



THE CITY OF SAN DIEGO

## Report to the Planning Commission

DATE ISSUED: April 30, 2024 REPORT NO. PC-24-019

HEARING DATE: May 9, 2024

SUBJECT: EAST ELLIOTT COMMUNITY PLAN AMENDMENT INITIATION – PALMER LAKES

PROJECT NUMBER: PRJ-1109904

OWNER/APPLICANT: American Pacific Investments

### **SUMMARY**

Issue: Should the Planning Commission initiate an amendment to the East Elliott Community Plan to redesignate approximately 7.25 acres of a 29-acre site located north of Trailmark Way from Open Space to Residential?

Staff Recommendation(s): INITIATE the community plan amendment process.

Community Planning Group Recommendation: The subject site is in the East Elliott Community Plan area which does not have a Community Planning Group.

Environmental Impact: This activity is not considered a "project" by the definition set forth in CEQA Guidelines Section 15378. Should the initiation of the Community Plan Amendment be approved, environmental review would take place at the appropriate time in accordance with CEQA Section 15004.

Fiscal Considerations: None. All costs associated with this action are paid from a deposit account maintained by the applicant.

Code Enforcement Impact: None.

Housing Impact Statement: If initiated, subsequent approval of the proposed community plan amendment could increase the potential for housing on the subject site. A community plan amendment would evaluate the appropriate zoning and the specific development potential for additional homes including detaching the potential developable area of the site

from the City of San Diego and annexing by the City of Santee. Based on the request by the applicant for a Residential – Very Low (0-5 du/ac) land use designation for the 7.25 acres of the 29-acre site, up to 36 homes could be built on the 7.25-acre portion of the site with the proposed community plan amendment. Based on the existing land use designation and development regulations, only two homes could be built on the entire 29-acre site.

**The initiation of a community plan amendment is not the adoption of a community plan amendment. Neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment, and the City Council is not committed to adopt or deny the proposed amendment.**

## **BACKGROUND**

### The East Elliott Community Plan

The [East Elliott Community Plan](#) was adopted in 1971 and most recently amended in 2015 by the Castlerock Amendment which resulted in the development area being detached from the City of San Diego and annexed to the City of Santee. The community planning area is designated for 2,212 acres of open space, 517 acres of landfill, 9 acres of low-density residential with a capacity for 45 homes and 7 acres of office commercial that is currently undeveloped open space.

### Site Location

The proposed amendment site (Assessor Parcel Numbers: 366-050-25 and 366-050-23) is a 29-acre vacant property located at the north end of Trailmark Way in the northeast portion of the East Elliott Community Planning Area adjacent to the Weston development in the City of Santee (Attachment 1).

### Adjacent Existing Land Uses

The subject site is bounded by open space to the north, east and west, and by single-family residential and Weston Park to the south within the City of San Santee (Attachments 2 and 3). The open space area is within the City of San Diego to the north, south, east and west.

### Community Plan Use Designation

The East Elliott Community Plan designates the subject site as open space, which provides for the preservation and enhancement of natural open space areas. The adjacent properties within the City of San Diego to the north, south, east and west are designated open space (Attachment 4).

### Zoning

*Base Zone:* The subject site is presently zoned RS-1-8, which allows low-density single dwelling units at a maximum density of 1 dwelling unit for 40,000 square feet of lot area (1.1 dwelling

units per acre) (Attachment 5). However, 100 percent of the site is within the Multi-Habitat Planning Area and is subject to the Environmentally Sensitive Lands Regulations in Chapter 14, Article 3, Division 1 in the San Diego Municipal Code which limits development to the OR-1-2 zone development regulations. Within the OR-1-2 zone, residential development is limited to one home per lot which would allow for two homes to be developed on a maximum of 25 percent of the 29-acre subject site.

*Overlay Zones:* The subject site is within Subarea 2 of the Mission Trails Design District Overlay Zone. These regulations ensure that development along the edges of Mission Trails Regional Park and the San Diego River Park enhances the parks' natural qualities and promotes the aesthetic and functional quality of park and urbanization relationships while recognizing the right to reasonable development within the Design District. The overlay zone requires that all proposed development comply with the design criteria and standards of the Mission Trails Design Guidelines in the Land Development Manual.

#### Multi-Habitat Planning Area

The subject site is located entirely within the Multi-Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Plan Subarea Plan (MSCP). As noted under the zoning discussion, the site is subject to the Environmental Sensitive Lands regulations and the OR-1-2 zone development regulations. The site is also located directly adjacent to City-owned property that is 100 percent conserved MHPA and managed by the Parks and Recreation Department Open Space Division (Attachment 6).

#### Vernal Pools

The site does not contain any vernal pools, as shown in the Vernal Pool Habitat Conservation Plan.

#### Complete Communities Mobility Choices

The subject site is in Complete Communities Mobility Choices Zone 4 (MZ 4). Development in MZ 4 is required to provide an active transportation in-lieu fee to mitigate for impacts to increased vehicle miles travelled (VMT).

#### Mobility

*Transit:* The subject site is not located within a Transit Priority Area. The site is approximately 1.4 miles north of a transit stop at Mast Boulevard and Medina Drive, served by MTS Route 834, which provides service along Mast Boulevard and Mission Gorge Road to the Santee Town Center. (Attachment 7)

*Roadway:* The subject site does not currently have frontage to a public street. Access to the site is provided via an existing public access easement at the north end of Trailmark Way, which is classified as a local street within the City of Santee (Attachment 8).

*Bicycle:* The nearest bicycle routes to the subject site are along Mast Boulevard and Fanita Way. (Attachment 9).

#### Existing Public Facilities and Services

*Schools:* Gage Elementary School, Pershing Middle School and Patrick Henry High School are approximately 6.5 to 7 miles southwest of the site in the City of San Diego. Sycamore Canyon Elementary School, Carlton Oaks Middle School, and West Hills High School are approximately 1 to 1.5 miles south and east of the site in the City of Santee.

*Parks:* The site is located 6.9 miles north of San Carlos Community Park in the City of San Diego and 0.2 miles from Weston Park in the City of Santee.

*Library:* The site is located 6.7 miles northeast of the San Carlos Library in the City of San Diego and is located 2.6 miles northwest of the Santee Library in the City of Santee.

*Public Safety:* The site is located 11.2 miles east of the San Diego Police Department's Eastern Division Station. The San Diego County Sherriff's Department provides police services to the City of Santee, and the site is located 4.2 miles northwest of the Santee Sherriff Station. The site is located 6.3 miles north of San Diego Fire Station 34 in the Navajo Community Plan Area and two miles north of the Santee Heartland Fire and Rescue Station. (Attachment 10).

#### Housing and Population

Currently, there are not any existing homes within East Elliot. In 2013, the City Council approved the Castlerock Project which resulted in the approval of 430 homes. In 2015, The developed portion of the property with the homes, renamed Weston, was detached from the City of San Diego and annexed by the City of Santee.

#### Employment

The primary employment use in East Elliott is the Sycamore Landfill.

#### Prior Community Plan Amendments

*Castlerock Project:* On September 16, 2013, the City Council approved a community plan amendment for the Castlerock Project. This action included an annexation agreement with the City of Santee and the associated approvals to allow for the construction of up to 283 single-family detached homes, 147 multi-family detached homes, a 4-acre public park, and approximately 90 acres of dedicated open space on a vacant 203.64-acre site located on the north side of Mast Boulevard between Medina Drive and West Hills Parkway.

The Castlerock Project is located southeast of the subject site and shares property boundaries. During the approval process, the Castlerock Project applicant evaluated annexation scenarios due to the site's close adjacency to developed areas in the City of

Santee. The analysis determined that roads, utilities, emergency services, park and recreation facilities, libraries, and other public facilities and services in the City of Santee would bear the project's impacts. The analysis also showed that the no annexation scenario had a much more significant negative impact on the City of San Diego General Fund. This scenario identified the need for an additional public water tank and determined the City of San Diego could not meet acceptable service levels for fire service without providing extra resources. The City Council approved the project under the scenario that the property be detached from the City of San Diego and annexed by the City of Santee with water service provided from the Padre Dam Municipal Water District as part of a Local Agency Formation Commission (LAFCO) decision.

*Castlerock Amendment:* On July 21, 2015, the City Council approved a technical amendment to the northern portion of the Castlerock Project area. The amendment reconfigured portions of the public streets, reduced the number of homes, reduced impacts to the natural drainage, and increased the onsite park from 4 to 5.3 acres.

## **DISCUSSION**

### Proposed Community Plan Amendment

The applicant is requesting an amendment to the East Elliott Community Plan to redesignate the subject site from Open Space to Residential – Very Low (0-5 dwelling units per acre). In the letter of initiation, the applicant stated that the community plan amendment would allow for development of the project site with single-family lots, clustered within 25 percent or less of the 29-acre site. Based on the requested land use designation, up to 36 homes could be built on 7.25 acres.

The proposed amendment would result in the development of land designated in the community plan as Open Space in a location where City of San Diego public facilities, services, and utilities are unavailable. Like the Castlerock Project, the site is adjacent to developed areas in the City of Santee and relatively far from developed areas in the City of San Diego. The City of Santee would bear the project site's impact on roads, utilities, emergency services, park and recreation facilities, libraries, and other public facilities and services. The City of San Diego General Fund would be impacted similarly if the property were not detached, and the City of San Diego would need significant infrastructure investments to serve the site.

Therefore, a detachment from the City of San Diego and the annexation of the 7.25-acre property proposed for residential use into the City of Santee could be warranted if the Community Plan Amendment were to be ultimately approved. A community plan amendment to change the land use from Open Space to Residential on 25 percent or less of the 29-acre site without a proposal to detach the residential portion from the City of San Diego and annex by the City of Santee would not be supported.

A condition of approval of this Community Plan Amendment Initiation could require the applicant to contact the San Diego Local Agency Formation Commission (LAFCO), City of Santee and all relevant public service providers and request an evaluation for detachment from the City of San Diego and annexation by the City of Santee. The applicant has indicated that Padre Dam Municipal Water District has confirmed the Water District's ability to provide water and wastewater service.

#### Multi-Habitat Planning Area

The property is located entirely within the MHPA, where development is limited to the regulations of the OR-1-2 zone. The allowable development area includes all portions of the site, both developed and undeveloped, that occur outside the MHPA. Due to the site being entirely within the MHPA, any future development would be limited in the amount of encroachment into the MHPA necessary to achieve the allowable 25 percent development area permitted under the OR-1-2 zone.

The specific location of allowable development that encroaches into the MHPA would be determined by the environmentally sensitive lands present. Encroachment into the MHPA beyond the development area is not allowed. A community plan amendment that would result in the development of more than 25 percent of the 29-acre site and require an MHPA Boundary Line Adjustment would not be supported.

Based OR-1-2 zone development regulations, up to two homes could be allowed on the 29-acre site, within the 25 percent developable area. A Community Plan amendment to a residential very low designation would allow an increase in allowed uses on the site of up to 36 homes, again within the 25 percent developable area.

#### Initiation Criteria

The City of San Diego is unique among jurisdictions. The process to amend the General Plan and/or a community plan requires either a Planning Commission or City Council initiation before a plan amendment process and accompanying project may proceed. Community plans are components of the General Plan. The staff recommendation of approval or denial of the initiation is based upon compliance with all three of the initiation criteria contained in the General Plan. The City Planning Department has provided an overview of how the following initiation criteria are addressed by the proposed amendment.

- (a) The amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria.**

Maintaining the community plan Open Space land designation for the entire 29-acre site would protect and conserve the existing open space, which is consistent with the

General Plan Conservation Element, but that nonetheless, the City of San Diego would be unable to serve the potential residential development allowed by the Environmentally Sensitive Lands and the OR-1-2 zone development regulations that are currently in place. The proposed amendment request would be consistent with General Plan Public Facilities, Services and Safety Element policies that address the need for community plan amendments and proposed developments to conduct an analysis to identify operation costs and impacts to public facilities and services.

**(b) The proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range plan policy or site design.**

Maintaining the community plan Open Space land designation for the entire 29-acre site would protect and conserve the existing open space, which is consistent with the General Plan Conservation Element, but that nonetheless, the City of San Diego would be unable to serve the potential residential development allowed by the Environmentally Sensitive Lands and the OR-1-2 zone development regulations that are currently in place.

**(c) Public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.**

Due to the location of the site, connections to City of San Diego public facilities, services, and utilities are unavailable. Public facilities, services, and utilities exist immediately to the east through the City of Santee and other agencies. The applicant has coordinated with Padre Dam Municipal Water District, which has confirmed the Water District's ability to provide sewer and water service. If the amendment to the Community Plan is initiated, an analysis of public services and facilities will be performed with the review of the amendment consistent with the General Plan.

Given the project's inability to connect to the City's public utilities, its distance from City of San Diego police and fire stations, parks and other public facilities, and its proximity to existing development in the City of Santee, a detachment from the City of San Diego and annexation of the property to the City of Santee is warranted. To be consistent with this criterion, the applicant will need to contact the San Diego LAFCO and all relevant public service providers and pursue detachment from the City of San Diego and annexation by the City of Santee.

## Conclusion

If initiated, City Planning Department staff would work with the applicant to address the following issues and others that may be identified by the Planning Commission and through the community plan amendment review process. The applicant should prioritize initiating the detachment and annexation of the property through San Diego LAFCO and initiating discussions with the City of Santee, County of San Diego and other service providers for public facilities, services, and safety.

The following land use issues have been identified by staff. If initiated, these issues, as well as others that may be identified, would be analyzed and evaluated by staff through the community plan amendment review and analysis of the potential LAFCO annexation process:

### Public Facilities, Services and Safety

- Provision of public services and facilities including, but not limited to, fire service, sewer and water facilities.
- Evaluation of the Local Agency Formation Commission process for reorganization and the most efficient method of providing public services and facilities.
- Obtain a letter of comment/support from the City of Santee on the potential for a future annexation.
- Evaluation of applicable wildfire safety planning strategies and emergency access and egress.

### Open Space

- Impacts of the proposed development to surrounding city-owned, 100 percent conserved open space (MHPA).
- The ability of the proposed development to strictly adhere to the City's MSCP Subarea Plan, Environmentally Sensitive Lands Regulations, and Land Development Manual Biology Guidelines (2018).
- Ensure that the proposed development does not exceed a 25 percent maximum development area (e.g., grading, access, brush management zone 1 area), which would necessitate a MHPA boundary line adjustment.
- Retaining the Open Space land use designation on at least 75 percent of the site to ensure no development would occur in the conserved area.
- Identification of trail access and improved connectivity within Mission Trails Regional Park.

### Land Use Designation

- Evaluation of the appropriate land use designation and zoning for the site, including an open space land use designation and zone that ensures 75 percent



- of the site remains 100 percent conserved within City of San Diego jurisdiction.
- Revision of community plan maps and figures to reflect new City and community boundaries.
  - Consideration of onsite affordable homes.
  - Evaluation for consistency with the goals and policies of the Mission Trails Regional Park Master Plan.

#### Site Design

- Compatibility of the proposed amendment with the General Plan Urban Design goals and policies addressing development adjacent to natural features.
- Address the minimization of lighting onto adjacent open space areas.
- Evaluate site design and grading for consistency with the Mission Trails Design District Subarea 2 design guidelines.
- Consider the visual impact of the site's position as a backdrop to Santee Lakes.

#### City of Santee

- Coordinate community plan amendment review including the issues identified in this report and analysis of the potential LAFCO annexation process with the City of Santee.

Maintaining the community plan Open Space land designation for the entire 29-acre site would protect and conserve the existing open space, which is consistent with the General Plan Conservation Element, but that nonetheless, the site would not be able to be served by the City of San Diego and the proposed amendment could provide the opportunity for the applicant to pursue a potential detachment from the City of San Diego and annexation by the City of Santee. A community plan amendment to change the land use from Open Space to Residential on 25 percent or less of the 29-acre site without a proposal to detach the residential portion from the City of San Diego and annex by the City of Santee would not be supported.

Staff has not fully reviewed the applicant's proposed community plan amendment. Therefore, by initiating this community plan amendment, neither staff nor the Planning Commission is committed to recommending in favor or denial of the proposed amendment.

If initiated by the Planning Commission, staff recommends that the Planning Commission request that the applicant fully address the issues identified in this report, including contacting the San Diego LAFCO, City of Santee and all relevant public service providers, and pursuing detachment from the City of San Diego and annexation by the City of Santee, as well as other issues that the Planning Commission may identify as part of the community plan amendment review process.

Respectfully submitted,

*Corey Funk*

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Corey Funk  
Senior Planner  
City Planning Department

*Tait Galloway*

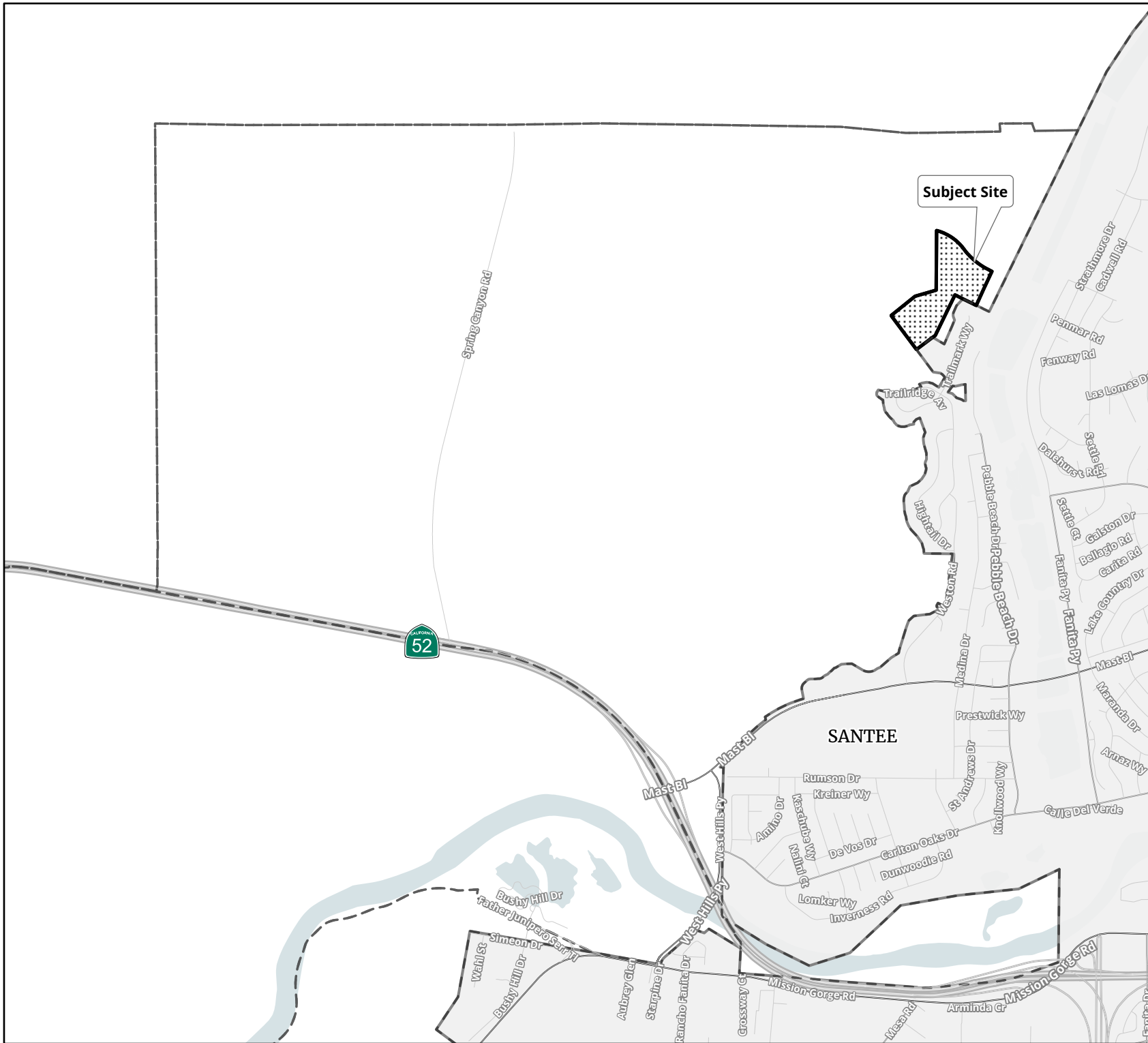
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Tait Galloway  
Deputy Director  
City Planning Department

Attachments:

1. Vicinity Map
2. Aerial Photographs
3. Existing Land Use Map
4. Planned Land Use Map
5. Existing Zoning Map
6. Multi-Habitat Planning Area (MHPA) Map
7. Transit Route Map
8. Roadway Classifications Map
9. Bicycle Network Map
10. Public Facilities Map
11. Applicant's Initiation Request Letter
12. Ownership Disclosure Statement

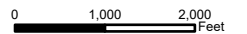
Vicinity Map



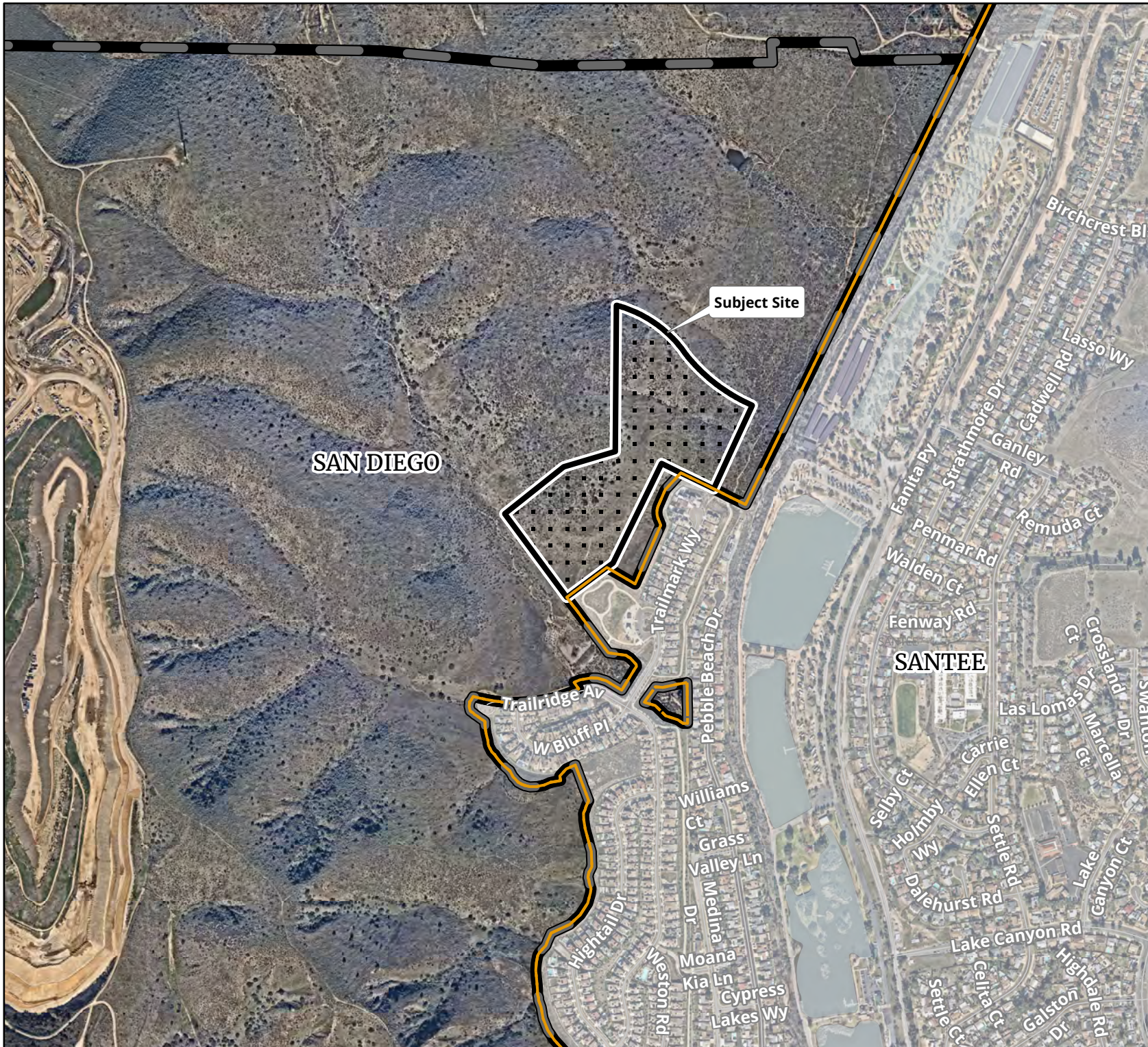
Legend

- Planning Areas
- City of San Diego
- Municipal Boundaries
- Subject Site





General Disclaimer:  
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 The boundaries and features on this map are intended to show existing or proposed conditions.  
 When/if the amendment is approved/adopted, the adopted plan shall be updated to reflect the approved changes.



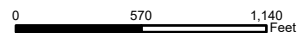
# Aerial Photographs



### Legend

-  Outside City of San Diego
-  Planning Area
-  Subject Site
-  Municipal Boundary

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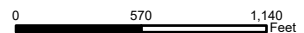
Existing Land Use Map



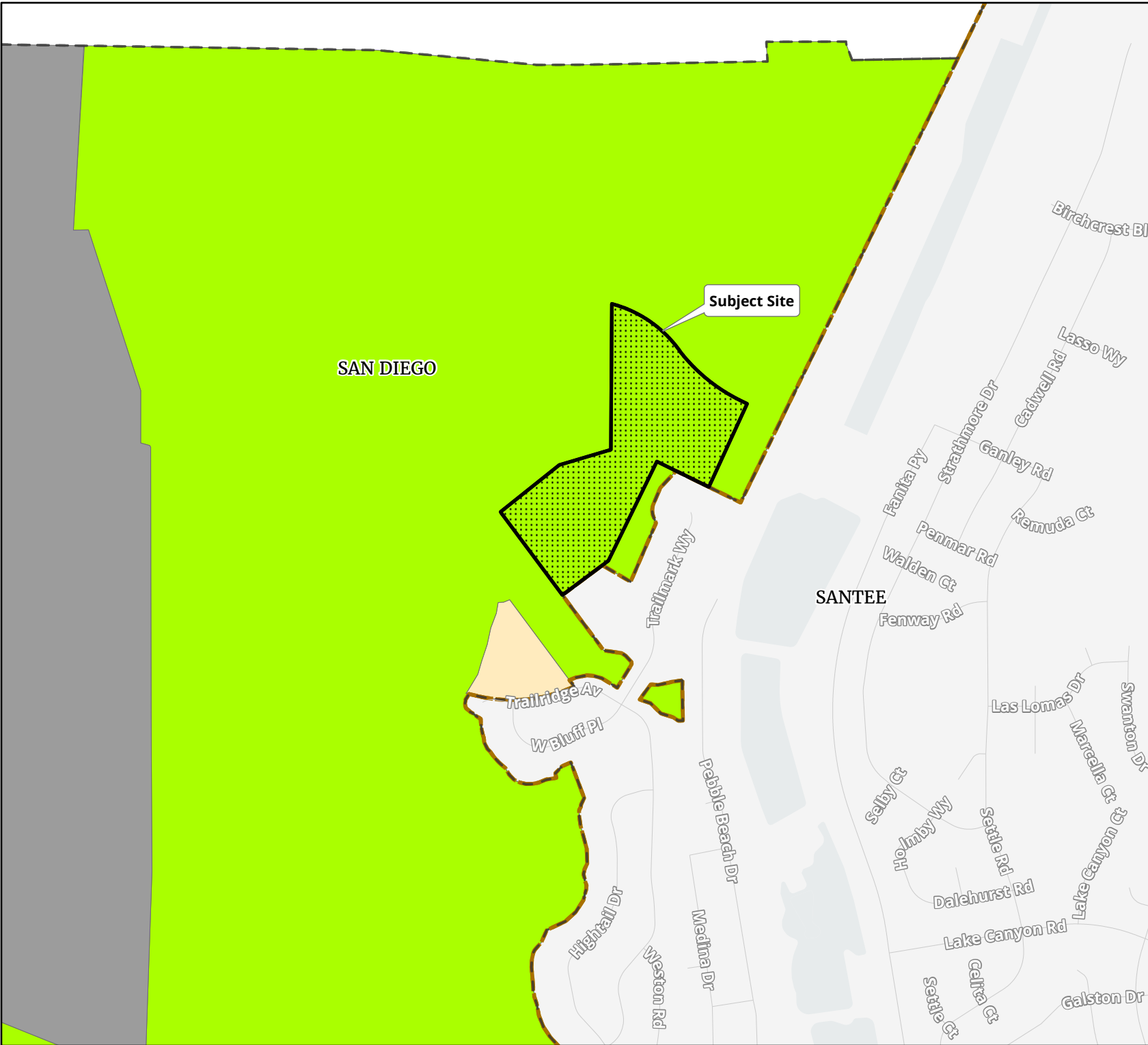
Legend

- RESIDENTIAL**
  - Single Family Detached
  - Single Family Attached
- PARKS AND RECREATION**
  - Recreation
  - Open Space Parks
- PUBLIC FACILITIES AND UTILITIES**
  - Transportation, Communications, Utilities
  - Institutions
  - Education
  - Military use
- UNDEVELOPED**
  - Undeveloped
- WATER**
  - River, Lake, Bay
- Planning Areas
- Initiation Site








**PLAN LAND USE LAYER NOTICE:**  
 This map is for illustrative purposes only. Refer to the Adopted Community Plan document for official land use boundaries. Map is intended to reflect land use designations depicted in the community plan document and should not be used for site planning purposes. If you notice areas of land use on this map that differ from adopted plan, please inform GIS staff to request a change to this map.



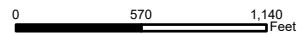
Planned Land Use Map



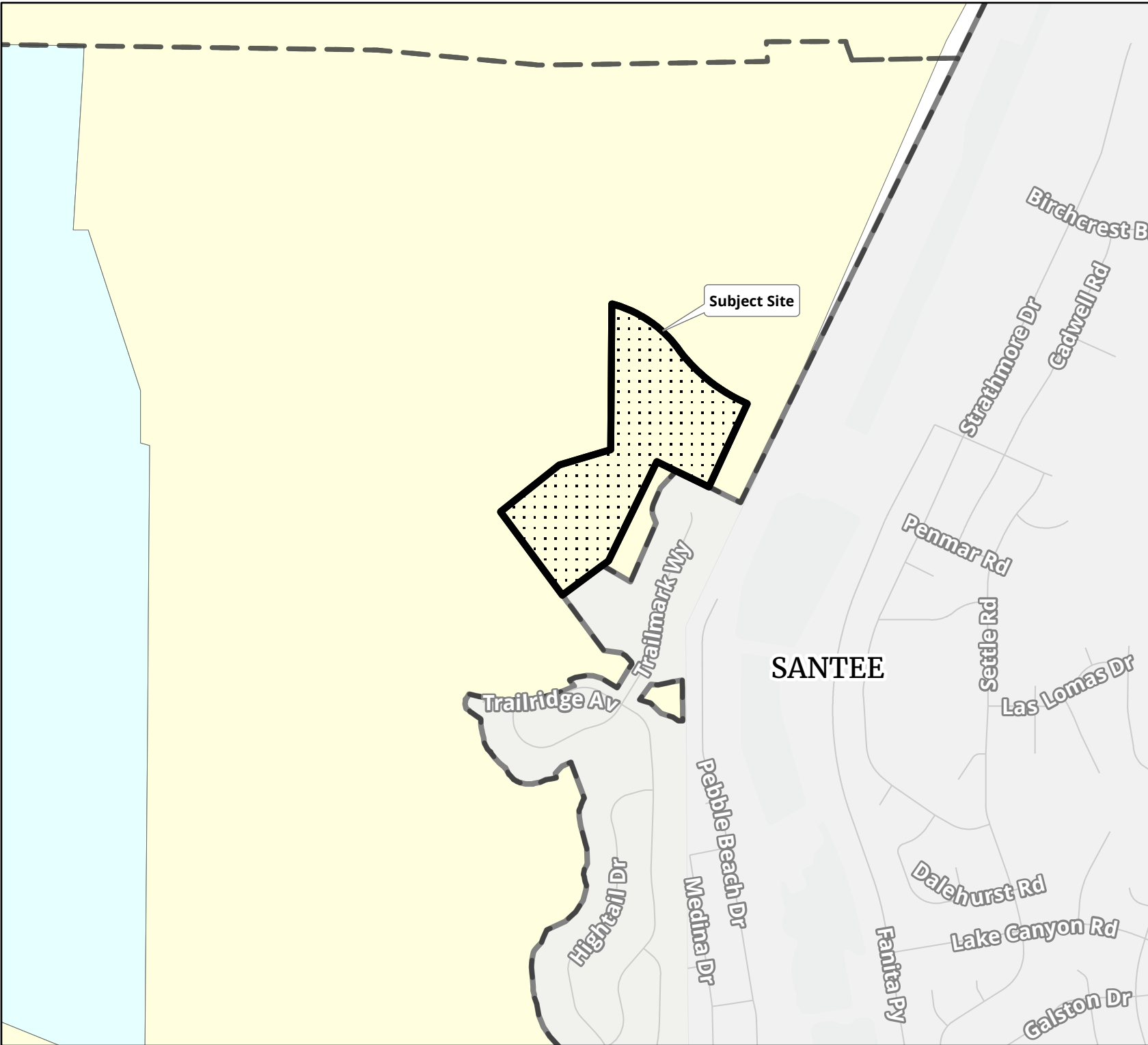
Legend

-  RESIDENTIAL VERY LOW DENSITY (0-5 DU/AC)
-  OPEN SPACE
-  SANITARY LANDFILL
-  Planning Areas
-  Municipal Boundary
-  Municipalities Outside of San Diego
-  Subject Site





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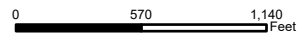
# Existing Zoning Map



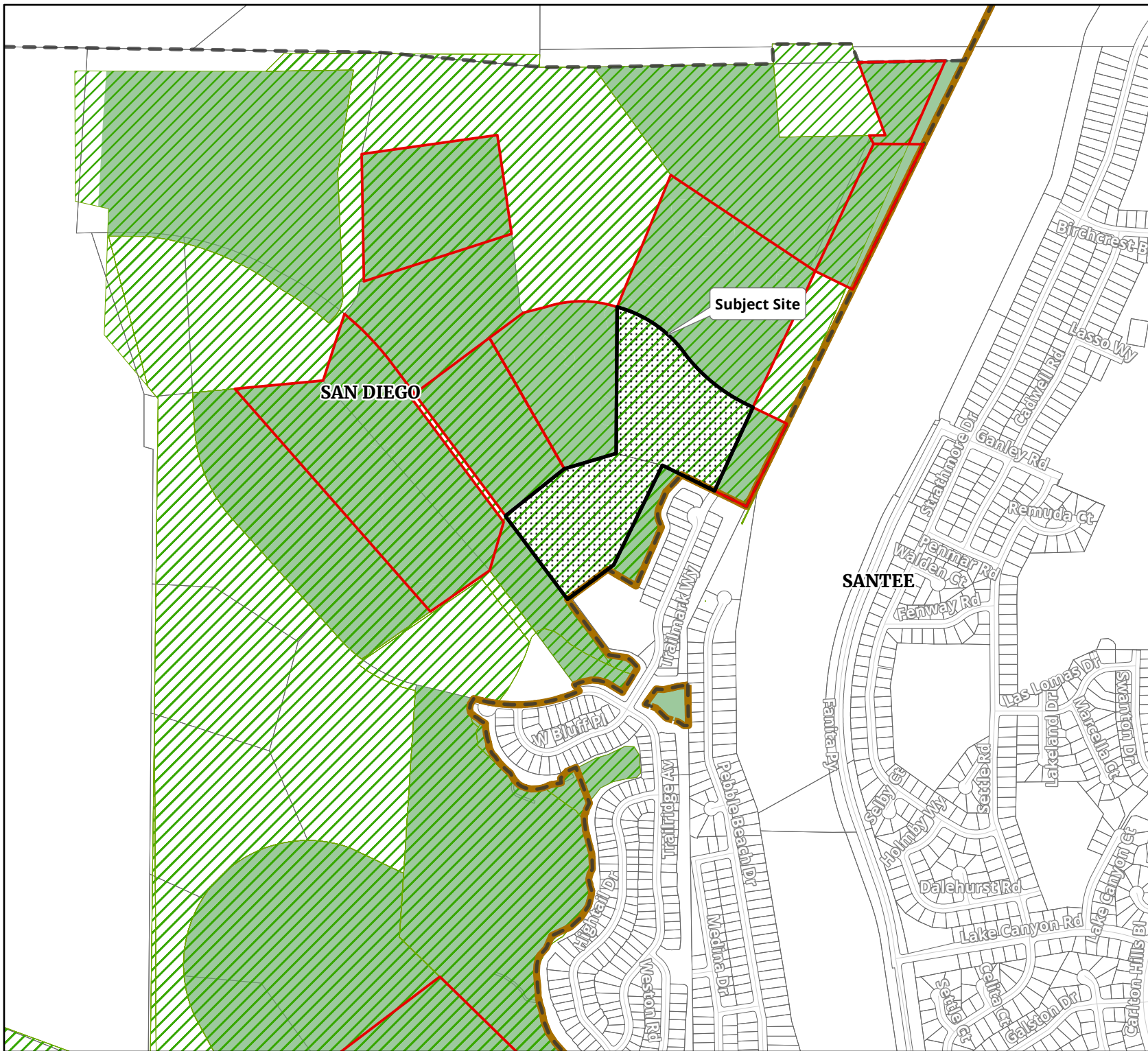
### Legend

-  Initiation Site
-  Planning Areas
- Zone
-  IH-2-1
-  RS-1-8

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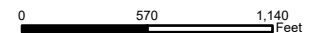
Multi-Habitat Planning Area (MHPA) Map



Legend

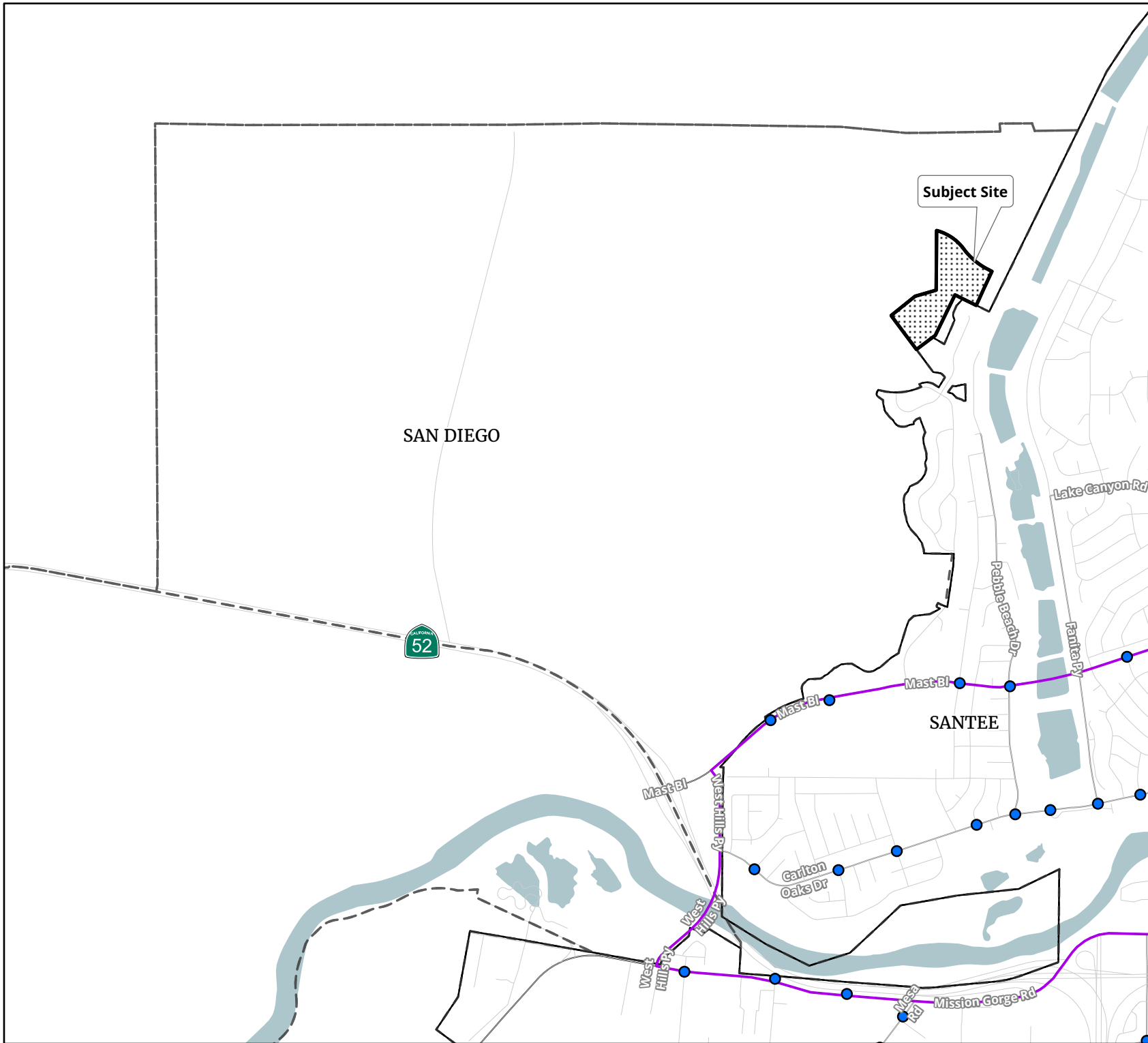
- Multi-Habitat Planning Area
- Conserved Parcels
- City Owned Land
- Parcels
- Planning Area
- Municipal Boundary
- Subject Site

Summary  
 To provide a compiled GIS dataset to spatially represent the General Plan and Community Plan designated land uses. Subject to revision as Community plan amendments and updates are processed. Not designed for site planning purposes. Refer to the adopted Community Plan for specific land use policies.  
 Description  
 City of San Diego draft community plan land use. Represents adopted planned land use polygons for City of SD community planning areas.





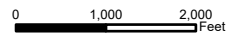
# Transit Route Map



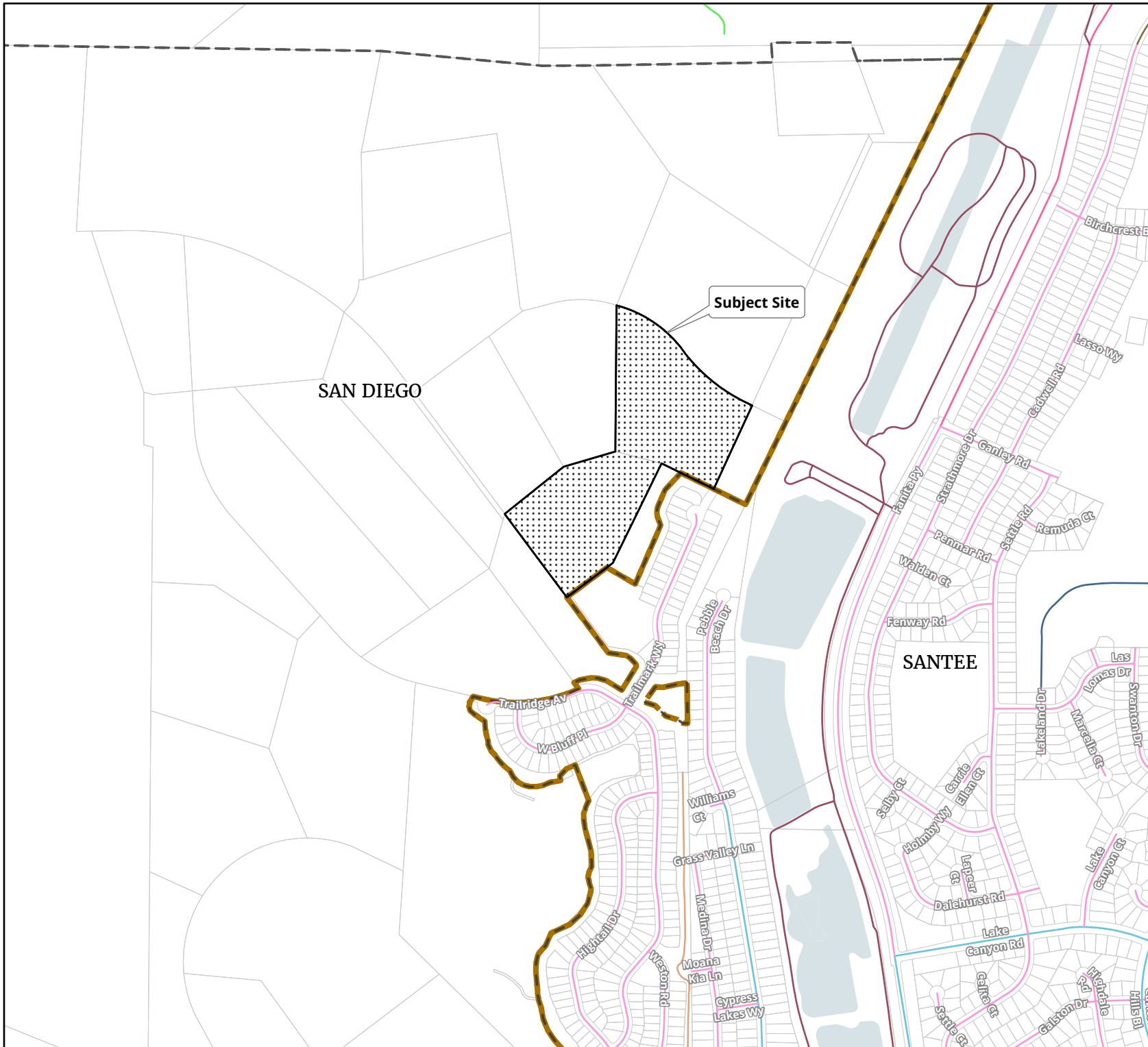
### Legend

- Bus Stop
- Bus
- Planning Areas
- Municipal Boundary
- Initiation Site

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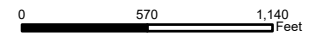
# Roadway Classification Map



### Legend

- Arterial or Collector
- Local Street
- Unpaved Road
- Private Road
- Military Street Within Base
- Paper Street
- Walkway
- Named Private Road
- Parcels
- Planning Area
- Municipal Boundary
- Subject Site

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# Bicycle Network Map

## Legend

### Proposed Bike Routes (BMP)

- Class I - Bike Path
- Class II - Bike Lane
- Class III - Bike Route
- Class II or III

### Existing Bike Routes (BMP)

- Class I - Bike Path
- Class II - Bike Lane
- Class III - Bike Route
- Freeway Shoulder

### Planning Areas

- City of San Diego
- Municipal Boundaries

### Initiation Site

- Initiation Site

### SANDAG Bike Routes

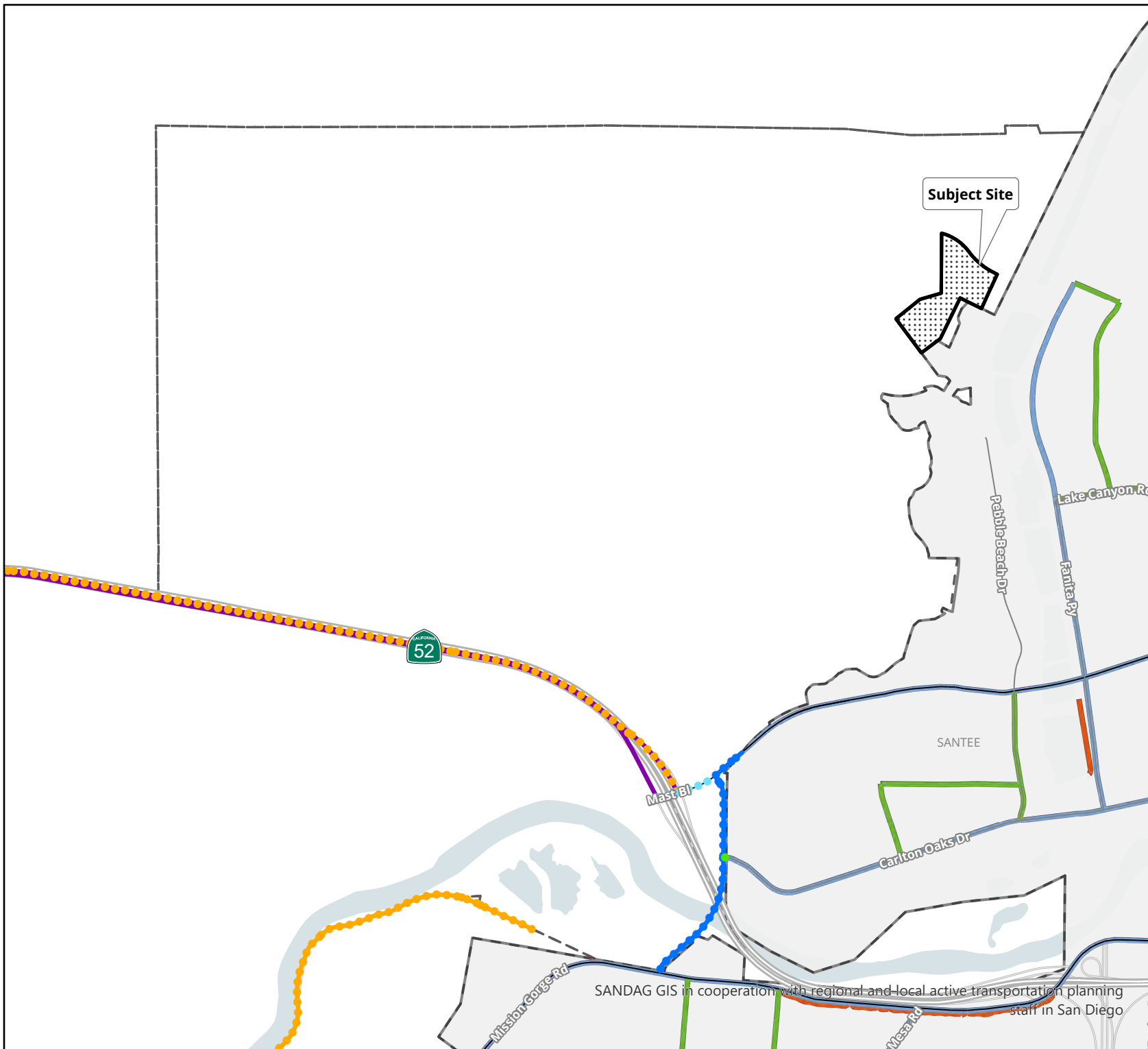
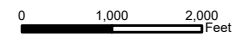
- Multi-Use Path
- Bike Lane
- Bike Route
- Separated Bikeway
- Bike Boulevard

### Summary

To provide a compiled GIS dataset to spatially represent the General Plan and Community Plan designated land uses. Subject to revision as Community plan amendments and updates are processed. Not designed for site planning purposes. Refer to the adopted Community Plan for specific land use policies.

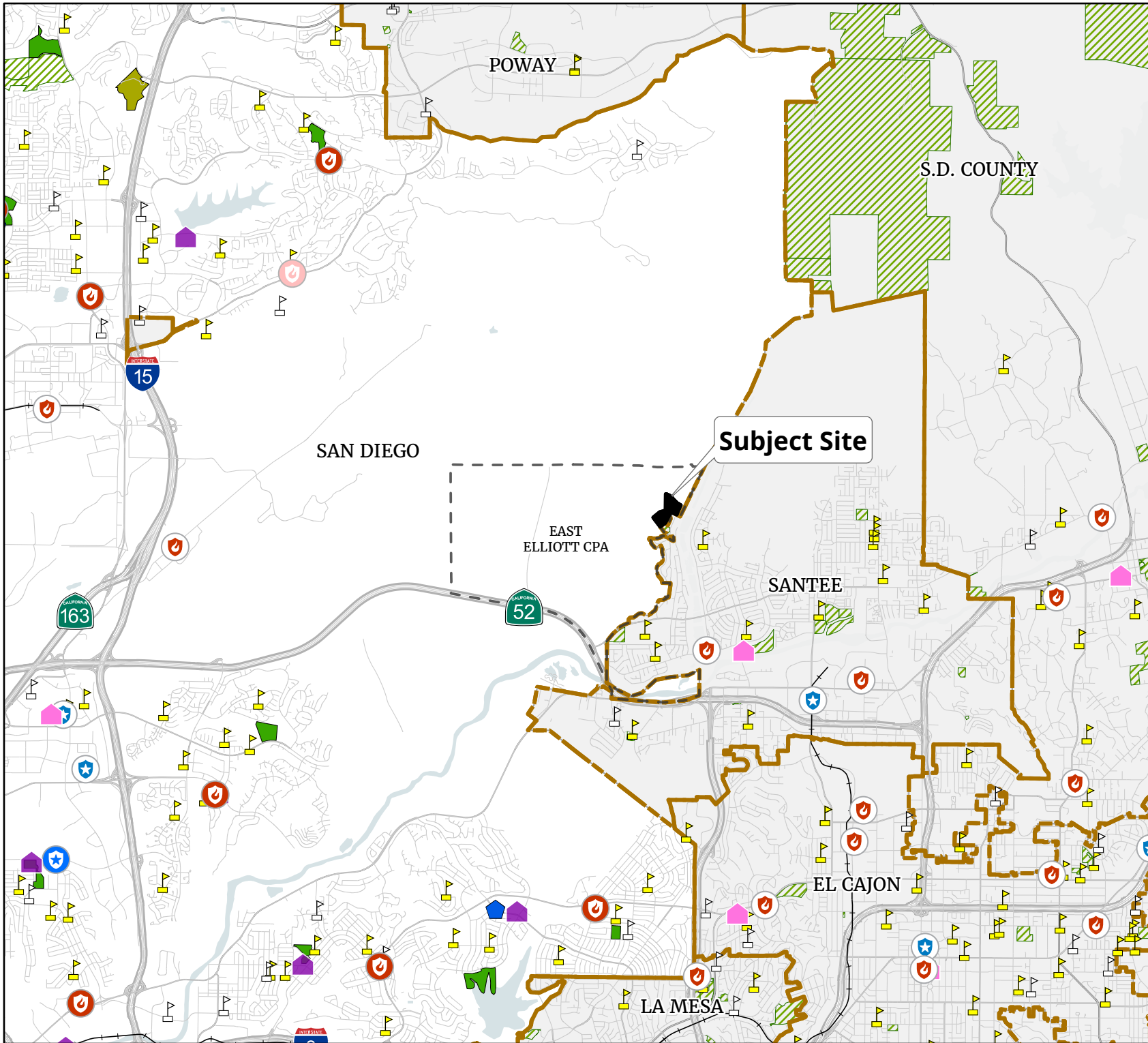
### Description

City of San Diego draft community plan land use. Represents adopted planned land use polygons for City of SD community planning areas.



SANDAG GIS in cooperation with regional and local active transportation planning staff in San Diego

Public Facilities Map



Legend

Schools

- Public
- Private

Parks

- Community Park
- Mini Park
- Neighborhood Park
- Regional Park
- Non-City Owned Parks

Libraries

- City of San Diego Branches
- Non-City Libraries

Police Facilities

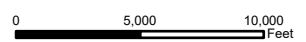
- Police Station
- Community Relations Storefront
- Non-City Police Station

City of San Diego Fire Stations

- Existing
- Proposed
- Non-City Fire Stations

- East Elliot Community Planning Area
- Municipal Boundary
- Municipalities Outside City of San Diego
- Subject Site

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P.O. Box 882676  
 San Diego, CA 92168-2676  
 karen@klrplanning.com  
 619.578.9505

November 3, 2023

Heidi Vonblum  
 Planning Director  
 City of San Diego  
 9485 Aero Drive  
 San Diego, California 92123

RE: REQUEST FOR COMMUNITY PLAN/GENERAL PLAN AMENDMENT INITIATION FOR  
**PALMER LAKES** IN THE EAST ELLIOTT COMMUNITY

APNs: 366-050-25-00, 366-050-23-00

APPROXIMATELY 29 ACRES

Dear Ms. Vonblum:

On behalf of American Pacific Investments (Applicant), we are pleased to submit this request for initiation of an Amendment to the East Elliott Community Plan for the **Palmer Lakes** project located in the east-central area of the City of San Diego (City), adjacent to the western border of the City of Santee. Attachment A – *Project Site Location*, shows the location of the project site in relation to surrounding communities and the City of Santee.

#### Location

Encompassing approximately 29 acres in the northeast portion of the East Elliott Community Plan area (see Attachment B), the project site is currently undeveloped (see Attachment C – *Project Site Aerial Photograph*). The site is entirely within the City's Multi-Habitat Planning Area (MHPA). Additionally, the site includes environmentally sensitive lands (ESL) in the form of both steep hillsides and sensitive biological resources.

The project site is immediately northeast of the Weston residential development. Formerly a part of the Castlerock project, this development is composed of single-family homes on small lots (minimum 4,000 square feet) with access off Trailmark Way. An amendment to the Castlerock Vesting Tentative Map for Unit 5, which is located immediately west of the project site, was approved in 2015. (See Attachment D, *Castlerock Vesting Tentative Map*.) Access to the project site would be via an existing public access easement at the end of Trailmark Way, within Unit 5 of Castlerock. (See Attachment E, *Weston Residential Development*.)

#### Land Use and Zoning

The project site is designated as *Park, Open Space, & Recreation* on the City of San Diego General Plan Land Use and Street System Map (*General Plan Figure LU-2*; see Attachment F). The *Park, Open Space, & Recreation* designation allows for development with *very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use*.

The site's Community Plan land use designation is *Open Space* (see Attachment G, *East Elliott Community Plan Land Use Map*). The Community Plan does not specifically prohibit other uses within open space

designated areas. As part of the Community Plan's Open Space Guidelines, the Community Plan states: *Open space areas which cover portions of an ownership and where reasonable development rights still exist on portions of the ownership, should be dedicated by the owner/developer, through an open space/conservation easement.* (Page 3.)

The project site is currently zoned Residential – Single Family (RS-1-8). (See Attachment H, *Existing Zoning*.) The RS-1-8 zone allows for residential development with a minimum of 40,000 square foot lots.

### **Project Background and Intent**

The City of San Diego Biology Guidelines state that *[f]or parcels outside of the Coastal Overlay Zone and wholly or partially within the MHPA, development is limited to the development area allowed by the OR-1-2 Zone.* Specifically, the Biology Guidelines state:

*The allowable development area of a site (premises) within the OR-1-2 zone includes all portions of the site, both developed and undeveloped, that occur outside of the MHPA. If this area is less than 25% of the total size of the site, then the development area would also include the amount of encroachment into the MHPA necessary to achieve development on 25% of the site. [Emphasis added.] The location of any allowable development into the MHPA would be determined by the ESL [...] No encroachment into the MHPA beyond the development area is allowed. All areas outside of the development area (remainder area) would be left in a natural undeveloped condition, except for those passive uses permitted by the OR-1-2 zone.*

The project proposes an amendment to the East Elliott Community Plan to redesignate the project site from *Open Space* to *Residential – Very Low (0-5 dwelling units per acre)* (see Attachment I). The intent of the change in land use is to allow for development of the project site with single-family lots, clustered within 25 percent of the project site area. It is envisioned that lots would be clustered in the eastern area of the project site, with access via an existing public easement off Trailmark Way. The development would appear as an extension of the recently constructed Weston subdivision (formerly a part of Castlerock subdivision) to the southwest of the project site (see Attachments D and E), where single-family homes have been clustered on minimum 4,000-square-foot lots, preserving undeveloped areas as open space. In this manner, the proposed Community Plan land use designation aligns with existing development in the immediate project vicinity, which includes master planned-development of a single-family housing community (Weston subdivision) immediately south of the project site. Development of the future subdivision on the 29-acre project site would occur in accordance with the San Diego Municipal Code (SDMC), including compliance with the Planned Development Permit and ESL Regulations, and as allowed by the City Biology Guidelines and MHPA.

In addition to the Community Plan Amendment/General Plan Amendment, Process Five, other discretionary actions that may be required include a Planned Development Permit (to allow clustering, as well as deviations to the proposed zone if the future development proposes modifications to zone regulations), a Site Development Permit (due to environmentally sensitive lands – both steep slopes and sensitive habitat – present on-site), and potentially a rezone to align zoning for the project site with the zoning for the Weston subdivision (i.e., RX-1-1). (See Attachment H.)

### **Community Plan Criteria Analysis**

The following section addresses the criteria associated with the plan amendment process, as outlined in General Plan Land Use Policy LU-D.10:

*LU-D.10. Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows: a) the amendment request appears to*

*be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and c) public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.*

We believe that all three criteria can be met for the reasons stated below.

- a) *The amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria.***

#### General Plan Consistency

There are numerous goals and policies of the City of San Diego General Plan with which the amendment would be consistent. For concision, however, the project is most aligned with the goals and policies of the Housing Element (2021-2029) and the Conservation Element of the General Plan.

Relative to the Housing Element, the project would further the following goals:

- Goal 1: Facilitate the Construction of Quality Housing
- Goal 3: Provide New Affordable Housing
- Goal 4: Enhance Quality of Life
- Goal 5: Exemplify Sustainable Development & Growth

*Goal 1: Facilitate the Construction of Quality Housing.* Per the Housing Element, quality housing refers to housing that is safe, comfortable, and well-maintained. Quality housing should provide access to clean air and natural light, proper plumbing and temperature, carbon monoxide and smoke detectors, and should not contain health or safety hazards.

The proposed Community Plan Amendment would allow for the ultimate development of a modern, single-family development clustered on a portion of the project site. Lot sizes would be a minimum of 4,000 square feet and each lot would be developed with a single-family home, providing access to clean air and natural light. Homes would be developed consistent with current California Building Code standards, which would include such components as proper plumbing, temperature control, carbon monoxide detectors, and smoke detectors. Development would additionally be consistent with City of San Diego regulations and requirements and would not contain health or safety hazards. As such, initiation of the Community Plan Amendment would facilitate the ultimate construction of quality housing.

*Goal 3: Provide New Affordable Housing.* The project intends to explore the provision of affordable housing units consistent with the City's Inclusionary Affordable Housing Requirements (SDMC §142.1304) in place at the time the project is deemed complete. The provision of affordable units on-site would promote diversity of housing available to all income groups across all communities. It is less common for a project to provide single-family affordable housing, because less single-family housing is being built within San Diego, and affordable housing in the East Elliott community is less common, as East Elliott is not a community that typically sees redevelopment/development opportunities in comparison to other parts of the City. As such, the provision of affordable housing, if possible, would not only provide new affordable housing, but provide new affordable housing in a location and building type not typically accommodated.

*Goal 4: Enhance Quality of Life.* Built as a modern housing community, the project would be designed and developed with public health and safety in mind. Such features as safe roadways and adequate brush management would ensure public health and safety. The project would allow for the creation of a vibrant,

equitable community within the greater context of East Elliot/western Santee, fitting into the fabric of recent single-family development in this area. The project would avoid displacement of residential or other land uses, as the project site is currently undeveloped.

*Goal 5: Exemplify Sustainable Development & Growth.* Although there is a strong push with the City and statewide for infill development in the urban core, there is still a place within San Diego for the provision of high-quality single-family homes on relatively compact lots. The ultimate project would align with State and local greenhouse gas emissions reduction and climate adaptation strategies by providing for housing in a location that is a logical extension of existing development, within the existing fabric of the community, in a manner that is compact, walkable, and sustainable (due to development that would be consistent with the latest State and local development regulations and the City's Climate Action Plan). Additionally, the project would preserve three-quarters of the site (approximately 22 acres) as open space, ensuring no future development would occur on this portion of the site. Project development would implement innovative green/sustainable building practices, as required by the City and State and as market demands.

Relative to the Conservation Element of the General Plan, the amendment request is consistent with and furthers policies CE-B.1(b) and CE-B.2(b). Policy CE-B.1(b) supports the preservation of rural lands and open spaces throughout the region. By clustering development on one-quarter of the project site, the remaining three-quarters of land area (approximately 35 acres) would be preserved as open space. Policy CE-B.2(b) advocates for the limitation of grading and alterations of steep hillsides, cliffs, and shoreline to prevent increased erosion and landform impacts. Future development under the Community Plan Amendment would be concentrated in the southern portion of the project site, limiting grading and alteration of on-site hillsides to the extent practicable while still allowing for a viable and vibrant residential enclave on-site.

#### Community Plan Consistency

The East Elliott Community Plan includes a discussion of an approximately nine-acre area on the eastern fringe of the community, adjacent to a residential area in Santee, that is designated for residential use. Allowing for development of single-family homes, residential units in this area should be sensitive and similar to the adjacent development in Santee in terms of siting, scale, density, and design. As the project site is located immediately north of this nine-acre area, the proposed Community Plan Amendment would allow for development consistent with this established vision for the eastern fringe of the community.

East Elliott contains 2,745 acres, nine of which are currently designated for residential use, representing less than one percent of the total land area. The project would add approximately seven acres of residential land use to the community (bringing the total residential land use acreage to 16 acres, still less than one percent of the land area), while maintaining the predominantly open space character of the community. Additionally, the Community Plan designates a total of 500 units available for East Elliott. The Castelrock/Weston development includes a total of 424 units, leaving 76 housing available for development consistent with build-out of the Community Plan. While the ultimate unit count for the project site, should the Community Plan Amendment be approved and a future project be developed on the site, the unit count would not exceed the anticipated total 500 units identified for East Elliott.

***b) The proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design.***

The proposed Community Plan Amendment would allow for a land area less than one percent of the total land area of East Elliott to develop as single-family homes. Although this represents a negligible alteration in the overall land use allocation in the community, the project provides for new housing units at a time when the City is desperately in need of housing. The project would provide single-family housing at an appropriate



location for such housing at a time that this housing product is becoming scarcer relative to new construction. These features represent additional public benefit when compared to the existing land use designation, which allows for nothing to occur on the project site.

***c) Public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.***

The proposed amendment would allow for residential development within a portion of the community where similar development already occurs. Public facilities, services, and utilities exist to serve the surroundings today, (Note: The Applicant has coordinated with Padre Dam Municipal Water District, which has confirmed the District's ability to provide sewer and water service.) As a component of the amendment process, the environmental document required by the California Environmental Quality Act (CEQA) would provide an in-depth analysis of potential impacts on a number of issue areas, including public facilities, services, and utilities.

We respectfully request that the City's Planning Department process this land use plan amendment initiation request to allow the subject property to be developed with a small-scale residential community that can provide much-needed housing to the community (and City as a whole) and support City climate action goals. The change in land use will retain the community character by encouraging orderly, sequential development consistent and compatible with surrounding existing and future land development. The density does not exceed 500 units allowed by the East Elliott Community Plan and is consistent with the goals and policies of the City General Plan Housing Element. Further, the land use change will facilitate development of the site that will be in harmony with the scale, height, bulk, density, and site coverage in a manner that results in compatible physical relationship to surrounding properties for which this area has been planned. In addition, approximately 22 acres of open space would be permanently dedicated as part of a future development – preserving habitat within the City's MHPA. We urge staff to schedule our request for a Planning Commission hearing at the earliest possible opportunity.

Thank you for your attention to this project. If you have any questions, please feel free to contact me at 619.204.9757 or [brittany@klrplanning.com](mailto:brittany@klrplanning.com).

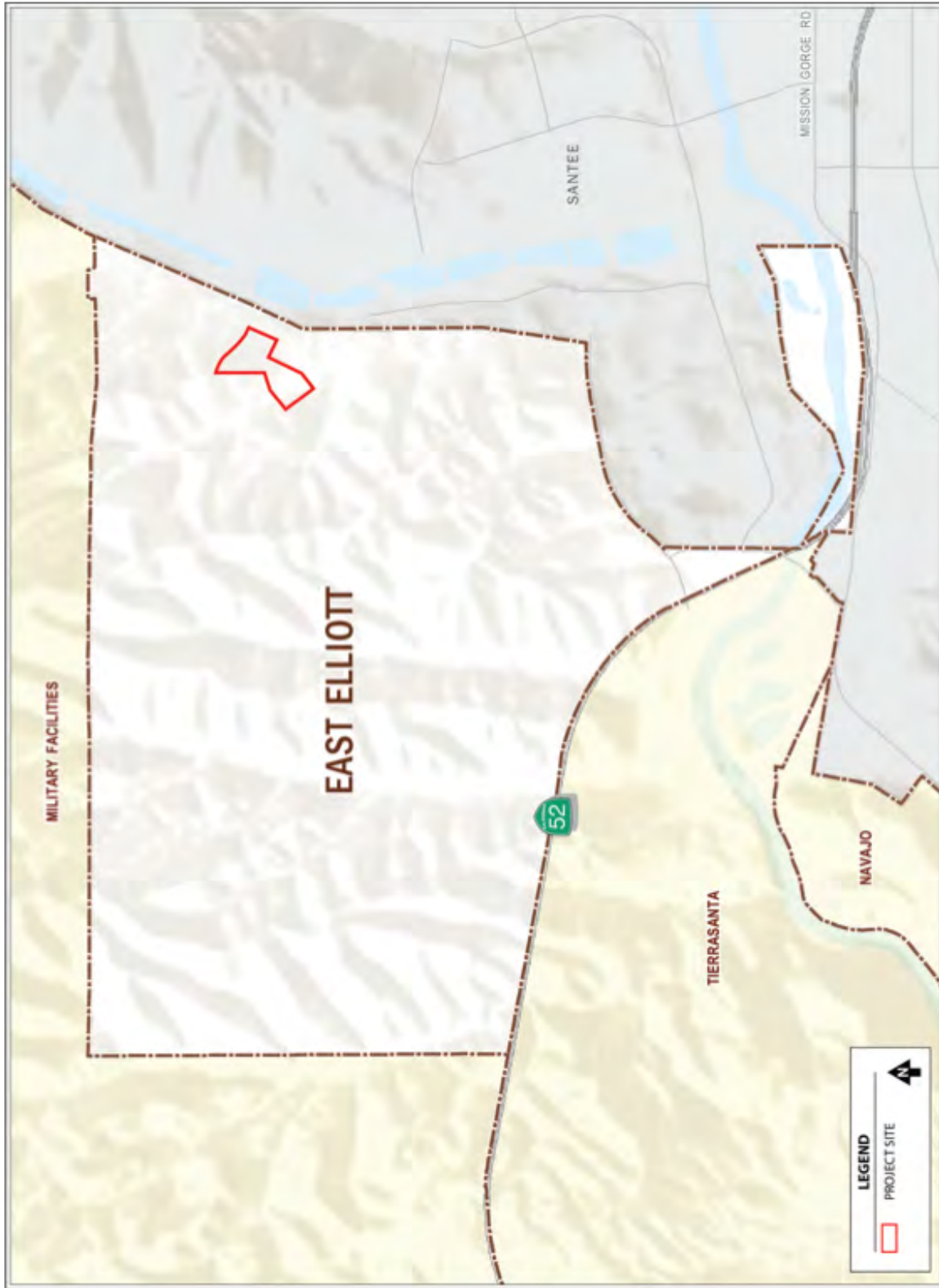
Sincerely,

Brittany Ruggels Wallace  
*Director of Policy and Planning*

Cc: David Dilday, Palmer Lakes, LLC

Attachments: A – Project Site Location  
B – East Elliott Community Plan Area  
C – Project Site Aerial Photograph  
D – Castlerock Vesting Tentative Map  
E – Weston Residential Development  
F – City of San Diego General Plan Land Use and Street System Map  
G – East Elliott Community Plan Land Use Map  
H – Existing Zoning  
I – Proposed Land Use

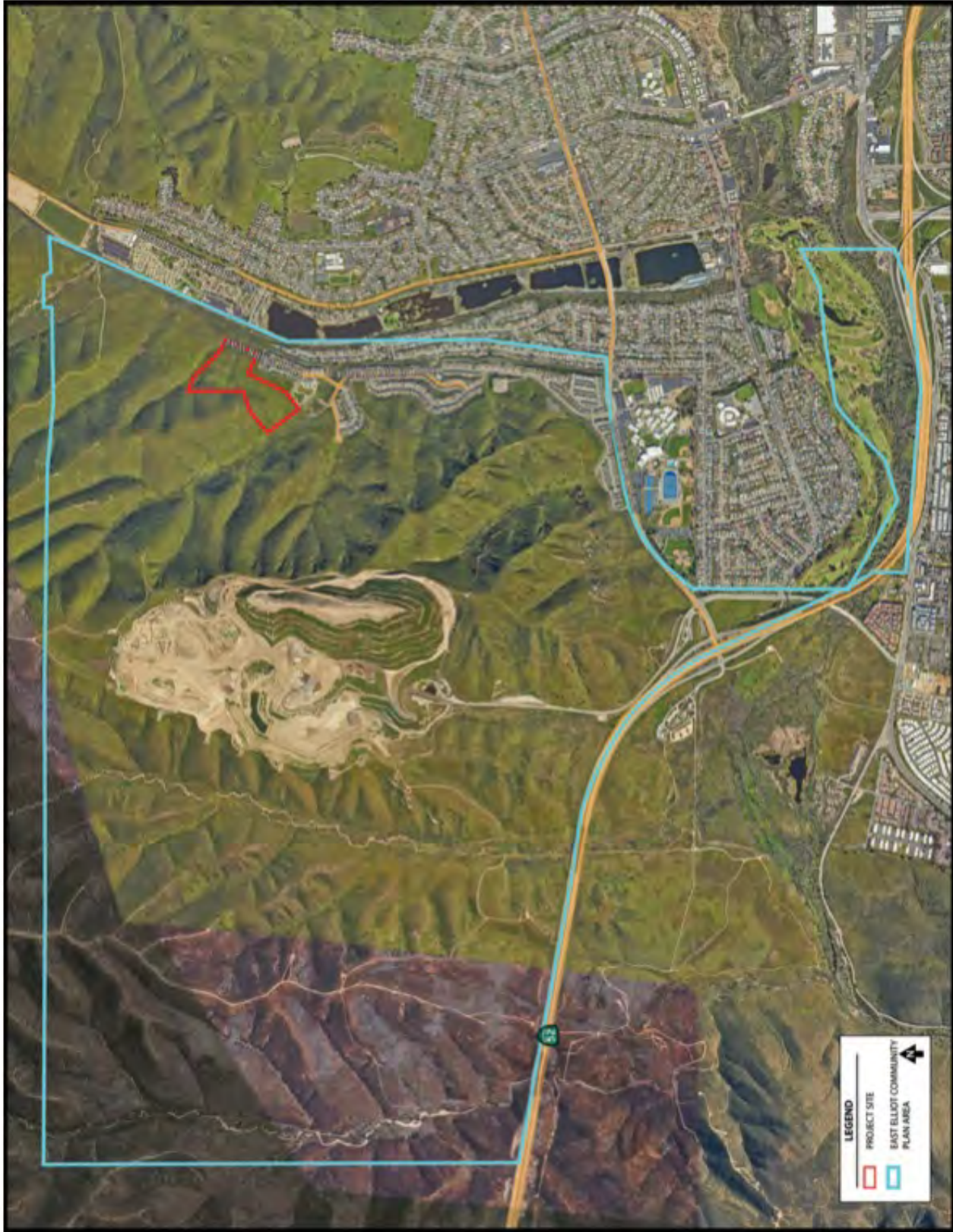
Attachment A – Project Site Location



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Map 1011

Attachment B – East Elliott Community Plan Area



Attachment C – Project Site Aerial Photograph



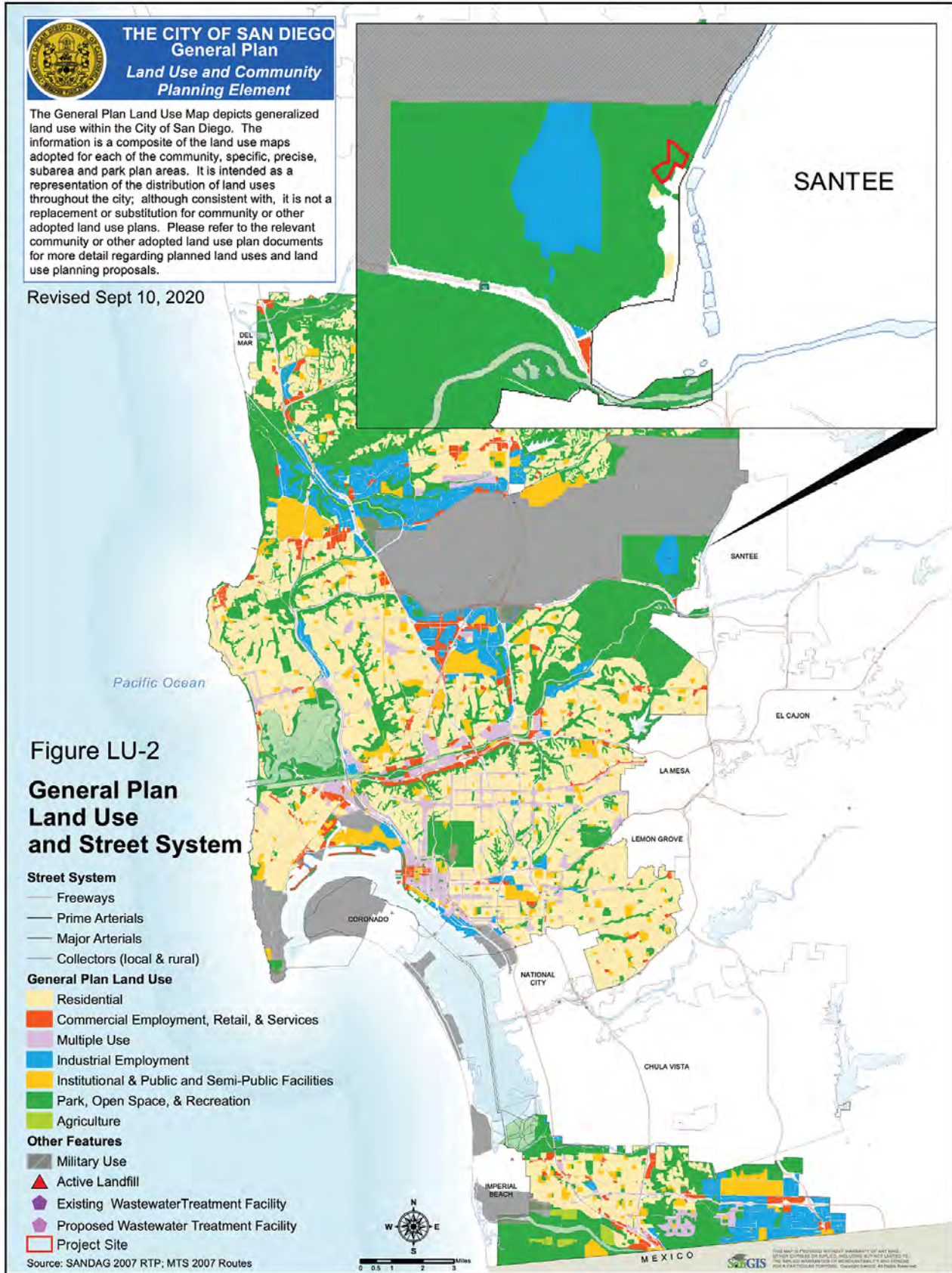
Attachment D – Castlerock Vesting Tentative Map



Attachment E – Weston Residential Development



Attachment F – City of San Diego General Plan Land Use and Street System Map



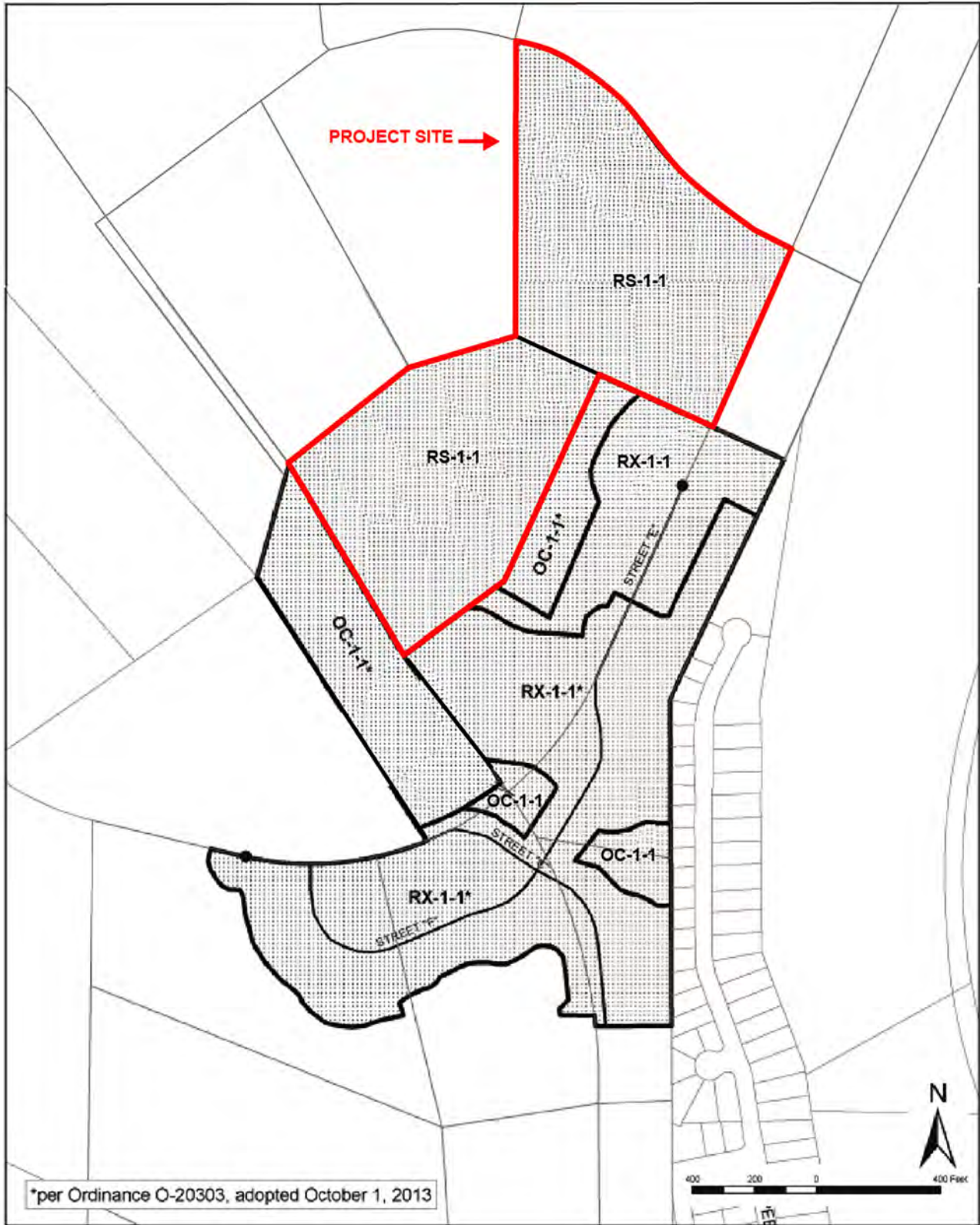
Attachment G – East Elliott Community Plan Land Use Map



Map prepared by City of San Diego Planning Department, 10/15/2014




Attachment H – Existing Zoning



Attachment I – Proposed Land Use



|   |   |   |                              |
|---|---|---|------------------------------|
|  | <b>City of San Diego</b><br><b>Development Services</b><br>1222 First Ave., MS 302<br>San Diego, CA 92101<br>(619) 446-5000 | <h1>Ownership Disclosure Statement</h1> | <b>FORM</b><br><b>DS-318</b> |
|   |   |   | October 2017                 |

**Approval Type:** Check appropriate box for type of approval(s) requested:  Neighborhood Use Permit  Coastal Development Permit  
 Neighborhood Development Permit  Site Development Permit  Planned Development Permit  Conditional Use Permit  Variance  
 Tentative Map  Vesting Tentative Map  Map Waiver  Land Use Plan Amendment •  Other \_\_\_\_\_

**Project Title:** Palmer Lakes **Project No. For City Use Only:** \_\_\_\_\_  
**Project Address:** APNs: 366-050-2501, 366-05002300

**Specify Form of Ownership/Legal Status (please check):**

Corporation  Limited Liability -or-  General - What State? CA Corporate Identification No. 93-2462822  
 Partnership  Individual

By signing the Ownership Disclosure Statement, the owner(s) acknowledge that an application for a permit, map or other matter will be filed with the City of San Diego on the subject property with the intent to record an encumbrance against the property. Please list below the owner(s), applicant(s), and other financially interested persons of the above referenced property. A financially interested party includes any individual, firm, co-partnership, joint venture, association, social club, fraternal organization, corporation, estate, trust, receiver or syndicate with a financial interest in the application. If the applicant includes a corporation or partnership, include the names, titles, addresses of all individuals owning more than 10% of the shares. If a publicly-owned corporation, include the names, titles, and addresses of the corporate officers. (A separate page may be attached if necessary.) If any person is a nonprofit organization or a trust, list the names and addresses of **ANY** person serving as an officer or director of the nonprofit organization or as trustee or beneficiary of the nonprofit organization. A signature is required of at least one of the property owners. Attach additional pages if needed. Note: The applicant is responsible for notifying the Project Manager of any changes in ownership during the time the application is being processed or considered. Changes in ownership are to be given to the Project Manager at least thirty days prior to any public hearing on the subject property. Failure to provide accurate and current ownership information could result in a delay in the hearing process.

**Property Owner**

Name of Individual: David Charles Dilday on behalf of Palmer Lakes  Owner  Tenant/Lessee  Successor Agency  
 Street Address: 10721 Trenea Street, Suite 200  
 City: San Diego State: CA Zip: 92131  
 Phone No.: 619-200-9787 Fax No.: \_\_\_\_\_ Email: daved@pacificcoastcommercial.com  
 Signature: David Charles Dilday on behalf of Palmer Lakes Date: February 1, 2024  
 Additional pages Attached:  Yes  No

**Applicant**

Name of Individual: David Charles Dilday on behalf of Palmer Lakes  Owner  Tenant/Lessee  Successor Agency  
 Street Address: 10721 Trenea Street, Suite 200  
 City: San Diego State: CA Zip: 92131  
 Phone No.: 619-200-9787 Fax No.: \_\_\_\_\_ Email: daved@pacificcoastcommercial.com  
 Signature: David Charles Dilday on behalf of Palmer Lakes Date: February 1, 2024  
 Additional pages Attached:  Yes  No

**Other Financially Interested Persons**

Name of Individual: Ladene N. Aardema  Owner  Tenant/Lessee  Successor Agency  
 Street Address: 15777 Pasea Penasco  
 City: Escondido State: CA Zip: 92025  
 Phone No.: 619-772-0155 Fax No.: \_\_\_\_\_ Email: aardema64@gmail.com  
 Signature: Ladene Aardema Date: \_\_\_\_\_  
 Additional pages Attached:  Yes  No