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San Diego, CA 92106

April 25, 2019

Ms. Laura Black, Deputy Director  
Planning Department  
City of San Diego  
9485 Aero Drive  
San Diego, CA 92123

Re: Carmel Mountain Ranch Community Plan Amendment Initiation Request

Dear Ms. Black:

PACS Enterprises LLC, owner of The Carmel Mountain Ranch Golf Course, and NUWI2-CMR, LLC, applicant, request initiation of an amendment to the Carmel Mountain Ranch Community Plan ("CMR CP"). If the initiation is approved, the amendment application will be accompanied by a request for rezoning portions of the property from AR-1-1 to various residential zones, a Site Development Permit due to the presence of Environmentally Sensitive Lands (biological resources) on the site, and an amendment to Conditional Use Permits No. 84-0111 and 87-0568 to extinguish the golf course use. A Master Planned Development Permit pursuant to MC 143.0480 may be processed. The site is not located within or adjacent to the City's Multi-Habitat Planning Area. See attached "Existing Conditions Map" for context.

#### **Initiation Criteria**

The proposed land use plan amendment is compliant with the three initiation criteria found in the General Plan, LU-D.10:

#### **1. The amendment request appears to be consistent with the goals and policies of the General Plan and Carmel Mountain Ranch Community Plan:**

The Land Use and Community Planning Element of the General Plan has goals for balanced communities and equitable development that ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels. The proposal would implement General Plan policies for balanced communities including:

- Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration. (LU-H.2)
- Maintain or increase the city's supply of land designated for various residential densities as community plans are prepared, updated or amended. (LU-C.3)

The General Plan also has policies that aim at providing a variety of housing types and sizes with varying levels of affordability in residential and village developments, and to provide a variety of different types of land uses within a community to offer a diverse mix of uses. The proposed amendment would have the potential to accommodate a variety of housing opportunities, ranging in price and product type, and would incorporate affordable housing units, open space and park

opportunities: commercial office and industrial uses are already present in the community. The proposed amendment would introduce affordable housing opportunities and that would be consistent with policies in the Housing Element of the General Plan, including:

- Seek attainment of community balance with respect to utilization of affordable housing resources. (HE-1.1)
- Encourage location of affordable housing opportunities throughout all sections of the City by encouraging mixed-income developments. (HE-1.8)

The Housing Element of the Camel Mountain Ranch Community Plan has a central objective to “accommodate a variety of residential options through a diversity of project types and economic appeal”.

When the CMR CP was adopted in 1984, as an amendment to the Rancho Carmel Community Plan, it transitioned from a mostly residential plan to a balanced plan of residential, commercial and industrial uses to create a jobs/housing balance. As stated in the CMR CP, it was the stated intention of the developers to provide affordable housing within the community. Affordability was identified to provide housing available to households having an income less than 120% of the medium household income in San Diego (for example, through product type or financing arrangements). All rental units and subsidized rental ownership units (subsidized by federal, state or local program) were deemed to satisfy this requirement for affordable housing. The development was ultimately built with 26% of the units of rental housing (1,263 rental apartment projects/4,995 total dwelling units.)

The General Plan and Community Plan reflect the former use of the Carmel Mountain Ranch Golf Course. In the General Plan's Land Use Element, the project site is identified as Park, Open Space, & Recreation on GP Figure LU-2, which encompasses a range of recommended community plan designations shown on GP Table LU-4; from open space to private/commercial recreation. The current community plan land use designation is Private Recreation (CMR CP Fig. 8 Parks and Open Space). Associated goals and policies for the site are to incorporate the privately owned and operated golf course “as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole”. However, in the past year, the Golf Course has ceased operation and the property has lay fallow.

The proposed amendment seeks to redesignate the existing land use " Private Golf Course" to: Low-Medium Residential, Medium Residential, Park, and Open Space, which are consistent with surrounding land uses (CMR CP Fig. 4 Land Use, Table 2 Land Use Analysis. Although, the General Plan and Community Plan identify the project site as open space/golf course use, the property is privately owned and operated. The golf course is not part of the population based open space/park calculations and would not eliminate any dedicated parks from the community. The proposed amendment would designate portions of the site to residential use, open space, and public park.

The initiation of the proposed plan amendment would provide the opportunity to comprehensively analyze and assess the impacts of the 167-acre site with the focus on providing community benefits. Community benefits may include various market-rate housing opportunities, on-site affordable housing, additional open space, recreational amenities, multi-modal transportation improvements, and public parkland for the community. Additionally, the amendment could facilitate increased access to the Sabre Springs/Penasquitos Transit Center and regional job centers through enhancement of existing bicycle and pedestrian infrastructure.

**2. The proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policies or site design; and**

The Carmel Mountain Ranch Golf Course was determined to be financially unviable, due to declining play and rapidly increasing water costs. In the calendar year prior to its closure, the golf course used over 46 million gallons of potable water for irrigation and property maintenance. Converting a privately-owned 167-acre recreation facility used by few people and which places a disproportionate strain on our potable water supply into much needed housing provide significant benefit to the community and to the city. The proposed amendment will provide diverse housing options within close proximity to major employment centers, retail opportunities, recreational amenities, schools, the public library and the existing Sabre Springs/Penasquitos Transit Center and rapid bus lines. The proposed amendment will improve the pedestrian/bicycle connectivity within the community and support the City's Climate Action Plan and associated policies for achieving reduction in per capita vehicle miles travelled through the creation of infill housing opportunities in a Transit Priority Area. (CMR CP Fig. 14 – Bikeways and Trails).

Carmel Mountain Ranch has 25 gross acres of public parks (neighborhood, community and pool). According to current City parks standards, it is parks deficient. With an estimated population of 12,000, it should have 33.6 acres of park land ( $12,000 \times 2.8 \text{ acres}/1,000 = 33.6 \text{ acres}$ ). The proposed amendment would offer additional public benefit to the community by providing new public park land and additional dedicated open space.

Carmel Mountain Ranch currently has no designated affordable housing; the applicant proposes to provide on-site affordable housing within walking distance to the existing Sabre Springs/Penasquitos Transit Center.

The proposed amendment supports a wide variety of General Plan policies and objectives. The Land Use and Community Planning Element of the General Plan has goals for balanced communities and equitable development that promote the creation of diverse and balanced neighborhoods with housing available for households of all income levels. The proposal would implement General Plan policies for balanced and equitable communities including:

- Provide affordable housing throughout the City that no single area experiences a disproportionate concentration. (LU-H.2)
- Include a variety of residential densities, including mixed use, to increase the amount of housing types and sizes and provide affordable housing opportunities. (LU-C.2)

The General Plan also includes policies that aim to providing a variety of housing types and sizes with varying levels of affordability in residential and village developments, and to provide a variety of different types of land uses within a community to offer a diverse mix of uses. The proposed amendment would have the potential to accommodate a variety of housing opportunities, ranging in price and product type, and would incorporate affordable housing units, open space and park opportunities. Commercial office, retail, and industrial uses are already present in the community. The proposed amendment would introduce affordable housing opportunities in an area that currently contains no designated affordable housing units, and that would be consistent with policies in the Housing Element of the General Plan, Including:

- Seek attainment of community balance with respect to utilization of affordable housing resources. (HE-1.1)
- Encourage location of affordable housing opportunities throughout all sections of the City by encouraging mixed-income developments. (HE-1.8)

The proposed amendment also serves to implement Strategy 3 of the Climate Action Plan by locating infill housing within a transit priority area, and thus, increasing transit mode share and reducing per capita transportation sector GHG emissions.

**3. Public Facilities appear to be available to serve the proposed increase in density/intensity, or their provisions will be addressed as a component of the amendment process:**

Public facilities appear available to serve the proposed amendment to increase density at the site. A full analysis of public facilities would be included as part of the community plan amendment analysis should this request be initiated. A portion of the property is in a Transit Priority Area due to its proximity to the Sabre Springs/Penasquitos Transit Center. Bus Routes 20, Rapid 235 and Rapid Express 290 serve the Carmel Mountain Ranch/I-15 corridor.

We will appreciate the opportunity to meet with staff to discuss this initiation application.

Best regards,



Kathleen Riser  
Senior Land Use Consultant

**Attachments**

1. Existing Conditions Map
2. Community Plan Park and Open Space (Figure 8)
3. Community Plan Land Use Plan (Figure 4)
4. Community Plan Land Use Analysis (Table 2)
5. Community Plan Bikeways and Trails (Figure 14)
6. General Application Package
  - General Application
  - Deposit Account
  - Ownership Disclosure Statement
  - Proof of Ownership (Grant Deed recorded 8/23/07 as doc 2007-0560775)
  - APN Maps
  - Affordable Housing Checklist
- 7: Fees (\$12,000 deposit and \$615.85 fees)

**CC:** Mr. Tait Galloway, Program Manager  
Mr. Michael Prinz, Senior Planner  
Mr. Kevin Hwang, PCS LLC  
Mr. Jonathan Frankel, New Urban West, Inc.  
Mr. Eric Edelman, Chair, Carmel Mountain Ranch/Sabre Springs Community Committee