

Save Radio Towers Park

Support the Chollas Valley Community Planning Group Appeal of the Emerald Hills Subdivision Project

Honorable Mayor Todd Gloria and Honorable City Council Members,

On behalf of the Chollas Valley Community Planning Group and the residents of Emerald Hills and the surrounding Southeastern San Diego communities, we respectfully ask you to support our appeal of the Emerald Hills Project, also known as Radio Towers, located at 5702 Old Memory Lane. **We urge you to grant this appeal, explore alternative solutions, and help us secure this land as a public park for generations to come.**

City Council will vote on July 7 at 2pm at city hall on this proposed subdivision of 123 homes, including 13 affordable units and four privately maintained pocket parks. This ministerial project does **not comply with the Encanto Neighborhood Community Plan of 2015, CEQA standards**, and did **not involve community members, not allowing for due process.**

This decision also cannot be separated from the history of Footnote 7 and land-use inequity in Southeastern San Diego. Community members fought to repeal a zoning rule that allowed smaller lots and greater density in historically redlined Black and Brown neighborhoods than in many wealthier areas of the city. **City Council now has an opportunity to acknowledge the deeper equity problem and refuse to compound it.**

The Radio Towers application was deemed complete before the repeal took effect, the project is now moving forward under the very standard the Council determined was unjust, undermining the intent of the Councils own repeal. Our community is left to live with the consequences of a process it had no real opportunity to shape.

We are not opposed to housing. We are opposed to a land-use decision that asks historically underserved communities to absorb additional development pressure without first correcting decades of infrastructure neglect, park inequity, environmental burden, and lack of meaningful community investment. **We believe there is a better way, one that delivers housing in the right place while preserving this hilltop as the public park our community plan has long envisioned.**

Radio Towers Hilltop in Emerald Hills is one of the most remarkable public-view sites in San Diego. From this hilltop, residents and visitors can experience panoramic views of the city, the bay, the Coronado Bridge, Point Loma, and the surrounding region. This land has held significance in our communities. For decades, community members have understood this land as an opportunity for a public park and long-overdue civic investment into District 4. **To replace that opportunity with a private subdivision would permanently close a rare chance to create a public benefit for generations.**

This appeal is fundamentally about environmental justice which requires equal protection from environmental and health hazards and meaningful participation in

land-use decisions. Parks improve environmental quality by filtering air pollution, reducing noise pollution and providing habitats for local flora and fauna. Our community has repeatedly asked for parks, safe streets, shade trees, sidewalks, trails, gathering spaces, and healthy public infrastructure. Instead, we are being asked to accept a dense private development on one of the last significant hilltop open spaces in the area.

The project also raises serious concerns about infrastructure and public safety.

The surrounding street network is already constrained by steep terrain, disconnected routes, canyons, freeways, and limited east-west and north-south connectivity. The Encanto area has long lacked consistent landscaped medians, shade-producing street trees, sidewalks, bike lanes, crosswalks, and lighting. Adding more homes to this hilltop without first resolving circulation, emergency access, stormwater, slope stability, and evacuation concerns risks worsening conditions that residents already experience every day.

The environmental review also deserves closer scrutiny. The project relies on an addendum to a prior Program Environmental Impact Report rather than a full project-specific environmental analysis. Given the site's size, topography, biological resources, paleontological sensitivity, drainage concerns, and proximity to existing homes, schools, and community facilities, residents deserve a transparent and comprehensive review that fully evaluates cumulative impacts and feasible alternatives, including preservation of the site as public parkland or open space.

Southeastern San Diego is home to hardworking families, innovators, artists, cultural leaders, athletes, veterans, elders, and young people who deserve the same quality of public amenities found elsewhere in the city. Yet our neighborhoods continue to face a shortage of parkland, limited soccer and rugby fields, limited access to healthy food, aging infrastructure, environmental burdens, and a lack of public spaces that honor our history and support our future. **The structural neglect and invisibility of our communities are not accidental; they are the result of repeated decisions. This Council can choose a different path.**

We also ask the City to take seriously the cultural and ecological significance of this land. San Diego sits on unceded Kumeyaay land, and the City's land acknowledgement must be more than words recited before public meetings. True respect for land stewardship requires decisions that protect biodiversity, restore natural systems, preserve meaningful open space, and give communities a real voice in determining the future of the places where they live.

A Path Forward: The Land Swap Solution

We want to be clear: this coalition is not simply opposed to development. **We are proposing a solution.** Community leader Johnny Dang has developed a land swap framework that deserves serious consideration by the City Council, the developer, and all stakeholders.

The proposal centers on a good-faith value-exchange transaction: the City of San Diego would facilitate an alternative development opportunity for D.R. Horton, including

potentially higher density or expedited entitlements on a comparable or superior site, in exchange for the dedication of the Radio Towers Hill and the adjacent Klauber Avenue parcels as permanent public parkland. This approach is grounded in the 2015 Encanto Neighborhoods Community Plan's explicit designation of these sites for park acquisition and leverages established California land-use tools, including Development Agreements under Government Code Section 65864.

This is not an untested idea. California law provides the precise mechanisms to make it work. Development Agreements authorize cities and developers to enter into binding contracts that may include land dedication for public facilities in exchange for vested development rights, density provisions, or other consideration on an alternative site. The Subdivision Map Act and local ordinances further support parkland dedication and in-lieu fee mechanisms that can be expanded through negotiation. Transfer of development rights programs can move entitlements from the park-designated site to a more suitable location.

We believe this framework serves everyone. The developer receives a viable, lower-risk alternative. The City advances housing production on a more suitable site while honoring the community plan. And the residents of Southeastern San Diego and the city gain a once-in-a-generation destination park on one of the highest and most visible points in the region. This is the kind of pragmatic, equity-centered problem solving that we are asking this Council to champion.

We call on the City Council to direct appropriate staff to formally explore this alternative, engage the developer in good-faith discussions, and commit to identifying candidate sites that could support this exchange. There are also private funding sources and nonprofit organizations specifically created to support park acquisition that are available as partners in this effort. Where there is a will, there is a way.

For these reasons, we respectfully ask the City Council to grant the appeal, reject the project as approved, and direct staff to pursue a community-centered alternative that prioritizes public parkland, open space, environmental protection, safety, cultural recognition, and equitable investment in District 4.

The Emerald Hills Hilltop is not merely a development site. It is a once-in-a-generation opportunity to correct historic inequities, honor community vision, and create a public legacy worthy of San Diego. Please stand with the Chollas Valley Community Planning Group and the residents of Emerald Hills, Encanto, and Southeastern San Diego by supporting this appeal. We want this park to be a living legacy for our citizens and a gift to our children.

Respectfully,

Saige Gonzales Walding

Chair, Chollas Valley Community Planning Group
& Community Members in Attachment A.