



La Jolla Community Planning Association

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September 8, 2021

William Hoffman, Chair
Planning Commission
City of San Diego
1222 First Avenue, MS 501 San Diego, CA 9210

RE: Planning Commission Meeting, September 9, 2021
Agenda Item #2: Spaces as Places Draft Regulations

Dear Commissioner Hoffman and Members of the San Diego Planning Commission,

At its September 2 meeting, the La Jolla Community Planning Association discussed the Spaces as Places initiative and draft regulations. While we understand the regulatory interest in normalizing new uses of public ROW for dining, social and recreational uses that spontaneously arose during the recent pandemic, and applaud the beautiful and informative Spaces as Places Design Manual, **we have concerns about cumulative impacts from a few of the proposed draft regulations that do not appear to be adequately addressed.**

Therefore, the LJ CPA respectfully requests that the following concerns, identified by the La Jolla Traffic and Transportation Joint Committee regarding the proposed Spaces as Places draft regulations, be further **evaluated prior to adoption:**

1. Cumulative Parking Loss Impact

The cumulative impact of parking loss to specific communities is not considered as part of this initiative. This is evident in LDC Sec. **141.0621(b)(2)(C)** Permit Requirements: "Removal of parking, with the exceptions of ADA spaces shall not be a basis of denial of a Public Right of Way Permit for a Streetary." We request this provision be removed from the draft regulations.

2. Limits or Cap on the Number of Streetaries

Please add specific limits for the number and location of Streetaries in each commercial area/community.

3. Width of a Travel Lane

LDC Sec. **141.0621(b)(4)(B)** Design Requirements: "The width of the Streetary shall not extend within 2 feet of the edge of the vehicle travel lane."

Please define "travel lane" in this context.

4. Permanent Curbs and Traffic Flow

There is no consideration of impacts to traffic flow and congestion for permanent Social Curb installations. This includes emergency vehicle access, emergency evacuation corridors and general impediments to traffic flow from multiple incursions into PROW. We recommend that permanent curb installation for Social Curbs be part of needed and thoughtful Traffic Calming efforts for several contiguous blocks within a neighborhood or commercial area.

Sincerely,

Diane Kane, President
La Jolla Community Planning Association

CC: Sameera Rao, Development Project Manager
Heidi von Blum, Deputy Director, Planning Department