on the side of buildings facing the river; the murals would illustrate life along the river. Public art installations along the river further encourage public use of the river path, lessening the potential for some parts of the path to become neglected.</p>	<p>Acknowledged. As noted on in Section 4.3.4.8, publicly accessible art in public and private installations is encouraged in the River Corridor and River Influence areas. Art can contribute to creating identity, to interpreting river systems and history, and to celebrating the presence of the river as a part of the San Diego culture.</p> <p>Public art is discussed on page 52 ‘Integrate Art into the Identity and Experience of the San Diego River Park.’, on page 56 ‘Use Art, Maps, and Signage’, page 129 ‘Public Art Opportunities’ and pages 148-149, ‘Public Art for Private Development’.</p>
B9/Grantville	<p>2. The SDRPMP should allow for ornamental fences which can also function as public art. For example, metal fences in some areas, which serve as effective barriers, can also be designed in such a manner and with appropriate materials,</p>	<p>Within the river corridor the vision is to create a natural environment using natural materials that blend into the colors and textures of the area, therefore natural wood peeler log fencing is proposed. Fencing of non-natural</p>

	such that people would consider these art.	materials can be located within the River Influence area.
B10/Grantville	<p><u>GRANTVILLE PONDS</u></p> <p>The SDRPMP should encourage reengineering the Grantville ponds so that they more closely mimic a natural river condition. The goal is to create a low flow river and improve water quality while providing for flood storage capacity outside of the low flow river</p>	This is discussed in the Recommendations Section 3.2.2 and 3.2.4.
B11/Grantville	<p><u>MAPPING: RIVER CORRIDOR, MHPA, WETLAND BUFFER</u></p> <p>Page 94 discusses the River Corridor, the Multi-Habitat Planning Area, and the Wetland Buffer and says, “Once the boundaries are mapped, the largest mapped boundaries will prevail”. This language requires that a wetland buffer be preserved even when a development project does not disturb existing jurisdictional areas. State and Federal resource agencies require the buffer only when habitat is being directly impacted. The language of the SDRPMP should be revised to clarify that a buffer will be required only where habitat is being disturbed for development.</p>	The City’s ESL requires all development to provide a buffer between development and sensitive lands (wetlands), regardless of impacts to sensitive biological resources, see LDC143.0101 and 143.0141.
B12/Grantville	<p><u>PERMITTED USES</u></p> <p>1. The SDRPMP identifies as the purpose of the River Corridor Area to “reclaim the valley as a common gathering place for all San Diego”. The permitted uses within the Path Corridor (page 97), however, are limited to vegetation, a pathway, and passive recreation. This range of uses is too limiting in an urban setting such as that envisioned for Grantville, complete with a mix of uses and activities afforded by an increased residential population. Planned redevelopment in Grantville Subarea A and Subarea B reflects an urbanized condition where people should be encouraged to access and explore the river. Redevelopment has the potential to increase activities along the river’s edge, creating an enlivened River Park through Grantville. Uses within the Path Corridor should be expanded to reflect and support the</p>	In general uses within the Path Corridor, as described in section 4.3.2, must be consistent with the City’s Multiple Species Conservation Program (MSCP) and Environmentally Sensitive Lands Regulation (ESL). In addition uses will be subject to the State and Federal Resource Agency regulations and will be determined on a case by case basis. Staff will add language with additional types of passive uses consistent with MSCP and ESL. Staff to add language about what kind of uses can occur when a public park is located adjacent to the River.

	<p>adjacent urban community planned for Grantville. Additional activities, designed to activate the river’s edge, should be encouraged. These might include observation decks, outdoor dining in close association with the river, pushcarts, mobile vendors, Frisbee golf, and picnicking areas. Such activities would encourage people to consider the River Park not only as a desirable amenity for the community, but as nearby park amenity for the increased residential population envisioned along the river in Grantville.</p>	
B13/Grantville	<p>2. Page 75 also suggests that, within Grantville, redevelopment be coordinated to “preserve additional open space along the river”. Land cannot be exacted from a property owner when regulatory constraints do not promote redevelopment. This language should be revised to state “redevelopment should be coordinated to purchase or preserve by means other than exaction additional open space along the river”.</p>	<p>Staff to revise language to ‘Public parks to serve new residential uses along the river should be located adjacent to the river where possible and provide connections to the river pathway.’</p>
B14/Grantville	<p>3. Other language in the Master Plan fails to recognize the land use plans being developed for Grantville. For example, page 59 states: “Future projects adjacent to the river should look for opportunities to provide mixed-use development that will orient towards the river.” On page 75, the Master Plan says, “The river side of structures will feature mixed uses, plazas, public access . . .” And the graphic on page 139 depicts cafes and restaurants next to the River Pathway. The preferred alternative for Grantville (Alternative D) will not comply with what is presented in the Master Plan, as areas within Subarea A that front the river are planned for residential uses. The Master Plan should include a specific discussion of the Grantville Redevelopment area and its preferred land use plan or the City should direct the GSC to consider a land use plan for Grantville that will not be in conflict with other City plans.</p>	<p>Staff to remove “mixed-use” on pages 58, and 73</p>

<p>B15/Grantville</p>	<p><u>PARKS</u></p> <p>1. Page 160 envisions that the Planned Development Permit process will be used to exact park land from property owners (“The PDP can also require ... reserving some of the site as protected open space or park land ...). The SDRPMP should recognize that exacting land from a property owner may be possible on large undeveloped parcels. However, in more constrained situations, public purchase of park land will likely be necessary.</p>	<p>See Section 5.2.3.2, within the Implementation Section, the PDP process does not say land will be exacted for park land; it describes a process for creating higher densities to allow for reserving some of the site for open space or parks. Population-based park land for residential development noted in a community plan will be provided through ‘Development Impact Fees’ or provided on site. All new residential development that requires a community plan amendment will provide parks through a park fee or provided onsite.</p>
<p>B16/Grantville</p>	<p>2. Page 75 states, regarding Grantville, that “Public parks required of the new residential use will be located adjacent to the river”. This statement should be revised to read “Public parks acquired to serve the new residential use should be located, where possible, adjacent to the river”. In some areas land available for development or redevelopment is physically constrained, with the river on one side and a public street on the other. In these situations, there may be more land area and an increased opportunity to develop a park within the adjoining community, but not necessarily along the river. Wouldn’t a public park within walking distance of the river and connected with well designed access trails be of value to the community? The Plan should encourage flexibility to ensure that parks are developed in a manner that relates to and connects with the river – even if those parks are not directly along the river.</p>	<p>Staff to revise language to ‘Public parks to serve new residential uses along the river should be located adjacent to the river where possible and provide connections to the river pathway.’</p>
<p>B17/Grantville</p>	<p>3. Page 49 states: “Establish linked string of parks and open space through land acquisition, public easements and partnerships with land owners in key locations.” If the river parcels in Grantville Subarea A are substantially constrained due to measuring of the River Corridor to reflect wetlands and MHPA and due to restrictive design guidelines in the Master Plan, redevelopment will be limited. This, then, precludes opportunities to create parks, open spaces, and linkages along this portion of the river. Staff should</p>	<p>Acknowledged</p>

	consider this potential and provide alternative language or incentives to ensure that the parks will be provided and the Master Plan can, therefore, be accomplished.	
B18/Grantville	4. Page 126 provides that: “Public parks may extend non-native turf areas to the non-river side of the river pathway”. This language precludes a public park that occurs on both sides of the river pathway (i.e., designing a linear park feature with the river pathway within the park). One can envision a wonderful public park where the actual river path is moved more inland and sandwiched on both sides with turf areas as part of a river park. This would allow for viewing areas, park benches, and picnic space along the river, providing for a unique and pleasant river experience. The river trail would still be realized; it would simply meander a bit farther inland and then back to the river’s edge. Flexibility should be provided in the Master Plan to allow for innovative park designs along the river.	Staff to revise language to ‘Public parks to serve new residential uses along the river should be located adjacent to the river where possible and provide connections to the river pathway.’
B19/Grantville	5. The SDRPMP should address giving park credits for developing parks along the river and/or constructing improvements in accordance with the Master Plan. The Master Plan should include specific policies for obtaining park credits and what those credits would be.	Staff to add “If the Path Corridor area is to serve as a population-based park for residential development, then the area should meet the Guidelines of the Park and Recreation Element of the City’s General Plan (Table RE-2-3)
B20/Grantville	<u>RIVER PATHWAY AND CORRIDOR</u> 1. The Master Plan also suggests that areas east of the river should be considered for expanding the river corridor: page 77 - “By engaging owners of the under-utilized property on the east edge of the river corridor, the Grantville redevelopment may create opportunities for the acquisition of land or establishing public access easements that could increase river corridor width. A wider river corridor would allow the river to be separated from the ponds, and offer space for passive recreation opportunities . . . If the river corridor in these areas can be expanded to the east, the San	Separation of ponds from the river is desirable throughout the river corridor; however the Master Plan acknowledges that constraints of space and cost may make this goal impractical in some locations. In areas where the corridor is narrow, separation could potentially be achieved by reconfiguring ponds to allow space within the mapped floodway of the river. However, it is likely necessary to deepen the ponds to preserve floodwater storage capacity. Any reconfiguration of the river corridor will require hydrologic study to ensure flood control is maintained or improved in addition to providing human and habitat

	<p>Diego River Park Pathway can be best accommodated on the east side of the river.” In Grantville Subarea A, there may not be sufficient space between the river and Fairmount Avenue to accommodate redeveloped urban uses, the pathway, a habitat buffer, development setbacks, and an expanded river corridor and park(s). The SDRPMP must consider the unique situation in Grantville Subarea A and offer suggestions relative to incentives and other measures the ensure that both redevelopment and goals of the SDRPMP can be realized.</p>	<p>benefits.</p> <p>Grantville Subarea A is narrow and accommodating the various setbacks is a challenge, but is also an opportunity to study the reconfiguration of the ponds to allow for river oriented development that benefits from the presence of a healthy river, and a corridor that benefits from quality edges and connections to the community.</p> <p>As specific projects are developed, opportunities should be explored that encourage and support quality, river-oriented development and achieve the goals of the Master Plan the river should be explored.</p>
B21/Grantville	<p>2. The SDRPMP’s regulations for the 35-foot path corridor should be revised toward the goal of facilitating greater human use of the river. Flexibility in creating a wider path corridor should be provided as an option to the uniform 35-foot path corridor. Trade-offs [such as park credits, increased development intensity, transfer of development rights (TDRs)] could allow narrowing of the corridor in areas where physical limitations might otherwise constrain a property for redevelopment. Allowing for an expansion of the width of the path in some areas, in exchange for narrowing the path in other areas, could accommodate vendors and mobile carts and even allow for spill-over of café seating. By enhancing the experience where the path takes the user, and the sights and activities to be encountered along the way, more users would tend to seek to use the river.</p>	<p>The river pathway, overall 14’ width, is the minimum standard per the Design Guidelines. On a case by case basis projects can propose a wider pathway.</p>
B22/Grantville	<p>3. Page 162 envisions “on private land, the river pathway will be built as part of new development or redevelopment”. The SDRPMP should address the implementation and financing mechanisms to be used to construct a pathway where redevelopment does not occur. Otherwise, completion of the river pathway may not be realized.</p>	<p>Where redevelopment does not occur the pathway could be built by the landowner to connect to the overall transportation corridor of the river pathway as a benefit to the users of the site. In addition the State River Conservancy or a non-profit organization could build the pathway for the landowner if requested.</p>

<p>B23/Grantville</p>	<p>4. The SDRPMP should recognize that, for Grantville Subarea A, there are constraints that make it infeasible to attain all of the Master Plan’s objectives relative to the River Path and access to the river. For example, page 26 states that “. . . there should be pathways and trails that link the river path to adjacent neighborhoods and open space areas. These secondary pathways and trails should be visual and physical green connections . . . Land acquisition and open space easements are two ways to rejoin the valley and allow unbroken passage along the river’s length.” Page 59 adds, “Through in-fill development and redevelopment of a site, access to the river should be provided either through the building or by a pedestrian path from the nearest public street through the site to the river” and “. . . with additional landscape to buffer pathways from adjacent roads and to provide access to the river pathway where appropriate.” Given the constraints and other Master Plan requirements and guidelines, not all these objectives may be realized.</p>	<p>Acknowledged, the Master Plan provides a vision for the development of the river and through the discretionary permit process each site is reviewed to see how it is meeting the intent of the master plan and applicable codes.</p>
<p>B24/Grantville</p>	<p><u>DESIGN GUIDELINES</u></p> <p>1. Staff should review the Design Guidelines to be sure that each is written in a manner that provides clarity and avoid ambiguity. Property owners within Grantville need a clear understanding as to what is required and what is a suggestion. It might be helpful to include what elements and/or design features that the SDRPMP is trying to avoid.</p>	<p>The city writes the LDC and Design Guidelines as prescriptive, meaning they provide a description of what is to be achieved.</p>
<p>B25/Grantville</p>	<p>2. The SDRPMP’s design guidelines fit best when applied in a wide, undeveloped reach of the river where ample space is available between water and the first urban feature. The Master Plan’s provisions appear reasonable and achievable, for example, in some undeveloped reaches of the river. Where existing development or roadways have encroached into the natural floodplain, the distance between water and</p>	<p>The Master Plan has recommendations, based on community workshops in 2004 and 2008, that provide guidance for future redevelopment goals. Subarea A and B are noted as being different and specific guidelines are written for each area, see pages 76-77 for Subarea A and pages 82-83 for Subarea B. The Design Guidelines have been written for the entire river area.</p>

	<p>urban features may be so restricted as to make it infeasible to implement the SDRPMP’s policies. This is true of Grantville Subarea A, where much of the existing development between Camino del Rio North and Friars Road is bounded on the west by the river and on the east by Fairmount Avenue. Few of these properties are developed in a manner which reflects the objectives of the SDRPMP. The community, and the river, would be enhanced by redevelopment consistent with the Master Plan. However, requirements of the SDRPMP may not allow redevelopment in a manner that can yield an economic return, and implementation of the SDRPMP would not be realized. The SDRPMP should recognize the unique situation for the Grantville Redevelopment Area – perhaps as a subsection to the Master Plan – and create guidelines that reflect the preferred land use plan for Grantville, which have been developed by City staff and its consultants in concert with the GSC.</p>	
B26/Grantville	<p>3. Page 131 states: “Structures should be located and shaped in a manner that opens up views to the river from nearby districts, neighborhoods, and hillsides, and a structure’s location and shape on the site should create a spatial transition to the river. The active uses of the structure should be focused toward the river and inactive, ‘back-of-house’ and service uses should be directed away from the river.” As stated previously, due to limited area along the river in Grantville Subarea A, this requirement may be too restrictive to allow for an appropriate level of redevelopment consistent with the preferred land use plan for Grantville. Some level of flexibility or consideration of unique circumstances should be included within the SDRPMP.</p>	<p>Acknowledged, the Master Plan provides a vision for the development of the river and through the discretionary permit process each site is reviewed to see how it is meeting the intent of the master plan and applicable codes. Staff to revise language and remove reference to ‘back of the house’.</p>
B27/Grantville	<p>Similarly, on page 138, the Master Plan requires that, “Buildings structures shall orient a primary facade and</p>	<p>Acknowledged, the Master Plan provides a vision for the development of the river and through the discretionary</p>

	<p>entrance or its equal in design and materials to the River Corridor Area.” In some areas, locating primary façade to the river in narrow parcels may be problematic. Ensuring that the façade facing the river is consistent with the overall design of the building is more achievable.</p>	<p>permit process each site is reviewed to see how it is meeting the intent of the master plan and applicable codes.</p>
B28/Grantville	<p>In general, requiring buildings to have primary access orienting toward the river and “back-of-house” portions of development away from the river may be in conflict with Grantville Redevelopment Area goals of creating a complete, pedestrian-friendly community. In situations where parcels reach from the river to a roadway, such as between the river and Fairmount Avenue, orienting all entries toward the river would create essentially a “back-of-house” alley along Fairmount Avenue. The façade facing the river should be consistent with the overall design of the building, creating an amenity for river trail users, without subordinating the design and function of the street side.</p>	<p>The Master Plan design guidelines, Section 4.4.2.7, state that building structures shall orient a primary façade and entrance <u>or its equal</u> in design and materials to the River Corridor. This allows the front entry to be located along public streets as long as an entrance equal to the front entrance is located on the river side.</p>
B29/Grantville	<p>4. Page 140 states that, “Public access pathways shall connect the street right-of-way to the river pathway at every street intersection and, at a minimum, provide a connection every 1,000 linear feet of frontage along the River Corridor Area.” Please explain the origin of the 1,000-foot standard so its appropriateness can be evaluated.</p>	<p>The 1000 foot standard is based on what two standard city blocks measure and therefore providing public access to the river to where public streets are not available. 500’ lineal feet was studied and found to be intrusive for one property. 1500 lineal feet was studied and was determined to be too far for pedestrians to get access.</p>
B30/Grantville	<p><u>PARKING</u></p> <p>1. Page 138 of the SDRPMP includes a graphic which suggests that off street parking not be visible from the river, illustrating parking located adjacent to the public street. While we agree that parking should be minimized along the river, areas in Grantville Subarea A are constrained due to depth of lots suitable for redevelopment. Such limitation on parking may force parking to occur in lots along streets, creating an inferior streetscene inappropriate for modern</p>	<p>Off street surface parking design adjacent to a street is guided by the Community Plan language and the LDC for off street surface parking.</p>

	<p>planning. The result may create an outdated street scene, with parking along the street, rather than siting buildings to address the street. The Master Plan should construct its design guidelines in a manner that considers both the river side as well as the street side of a project. Redevelopment in Grantville should give equal consideration to creating an interesting streetscene and respecting the importance of the San Diego River. Small pockets or bays of well-designed and landscaped parking along the river could enhance the river environment by offering a break in the built landscape, allowing potential users more direct access to the river (for those using their automobile to get to the river), and allow for greater views into the river corridor.</p>	
<p>B31/Grantville</p>	<p>2. Text included on page 138 states: “Off-street surface parking shall not be visible from the River Corridor Area. Alternatively, off-street surface parking shall be located a minimum of 100 feet from the River Corridor Area and screened by landscaping and an opaque wall at least 6 feet high or 1 foot higher than the item to be screened if item exceeds 6 feet in height.” With regard to this objective, locating surface parking at least 100 feet from the River Corridor adds yet another constraint to successful redevelopment within Grantville. Furthermore, the requirement for a wall or landscape screening has the potential to close off views to the river environment. Often, open parking areas (if designed properly) provide a break in both development and dense vegetation and can expand the enjoyment of the river/urban environment. The SDRPMP should neither encourage nor prohibit parking lots along the river, but should provide flexibility to allow it in appropriate circumstances.</p>	<p>Staff to revise Section 4.4.2.4 ‘Off Street Surface Parking’ to allow more flexibility.</p>
<p>B32/Grantville</p>	<p>3. Page 137 states that “Facades of parking structures that face the River Corridor Area shall be developed with permitted</p>	<p>Staff to revise section 4.4.2.5 ‘Parking Structures’ to allow more flexibility.</p>

	<p>residential, commercial, and /or mixed use structures for the full height and width of the parking structure.” This, again, may limit redevelopment of parcels along the river in Grantville Redevelopment Area A. The SDRPMP should expand this requirement to state: “As an alternative, parking structures should be designed to be compatible with associated structures and to blend with the river environment through the use of color, texture, and landscaping”.</p>	
B33/Grantville	<p>In summary, the GSC believes that edits to the SDRPMP may be needed. The SDRPMP should be expanded to include a subsection which specifically addresses the unique circumstances within Grantville. Grantville is the only redevelopment area along the eastern reaches of the San Diego River. Because there is an active and parallel planning process occurring for Grantville, it is essential that the SDRPMP allow for and acknowledge what will result from that effort. We want to avoid creating a land use plan for Grantville that is, at the onset, inconsistent with the SDRPMP. Additionally, the SDRPMP should not include guidelines and restrictive/conflicting language that will not allow redevelopment of Grantville to be realized.</p>	Acknowledged
C1/Tierrasanta	<p>The TCC evaluated your request for support of the trail connection part of the River Park Master Plan. The Master Plan is proposing a trail connection from MTRP to Carlton Oaks Golf Course and then a trail through Carlton Oaks that would connect to the trail in the City of Santee. After careful consideration and discussion the TCC voted to support the changes as proposed. We also want to have included in our support notice that if Golf Course becomes developed into something other than a Golf Course, the TCC voted to still have the trail connection put through that new development. The TCC hopes for a smooth passage at both planning commission and city council. If you have any questions or additional changes that we have not seen, or that are made at</p>	Acknowledged

	<p>Planning Commission or City Council, we would void our approval and ask to see those changes, as our community is directly impacted by the River Park Master Plan.</p>	
D1/MTRP CAC	<p>Recommendations page 86, paragraph 1, lines 4-5 reads “At approximately 5,800 acres, Mission Trails Regional Park is one of the largest urban parks in the nation, and a regional destination for hiking, biking, and wildlife viewing.” This information is inconsistent with the acreage information in the Recreation Element of the 2008 City of San Diego General Plan which reads “The park encompasses approximately 8,000 acres of rugged hills, valleys, and open areas which represent a San Diego prior to the landing of Explorer Juan Rodriguez Cabrillo in San Diego Bay in 1542.” This information is also quoted on page ii of the draft Mission Trails Regional Park Master Development Plan 2008 which is available on the mtrp.org web site. Recommendation – Change wording to read “At approximately 8,000 acres,”</p>	<p>Staff to make this revision, now found on page 84.</p>
D2/MTRP CAC	<p>Recommendations page 87, item E reads “Study trail connections from Kumeyaay Lake campground to the Mast Boulevard Staging Area.” There is an existing connection from the campground via the Grasslands Crossing a few feet to the west of the campground on Father Junipero Serra Trail which provides access to the Equestrian Staging Area (not the Mast Boulevard Staging Area). Recommendation – Change wording to read “Study trail connections from Kumeyaay Lake campground to the future river pathway below State highway 52.”</p>	<p>Staff to make this revision, now found on page 85</p>
D3/MTRP CAC	<p>Recommendations page 87, item G reads “Study trail connections and alignments from the Mast Boulevard Staging Area to the future river pathway below State highway 52.” Recommendation – Change “Mast Boulevard Staging Area” to “Equestrian Staging Area.”</p>	<p>Staff to make this revision, now found on page 85.</p>

D4/MTRP CAC	Design Guidelines page 124, paragraph 2 reads “All signs in the River Corridor Area should contain the River Park Logo (refer to Image). Recommendation – Change wording to read “All signs in the River Corridor Area, except those in Mission Trails Regional Park, should contain the River Park Logo (refer to Image). When feasible, signs in Mission Trails Regional Park should contain the River Park Logo in addition to the Mission Trails Regional Park logo.”	Staff to revise language to allow for the San Diego River Trail Logo to be used on MTRP trail signs as approved by Mission Trails Regional Park staff, now found on page 120
D5/MTRP CAC	Design Guidelines page 124, paragraph 3 reads “All site furniture in the River Corridor Area should contain the River Park Logo. Recommendation – Change wording to read “All site furniture in the River Corridor Area, except those in Mission Trails Regional Park, should contain the River Park Logo (refer to Image).”	Staff to make this revision, now found on page 120.
D6/MTRP CAC	Regulatory Framework page 185, paragraph 2, last sentence reads “A master plan update is slated to begin in 2010. The master plan update began in 2007 with the appointment of the MTRP CAC Master Plan ad-hoc subcommittee. The subcommittee met monthly, took field trips into the park, and made recommendations which were presented to the MTRP CAC and Task Force. The CAC and Task Force approved the 2008 Draft MTRP Master Development Plan as presented by the ad-hoc subcommittee in the fall of 2008. At that time funding was identified and the process started to work with Park Planning and Community Development to create a “City-sanctioned Master Plan update with an official standing,” which will include a MTRP Resource Management Plan, and a Program Environmental Impact Report. The City agreed in a memorandum dated September 17, 2008 to work in close coordination with the CAC ad-hoc subcommittee on a regular basis during the completion of the plan update, presenting draft documents to the CAC for review. Recommendation – Change wording to read “A master plan update began in 2007, spearheaded by the MTRP CAC. The City hired consultant will begin work on the update, which will include a Resource	Staff to make this revision, now found on page 178.

	Management Plan, in 2011.”	
D7/MTRP CAC	ADDITIONAL COMMENTS FROM CAC, DATED 3-2-11 Page 33 – Five guiding principles. Include public access as one of the guiding principles, e.g., Provide public access for passive and, where appropriate, active recreation.	The principles are listed on page 20 and were generated from the 2004 public workshops. These principles express the essential elements of the Master Plan’s vision ‘Reclaim the Valley as a Common, a Synergy of Water, Wildlife and People’. Public access to the river is addressed in Principles 3 and 5.
D8/MTRP CAC	Page 34-3.1.1 H. – Clarify what is being implemented.	Staff to modify statement: Incorporate hydrology and water quality considerations in all future planning and guidance documents and monitor water quality following implementation of future development projects.
D9/MTRP CAC	Page 37-B. – <ul style="list-style-type: none"> • Disconnecting ponds from river doesn’t make sense. Ponds and lakes should be discussed separately as they don’t necessarily require the same treatment as culverts, roads and dams. • Culverts don’t necessarily impede flow. • Should be a reference to shallow pools leading to an increase in mosquito population. • Disagree with the following statement. “It is beneficial to the river to separate the channel from the ponds, but with aeration and other treatments so the ponds can remain as assets to the river park.” 	Prior to development, the river flowed in a braided and meandering pattern. The ponds that currently exist are the result of mining activity that interrupted this pattern. The intent of removing obstacles the impede flow such as the ponds, is too reestablish a hydrological pattern and flow more consistent with predevelopment conditions, that will support diverse habitat, while improving flood control. The ponds can be a component of the hydrologic design of the river corridor and contribute to flood water storage. If made deeper, the ponds will be cooler and less likely to be choked with duckweed and other invasive vegetation and less a mosquito breeding ground. Deeper ponds will also provide habitat for an increased diversity of aquatic species. While a large culvert does not necessarily impede flows, those present in the San Diego River corridor generally do impede flow, particular in high flow conditions.
D10/MTRP CAC	Page 38-C. – Include reference to developing a strategy/plan for the systematic removal of invasive species from up-stream to down-stream; coordinated with other jurisdictions.	Staff to add language, now found on page 37.
D11/MTRP CAC	Page 40, last paragraph – The following sentence needs to be clarified: “The city recognizes the linkages between land use and in urban and suburban developments to impacts on the river,	Staff to revise statement as follows: The city recognizes the linkages between land use and impacts on the river in urban and suburban areas and has

	and has developed comprehensive programs to minimize these detrimental effects by implementing high standards on new development and redevelopment as it relates to non-point source runoff.”	developed a ‘Storm Water Standards Manual’ as a comprehensive program that sets forth a list of permanent best management practices that development must incorporate into their projects.
D12/MTRP CAC	Page 41-H. – What is being Implemented?	Staff to revise language to remove “flowing implementation’
D13/MTRP CAC	Page 44, paragraph one, last sentence – “These three layers: San Diego River Park Corridors, MHPA and the Wetland Buffer, all work together to provide for an appropriate corridor for the integration of the river, wildlife and people.” Text should clarify that in some cases corridors may not be appropriate for both people and wildlife.	Staff to remove the word ‘integration’.
D14/ MTRP CAC	Page 45-F, paragraph one – Last sentence refers to “eco-bridges” which may not be appropriate for the San Diego River.	Land bridges, sometimes referred to as “eco-bridges” are becoming increasingly recognized as feasible solutions to reconnecting wildlife movement routes and for providing safe and beautiful connections for humans. Such bridges are a potential option for crossing roadways and reconnecting the river and canyon system.
D15/ MTRP CAC	Page 49 – The first paragraph references “a continuous river pathway system from the ocean to Mission Trails Regional Park” while recommendation A references from the Pacific Ocean to the City of Santee. Why are these references different?	Staff to revise language to be consistent, now page 48
D16/ MTRP CAC	Page 50, paragraph two, first sentence – “The river pathway should be located on both sides of the river.” Add “where appropriate” to the end of the sentence.	Staff to add ‘where appropriate’, now page 49
D17/ MTRP CAC	Page 52, map – <ul style="list-style-type: none"> • Add Famosa Slough. • Rancho is spelled incorrectly in Rancho Mission Canyon Park / Open Space. • What is the criteria for including neighborhood and community parks on the map? 	Reference will be added to the map. Spelling to be corrected Labeling of parks is primarily for orientation, with general consideration of potential connection with the river corridor.

D18/ MTRP CAC	<p>Page 57 –</p> <ul style="list-style-type: none"> • Significant historic sites. Check the boundaries of the community planning maps. Kumeyaay Village, Old Mission Dam and Flume may be within the boundaries of the Tierrasanta area rather than the Navajo area. • Picture, Example of Interpretive Sign. Add location – Kumeyaay Lake, Mission Trails Regional Park. 	<p>Staff to revise text.</p> <p>Specific reference will be added to picture.</p>
D19/ MTRP CAC	<p>Page 60 – Example of a green street in Seattle, WA is not a good example for San Diego, CA where irrigation is necessary. How about showing something with drought tolerant native plants as the example.</p>	<p>Image will be replaced.</p>
D20/ MTRP CAC	<p>Page 62, map –</p> <ul style="list-style-type: none"> • Label “Rancho Mission Canyon” • Incorrect street configuration for Mast Blvd. Mast goes under SR52 and into Mission Trails and West Hills Parkway connects with Mission Gorge Road. 	<p>Reference to Mast Blvd. will be removed from map, as the community boundary line is confused with the street.</p>
D21/ MTRP CAC	<p>Page 86, Gorge Reach, Overview, paragraph 2 –</p> <ul style="list-style-type: none"> • Change Mast Boulevard Staging Area to Equestrian Staging Area. • Change “The river pathway...” to “Any additional river pathway...” • Second picture should be labeled “Mission Trails Visitor Center Terrace” • What’s the definition of a “soft paved” trail? 	<p>Staff to revise language.</p> <p>Staff to revise language.</p> <p>Staff to revise language.</p> <p>‘Soft Paved’ is defined in the Design Guidelines, page 100</p>
D/22 MTRP CAC	<p>Page 89, map – Incorrect street configuration for Mast Blvd. Mast goes under SR52 and into Mission Trails and West Hills Parkway connects with Mission Gorge Road.</p>	<p>See D20/ MTRP CAC</p>

<p>D/23 MTRP CAC</p>	<p><u>DESIGN GUIDELINES SECTION (PAGES 93 TO 150)</u></p> <p>General comments –</p> <ul style="list-style-type: none"> Disagree with recommendation to disconnect ponds from the river. See notes from Recommendations section, page 37. Information should be included regarding use of sustainable materials in facilities and infrastructure wherever possible. Special attention should be given to ensuring urban runoff from the river influence area does not contaminate the river. 	<p>See D23/MTRP CAC</p> <p>Sustainable materials is provided in the General Plan under Conservation Element and implemented by City Council Policy 600-22.</p> <p>The City implements a number of storm water pollution prevention requirements identified in our Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit issued by the Regional Board. The City’s comprehensive set of Permit-required storm water pollution prevention activities and programs is identified in the City’s Jurisdictional Urban Runoff Management Plan.</p>
<p>D/24 MTRP CAC</p>	<p>Page 101-E – “The river pathway shall meet ADA guidelines and California Title 24 regulations for accessibility.” Suggest “where practicable” be added to the sentence. It may not be possible to meet ADA guidelines for the proposed new trail from the Upper Valley Reach into Mission Trails Regional Park. It is our understanding that there are exceptions to the guidelines and regulations for some new trails.</p>	<p><i>To be incorporated into the public hearing draft document: <u>‘The river pathway will be designed to meet ADA standards and guidelines and California Title 24 regulations for accessibility, which allows for flexibility in how trails are designed and used.’</u></i></p>
<p>D/25 MTRP CAC</p>	<p>Page 103-C – “Trails should be soft-surface materials, such as decomposed granite (color to be a natural earth brown or tan color) or suitable native soil with a maximum cross slope of 2%.” Add “...with appropriate sediment and erosion control devices.”</p>	<p>Staff to revise language, now found on page 100.</p>
<p>D/26 MTRP CAC</p>	<p>Pages 110 to 113 –</p> <ul style="list-style-type: none"> Suggest that some common elements be included throughout all Zones such as stone, tile and metal. Has an assessment been done of the maintenance costs for use of fabric and 	<p>It is acknowledged that some materials are less durable than others. However, specific selections such as ipe’ wood are much more durable and require no paint or</p>

	<p>wood? In Mission Trails Regional Park wood needs to be repainted and resealed every two to five years because of damage from the intense sun.</p> <ul style="list-style-type: none"> Recommend that all architecture in Zone 4 (Gorge and Plateau) be consistent with the Mission Trails Regional Park Master Plan Design Guidelines. 	<p>special finish.</p> <p>Staff to add ‘All architecture in the park shall be per the MTRP Design Guidelines’ now found on page 109.</p>
D/27 MTRP CAC	<p>Page 124 –</p> <ul style="list-style-type: none"> Paragraph 2 reads “All signs in the River Corridor Area should contain the River Park Logo (refer to Image). Recommend wording be changed to read “All signs in the River Corridor Area, except those in Mission Trails Regional Park, should contain the River Park Logo (refer to Image). When and where feasible, signs in Mission Trails Regional Park should contain the River Park Logo in addition to the Mission Trails Regional Park logo.” Paragraph 3 reads “All site furniture in the River Corridor Area should contain the River Park Logo. Recommend wording be changed to read “All site furniture in the River Corridor Area, except those in Mission Trails Regional Park, should contain the River Park Logo (refer to Image).” <p>Page 129-A –</p> <ul style="list-style-type: none"> Why are removable bollards being limited to steel? Concrete and faux fabricated removable bollards are also available. 	<p>See D4/MTRP CAC</p> <p>Staff to make this revision.</p> <p>Steel bollards were recommended by the Police Department for durability and visibility.</p>
E1/Wetlands Advisory Board	<p>The Wetlands Advisory Board voted to continue to review the draft documents and make comments during the Program EIR public review period.</p>	<p>Acknowledged</p>

F1/Mission Valley

GENERAL COMMENTS/QUESTIONS:

1. We have been asked to review the SDRPMP as an amendment to our Community Plan. However, our Community Plan is woefully outdated; and we understand the Community Plan update has been put on–hold for an indefinite time. As such, we are at a disadvantage in that we are not able to consider the whole of planning for our community in our evaluation of the SDRPMP; in other words, we are unable to evaluate other land use changes, which could either enhance or conflict with the SDRPMP.

Amending the Community Plan for the SDRPMP without consideration of other revisions to land uses in Mission Valley appears as planning in a vacuum and lacks the advantage of comprehensive knowledge of planning and land use goals that are important to our community and which would be considered through a comprehensive Community Plan update process. This is unfortunate, as the Master Plan eventually adopted for the San Diego River Park may preclude other planning and land use goals that the Planning Group might want to evaluate as part of the update of our Community Plan.

Acknowledged

An example of this dilemma appears in the way the SDRPMP addresses the Riverwalk Golf Course site. Page 71, item “A” states: *“These recommendations should be modified to favor a naturalized river pattern as suggested in this master plan, increasing the channel width, creating meander and separating the stream flow from any existing ponds.”* The Community Plan update should consider any modifications to uses and development of the Riverwalk Golf Course in concert with other land use considerations. What is presented in the SDRPMP may not allow development to adequately address and interact with the river. Discussion on page 72 seems to predetermine how the Levi-Cushman Specific Plan will be modified.

Page 69-71, from the Recommendations Section, are recommendations from the public workshops that were held in 2004 and 2008. These are recommendations only and all development within the River walk Specific Plan are subject to the approved Specific Plan. If the Specific Plan is amended them the recommendations of the Master Plan would be considered.

	<p>However, development of the Riverwalk Golf Course and other areas within the Levi-Cushman Specific Plan should be a consideration in the Community Plan update and should be evaluated in conjunction with other land uses and impacts to the community.</p>	
	<p>Similarly, the SDRPMP places too much emphasis on how the Qualcomm Stadium Site should redevelop. Specifically, the SDRPMP includes suggestions relative to the Qualcomm Stadium Site, stating that it is “<i>a long-term mixed-use redevelopment opportunity</i>” (page 72). Consideration of the Qualcomm Stadium Site will be a critical component for the Community Plan update. The SDRPMP should reflect the current Community Plan recommendations for the Qualcomm Stadium Site. The Community Plan update – and not the SDRPMP - should include specific recommendations for its redevelopment.</p>	<p>Page 72, Staff to revise language to be consistent with the Community Plan.</p>
	<p>City staff has indicated that it was not their intent to regulate land use planning along the river with this document. However, on page 70, there is the statement, “<i>These recommendations set forth the character of the valley moving it toward being a greener place planted with native species that concentrates higher density away from the river edge</i>”. This language does appear to us to be planning land uses along the river. Setting the character of the valley, moving toward a greener place planted with native species, and concentrating higher densities away from the river edge is quite a diversion from what our Community Plan and subsequent amendments currently show and, perhaps, from what the ultimate Community Plan update might envision.</p> <p>It would have been our preference that the River Park Master Plan be considered in concert with the update of</p>	<p>Page 70, Staff to revise language about moving density away from the river.</p> <p>Acknowledged</p>

	<p>the Mission Valley Community Plan. Since that is not possible, a solution would be for the SDRPMP to focus on the river park and leave land use decisions and recommendations to the Community Plan update.</p>	
<p>F/2 Mission Valley</p>	<p>2. When private development projects are proposed to the City that are located proximate to or include wetlands and riparian area, the City Environmentally Sensitive Lands Ordinance (LDC §143.0141) requires that the applicant confer with resource agencies (U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and California Department of Fish and Game). It seems essential that the SDRPMP be reviewed by the resource agencies to be sure that the Master Plan can be implemented in light of federal and state regulations and also to be sure that the Master Plan includes any other anticipated restrictions and constraints (such as permitted uses in the river and within the River Corridor) that would be required when public and private projects along the river are brought forward for consideration. Without review by the wildlife agencies at this time, proposals included in the SDRPMP may not be possible or may require restrictions and requirements that go beyond what is included in the SDRPMP, making its implementation ultimately impossible. Also, this early coordination would be useful in defining what form of public use of the actual river would be considered acceptable.</p>	<p>The project documents will be sent to the Resource Agencies for review and comment during the Environmental Impact Review (EIR) public review period.</p>
<p>F/3 Mission Valley</p>	<p>3. While we recognize that actual mapping for wetland and riparian habitat and defining the biology buffer is project-specific and determined through discussions with City staff and the resource agencies, the City's Multi Habitat Planning Area (MHPA) is set. Therefore, it would be helpful to include within the SDRPMP an exhibit that shows the City's mapped MHPA and then show how the</p>	<p>The City's MSCP map is provided on page 187 of the Regulatory Framework section. We believe a map showing the River Corridor and the River Influence area with the MHPA area would be misleading for future staff and applicants in that they could believe this line to be fixed when the line for the River Corridor will be adjusted per the proposed wetland buffer that will be determined on</p>

	River Pathway and River Influence Area would be located outside the MHPA.	a project by project basis.
F/4 Mission Valley	<p>4. The SDRPMP implies that the Master Plan’s regulations would not apply to adopted Specific Plans in Mission Valley. However, if Specific Plans are brought forward for amendments or other changes, then we assume that the SDRPMP would apply. The SDRPMP should include specific language to clearly address existing Specific Plans and future amendments.</p> <p>Additionally, it would be helpful to show a graphic of the areas where the SDRPMP regulations would apply for Mission Valley. It seems that, within the Mission Valley community, areas where the SDRPMP would apply are limited.</p> <p>Relative to areas where the SDRPMP applies within Mission Valley, and to approved Specific Plans if they are amended in the future and then must comply with the SDRPMP, requirements of the SDRPMP may be too restrictive to allow viable redevelopment and development options.</p>	<p>Staff to add language to page 6.1.2.1 to address this issue.</p> <p>A map of the area is found within the Mission Valley Planned District Ordinance (PDO), Chapter 15, Article 14, Appendix E, No.1</p> <p>The Master Plan is a policy document and allows for flexibility through the Mission Valley PDO process.</p>
F/5 Mission Valley	<p>5. There is an inappropriate focus of the Master Plan toward the natural environment and it does not adequately express the need – and benefits – of balancing the river’s natural environment with the built environment of the adjacent community. For example, page 43 states: “<i>Development should relate to the natural landscape and the special character of the river.</i>” This statement implies that the natural characteristics of the river override the multifaceted importance that the river plays in an urban setting. Revisions to the plan are necessary to better balance the reality and value of human interface with protection and enhancement of the wildlife habitat. In support of the SDRPMP’s Vision to “<i>Reclaim the valley as</i></p>	<p>The Master Plan has been written with community input and with the acknowledgement of the City’s MSCP and ESL regulations. The master plan seeks to provide a balance between future development and the existing regulations. The Master Plan provides for a multi-use path along the river where potential people places can occur that are consistent with the requirements of the MSCP and the ESL. Additional uses along the river could be considered when development is proposed through consultation with the Resource Agencies on a case by case basis.</p>

	<p><i>a common, a synergy of water, wildlife and people</i>”(emphasis added), a principle should be added that provides opportunities for people to access and utilize the river, particularly where the river and urban environments meet.</p> <p>Additionally, a principle allowing the urban environment to embrace the river would avoid the perception that there is a barrier between the more developed portions of the community and the river. As staff is aware, a situation has resulted along the existing river path in FSDRIP where, due to the inability to regularly thin and prune vegetation between the river path and the river, the corridor has become an unsafe place for pedestrians and bicyclists. We must design and provide a trail system that can be <u>safely</u> used and enjoyed by those it was intended. Energizing the interface of the river and the community with people should be a primary goal of the Master Plan.</p>	<p>Acknowledged</p>
<p>F/6 Mission Valley</p>	<p>6. Page 33 of the Plan states, encouragingly, “<i>The master plan’s single overarching recommendation is one of flexibility; seeking and pursuing opportunities as they arise with property owners to implement the master plan’s vision ...</i>”. Other than this singular reference, the remainder of the SDRPMP does not provide guidelines to identify the circumstances under which flexibility might be anticipated and administered. The Master Plan should identify the manner and circumstances under which its design guidelines can be flexibly applied to ensure that all properties have an incentive to redevelop and incorporate the SDRPMP’s concepts.</p>	<p>The actual implementation of the Master Plan is through the requirements of the LDC. Within the Mission Valley Planned District Ordinance, flexibility is provided in Section 1514.0201.</p>
<p>F/7 Mission Valley</p>	<p>7. The SDRPMP identifies as the purpose of the River Corridor Area to “<i>reclaim the valley as a common gathering place for all San Diego</i>”. An assertion to “reclaim” the valley suggests that condemnation is needed</p>	<p>Staff to revise Section 4.3.1.1 and remove the word ‘reclaim’.</p>

	<p>rather than building on the connections and integration that has already been achieved in a community that includes some of the City’s most popular destinations and most desirable residential choices. The permitted uses within the Path Corridor (page 97), however, are limited to vegetation, a pathway, and passive recreation. This range of uses is too limiting in an urban setting such as exists in Mission Valley. Uses within the Path Corridor should be expanded to reflect and support the adjacent urban community. Additional activities, designed to activate the river’s edge, should be encouraged. These might include observation decks, outdoor dining in close association with the river, pushcarts, mobile vendors, Frisbee golf, and picnicking areas. Failure to encourage and support significant opportunities will create a dangerous alley in our community. Urban planners know that commons that support fewer than ten destinations and activities are seldom successful.</p>	<p>In general uses within the Path Corridor, as described in Section 4.3.1.2, must be consistent with the City’s Multiple Species Conservation Program (MSCP) and Environmentally Sensitive Lands Regulation (ESL). Staff will add language with additional types of passive uses consistent with MSCP and ESL and recreational amenities such as children’s play areas, multi-purpose courts or multi-purpose turf areas can be considered.</p>
F/8 Mission Valley	<p>8. The SDRPMP lacks guidance for creating an urban greenway. Mission Valley is a great community and the River Park will be a wonderful addition to our community, if implemented properly. The urban corridor that exists on both sides of the river varies in character. While we understand that the Master Plan is intended to be a document applicable to the entire River Corridor and River Influence Area, the whole of the river and the segment that runs through the built environment of our community is not consistent. The document does not allow for exceptions in unique or special circumstances, such as central Mission Valley when compared with western Mission Valley, or to allow for variety in orientations. Rigidly mapping a single corridor removes opportunities for urban meander that could allow more creative designs.</p>	<p>Acknowledged</p>
F/9 Mission Valley	<p>9. Relative to illustrative drawings and images included in the SDRPMP, development that reflects these images</p>	<p>Acknowledged. Images in document will indicate development that is allowed and removed if not. Images</p>

	<p>(pages 31, 60, and 145, for example) would not be allowed with implementation of the Master Plan’s requirements. Images should not show development not allowed by the document. Additionally, there are several photographs in the Master Plan of other areas that do not reflect San Diego (pages 23 and 46, for example). These should be supplemented with local images that are reflective of San Diego. Photographs currently absent that should be included are examples that show a major retail center and hotel uses and how those can be designed to relate to the river. These are actual conditions in Mission Valley and should be shown in the Master Plan.</p>	<p>will typically indicate development in the San Diego area or similar region. However, an appropriate development from another region may be included to support a specific intent if unavailable in the San Diego area.</p> <p>Images #31, 60, 23 and 46 will be removed.</p>
<p>F/10 Mission Valley</p>	<p>10. The Master Plan assumes redevelopment, particularly on the Qualcomm Stadium site and the Riverwalk Golf Course/Levi–Cushman Specific Plan, as well as properties in other reaches (pg 71). However, the SDRPMP does not allow for the possibility that development may not occur. If redevelopment of assumed sites does not occur, how will the river park be completed in these areas?</p>	<p>See Implementation Section 5.2.3, for discussion on the option of acquisition and the potential of dedication in exchange for development rights. Where redevelopment does not occur the pathway could be built by the landowner to connect to the overall transportation corridor of the river pathway as a benefit to the users of the site. In addition the State River Conservancy or a non-profit organization could build the pathway for the landowner if requested.</p>
<p>F/11 Mission Valley</p>	<p>11. Mission Valley has a large transient population that inhabits the river. However, there is no mention of how the SDRPMP will treat this situation. Picnic areas, as illustrated in the draft document, can become transient campgrounds without high levels of activity. By allowing various uses to extend out into the 35-foot River Corridor, the picnic areas could be embraced by the community and not left as islands of neglect. Additionally, picnic and overlook areas should be provided for more than just education or cultural appreciation (for example, passive viewing, respites, etc.). The SDRPMP should address the transient population along reaches of the river and provide solutions which will allow the community to enjoy the river in a safe manner.</p>	<p>The Master Plan is not the document for a policy on social issues that affect the city. In the Design Guidelines, Section 4.3.4.9, is a section on river pathway and trail safety for general safety and crime prevention.</p>

F/12 Mission Valley	12. Flooding and maintenance should be addressed in the Master Plan.	Flood Control is found with the Environmentally Sensitive Lands Regulations, Section 143.0145.
F/13 Mission Valley	13. The SDRPMP should allow a property owner who constructs the River Pathway to receive population-based park credit. Specific guidelines should be provided relative to under what circumstances the credit can be applied and how the credit would be calculated. Also, the amount of park space satisfied by the credit should be identified so that it can be included in future updates to financing plans.	Staff to add “If the Path Corridor area is to serve as a population-based park for residential development, then the area should meet the Guidelines of the Park and Recreation Element of the City’s General Plan (Table RE-2-3)
F/14 Mission Valley	14. The SDRPMP should include a section on public art.	Public art is discussed on page 52 ‘Integrate Art into the Identity and Experience of the San Diego River Park.’, on page 56 ‘Use Art, Maps, and Signage’, page 129 ‘Public Art Opportunities’ and pages 148-149, ‘Public Art for Private Development’.
F/15 Mission Valley	15. Emphasis on sustainability/sustainable features (such as solar or photovoltaic lighting, recycled materials, etc.) is largely lacking in the SDRPMP. Emphasis on these elements should be included wherever possible, as green initiatives should inherently coexist with resource preservation and enhancement strategies.	Sustainable materials is provided in the General Plan under Conservation Element and implemented by City Council Policy 600-22.
F/16 Mission Valley	16. The SDRPMP should clarify the use of “should” versus “shall” throughout the document. The two are not synonymous. “Should” is not a mandate to comply; “shall” is a mandate to comply. This should be clearly stated in the Master Plan to avoid confusion between what must be adhered to and/or implemented from what is a suggestion or encouragement.	Staff to revise language in the Master Plan to ‘Should’ and in the Municipal Code ‘Shall’ is used.
F/17 Mission Valley	17. What is the point of Appendix I?	Staff will remove Appendix I from the final master plan.
F/18 Mission Valley	<p><u>SPECIFIC COMMENTS:</u></p> <p>1. Page 4 – In addition to listing the City’s Land Development Code and specific community regulations, Community Plans should also be listed.</p>	<p><i>To be incorporated into the public hearing draft document: <u>“The purpose of the design guidelines is to provide written and graphic information to support the Master Plan’s vision, principles, and recommendations,</u></i></p>

		<u><i>the goals of the Community Plans for Mission Valley, Navajo, Tierrasanta and East Elliot....”</i></u>
F/19 Mission Valley	2. Page 5 – The First San Diego River Improvement Plan (FSDRIP) should be specifically included in the list of applicable policy documents.	The applicable list has general categories and does not list the community plans or the specific plans by name in this location of the document.
F/20 Mission Valley	3. Page 10 – This exhibit should include a legend that identifies what the various shaded areas are. For example, what do the light green and yellow shaded areas signify?	Acknowledged. Drawing will be modified.
F/21 Mission Valley	4. Page 13 – It would be helpful to include on this graphic the ½-mile area on either side of the river, as well as the 1-mile wide study area.	½ mile study area on either side of river will be added to map.
F/22 Mission Valley	5. Page 18 – If a 250-foot tall building is only replaceable by a 45-foot tall building, what is the tax and property value loss?	See Design Guidelines for building heights and setbacks, Section 4.4.2.2.
F/23 Mission Valley	Page 23 – These images seem out of place. They should be replaced with local images reflective of San Diego	Lower image will be removed; Upper is Ruffin Canyon in San Diego.
F/24 Mission Valley	6. Page 29 – The two different yellow areas are difficult to differentiate. Use of a different color would be helpful.	Colors will be modified for greater distinction.
F/25 Mission Valley	7. Page 30 – This Principle requires that: “ <i>Development further inland should seek opportunities to connect with the river</i> ”. How far inland does this apply?	Staff to revise language to remove further inland and replace with River Valley.
F/26 Mission Valley	8. Page 31 and 60 – These are terrific images for the urban interface of the river park, but this plan prohibits both of these situations.	See F9/Mission Valley
F/27 Mission Valley	9. Page 39 – To carry the Vision of the SDRPMP, examples should be added that apply to urban environments. The Master Plan’s example of natural river parks from other states that are car destinations surrounded by communities that developed later on their edges does not provide San Diego with appropriate images that support an enlivened river corridor through an existing developed community.	Acknowledged
F/28 Mission Valley	10. Page 62 – The 1-mile wide study area should be added to this exhibit.	The one mile study area is shown on Figure 3.

F/29 Mission Valley	11. Page 67 – The Master Plan mentions the role of parks in the valley in relation to the mesas’ park. Does this mean the valley will be used to fill other community’s park deficits?	Staff to revise language to refer to the Lower Valley on page 67 only.
F/30 Mission Valley	12. Page 69 – Recommendation “D” – There is an approved Specific Plan for Levi-Cushman. However, Recommendation “D” suggests opportunities to address the river’s hydrology, provide a public park, and orient development toward the river. How would this be accomplished if a Specific Plan has already been approved for this area?	Staff to revise language to add that if the Specific Plan is amended opportunities could be pursued.
F/31 Mission Valley	13. Page 70 – Recommendation “I” – Replace “if” with “when” in this sentence. The Mission Valley Community Plan specifically recognizes that redevelopment of the Qualcomm stadium site shall include a public park.	Staff will revise language to change ‘if’ to ‘when’
F/32 Mission Valley	14. Page 93 – Isn’t the purpose of the SDRPMP to also implement the Community Plan, in addition to the regulatory documents?	Staff to revise language to add ‘support existing policy documents’
F/33 Mission Valley	15. Page 94 - The Master Plan requires any project within the River Influence area to process a discretionary permit. Consideration should be given to allowing for ministerial permits for certain actions.	Staff to remove last sentence of page 94. The PDO will describe when a discretionary permit is required.
F/34 Mission Valley	16. Page 101 – Section 4.3.2.4 River Pathway states that: <i>“The river pathway shall be 14 foot wide and shall consist of a 10 foot wide concrete, porous concrete material preferred, with a 2 foot wide shoulder area of decomposed gravel or similar soft material along each side of the 10’ wide river pathway.”</i> Although porous concrete is considered a “green” material because of its ability to allow water to percolate though it, several of its characteristics are not necessarily equivalent to that of reinforced concrete (i.e. slip resistance, strength, longevity.) Given the narrow width of this path, and its proximity to the river, we recommend deletion of “porous concrete material preferred.”	Staff to revise language to make it clear that porous concrete is ‘preferred’ but not a requirement.

	<p>The Master Plan should allow for a trail through the MHPA, if circumstances are appropriate. For example, some of the grade separations over roadways will likely require encroachments into the MHPA. Restricting all trails within the MHPA may preclude completion of a comprehensive trail system.</p>	<p>The paved multi-purpose river pathway is not a compatible land use with the MSCP (See MSCP, Framework Management Plan, page 53), and therefore is not allowed in the Wetland Buffer or the MHPA. If through the discretionary process the river pathway is proposed to be within the MHPA, a MHPA boundary line adjustment maybe required. Trails 4’ wide or smaller can occur in the MHPA per the MSCP General Management Directives.</p>
F/35 Mission Valley	<p>17. Page 111 – Section 4.3.3.1 General Architecture Materials for Structures – Architectural Zone 2 states: “<i>Lower Valley (Interstate 5 through Mission Valley to Interstate 15): Influenced by the adobe walls and post and beam structure and expressive of traditional Mission Style architecture... Walls that are part of shade structures, picnic and overlook shelters shall be clad in hard coat cement stucco over precast concrete, cast-in-place concrete or concrete block. The stucco shall be colored in soft white or adobe colors that are similar to the mission walls.</i>” Please delete the reference to “Mission Style”, along with the requirement for specific stucco colors, as these are too restrictive for the intent of this document. Also, please expand to include use of split-face concrete masonry units as a possible building material – especially because of its texture/surface characteristics and because of it being somewhat less prone to graffiti.</p>	<p>Staff to revise statement to state ‘traditional regional architecture’.</p> <p>Category to be added for walls that accepts cast in place concrete, cement stucco finish over concrete masonry units.</p>
F/36 Mission Valley	<p>18. Page 115 & 117 – The SDRPMP should include a greater focus on sustainable design. The use of photovoltaic lighting to reduce energy needs is one area where the Master Plan can incorporate sustainability. Item “E” on page 117 should be rewritten so that use of solar powered lighting is less of an option.</p>	<p>Staff to revise “E” on page 113.</p>
F/37 Mission Valley	<p>19. Page 118 – Relative to Section 4.3.4.2 Site Furnishings, we recommend that additional examples of Site</p>	<p>Site furnishings for the River Corridor Area, Section 4.3.4.2 are only examples of durable and anti-graffiti</p>

	Furnishings be included that are less stark in appearance. This would then provide for consideration of a range of bench types and walls without precluding options in the future and those that might be more appropriate for certain locations.	furnishings. Actual furnishings will be determined on a project by project basis.
F/38 Mission Valley	20. Page 125 – Relative to Section 4.3.4.5 Vandalism Prevention, we suggest that a bullet point item be added to mount signs high enough to minimize possible graffiti.	This section is in regards to vandalism from skateboarding.
F/39 Mission Valley	Section 4.3.4.6 Fences states: <i>“Use natural peeler log fencing for all fences within the River Corridor Area. Fencing shall follow grades along the river pathway and be a maximum of 4 feet in height. Chain link fencing is prohibited within the River Corridor Area to allow for habitat crossings.”</i> We recommend that the specific requirement for “peeler log fencing” be deleted, as it does not allow the flexibility for other fencing types. We also suggests that the mandate to prohibit chain link fencing be changed to a preference, and allow its use where a need or special circumstance can be demonstrated.	Within the river corridor the vision is to create a natural environment using natural materials that blend into the colors and textures of the area, therefore natural wood peeler log fencing is proposed. Fencing of non-natural materials can be located on the River Influence area.
F/40 Mission Valley	21. Page 136 – Section 4.4.2.4 Off-Street Surface Parking states <i>“Off-street surface parking shall not be visible from the River Corridor Area. Parking areas should be screened with permitted residential commercial and/or mixed use structures. Alternatively, off-street surface parking shall be located a minimum of 100 feet from the River Corridor Area and screened by landscaping and an opaque wall at least 6 feet high, or 1 foot higher than the item to be screened if the item exceeds 6 feet in height. Opaque walls shall be designed and composed of materials of the same quality as the primary building façade.”</i> This language is too restrictive: what about parking that is provided exclusively for the use of the River Park, perhaps even in a rural area? The requirements in this section would mandate walled-off	Staff to revise Section 4.4.2.4 ‘Off Street Surface Parking’ to allow more flexibility.

	<p>parking lots that may create more of an eyesore than a well-done surface parking lot. Additionally, views to and through parking areas should not only be considered from the River vantage points, but also from the street side as well.</p>	
F/41 Mission Valley	<p>22. Page 138 of the SDRPMP includes a graphic which suggests that off street parking not be visible from the river, illustrating parking located adjacent to the public street. While we agree that parking should be minimized along the river, such limitation on parking will force parking to occur in lots along streets, creating an inferior streetscene inappropriate for modern planning. The Master Plan should construct its design guidelines in a manner that considers both the river side as well as the street side of a project. Small pockets or bays of well-designed and landscaped parking along the river could enhance the river environment by offering a break in the built landscape, allowing potential users more direct access to the river (for those using their automobile to get to the river), and allow for greater views into the river corridor.</p>	See F/40 Mission Valley
F/42 Mission Valley	<p>23. Page 138 – Text included on page 138 states: “. . . <i>off-street surface parking shall be . . . screened by landscaping and an opaque wall at least 6 feet high or 1 foot higher than the item to be screened if item exceeds 6 feet in height.</i>” The requirement for a wall or landscape screening has the potential to close off views to the river environment. Such walled off portions of the River Path could also present safety issues, potentially creating derelict parkway segments. Often, open parking areas (if designed properly) provide a break in both development and dense vegetation and can expand the enjoyment of the river/urban environment.</p>	See F/40 Mission Valley
F/43 Mission Valley	<p>24. Page 141 – Regarding Section 4.4.2.10, Streets that Abut and/or Parallel the River Corridor Area, and the statement that “<i>Public streets should be located adjacent to the river</i></p>	Staff to revise language.

	<p><i>wherever possible.</i>” We disagree with this preference. This precludes creating usable spaces between developments and the River Park, such as river walk cafes etc. We suggest using language such as “where appropriate, public streets may be located adjacent to the river.”</p>	
F/44 Mission Valley	<p>25. Page 145 – Section 4.4.3.1 Building Massing requires that: <i>“The appearance of bulky building structure shall be minimized to produce the impression of an aggregate of parts rather than a single building mass. Above 45 feet in height, buildings shall orient the narrow side of the building façade parallel to the river and the wide side of the building perpendicular to the river.”</i> We do not agree with the mandate to orient the building as noted. This may produce monotonous massing of buildings, all oriented in the same direction.</p>	<p>MV CP currently states “Large development projects should be sensitively designed to avoid forming a wall of development that restricts views from surrounding areas. This may be accomplished by requiring greater setbacks for upper floors.”</p> <p>Revised language to: Above 70’ feet in height above finish grade the building width fronting the river to be reduced by a minimum of 30 percent of the width of the building at the ground floor level fronting the river</p>
F/45 Mission Valley	<p>26. Page 147 – A requirement in Section 4.4.3.4 Building Transparency states that: <i>“The coefficient of transparency for glass, the Visible Light Transparency (VLT), shall be at least 65% (0.65) VLT.”</i> This highly-specific performance requirement is typically found in a building code and does not belong in a discretionary land use document. Using language such as “Transparent glazing types are encouraged” accomplishes the same goal without the specificity.</p>	<p>Staff to remove technical data.</p>
F/46 Mission Valley	<p>27. Page 148 – Section 4.4.3.5 Building Reflectivity states that: <i>“All building facades that face the River Corridor Area or face a street that is parallel to the River Corridor Area shall incorporate glass and other materials with a visible light reflectivity factor (VLR) no greater than 10% (0.10 VLR).”</i> This highly-specific performance requirement is typically found in a building code, and does not belong in a discretionary document. Including a</p>	<p><i>To be incorporated into the public hearing draft document: <u>“All building facades that face the River Corridor Area or face a street that is parallel to the River Corridor Area should incorporate non-reflective glazing types of materials to reduce the visible light reflectivity.”</u></i></p>

	statement that “Non-reflective glazing types are preferred” would accomplish the same goal without being overly specific.	
F/47 Mission Valley	28. Page 160 – The second sentence in Section 5.2.3.2 states that: “ <i>Within the river valley, most land development will include some type of discretionary permit . . .</i> ” Similarly, in Section 5.2.4.1 (page 163), the SDRPMP states: “ <i>In most cases, all project within the river valley will require development permits . . .</i> ” However, page 94 states that: “ <i>All development within the San Diego River Park is required to undergo a discretionary review process and obtain the required discretionary permits.</i> ” This seems contradictory. The SDRPMP should clearly state where a discretionary permit is required (for example, within the River Corridor, within the River Influence Area, etc.).	Staff to revise language on page 94 to be consistent with Sections 5.2.3.2 and 5.2.4.1.
F/48 Mission Valley	29. Page 176 – In the second paragraph under Section 6.1.2.1, it is stated that “ <i>All development in Mission Valley is regulated by the Mission Valley Planned District Ordinance</i> ”. This is not true. Specific Plans are not regulated by the PDO.	Staff to add language about specific plans.
F/49 Mission Valley	30. Page 250 – Include the Friars Road and SR-163 interchange in the list of SANDAG’s RTP planned roadway improvements.	This appendix H will be removed from the Master Plan and placed in a project existing conditions file for the project, in that over time the information will be out dated.
F/50 Mission Valley	31. Page 251 – Identify the circulation network for Civita (aka Quarry Falls) as a planned roadway. That roadway network was approved as an amendment to our Community Plan. Also, change the legend to show the roadway network as “planned”, not “proposed”. This roadway network is a part of our Community Plan.	This appendix H will be removed from the Master Plan and placed in a project existing conditions file for the project, in that over time the information will be out dated.

<p>F/51 Mission Valley</p>	<p>PROPOSED AMENDMENT TO THE MISSION VALLEY PLANNED DISTRICT ORDINANCE (MVPDO)</p> <p>1. Certain revisions to the MVPDO are not in tune with the character of or vision for Mission Valley. Sidewalk cafés, art shows, etc. would not be allowed under MVPDO revisions. These can enliven the river scene and provide extra security with eyes on the river. Sidewalk cafés are illustrated in the SDRPMP, as well as other enlivening uses. The PDO Amendment should be revised to allow such uses along the river.</p>	<p>The 35’ wide River Corridor Area will in most cases contain the MHPA and a wetland buffer. Cafes are not a compatible use in the MHPA or a wetland buffers. Cafes can be located in the adjacent River Influence area. The amendments to the MVPDO does not define uses for the River Influence area.</p>
	<p>2. Page 4 - It is unclear why accessory uses have been deleted from the MVPDO.</p>	<p>‘<i>Accessory uses</i>’ is now defined in the Land Development Code under Definitions, Section 113.0103.</p>
	<p>3. Page 5 – A dimension should be included in the definition of the River Park Subdistrict. Based on what we understand from the SDRPMP, that dimension should be the 100-year floodway + 35 feet + 200 feet.</p>	<p>The dimensions are provided under definition for River Corridor Area and River Influence Area, page 4 of the Mission Valley PDO.</p>
	<p>4. Page 7. “Minor additions...” – As stated in our letter to you dated Feb. 2. 2011, we are not in agreement that all projects within the River Park Master Plan require a discretionary permit. Therefore, we request that the added text under Section 1514.0201(b)(3) be removed.</p>	<p>Within the MV PDO, all interior modifications and exterior repairs or alterations to conforming of previously conforming uses are not required to process a MV PDO. Staff to add language that as long as minor additions to not require a construction permit, and do not meet the threshold in Section 1514.02(b) (3) are not required to process a Mission Valley Permit.</p>
	<p>5. Page 11 - To be consistent with the SDRPMP, Table 1514-02A should specifically state that ministerial permits are not allowed within the River Park Subdistrict. It should be noted, however, that the Mission Valley Planning Group recommends that a ministerial process be permitted in the San Diego River Park</p>	<p>Language in the table states this.</p>
	<p>6. Page 18 - The proposed purpose of the River Park</p>	<p>Acknowledged</p>

	<p>Subdistrict in the MVPDO fails to recognize that the San Diego River acts as a natural resource amenity in an urban setting. The “Purpose” should be revised to reflect the urban environment within Mission Valley, and it should capture that the visionaries of Mission Valley have already created much of the river trail and a walkable connection under Friars Road.</p>	
7.	<p>Page 18 The graphic of the River Corridor Area and River Influence Area shown on page 18 should be footnoted to state this cross-section would not apply where a wetland buffer or MHPA occurs.</p>	<p>See Diagram 1415-03B for the cross section.</p>
8.	<p>Page 23 - All references to flood control and financing have been removed from the MVPDO and are not in the Master Plan. How will flood control and financing for river park improvements occur?</p>	<p>Flood Protection is found in the City’s Environmentally Sensitive Lands regulation, section 143.0145. Financing for the river park is found in the Master Plan within the Implementation Section, pages 154 – 159.</p>
9.	<p>Page 25 - Cafes should be a permitted use in the River Corridor Area.</p>	<p>The 35’ wide River Corridor Area will in most cases contain the MHPA and a wetland buffer. Cafes are not a compatible use in the MHPA or a wetland buffers. Cafes can be located in the adjacent River Influence area.</p>
10.	<p>Page 27, item (B) Trails – Trails within the River Corridor should allow bicyclists, as well as pedestrians.</p>	<p>This section defines unstructured pedestrian-only trails.</p>
11.	<p>Page 27, item (4) – Picnic areas and overlooks should be allowed for passive viewing, a respite to daily routine, gathering/meeting-up opportunities, and connections and should not be limited to providing “<i>educational and/or cultural interests</i>”. Additionally, discussion should be added to encourage adjacent private developments to provide these amenities. That way, these amenities can be monitored and kept free of camping and other undesirable uses.</p>	<p>Staff to add language that picnic areas and overlooks shall be provided along the river pathway at a minimum intervals not to exceed one-half mile.</p>

	12. Page 27, item (6) – How is “parcels” defined?	Staff to revise ‘parcel’ to ‘lot’ which is defined in the LDC under Definitions, Section 113.0101.
	13. Page 28 - Fencing should not be encouraged along the river. Where fencing is necessary, it should be decorative or open.	Fencing within the River Corridor is noted as only being provided when required to protect sensitive resources.
	14. Page 32 – (11) Parking – Recommended screening of parking areas can obstruct views to the river and create a walling-in of the river. Open views into the river should be promoted.	Screening of parking areas to be 30 inches maximum height.
	15. Page 32 (B) Parking Structures. Requiring that parking structures be screened with residential and commercial uses significantly restricts development on narrow lots. Architectural treatments and/or landscaping should also be recommended as screening for parking structures.	Landscaping of parking structures as a screen has been added.
	16. Page 32 - Language needs to be added to the MVPDO in reference to lighting prohibiting overly bright lights. This language should also be included in the Master Plan as it pertains to signage lighting. Additional emphasis on requiring sustainable lighting should be included.	The language in the amendment requires lights to be shielded, see page 27 and page 32. All lighting in or adjacent to the MHPA will require shields also. The code cannot require sustainable lighting, but the Master Plan Design Guidelines recommends it.
	17. The MVPDO Amendment should include a provision for non-discretionary actions that would be allowed in the River Influence area. Precluding non-discretionary actions would create a processing burden, as every project would need a discretionary permit. Specific guidelines should be developed to act as a checklist to allow for ministerial review.	The MVPDO allows interior building improvements and exterior repairs or alterations to conforming or previously conforming uses an exemption. Staff to add language that minor additions in the River Subdistrict that do not require a construction permit , and do not meet the threshold in Section 1514.02(b)(3) are not required to process a Mission Valley Permit.
	18. The map located in Appendix E of the MVPDO is difficult to read. This graphic should be revised to clearly indicate	Appendix E does not contain a map?

	what the various colors mean.	
	PROPOSED AMENDMENT TO THE MISSION VALLEY COMMUNITY PLAN	
F/52 Mission Valley	1. We note that there is a huge gap in the background history in the Community Plan revisions. This should be corrected when the Community Plan update occurs. In the least, page 10 should recognize the First San Diego River Improvement Project (FSDRIP). FSDRIP was successful in providing for viable private development while also improving the San Diego River environment.	This information would be provided in a Community Plan update.
F/53 Mission Valley	2. Page 121 – The added paragraph at the bottom of page 121 fails to recognize the success of FSDRIP. FSDRIP has laid the groundwork upon which the SDRPMP will build in the future. Rather than such a negative approach to the river environs through Mission Valley, the text in the Community Plan should reinforce the positive benefits that FSDRIP has provided to the community and the river environment.	<i>To be incorporated into the public hearing draft document on page 120 of the community plan: <u>“The First San Diego River Improvement Project Specific Plan (FSDRIP) was prepared by the City in 1986 to address approximately 254 acres along the river within the Mission Valley Community. At the time, FSDRIP, was a new approach to addressing flood control, providing more land for development, restoring the San Diego river wetlands and providing public improvements implemented through private development. This area was to provide a permanent greenbelt in Mission Valley, linking the ocean to the inland hillsides. The new flood control channel, revegetated channel banks and buffer zones as shown in the FSDRIP document were completed in 1988. This area serves as the mitigation site required by the US Army Corps of Engineers, under the Federal Clean Water Act, and includes the replanting and permanently preserving natural riparian and upland habitat values impacted during construction of the flood control improvements. Along with the river channel improvements a pedestrian/bicycle path, picnic areas, benches and viewing areas were built for the public recreation. Private</u></i>

		<u><i>project recreational and urban plaza areas were built to link visually and/or physically to the river pathway, in order to integrate them into an area-wide open space system. FSDRIP's success as a region asset to the San Diego region has laid the groundwork for the future San Diego River Park Master Plan.</i></u>
F/54 Mission Valley	3. Page 122 – The principles should be expanded to include a principle that provides opportunities for people to access and utilize the river, particularly where the river and urban environments meet. Additionally, a principle allowing the urban environment to embrace the river would avoid the perception that there is a barrier between the more developed portions of the community and the river.	Staff to revise language to state “Public parks that serve new residential use will be located where possible adjacent to the river and will provide passive uses and connections to the river pathway. Parks not adjacent to the river should have a well connected multi-use path to the park from the river pathway.”
F/55 Mission Valley	4. Page 122, last paragraph – The word “Park” has been added following “San Diego River”, which changes the intent of this sentence. The Community Plan should not be facilitating “the development of the San Diego River Park as a natural, functional component of the Mission Valley community”. The intent is the Community Plan facilitates “the development of the San Diego River as a natural, functional component of the Mission Valley community.”	Staff to revise language and take out the word ‘park’.
F/56 Mission Valley	5. All reference and proposals for flood control have been removed from the Community Plan. Why? This is an important element of our community, in that we experience severe flooding on a yearly basis.	Flood Control is now regulated by the City’s LDC, Section 143.0145 (Development Regulations for Special Flood Hazard Areas), Section 143.010 (Environmentally Sensitive Lands Regulations and within the Multiple Species Conservation Program (MSCP) Subarea Plan “Land Use Considerations for Flood Control’ where the floodway is mapped MHPA.
F/57 Mission Valley	6. Page 123, PROPOSALS, “ <i>Implement the Design</i>	Staff to revise language on how Specific Plans apply to

	<p><i>Guidelines of the San Diego River Park Master Plan and the Development Regulations within the Mission Valley Planned District Ordinance, ‘ River Sub-district’ section for all development along and within the San Diego River”</i></p> <p>– This statement needs to be re-written. Neither the SDRPMP nor the PDO apply to Specific Plans within our community. Since much of the area along the San Diego River is within a Specific Plan, the SDRPMP and PDO would have limited application within our community.</p>	the Master Plan.
F/58 Mission Valley	7. Page 123, PROPOSALS – Please rewrite the third new bullet to read: “Provide a bicycle and pedestrian pathway connection from neighborhoods and parks within Mission Valley to the San Diego River Pathway”.	<i>To be incorporated into the public hearing draft document: <u>“Provide bicycle and pedestrian pathway connections from neighborhoods and parks within Mission Valley to the San Diego River Pathway.”</u></i>
F/59 Mission Valley	8. Page 123, PROPOSALS - Delete the fourth new bullet pertaining to the Riverwalk Golf Course. Our Community Plan Update has been put on hold. It is inappropriate to be addressing specific land uses in an area of our community without benefit of evaluating the whole of the Community Plan Update.	<i>The fourth bullet will be removed from the public hearing draft document:</i>
F/60 Mission Valley	9. Page 123, PROPOSALS, fifth new bullet – How can a ‘Green Gateway’ be established for I-805 at the River? I-805 is at a substantial elevation over the river. If this bullet is to remain, please provide an idea of how this would occur.	Through the public workshops the community recommended that the areas where the river and major highways occur that large scale native riparian trees be provided to identify the location of the river. This could occur through coordination with Cal Trans to re-vegetate the areas below the freeways with the large scale native trees. See the Master Plan, page 44, G. Create Green Gateways.
F/61 Mission Valley	10. Page 124, PROPOSALS, seventh new bullet – Please re-write this bullet to read: “The Qualcomm Stadium site should include development of an active park, provide a naturalized open space along the river, and construct the	Staff to revise language

	<p>river pathway.” Our Community Plan is specific as to the requirement for a park at Qualcomm Stadium. However, the current Community Plan does not speak to any other “new development.” Any redevelopment of Qualcomm Stadium should be considered as part of the Mission Valley Community Plan Update.</p>	
F/62 Mission Valley	<p>11. Why has all maintenance and financing criteria been stricken from the Community Plan?</p>	<p>On page 124, Flood Control Facility has been revised to be current with current policies and regulations. Hydraulic, Environmental Criteria, Design, Maintenance, Criteria have been removed and this criteria is now found the City’s MSCP and ESL regulations and the City’s Biology Guidelines. Financing Criteria is now found in the Master Plan, Implementation Section.</p>
F/63 Mission Valley	<p>12. Design guidelines only reference back to the Master Plan. The SDRPMP’s Amendment to the Community Plan should incorporate pertinent information from the Master Plan.</p>	<p>The Master Plan is the policy document for development along the River Corridor and River Influence area and therefore contains the Design Guidelines. The Community Plan refers to the Master Plan to prevent duplication and that could result in errors during an amendment of the Community Plan. This standard practice for Policy Documents.</p>
F/64 Mission Valley	<p>13. Page 138 lists only paths. This is limiting and promotes isolation and disuse.</p>	<p>Acknowledge</p>
F/65 Mission Valley	<p>14. Page 182 – Urban Design for the San Diego River should be presented in the Community Plan. Therefore, it is unclear why all of the Design Guidelines have been deleted. It would be more appropriate to modify the Design Guidelines and add any new pertinent guidelines from the SDRPMP. Many of the exiting Design Guidelines remain appropriate. A wholesale removal of all Design Guidelines eliminates a very important element of the Mission Valley Community Plan. This is particularly relevant for the existing Design Guidelines provided for “Passive Recreation Areas”, “Open Space”, and “View Enhancement”.</p>	<p>Only the urban design for the San Diego River has been amended. Within this section, Flood Prevention, Wetlands, and Buffer Areas have been deleted because this is now found in the City’s MSCP and ESL regulations. Passive recreation, Open Space, View Enhancement, and Architectural Massing have been deleted and moved the Master Plan in the Design Guideline section for River Corridor and River Influence.</p>

<p>F/66 Mission Valley</p>	<p>15. Page 218, under LEGISLATIVE IMPLEMENTATION – The revised bullet should be re-written as follows: “A San Diego Park Sub-district will be established in the Mission Valley Planned District Ordinance which will guide development and redevelopment of properties adjacent to the river, except for areas that fall within a Specific Plan. Critical aspects of this Sub-district will be the relationships between development (the River Influence Area), the floodway (River Corridor), the pathway corridor (River Pathway), any required wetland buffers, and the MHPA.”</p>	<p><i>This bullet will be added into the public hearing draft document.</i></p>
<p>G/1 SD Audubon Society</p>	<p>Wherever possible, it is desirable to protect as much of the floodplain as possible, since protecting only the floodway will not allow a healthy “river system”. For example, it will not allow natural meandering or braiding of the river. The Plan does not free the river of unnatural ponds (such as borrow pits), it channels the river around them, leaving water quality issues in the ponds and unnecessarily reducing the area available for a natural free flowing river.</p> <p>To free the river of ponds, the ponds should either a) be filled in, or b) connected to the river and allowed to partially fill themselves in and become fresh-water marshes by means of river-borne sediment. Routing the river around the deep ponds will not provide for a healthy river system, and might require pesticide sprayings to control vectors on the ponds.</p> <p>Protecting just the floodway will nominally increase flood surface elevations by up to one foot for a 100 year flood. However the actual flow volume for a “100 year flood event” is unknown, especially in the face of ongoing climate change. The realistic way to protect people from the economic, health and safety impacts of major flooding is to leave as much of the floodplain open for water flow and groundwater recharge as possible.</p>	<p>Acknowledged. The river once flowed freely, flooded the entire valley floor at times, and sometimes changed its course following such flood events. It is understood that a natural river system cannot be recovered, however, the goal of recreating a river that is as healthy as possible within the constraints of private land ownership, urban runoff and urban development is fundamental to creating the San Diego River Park.</p> <p>Any project that proposes modifications to the river corridor is now regulated by the City’s LDC, Section 143.0145 (Development Regulations for Special Flood Hazard Areas), Section 143.010 (Environmentally Sensitive Lands Regulations and within the Multiple Species Conservation Program (MSCP) Subarea Plan “Land Use Considerations for Flood Control’ where the floodway is mapped MHPA.</p>

	<p>Protecting just the floodway will require armored banks and continuous removal of vegetation to minimize flood risks. Neither of those is consistent with the design guidelines of the Plan and Principle One “Restore and Maintain a Healthy River System.”</p>	
G/2 SD Audubon Society	<p>We feel there are potential problems within those portions of the river that are defined by the floodway. For example, the parkway of 35 feet outside the floodway will include 14 feet of cleared area for the trail plus an unspecified area of low vegetation outside of that to allow park users to feel safe. This will not provide for suitable habitat for an upland corridor for the movement of wildlife along the River.</p> <p>The Plan’s preservation of only the floodway will require that vegetation be removed from the river for flood control, contrary to the design principles of the Plan. This will not allow the river to adequately allow wildlife to move up and down the River as is required to unify the fragmented habitat areas up and down the River.</p>	<p>Suitable habitat criteria and the wetland buffer will be determined by the City’s ESL Regulations and the City’s Biological Guidelines on a project by project basis.</p>
G/3 SD Audubon Society	<p>The Plan’s preservation of only the floodway will cause the river to have very high velocities of water during major storms, so that in many places the banks will have to be steep and heavily armored. This will prevent some wildlife from being able to move out of the river floodway for refuge during high water. Thus the river could be further fragmented from the adjacent upland in many places, which is contrary to the Plan’s second principle.</p>	<p>See G2/ SD Audubon Society.</p>
G/4 SD Audubon Society	<p>Principle Two discusses connecting the habitats of adjacent canyons and tributaries to the river itself. This is very important concept. But as present the Plan does not appear to provide a clear strategy as to how that will be accomplished.</p>	<p>Connecting canyons and other undeveloped land is a guiding idea. The recommendations outline steps toward achieving this goal, however identifying specific sites for acquisition is beyond the scope of the Master Plan.</p>
G/5 SD Audubon	<p>In general, although we are pleased with the intent of the</p>	<p>The City’s ESL regulations will address the wetland</p>

	<p>Plan, we urge that it be modified to protect as much as the floodplain as possible, that the buffer between the river and development or active recreation (that is, outside the floodway) be 100 feet or more wherever possible, and that ponds be turned back into an integral component of the river. We would also like to see more explicit language as to how areas intended to remain as open space and wildlife habitat will be given legal protection to ensure this in perpetuity. More discussion of an ongoing monitoring system that will allow San Diegans to know the quality of the river and the viability of its habitats is also needed.</p> <p>Additional language and provisions along the lines recommended above will allow for a full and more effective implementation of the Principles. More, importantly, over time, it will allow the Park Master Plan to convert the City portion of the river from its past unfortunate state, successfully guide it through the present transitional period, and create a permanent scenic recreational, and environmental treasure for our City.</p>	<p>buffer and sets criteria for the buffer based on the functions and values of the existing wetland on a project by project basis. The Master Plan does not modify the ESL requirements for the wetland buffer.</p> <p>Legal protection to ensure perpetuity is outside the scope of the master plan.</p>
<p>H1/ Superior Ready Mix L.P. and Rick Engineering</p>	<p>The overall guidelines appear written in a prescriptive, rather than suggestive. It is our opinion that the guidelines should be written in a manner that City staff and developers both have a clear understanding as their goals and objectives. Perhaps a clearer description of what they are trying to prevent would be useful. The proposed guidelines should allow flexibility to address the unique circumstances and opportunities that are afforded each zone of the river corridor.</p>	<p>The Master Plan is a policy document to guide development through Design Guidelines that are written as recommendations. Actual requirements along the river corridor are found in the City's Regulations: Mission Valley PDO, Navajo CPIOZ, and the Mission Trails Design District Ordinance.</p>
<p>H2/ Superior Ready Mix L.P. and Rick Engineering</p>	<p>Section 4.3.2.2-A As the river carves its way into the more urban developed areas, a uniform 3:1 gradient slope along the entire frontage will be problematic.</p> <p>Not all segments of a river should have a uniform</p>	<p>Revise language to 'manufactured slopes in the path corridor to preserve the natural character of the floodplains and protect the function and values of ground water recharge, water quality, and wildlife movement and habitat.' Add language that if the Path Corridor is used for</p>

	<p>trapezoidal 3:1 side-slope. In river design, the existing river flow parameters can sometimes dictate the varying of side-slope ratios. Sometimes it makes hydraulic sense to use 2:1 side-slopes. The erosion potential of a 3:1 side slope vs. a 2:1 side slope is quite large, causing increased deposition into the river over time. Varying the side slope ratios makes for a far more balanced and natural river corridor setting.</p> <p>The plan also suggests the use of ‘colored concrete’ outflow structures (from the future development into the river) placed to match existing soil. This has historically proven to be a poor choice, both in function and maintenance. Ultimately, the paving gets undermined and deposited downstream (as evidenced upstream of Friars road) Creating a blend of natural stone and geogrid blanket slope protection has proven over the years to be the best solution to dissipate outlet structure flows while also providing a natural look to the river corridor.</p>	<p>population-based parks for residential development then the area must be graded to meet the General Plan definition of ‘useable’ park land. Useable is defined between 2% to 10% grade</p> <p>This design guideline is for headwalls only and does not preclude other outflow structures. Headwalls are permitted by the LDC and the master plan design guidelines only suggest that to minimize the visual impact that the headwalls could be colored to match the existing soil color. This is a design guideline only and not a regulation.</p>
<p>H3/ Superior Ready Mix L.P. and Rick Engineering</p>	<p>Section 4.3.2.4-B Colored porous concrete paving for all bicycle and pedestrian paths is excessive. Where paths are in floodway areas, sediment from river overflow will constantly clog pores in the concrete eliminating its environment benefits. Moreover, in a riverbank setting constant drying and wetting of the soil under the concrete will uplift the inflexible concrete causing cracking and constant repair issues. Repair or replacement of colored concrete to match existing concrete is difficult if not impossible, making for an ugly quilt-like appearance forever in the future. Keep it simple.</p> <p>In the zone our property occupies, the use of ultra-wide Class Type 1 bike path is not commensurate with our narrow and topographically constrained reach of the river corridor. We suggest a use of scale and materials more in keeping with the nature of this zone of the river. While our project is</p>	<p>The San Diego River Multi-Use Pathway will not be located in the floodway due to the City’s MSCP and ESL. One of the main goals of the Master Plan is to provide a multi-use path from the Pacific Ocean to the City of Santee. The Design Guidelines have been written to give criteria only, and actual colors will be determined on a Project by Project basis.</p> <p>One of the main goals for the Master Plan is to provide a multi-use path all along the river that is paved for bicycle and pedestrian use. This multi-use path is to address the transportation issues of each development. Through the discretionary process your property can propose</p>

	urban in concept, the river corridor “path” system changes to a trail system in the Mission Valley Regional Park. We see the type and volume of traffic using the upper reach of our property as far less urban than the downstream reach.	alternatives and justifications of the size and materials of the River Pathway.
H/4 Superior Ready Mix L.P. and Rick Engineering	Section 4.3.4.2 – Specifying exact types and colors of ‘furniture’ at the top of the trail is too restrictive. Why not allow each park and destination along the trail to have its own personality, texture and scale? All great river trails and park have quality furnishings which are unique to the river park, and bound to regional park standards.	Corridor design intent is a balance of continuity and variety associated with each reach. Note that exact types of furnishings are not specified in the Master Plan. The guidelines are intended to provide direction regarding to materials and character to achieve both consistency of material within the corridor and diversity in material and character of park structures, walls, plant materials and other elements.
H/5 Superior Ready Mix L.P. and Rick Engineering	Crime prevention – Consider solar call boxes in strategic locations.	This is noted on page 129 of the Master Plan.
H/6 Superior Ready Mix L.P. and Rick Engineering	Section 4.4.2.3 – Some parcel depths and widths in urban areas make it prohibitive to have parking a minimum of 100 feet from the river corridor. We suggest a minimum of 50 feet.	Staff to revise Section 4.4.2.4 ‘Off Street Surface Parking’ (A) The surface parking area to be separated from the River Corridor by a required planting area totaling at least 20 feet in width, measured perpendicular to the River Corridor. The planting area shall extend along, and directly abut, the entire length of the surface parking except at pedestrian access points. The planting area shall be planted to screen the surface parking with densely foliated, evergreen species that achieve a minimum height of 30 inches within two years of installation over at least 80 percent of the length of the required planting area. The screening may also be achieved through the use of fencing, walls or a combination of these that provide an equivalent screen. (B) Surface parking can front no more than 30 percent of the length of the lot frontage cumulatively along the River Corridor or a maximum of 120 feet of the lot frontage along the River Corridor, whichever is less.
H/7 Superior Ready Mix L.P. and	Locating primary façade to the river in narrow parcels is problematic. Perhaps ensuring that the façade facing the	The Master Plan design guidelines, page 138, state that building structures shall orient a primary façade and

Rick Engineering	river is consistent with the overall design of the building in achievable. Some flexibility in design always creates a more artful project.	entrance <u>or its equal</u> in design and materials to the River Corridor. This allows the front entry to be located along public streets as long as an entrance equal to the front entrance is located on the river side.
H/8 Superior Ready Mix L.P. and Rick Engineering	Section 4.2.2.9 – Public river connections at 1,000 foot intervals is problematic and should only be a goal. We suggest a goal of every 1,500 feet for our stretch of the river in this document.	The 1000 foot standard is based on what two standard city blocks measure and therefore providing public access to the river to where public streets are not available. 500’ lineal feet was studied and found to be intrusive for one property. 1500 lineal feet was studied and was determined to be too far for pedestrians to get access.
H/9 Superior Ready Mix L.P. and Rick Engineering	Permitted Uses – The range of uses within the river corridor is too narrow for an urban setting such as ours and doesn’t envision how development along the river can contribute to the experience. New development can make use of the outdoor dining, portals to the river via observation decks, et cetera.	In general uses within the Path Corridor, as described on page 97, must be consistent with the City’s Multiple Species Conservation Program (MSCP) and Environmentally Sensitive Lands Regulation (ESL). In addition uses will be subject to the State and Federal Resource Agency regulations and will be determined on a case by case basis. Staff will add language with additional types of passive uses consistent with MSCP and ESL. Staff to add language about what kind of uses can occur when a public park is located adjacent to the River.
H/10 Superior Ready Mix L.P. and Rick Engineering	The Plan suggests that public parks should be located along the river where possible, however it does not acknowledge that community parks optimally centralized within the heart of a community (as opposed to a satellite park) are best for all. A centralized park will be enjoyed by all those living within the community simply by being located where everyone conducts most of their life’s activities. A satellite park violates the planning principle of live-work-play in a single location. A satellite park generates additional traffic and will not benefit the community as a whole.	Staff to revise language to state “Public parks that serve new residential use will be located where possible adjacent to the river and will provide passive uses and connections to the river pathway. Parks not adjacent to the river should have a well connected multi-use path to the park from the river pathway.”
I/1 H.G. Fenton Company	Page 94 of the SDRPMP discusses the River Corridor, the Multi-Habitat Planning Area, and the Wetland Buffer and says “Once the boundaries are mapped, the largest mapped boundaries will prevail”. This language requires that a	The requirement for a wetland buffer is through the Environmentally Sensitive Lands (ESL) of the Land Development Code (Section 143.0101), <u>which states that there shall be a buffer between sensitive lands, such as</u>

	<p>wetland buffer be preserved even when a development project does not disturb existing jurisdictional area. State and Federal resource agencies have the regulatory ability to require a buffer only when habitat is being directly impacted. The Land Development Code only requires a buffer for “development that proposes encroachment into sensitive biological resources”. The language of the SDRPMP should be revised to clarify that a buffer will be required only where habitat is being disturbed for development.</p>	<p>wetlands, and development in all cases and not when habitat is being directly impacted. If a 100’ buffer (143.0110(c) (1) (A), is provided then typically a Site Development Permit is not required. Any proposed buffer less than 100’ would require a Site Development Permit and through the Biological Study the appropriate buffer would be determined based on the functions and values of the existing wetland at the time of development. The requirement for the buffer is not based on habitat being disturbed for development.</p>
<p>I/2 H.G. Fenton Company</p>	<p>Providing neighborhood park acreage to meet the requirements of new development will be difficult, particularly since the SDRPMP envisions parks being located within the small parcels adjacent to the River. We believe the entire River Pathway can be designed in a manner such that its entire width would be of value as a park. The entire 35-foot width of the Pathway, not just the 14-foot trail, should be calculated as satisfying required park acreage.</p>	<p>Population-based park standards for residential development could be provided within the 35’ path corridor as a ‘Park Equivalency’ per the General Plan, as long as the area meets the definition of useable park land. Useable park land is defined as <i>‘A graded pad not exceeding two percent, as required to provide for structured, public recreational programs of an active nature. Or gently sloping land not exceeding 10% grade for unstructured public recreational activities, such as children’s play area, appreciation of open spaces or a combination of thereof, unconstrained by environmental restrictions that would prevent its use as a park and recreation facility, free of structures, roads or utilities and unencumbered by easements of any kind.’</i></p>
<p>I/3 H.G. Fenton Company</p>	<p>It is our understanding from public meetings of the Grantville Stakeholders Committee that the Grantville Master Plan will take precedence over the SDRPMP, and the existing CPIOZ will be amended to reflect the GMP objectives. If the Grantville Master Plan designates specific properties for park use it will be difficult for a land owner to consider redevelopment. It would be challenging to process entitlements on a park-designated parcel, and an owner would have little reason to sell the parcel, since its appraised</p>	<p>The Grantville Master Plan does not take precedence over the Master Plan; both are city policy documents having equal weight. The existing CPIOZ in the Navajo Community Plan will be amended to be consistent with the Master Plan and the Grantville Master Plan.</p> <p>The Grantville master plan will amend the Recreation Element of the Community Plan, and this section will discuss park standards and general locations for parks, but</p>

	<p>value as park would be too small to justify a sale. It would be better for the GMP to narratively describe sectors of the community in which parks are sought, or to use a graphic technique which cannot be interpreted to designate a specific parcel or ownership as park use.</p>	<p>will not state parcels as future sites. When residential development comes forward, the exact location for park land will be determined at that time.</p>
<p>I/4 H.G. Fenton Company</p>	<p>The SDRPMP can be reasonably interpreted to anticipate that park land along the river will be acquired through development exactions. Page 160 specifically envisions that the Planned Development Permit process will be used to exact park land from property owners (“The PDP can also require... reserving some of the site as protected open space or park land...”) Because the available land between river and Fairmount Avenue is so limited, any loss of land without compensation would likely render a prospective redevelopment project either uneconomic or less advantageous than maintaining existing uses. You have noted in earlier public meetings that you expect Grantville to be a “grant rich” area, including but not limited to acquisition of funds to purchase park lands. The language of Page 160 should be revised to reflect that park land will be purchased, not exacted.</p>	<p>Page 160, from the Implementation Section, talks about Development Tools for the Master Plan. Through discretionary development permits, such as the Planned Development Permit (PDP), the Land Development Code states that specialized zoning for larger land developments can be proposed and that if the residential development is provided on part of the parcel, a transferring of densities internally on site, then park land can be also provided on the parcel. The PDP is an option to land development and not a requirement. Loss of land is not anticipated in that if a parcel is constrained, the required population-based park standard could be provided by a payment to the Development Impact Fee (DIF). This money would go to the Community Plan financing plan for the development of future parks.</p> <p>Currently the Navajo CPIOZ states that a 10’ river path (page 33 and 45) will be provided along the river. The Master Plan is consistent with this by providing a river pathway of 10’ hard surface with 2’ of soft fines on either side. Through redevelopment there is flexibility in the process to locate the pathway in the most economic location so as to make the project feasible.</p>
<p>J/1 Wetlands Advisory Board</p>	<p>Vision and Principles: The Plan needs an overall concept of the preferred location of major park sites and amenities, with the goal of leveraging city-owned land to provide a</p>	<p>The preferred location of park sites is discussed in the Recommendations section under each of the six reaches.</p>

	foundation for the park system.	
J/2 Wetlands Advisory Board	Vision and Principles: There is concern that the Plan will implemented in a piecemeal fashion as individual private development projects proceed, and the individual projects may be approved without the necessary conditions to ensure eventual development of the “connected continuum” visualized in the Plan.	To ensure the eventual development of the connected continuum, three sections of the Municipal Code and four Community Plans are being amended to implement the Master Plan.
J/3 Wetlands Advisory Board	Vision and Principles: There needs to be increased attention to the biological feasibility of carrying out the Plan. For example, restoring a braided streambed in areas that currently are deep holes resulting from sand mining is unlikely to be successful. Similarly, the concept of planting native vegetation in a way that results in habitats which are low in elevation and thinned to allow visual contact with users, and the long-term management implications of such an approach, lack appreciation of potential impacts to existing habitats and species.	Acknowledged.
J/4 Wetlands Advisory Board	Recommendations: There are questions about statements that current mean annual flows are shrinking, that ephemeral conditions would increase biodiversity and that the volumes of reclaimed water flow augmentation could be great enough to mimic historic peak floods. There needs to be better data on the quality of water available for augmentation and whether it is needed. Also, management and restoration activity should be better tailored to the expected hydrologic regime.	Data on the quality of water available for augmentation and if it is needed and hydrologic regime is beyond the scope of the Master Plan.
J/5 Wetlands Advisory Board	Recommendations: It is desirable to leave some water impoundments, to increase diversity of habitat/system types across the landscape, even if not consistent with the historical state of the area. However, flushing of the ponds needs to be improved.	Acknowledged.

J/6 Wetlands Advisory Board	Recommendations: Efforts to remove invasive vegetation species should be coordinated to ensure that removal in one area is not followed by repopulation from other areas. Prioritizing species to be removed, emphasizing removal of high impact species such as arundo ahead of lower-impact species such as ice-plant, would be more effective than prioritizing areas for removal. Post-eradication restoration would minimize invasion or re-invasion by non-native species.	Acknowledged.
J/7 Wetlands Advisory Board	Recommendations: Encouraging growth of native plant communities needs to take into account current hydrologic and disturbance regimes.	Section of native plant communities will be based on the current hydrologic conditions of each site through a biology study as projects come forward for development.
J/8 Wetlands Advisory Board	Recommendations: In connection with rehabilitation of the river channel, to encourage meander and braiding, site-specific plans are needed for each area that could support such improvements. Sufficient area needs to be set aside to allow movement of the channel, and such areas must have sufficient water velocity to maintain a steady flow, or the improvements will fill in or become isolated.	Acknowledged.
J/9 Wetlands Advisory Board	Recommendations: Issues such as expansion of the river's recharge area and reducing non-point source loads should also be discussed in connection with land use policy.	Expansion of the river's recharge area is beyond the scope of the Master Plan. Reducing non-point loads is covered in the City's Storm Water Ordinance.
J/10 Wetlands Advisory Board	Recommendations: Incorporation of hydrology and water quality considerations in future planning documents should stress natural solutions, e.g. wastewater wetlands.	Acknowledged.
J/11 Wetlands Advisory Board	Recommendations: Discussion of establishing appropriate corridors for the river, wildlife and people needs to consider whether each proposed corridor zone takes into account future sea level rise due to climate change. The proposed 35-foot wide buffer on each side of the floodway should be widened whenever possible, as it is too narrow to provide for useful habitat, especially since it contains the multi-use	Per the City's Environmentally Sensitive Lands Regulations, the required wetland buffer for habitat will be determined for each project that comes forward for development based on the functions and values of the existing wetlands. Beyond the required wetland buffer is the 35' wide area for the San Diego River pathway.

	pathway.	
J/12 Wetlands Advisory Board	Recommendations: Proposed habitat corridors as secondary gateways at side canyons and tributaries should be assessed as to desirability at a given location.	Acknowledged.
J/13 Wetlands Advisory Board	Recommendations: Considerations should be given to constructing the pathway with a natural/or permeable surface, and also to using existing paths where possible.	Per the Design Guidelines, a porous concrete material is preferred.
J/14 Wetlands Advisory Board	Design Guidelines: Some of the Design Guidelines, such as descriptions of development facing the river and of public art, are worded as examples rather than clear rules. They should be consistent in establishing criteria, not simply desirable.	The Guidelines are intended to be more flexible and to allow for creativity depending on the site-specific conditions. Criteria is found in the regulations. Projects will be reviewed for consistency with the guidelines and how they meet the regulations.
J/15 Wetlands Advisory Board	Design Guidelines: The Design Guidelines need to more explicitly address how built infrastructure will be designed and constructed in a way which will promote the ecological functions of the river system and will advance restoration goals.	The Guidelines are intended to be more flexible and to allow for creativity depending on the site-specific conditions. Criteria for infrastructure are found in the city's regulations. Projects will be reviewed for consistency with the guidelines and how they meet the regulations.
J/16 Wetlands Advisory Board	Implementation: It is questionable that all federal and state funding sources identified will be available in the future. Even local sources are uncertain – SANDAG is a minimal source, city impact fees are not generally available, redevelopment as increments is not generally available for this purpose and may become even less available, special districts would require local property owner approval, development agreements typically only are valuable for funding in connection with very large projects, and private funding has generally been available mainly for habitat acquisition and management.	The implementation section is a guide only and actual methods to implement the plan will take various paths through the life of the Master Plan.

J/17 Wetlands Advisory Board	Implementation: It is unclear how the funding will be obtained for land acquisition in particular. Because of the difficulty in obtaining funding for this purpose, acquisitions typically take a long time, especially where they involve assembling multiple parcels. This is made even more complex due to the existing division of property along the river into so many separate land holdings.	Acknowledged.
J/18 Wetlands Advisory Board	Implementation: Raising money to finance maintenance, management and security activities is even more difficult than raising money for land acquisitions. The comments above apply similarly to this, with even greater emphasis. These programs rely greatly on volunteer labor and participation by non-profit and citizen organizations, all of which are uncertain.	Acknowledged.
J/19 Wetlands Advisory Board	Regulatory Framework: The description of the community plan areas along the river should be augmented with a discussion of wetlands and other environmentally sensitive resources, without having to refer separately to each planning section. The location of those resources also should be shown on consolidated map and on the individual planning area maps.	A discussion and maps of the wetlands and other environmentally sensitive resources all along the river as a whole is beyond the scope of this Master Plan.
J/20 Wetlands Advisory Board	Regulatory Framework: The description of the various governmental agencies and regulations having jurisdiction over the river or conditions affecting it should be located earlier in the Plan, as it provides basic information important to an understanding of many of the other issues in the Plan.	Acknowledged.
J/21 Wetlands Advisory Board	Appendices: As scientific studies cited in the plan conclude, restoration plans should be consistent with current structural processes and not focused on particular species to be reintroduced, in order to achieve the most self-sustaining, functioning system. While the planting of large and small growth plants may be a short-term solution for achieving ecosystem heterogeneity and desired aesthetics, it is a short	Acknowledged.

	<p>lived and is likely to be overgrown within five to ten years. Either historic disturbance regimes are needed to knock out competitive dominants or we need to identify the current predominant structural processes acting in this system and tailor management and restoration strategies to current ecosystem processes (e.g. planting native plants that can thrive under the current hydrologic conditions). There is concern that management and restoration is proceeding with insufficient understanding of the dynamics of this waterway, thereby leading to unpredictable and undesirable (invaded, unsustainable) outcomes. The effects of dams and floodplain constriction in limiting sediment transport and channel meandering, increasing channel incision, and altering flood regimes and riparian vegetation are well documented. Less well understood are the effects further downstream on the relative role of tidal flushing in structuring ecosystems. This coastal river is influenced both by estuarine and riparian processes. Further, watershed development has increased nutrient-rich urban runoff into streams, converting semi-dry drainages from ephemeral to perennial systems. Introduced species flourish in this novel moist and fertile environment. The old rules of typical semi-arid, ephemeral riparian ecosystems do not apply to systems with perennial flows and tidal flushing. Effective management and restoration of such coastal riparian ecosystems under new hydrologic regimes begins with defining the structural processes and translating results into management strategies.</p>	
<p>J/22 Wetlands Advisory Board</p>	<p>Appendices: Another concern is that there is insufficient mention of climate change in relation to whether the definition of each hydrologic zone (e.g. 100-year flood zone), on which much of the plan was based, accounts for future sea level rise. Further, there seems to be no consideration of the other effects of climate change (e.g. warmer temperatures, shorter wet seasons and higher salinities pushing further upstream) on</p>	<p><i>To be incorporated into the public hearing draft document on page 35, under A. Augment Flows to the River Periodically: <u>“Climate change impacts have the potential to further influence river flows due to warmer temperatures, drier weather, sea level rise, and increasing storm surges. For information on climate change impacts and adaptation strategies, see <a 458="" 541="" 898="" 916"="" data-label="Page-Footer" href="http://www.sandiego.gov/environmental-</u></i></p> </td> </tr> </table> </div> <div data-bbox="> <p>Page 65 of 66</p> </u></i></p>

	restoration/management with within zones. This should be addressed in some form, e.g., that the berms are high enough to withstand the highest sea level rise estimates made for the next century, and that the plants chosen will include those least sensitive to increases in CO2, salinity and temperature.	<u>services/sustainable/eestf.shtml</u>).
J/23 Wetlands Advisory Board	Appendices: The focus of the plan is a combination of recreation and natural areas, but, even taking into account that the plan is a work in progress, the bulk of the plan is still skewed toward urban elements. Individual restoration/management plans need to be fleshed out for distant reaches and tributaries to address the site specific issues (e.g. land use/ownership and biology). However, the individual plans must be coordinated with each other, since all sites are part of the greater system. For example, invasive plant removal strategies in one area should be coordinated with sites upstream or reintroduction could quickly occur.	Acknowledged.
J/24 Wetlands Advisory Board	Appendices: As an expansion of the education and outreach activities, consideration should be given to incorporating research into the plan (e.g. simultaneously contributing to education, advancing science and providing information that would help with management and restoration strategies).	<u>To be incorporated into the public hearing draft document on page 166, Section 5.4.2 will be added, "The City will continue to collaborate with the River Foundation on the education, advancing science and information that would help with management and restoration strategies."</u>
K/1 Tierrasanta Community Council	IF the golf course becomes developed into something other than a golf course, the TCC voted to still have the trail connection put through any new development.	<u>To be incorporated into the public hearing draft document on page 81, under key points: 'If the Admiral Baker Golf Course develops into something other than a golf course, the new development should provide trail connections from the San Diego River Pathway to the Tierrasanta community.'</u>