

Shannon Mulderig
Senior Planner, City Planning Department
202 C St, 5th Floor
San Diego, CA 92101

November 16, 2023

Dear Ms. Mulderig:

We are a coalition of community members, business owners, non-profit organizations, and property owners who have many years of engagement in the Hillcrest community. We have formed an LGBTQ+ Cultural District Advisory Group to support the creation of an LGBTQ+ Cultural District and provide input from the community to the City of San Diego.

We have held a series of meetings this year to develop recommendations for the LGBTQ+ Cultural District and the related Plan Hillcrest initiative. We appreciate that City Planning Department staff members attended several of these meetings and listened to our recommendations for the Hillcrest Focused Plan Amendment.

We have reviewed the October 2023 Discussion Draft of the FPA and we are providing comments in the attached table. Overall, we feel much of our prior input has been heard and incorporated into the plan. Although further refinement to the FPA is needed, the October Discussion Draft is moving in the right direction. We appreciate the City Planning Department's willingness to listen to address issues raised by the LGBTQ+ community.

Thank you,



Susan Jester
(she/her/hers),
Chair of LGBTQ+
Cultural District
Advisory Group and
San Diego City
Commissioner



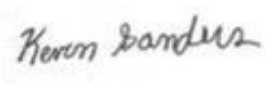
Fernando Z. López
Jr., (he/him/his),
Executive Director,
San Diego Pride



Nicole Verdés (she,
they),
Board President,
Lambda Archives



Benjamin Nicholls
(he/his/him),
Executive Director,
Hillcrest Business
Association



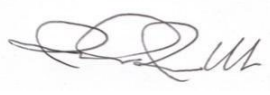
Kevin Sanders
(he/his/him),
Owner, Number 1 on
Fifth Avenue



Ryan Bedrosian
(he/his/him),
Owner, Rich's
Nightclub



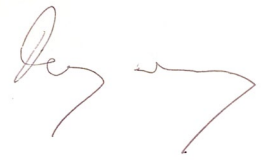
Adam Gilman
(he/his/him),
Property Owner



Moe Girton
(she/her/hers),
Owner, Gossip Grill



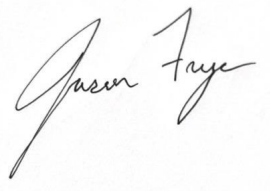
Matt Ramon,
Owner, Urban MO's
and Inside OUT



Gary Wong
(he/his/him),
Property Owner



Mike Burnett
(he/his/him),
Owner, Foundation
for Form



Jason Frye
(he/him/his),
Chair, Hillcrest Town
Council

Page/Policy	Existing Language	Comment
LU-37 (LU-2.11)	Design and enforce stricter controls and location criteria on Conditional Use Permits in residential neighborhoods to minimize nuisances generated by nonresidential uses outside of the Hillcrest Focused Plan Amendment area.	We support this change and request that it be included in the final version.
MO-48	None	Consider adding MO-1.18: “Implement the LGBT Walking Corridor through streetscape improvements and adjustments to the Spaces as Places program to increase pedestrian activity and interest along the corridor.”
UD-92	None	Add Streetaries and Active Sidewalks to the public space types listed. Please also consider adding Fifth Avenue between Robinson and University as potential promenade in the future.
UD-101	None	Consider adding UD-4.79 to encourage setbacks and building orientation where new development is adjacent to private outdoor patios and entertainment spaces in commercial areas. [Recognize change for overshadowing impacts]
UD-102	None	Consider adding a graphic showing transitions from residential or mixed-use to existing commercial private outdoor areas.
LC-109	A cultural district is an area of the city formally recognized for its history, people, events, and culture.	Reorder to put “people” before “history”.
LC-109	Key Objectives of the LGBTQ+ Cultural District	We support the Key Objectives and feel they embody the vision of the Cultural District.
LC-110/111	Graphics	The graphics recognize important events and locations and we appreciate their inclusion. Please make a minor correction noting that Numbers Nightclub closed in

		2017. Please contact us as we have a suggestion for alternative photos which may better represent the messages in the text.
LC-111	"The Hillcrest Youth Center opens its doors and becomes a critical resource for LGBTQ youth in San Diego in 1973."	Please change to: "The San Diego LGBT Community Center opens its doors and becomes a critical resource for the LGBTQ community in San Diego in 1973."
LC-112	<ul style="list-style-type: none"> • Displacement of LGBTQ businesses is a major concern; policies are needed to ensure new development recognizes the existing businesses in the area. • Hillcrest needs more gathering areas for community events. • A Cultural District provides an opportunity to promote and leverage funding for neighborhood enhancements and investment. 	<p>Consider revising to state that new development should be compatible with LGBTQ businesses, not just recognize them.</p> <p>Note that a community-identified issue is also supporting the existing events in current locations.</p>
LC-112	For this and many reasons, the Pride Parade and Festival must take place in Hillcrest if a LGBTQ+ Cultural District is to have any meaning here.	This is an important statement and should remain in the final version. However, we request a minor correction because the Pride Festival is not located in Hillcrest, but in Balboa Park. The Pride Festival is specifically allowed by City policy to hold this event in Balboa Park in the summer.
LC-113	San Diego LGBTQ+ Community Center	<p>Please replace with: "San Diego LGBT Community Center" here and throughout.</p> <p>Please also consider adding a paragraph about Hillcrest Youth Center:</p> <p>Established in 2000, The Center's Hillcrest Youth Center (HYC) is the first drop-in and recreational center in San Diego County dedicated to the needs of LGBTQ and nonbinary youth, as well as youth living with HIV. HYC offers safe space and affirming programming for high school youth ages 14-18; middle school youth ages 10-13; and transitional age youth from 18-24. In 2023, HYC opened its forever home, which has multiple rooms to host activities and tailored resources for our</p>

		youth, including a community closet with gender-affirming clothing, a game room, library, lounge, kitchenette, a dedicated office for on-site behavioral health visits, and a beautiful outdoor patio and garden.
LC-115	Interpretive Elements Section	We appreciate the inclusion of the quotes from community leaders. Please also consider including guidance for people or organizations who would like to provide walking tours or propose new historic or interpretive elements.
LC-120/121	An LGBTQ+ Cultural District in Hillcrest could include a Walking Corridor consisting of conceptually connected “parklets” or other interpretive elements at key locations that are themed to recognize the locations’ significance in LGBTQ+ life in Hillcrest.	Rephrase to be definitive about the inclusion of the Walking Corridor in the Cultural District and include business establishments and organizations among the key locations connected by the corridor. Please also add the Hillcrest Youth Center at 514 Pennsylvania Avenue (near the NW corner with Fifth Avenue).
LC-122 (CD-1)	Work with organizations, business groups, property owners, and the Hillcrest Business Association to establish a program to formally recognize anchor institutions and businesses.	We support the inclusion of a program to recognize anchor institutions and businesses and look forward to its development.
LC-122 (CD-2)	Highlight stories of diversity and the role of the BIPOC community in LGBTQ+ culture to ensure there is broad representation.	We support the inclusion of this proposal and think the City should consider providing guidance and facilitation for BIPOC individuals and groups to help tell these important stories.
LC-122 (CD-3)	Celebrate the history of Hillcrest and the LGBTQ+ community by emphasizing stories of San Diego individuals and communities to recognize what the community went through to get to today.	LGBT veterans have a unique role in LGBT history and culture in San Diego and should be recognized in the Cultural District. Please consider calling for a memorial or other element to help celebrate this history.
LC-122 (CD-5)	Evaluate the need for anti-displacement regulations to provide protections for small and local businesses so they have a space to stay in the community.	The FPA should include these regulations as SDRs. If the FPA only includes a policy to evaluate the need for them, the anti-displacement protections will not be in place prior to the City approving the changes that may cause the displacement.

<p>LC-122 (CD-8)</p>	<p>Explore the potential for an LGBTQ+ Arts and Culture Campus on the DMV site. The space may house several uses, including affordable housing, middle income housing, a hotel, LGBTQ+ businesses, and a broad of cultural organizations, such as SD Pride, Queer Youth Chorus and Marching Bang, Film OUT, and others.</p>	<p>We support this vision and believe the site should require a minimum percentage of affordable housing to leverage the site’s public ownership and provide opportunities for current Hillcrest residents to stay in the community.</p>
<p>LC-122 (CD-9)</p>	<p>Incorporate interactive and dynamic audio and visual technology in the interpretive elements, with narration and storytelling by individuals in the community (such as video archives, use of QR codes, holograms, projections, augmented reality, and lighting displays).</p>	<p>We support the inclusion of this proposal and think the City should consider providing guidance and facilitation for new individuals and groups to help tell these important stories.</p>
<p>LC-123 (CD-11)</p>	<p>Acknowledge the significance of SD Pride and the Pride Parade in Hillcrest by formally recognizing it as a Cultural Event in the district and considering the impacts to the event when proposing street improvement projects, development proposals, and infrastructure projects along the parade route.</p>	<p>We support the creating of a formal recognition process for a “Cultural Event” and appreciate the specific mention of SD Pride and the Pride Parade. Please consider including language allowing other events to be recognized as a Cultural Event and a call for a process to be developed for the recognition.</p>
<p>LC-123 (CD-12)</p>	<p>Engage the City of San Diego’s Economic Development Department in the development of the Cultural District, focusing on programs that support local LGBTQ+ organizations and businesses, district marketing, and branding.</p>	<p>Since the Cultural District will be established at time of FPA adoption, this should focus on its “further development and implementation”.</p>
<p>LC-123 (CD-13)</p>	<p>Formally recognize a “Walking Corridor” as shown on Figure _ to provide a focus for conceptually connected “parklets” or other interpretive elements at key locations that are themed to recognize the locations’ significance in LGBTQ+ life in Hillcrest.</p>	<p>Include important business establishments and organizations as elements connected by the Walking Corridor.</p>
<p>EP-104</p>	<p><u>A strong LGBTQ+ Cultural District that recognizes and protects</u></p>	<p>We appreciate the inclusion of this statement and connection made between</p>

	<u>Hillcrest’s unique role as a place for LGBTQ+ social interaction, activism, and community organization.</u>	the Cultural District and economic prosperity.
EP-107	The success of Uptown’s Entertainment District-district, primarily <u>primarily</u> located within the Business Improvement District boundaries, depends on continuing to attract consumers from the central communities and the region.	We believe the location of the entertainment district should be coterminous with the Cultural District rather than the BID boundary.
EP-108 (EP-1.8)	Request that future City Council legislation be considered to define and recognize the boundaries of the Hillcrest’s Entertainment-entertainment District-district.	We believe the location of the entertainment district should be coterminous with the Cultural District rather than the BID boundary.
EP-108 (EP-1.9)	<u>Strengthen the LGBTQ+ Cultural District by supporting existing community uses that serve as anchor institutions for LGBTQ+ people.</u>	We support this language and it should be included in the final plan.
EP-111	<u><i>LGBTQ+ Cultural District</i></u> <u>The LGBTQ+ Cultural District celebrates and honors the LGBTQ+ culture and history of Hillcrest. The district recognizes the importance of existing businesses, community organizations, and events that serve as anchor institutions for LGBTQ+ people. The district acknowledges Hillcrest’s unique role as a place for LGBTQ+ social interaction, activism, and community organization. For more information and recommendations, see the Urban Design Element.</u>	We support this language and it should be included in the final plan.
EP-112 (EP-2.5)	<u>Support a certification or recognition program for places and events within the LGBTQ+ Cultural District that are tied to protections and incentives to strengthen establishments and minimize the potential loss of valued institutions.</u>	We appreciate the addition of this program and look forward to its development.

NE-154	None	Add an additional goal which aims to have development that is compatible with and coexists with existing commercial uses, especially within the Cultural District.
NE-154	<p><u>In Hillcrest, the mixed-use character and increasing intensities result in the juxtaposition of residents and more active, noisy uses due to foot traffic, restaurants, bars, and nightlife activities.</u></p> <p>Reducing the effect from commercial activity noise involves site planning and integrating noise attenuation measures in new buildings that will reduce interior sound levels. <u>In addition, new residents will also need to accept higher noise levels in general as part of urban living.</u></p>	We appreciate the new text and believe it should be included in the final plan.
NE-155 (NE-1.1, 1.2, & 1.3)	<p>NE-1.1 Implement operational measures in areas where eating, drinking, entertainment, and assembly establishments are adjacent to residential.</p> <p>a. Institute appropriate open/close window hours for eating and drinking establishments.</p> <p>b. Lower the volume of amplified music during the last hour of service.</p> <p>c. Encourage the use of evening security staff to control loitering after hours and crowds.</p> <p>d. Provide noise attenuation measures to reduce the noise levels generated from the establishment, to the degree possible, within their premises with special attention on “open air” concept establishments- such as beer gardens or large outdoor eating and drinking venues.</p> <p>e. Encourage bars to remain open to serve food after alcohol has stopped being served to encourage a slower flow of people leaving the establishment after hours.</p> <p>NE-1.2 Evaluate and consider potential noise impacts as a condition of permit</p>	This language should be updated to reflect the existing commercial uses and higher ambient noise levels within the Cultural District. If not amended, the policies in NE-1.1, 1.2, and 1.3 would be inconsistent with the improved language of the Draft FPA on NE-154 and NE-155.

	<p>approval, renewal, and/or a change of use, for eating and drinking establishments that incorporate “open air” or large outdoor eating and drinking venues, based on acoustical studies and/or industry best practices.</p> <p>NE-1.3 Locate the commercial portion of new mixed-use developments away from existing single-family residences and ensure that noise levels generated are at or within acceptable levels when residential uses are located nearby.</p>	
NE-155 (NE-1.5)	<p><u>Encourage upfront disclosure of noise concerns in mixed-use and residential developments near commercial/entertainment areas. Particularly within the LGBTQ+ Cultural District, during property sales or lease agreements.</u></p>	<p>We support this and it should remain in the final version of the plan.</p>
NE-159 (NE-1.22)	<p>Consider the establishment of a “buffer zone” between the location of special events and Sixth Avenue <u>with the exception of the Pride festival and parade.</u></p>	<p>We support this addition and it should be included in the final version of the plan.</p>
IM-220	<p>Public Spaces and Promenade SDRs</p>	<p>Please include specific SDRs and Spaces as Places amendments to facilitate the LGBTQ+ Walking Corridor concept. This could include policies to facilitate pedestrian activity and strengthen the key establishments along the corridor including longer operating hours for streetaries and private outdoor spaces which has proven successful post-COVID. This could be modeled on the specific regulations that apply to the Gaslamp Quarter within the Spaces as Places regulations.</p>
IM-227 (SDR-B.8)	<p>Regulations for Contributing Resources</p> <p>a. Preservation of Historic Features:</p>	<p>Preserving existing facades and requiring restoration to prior conditions for contributing resources should be removed. This will cause a financial hardship for businesses, many of which are anchor institutions to the LGBTQ+ community. At a minimum, the regulations should only</p>

	<p>i. Existing building facades along the street wall(s) shall be retained and preserved.</p> <p>ii. Exterior materials and features associated with the architectural, historical and/or cultural/LGBTQ significance of a contributing resource shall be retained in their current location/appearance or restored to their historic location/appearance based on historical documentation.</p>	<p>apply to the portion of the building and façade that specifically contributes to the district or is actually a designated resource.</p> <p>Consider allowing for more flexible regulations for designated LGBTQ+ anchor institutions. These institutions contribute significantly to the feeling and association of the properties with the LGBTQ+ Historic District period of significance. These properties therefore provide other contributions to the district’s integrity which should be recognized and valued. The contributions of these anchor institutions to the district should not be undervalued and incentives for their preservation should be incorporated in the regulations. A historic district with no remaining LGBTQ+ anchor institutions would significantly erode the integrity of the district due to loss of feeling and association.</p>
IM-228-229 (SDR-B.9, B.10, B. 11)	Regulations for Non-Contributing Resources, Building Height, and Tower Massing	<p>Figure 12-4 does not match the proposed regulations in the SDRs. Please bring the language into consistency with the figure by allowing structures over 100’, allowing 10’ stepbacks for structures under 100’, and correcting the inconsistency on streetwall minimum frontage percentages.</p> <p>We believe 75% tower coverage may be appropriate for larger sites as depicted in the main tower in Figure 12-4. However, SDR-B.11 does not define tower, and Figure 12-4 depicts 2 multi-story structures which appear to exceed 75% building base coverage. We agree with the depiction in Figure 12-4 that buildings on smaller lots should not be subject to the 75% tower coverage. Please revise to bring the text into consistency with the figure and allow mid-rise buildings and buildings on smaller lots to exceed 75% building base coverage.</p>
IM-229 (SDR-B.12)	Noticing. New residential development within the area identified on Figure 12-5	We support this SDR and it should be included in the final version of the plan.

	shall provide the following Commercial Activity Notice to all persons considering purchasing or renting a residential dwelling unit prior to entering into an agreement to sell or rent the dwelling unit. This Commercial Activity Noise Notice shall also be prominently displayed in any onsite rental or sales offices.	However, the boundary of the plan should be revised to include residential areas across the alley from commercial areas. The notice should be required for residents living in a building across the alley from commercial activity, and the boundaries redrawn to include areas that may experience the increased noise.
IM-229	None	Similar to the inclusion of several SDRs that specifically help implement the Historic District, the FPA should also include SDRs tailored to the particular conditions and needs of the Cultural District. SDR-B.12 could be included in this section, along with additional language to help implement the vision of the LGBTQ+ Cultural District.