



November 17, 2017

Development Services Department, City of San Diego
1222 First Avenue, San Diego, CA 92101

RE: Map Waiver Process

This letter is to serve three purposes related to map waivers for multifamily projects:

1. To express frustration at a process which requires a discretionary action on the part of the Planning Commission while giving our planning group no meaningful approach to the review of the project;
2. To pose particular questions regarding the map waiver process so that we may be fully aware of the purpose and utility it represents for applicants to assist us in understanding how our planning board may appropriately interact in the review of such projects; and,
3. To seek action on the part of the Development Services Department to encourage potential for review and comment by our planning board.

The Problem

The map waiver process, whereby a fully permitted development project seeks a discretionary approval by the planning commission, is an awkward matter. We acknowledge that waivers are appropriate for the most part, since they recognize that every subdivision requires the action of the jurisdiction but that the surveying and engineering obligations for a Tentative Map and Final Map are expensive and unnecessary for previously subdivided and surveyed sites. But in our advisory role, the PCPB is asked to make a recommendation on a project for which the project's design is not subject to any meaningful revision regardless of its quality or neighborhood impacts. This process is frustrating to our board and to citizens who appear before us.

Our Questions

That said, we seek to more fully understand the map waiver regulations and practicalities. We would appreciate any background you could provide. More specifically, we seek a simple true/false response which one or more of the following apply describe *strategically* the timing of the map waiver action:

- Since the building permit is ministerial and the Map Waiver process is relatively automatic, it makes little sense for an applicant to subject the project to comment and controversy by filing the Map Waiver prior building permits. [True or False?]



- There are fees and obligations associated with the Map Waiver which can be deferred to nearer the project completion date, which lessens construction financing costs. [True or False?]

- There are differences in the building review process between rental dwellings and for-sale units in some way related to parking calculations, ADA compliance or other criteria, which can be avoided by condominium conversion after the issuance of permits but prior to occupancy. [True or False?]

Action Request

Finally, the PCPB requests that the Development Services Department, through its advisory documents and during staff consultations, encourage applicants contemplating map waivers to voluntarily submit their otherwise ministerial development projects for review by the Peninsula Community Planning Board through its design review subcommittee. We believe that good faith submittals by responsible developers will be advantageous for them, their projects and the Point Loma community.

Thank you for consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon K. Linney", is written over a light blue horizontal line.

Jon Linney, Chair (PCPB)

Attachment

Approved by an Action of the Peninsula Community Planning Board on 19 October 2017.