

7/15/2020

Carmel Mountain Ranch/Sabre Springs Community Council

Attention: Mr. Jeff Peterson - Project Manager  
Jonathan Frankel, New Urban West

Regarding: The Trails at Carmel Mountain Ranch - Project No. 652519

On June 30, 2020, the golf course subcommittee (GCS) of the Carmel Mountain Ranch / Sabre Springs Community Council (CMRSSCC) presented for discussion and consideration a list of concerns and objections, along with the specific proposals to remedy these concerns and objections, which would then be presented to New Urban West (NUW) for their consideration and response.

The GCS had not met since February 25, 2020, over 4 months ago. It's been very difficult to adjust to the new norm of communication based on social distancing policies due to the COVID 19 virus. This new norm since the March 19th quarantine, has involved learning new forms of communicating using new computer applications and formats (Go to Meeting, Microsoft Teams, Zoom, Google), has created difficulty in physically accessing plans, has generated quarantine fears causing people to stay home, has created breaks in communication and standards of traditional project reviews, and has made it even more difficult for our community to try to understand the developer's plans and complex terminologies and meanings.

As you know, the purpose of the GCS is to research, develop information, discuss, and give honest opinions regarding proposed development. They then pass all of this on for consideration by the CMRSSCC. The GCS recommended and the CMRSSCC concurred that we should provide you with the enclosed feedback. We are hopeful the city and the developer are listening and take seriously the information provided here.

The City's Development Services Division Project Manager provided two documents to the Community Council for its review in mid-April. Those documents are the 59 sheet "Complete Set of Plans, revision 2, dated April 13, 2020, and the Design Guidelines, second submittal, dated April 14, 2020. These documents are digital, and links to them have been widely publicized and available since mid-April.

Unfortunately due to various reasons, there was a notice passed on to us that another set of drawings and plans had been submitted by NUW (dated June 12th) but our committee was not correctly notified until June 22nd (only days before our subcommittee meeting), which did not give us enough time to adequately review these plans. A brief review has revealed that only minor changes physically have been made. Our comments refer to the April submittal.

While these documents are draft documents and not final, a final vote of the GCS and the CMRSSCC group has not been called for and would be premature for many reasons such as all proposals are in draft and no Environmental Impact Report has been issued. However, there are certain aspects of what is being proposed that are sufficiently clear that the CMRSSCC will provide specific comments and proposals to the developer about what the CMRSSCC believes would be acceptable aspects of this development, and for the most part have been mentioned many times in most, if not all of the past community meetings over the last year.

This proposal puts thousands of additional people and vehicles onto our streets, creating unsafe conditions as our community is located within or adjacent to a Very High Fire Hazard Severity Zone. Moreover, they incorrectly characterize their development as in a Transit Priority Area (only one section), to make it easier to ignore the traffic congestion coming our way. This development has revealed itself to override concerns of the existing residents of Carmel Mountain Ranch (CMR). The owner and the developer benefit with millions of dollars in profits to the detriment of the wider community.

We are shocked and upset that NUW has been marketing this project publicly as acceptable to our community when in fact, not one person attending any Community Council or Community Council Subcommittee meeting has been in agreement with the high-density development proposal submitted to the city.

We were encouraged by the expectations the City Planning Commissioners set for New Urban West at the July 25, 2019 planning commission meeting, where the community plan amendment initiation for this proposed project was approved. While Commissioner William Hofman voted to deny initiation, the remaining commissioners voted to approve initiation, and offered sensible guidance for New Urban West.

Commissioner Douglas Austin stated during his discussion:

“I look at these long fingers and I’m trying to imagine how you put housing and access in there, and it’s difficult, I’m an architect, I’m a planner, I’ve been doing it for a long time. But if you look at 167 acres, and somebody said ‘Well gee, there’s 300 units that are going to be built there’, you could build those 300 units in 10 acres. You don’t need 167 acres. So, you could provide for the housing shortage in a creative way that retains more open space.” He also stated: “We’re going to demand that this is one of the most innovative, sensitive projects in San Diego, and sets a model, a very, very high bar for San Diego, and that these homeowners, at the end of this, will be pleased enough that they are going to get behind you.” He also stated: “You come back with something that just gobbles up those fairways, doesn’t provide buffers, is not creative, and doesn’t also allow for housing where the biggest need is, which is in middle income, you’re not going to get approved.”

Commissioner Dennis Otsuji stated during his discussion:

“The golf course was designed as part of the neighborhood more than anything else.” He also stated: “There’s 167 acres, and my expectation is going to be that, and hopefully it is going to be lower than this, that you only develop 20% to 40% of that, and the rest of it is going to be open space.”

Commissioner William Hofman stated during his discussion:

“I will be looking for that objective to be met, that this open space that is there now, the golf course, will be a cohesive element tying the community together. It’s going to be real difficult to get my vote if we’re talking about chopping it up into little development pieces.”

Commissioner James Whalen questioned New Urban West for more proposal detail:

“This is, assuming you even got the ability to proceed with a project, this is not a development footprint that’s the type that we normally seek in the development business. These are long narrow ... What is the concept for this property, what do you have in mind, you wouldn’t be here if you didn’t know what you wanted to do?”

Commissioner Matthew Boomhower stated during his discussion:

“Be prepared to show us every step along the way how you engaged with the community.” He also stated: “You’ve got to show us that you’ve been working in good faith.”

In our opinion the 1,200-unit development proposal submitted by New Urban West does not remotely meet the expectations of the City Planning Commissioners. The proposal does in fact gobble up 9 of the 18 former golf course fairways, and portions of 2 additional former fairways. The proposal, by design, chops up the former golf course into little development pieces. Inadequate landscaped buffers have been planned, which could be as narrow as 15 feet in some places, according to Section 3-F of The Trails at Carmel Mountain Ranch Design Guidelines document submitted by New Urban West.

New Urban West has not engaged with the community in good faith, holding three workshops to only solicit community opinions regarding trails, landscaping and park amenities, and refusing to entertain discussion regarding the number of housing units, the size of the buildings or specific location of housing units. The number of housing units, the size of the buildings, and the specific location of the housing units were revealed to the Carmel Mountain Ranch / Sabre Springs Community Council only shortly before the completed proposal was submitted to the city in November 2019, allowing no time for meaningful engagement with the community.

Furthermore the proposal NUW put forth calls for 60 - 80% of the 1200 units to be rental homes. This does not conform to the character of Carmel Mountain Ranch. Roughly 25% of the

living units in our community are currently designated as rentals. The proposed volume of rental units does nothing to address the commissioner concerned about providing units that could be considered “starter homes”.

With this background we would like to present four topics for discussion. They are simply...

1. **Too much.**
2. **Too tall.**
3. **Too close.**
4. **Too non-transparent.**

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1. **Too much.** Development must not exceed 200-250 units total, to include a mix of starter homes, condos, and apartments. This would be at similar housing density to other developments identified below.

There are examples of what's been done already throughout the county that have set reasonable precedents for communities to consider for development of a former golf course:

**Stoneridge Country Club** - An agriculturally themed development of 159 units, a racquet club with two pools, meeting spaces and a 100-foot buffer from existing homes on three sides.

**Escondido Golf Course** - Three “villages” with 380 units, including 188 condos, constructed in two-story buildings in a neighborhood of single-family homes. Almost half the 109 acres are to be classified as open space, with landscaped buffer zones of between 50 and 200 feet between the new units and the existing houses built around the former golf course.

**Doubletree Golf Course** - Junipers development, 114 acre, RM1-1 zoning, 536 units, 15% affordable units, parks and trails.

This huge increase in density (30% increase in units on only 7% of the land) being proposed by NUW in CMR is unacceptable. This increase will negatively impact our view corridors, significantly reduce our open space, insert inappropriate development that fails to blend with the topography, create short impractical driveways between roadways, reduce our landscape buffers between neighborhoods, create congested intersections, weaken our emergency fire exits, increase crowding at our retail and commercial areas, slow on-off ramp traffic to freeways, generate more neighborhood noise, more stress, more tension, invite crime and eventually result in a deterioration and breakdown of our 35 year old master planned

community. We have continually expressed in our meetings and workshops that cluster development is undesirable. Clustering is a poor design choice along ridgetops because it ends up becoming a series of huge buildings creating walls of tall housing, especially with apartments (see Jefferson, Carmel Terrace, Carmel Summit, Carmel Landing in CMR). These buildings will block the view corridors of most of the hilltop homes that we continually asked to be protected. This is not a smart solution to blend a community together; it feels more like just meeting a state mandated quota.

New Urban West is proposing housing on 11 of the 18 former golf course Holes (Nos. 1, 2, 5, 6, 8, 9, 10, 11, 16, 17, and 18), resulting in 61 percent of the Holes being developed, yet claims that about 110 of the about 164 total acres, or about 70% of the acres are "Open Space". Because there apparently is no accepted definition of "Open Space" in, for example, the Municipal Code's Land Development Terms Definitions (Ch. 11. Art.3, Div.1), NUW apparently felt free to define "Open Space" as it desires. The Community Council rejects NUW's "Open Space" concepts other than counting acreage of Units that have no housing proposed for development.

NUW in its submittal "Complete Set of Plans" (59 sheets, Revision 03 dated June 10, 2020), has re-designated and combined what were 18 "Holes" into 17 "Units" and has divided "Units" into "Lots". The Complete Set of Plans, Sheet 2, Land Use and Zoning Table, sets forth how NUW arrived at the 110 acres and 70 percent figures by adding the 50 foot buffer zone Lots on each Unit being developed with housing (25.02 acres), the 3 parks (9.79 acres) and other "Open Space" (76.19 acres) which total 111.00 acres. This "Open Space" column on the Table totaling 76.19 acres includes the 63.2 acres of the Units not being developed for housing (Units 3, 4, 7, 11, 12, 13, 15), and other odds and ends Lots within Units being developed for housing.

The Community Council rejects NUW's definition of "Open Space" to include the 25.02 acres of buffer zone and other odds and ends Lots that are part of Units developed with housing. An acceptable and more common sense approach is to only count as "Open Space" Units which will not have housing (63.2 acres). Units with towering clusters of 3 and 4 story multi-unit buildings crammed into cul-de-sacs are not "Open Space".

#### Key Points:

- a) SD City Council wants high density (and high buildings) in every neighborhood period. Our community is not against smart growth development, but this is not a good example of raising the bar for development design, and goes against smart design principles.
- b) We have asked for similar housing next to similar housing (but never did we ask for 3-4 stories butting up against existing 2-story homes).

- c) This type of high-density high-rise development should be built in or above the large shopping centers, not among existing single-family homes. This would improve the efficiency of transit and reduce Vehicle Miles Traveled (VMT) as well as reduce the traffic impact to residential streets.
- d) The community has asked to see actual/accurate scaled sections in the design guidelines between existing and new development at each unit proposed, to show how all the development meshes or doesn't mesh within the neighborhood. Instead, the NUW drawings are only templates that could work for any development, as they are just pretty pictures that are misleading and wide open to interpretation.
- e) We feel the city's mantra is clustered buildings with more open space, but this is wrong for our community where the "open/green space" was designed into the master plan, and was never planned for development. An increased availability of and access to recreational open/green space promotes mental health (by providing a calm, restorative, and serene refuge). Even by just visual access (i.e. viewing corridors, natural scenes), it is clinically proven that open/green space exposure helps reduce stress and restore the ability of human beings to pay attention and concentrate.
- f) NUW indicated at several community meetings of their 'high-bar' intentions to provide parks and open space for public recreational opportunities. However, their proposed designs only allow for reaching bare park acreage minimums, providing inaccessible trails, while taking all the suitable land for development. Our CMRSSCC group would like to see more neighborhood parks and open space provided more equitably throughout our rolling hills, which would improve accessibility.

**2. Too tall.** The proposed buildings must not exceed 2 stories.

At all our CMRSSCC and GCS mtgs, we have always requested to match up similar housing types next to similar existing residences, meaning nothing higher than 2-story homes when next to 2-story homes. Even in our own development, the original designers saw the sense in putting the taller 3-4 story apartment housing (such as Jefferson, Carmel Terrace, Carmel Summit, Carmel Landing in CMR) at the lower elevations, with densely planted slopes and buffers, and with access to larger vehicular arterials (Rancho Carmel Road and Carmel Mountain Road) near the freeway, in order to protect and preserve views of the 2-story developments at the higher hilltops and ridgelines and minimize traffic into the single family home areas. The CMR Master planned development was designed to rigorously conform to the topography of the land and protect the community's investments and provide a way of life.

**Key Points:**

- a) We feel dense buildings need to be near mixed-use development at shopping centers to maximize transit usage and minimize VMT.

- b) Shopping Centers are set apart from residential areas and served by bigger streets and can tolerate mass transit and higher volumes of traffic quicker and better.
- c) Leave view corridors between the 2-story condos or townhomes to allow for a more spacious feeling, preserve views and take advantage of cross-breezes.
- d) None of the existing CMR apartment buildings rise above adjacent houses because they were planned to ALL be downhill from them.
- e) ALL the multi-story apartment buildings proposed by NUW are built on ground mostly level with adjacent houses. These should be terraced more to conform with the topography and open more views. These are common design principles in the way the existing CMR apartments were built in relation to the existing single-family homes, i.e... near major street arterials, with dense landscaped buffers and grade changes.
- f) No height waivers - they work contrary to zoning code intentions to balance size and impact against required functionality (Waivers represent a bait and switch tactic, providing flexibility for the developer, but negatively impacting the community. This is unacceptable to the community).
- g) No clusters of tall buildings along community planned ridgelines (As in Unit 9, among others) - it is damaging to the community feeling by blocking distant mountain views and view corridors that over 600 existing homeowners invested in.

**3. Too close.** Landscaped buffer zones must be a minimum of 100 feet.

In addition, we want firm 50 feet of densely planted landscaping screens that are permanently irrigated, and then another 50 feet for any "pedestrian circulation elements". We have continually requested 100' landscape buffers between new and existing residences at each meeting when discussions on buffers came up, including the workshops. Now we're learning that even when a 50' buffer was proposed by NUW in Section 3-F of The Trails at Carmel Mountain Ranch Design Guidelines, a bait and switch waiver occurred and it now turns out that only 15' of landscape buffer is proposed to be required after so called vehicular infrastructure. How can you screen a 2 story building with fifteen feet of landscape buffer? A 20 foot tree won't even fit (especially the ones listed in the submitted plant palette).

Our CMRSSCC recommends a better open space proposal. We suggest to build the trails with the 100' landscape buffer zone together as one project. These buffer zones would be fundamental to the CMR community as a recreational amenity that would link together all the parks and open space. These would set the bar high as a public amenity, providing protection of view corridors, improving development screening and seamlessly blending development together. This would prove itself to be a major benefit to the community.

**Key Points:**

- a) New trails must be outside the 50' landscape buffer zone. The trails must also be 100% ADA compliant. The developer has worked to sell the community on amenities accessible to everyone. If the project is being called "The Trails" and the selling point is

new amenities accessible to the entire community, then ADA compliance has got to be mandatory, so this amenity is truly accessible to everyone.

- b) All recreational amenities (exercise stations, benches, etc.) must be along trails, accessible to the public and reviewed by CMRSSCC.
- c) The first 50 feet of landscape only buffers must be clear of dwelling and vehicle-related circulation and support elements such as drive aisles, parking areas, carports, garages, and trash/recycling collection areas. This area is being marketed as a buffer and should meet the public expectation that encroachments from the housing complexes are not part of that.
- d) All landscape buffers must be provided with a permanent satellite-controlled irrigation system to insure establishment and long-term survival.
- e) The currently proposed 15' landscape - only minimum is too small an area to fit a 20' wide screening tree when mature, creating a constant battle for adjoining homeowners. To have a legitimate landscape buffer with evergreen type trees, an overall 100' Landscape Buffer zone with an unimpeded densely planted 50' landscape buffer is absolutely necessary. The irony is that NUW never once revealed that their proposed 50' buffer could actually be 15' with vehicles parked right behind the back yards of single-family homes in many cases.
- f) Develop all pedestrian trails with 100' buffer zones together as one project. This will provide a healthier standard for integrating with the community.

**4. Too non-transparent.** All plans for permits must be submitted under a Substantial Conformance Review Process 2.

We understand that this is a City procedural matter, but our community wants transparency to review and continually comment on any and all final building plans through build-out. We are an existing master planned community and it should be only fair to have the neighboring public express what we want in our communities, where many have lived and invested for almost 40 years. Our concerns are based on our experience with NUW, leading up to the submission of their proposal. Even though NUW was continually asked, they never offered, divulged, or revealed any of their housing concepts, the desired density and size, or the specific location of housing units until our 18th community meeting, which was right before their city submission in November 2019. This is not transparency or engagement with the community. This is not transparency or even close to what a successful engagement with a community looks like.

Key Points:

- a) Design Guideline illustrations are too cartoon-like and descriptions are not realistic depictions of actual CMR conditions, making understanding much more difficult. We want real sections for all unit areas adjacent to each neighborhood.
- b) Design Guideline document fails to address effects of site space limitations and topographical challenges. We are requesting ADA compliance for public access and use of trails.

- c) The existing CMR Clubhouse is at 810' elevation and the Sabre Springs Transit Station is 537', a 273' change in elevation and is 1.8 miles away...the pathways are not TPA compliant or accessible for senior citizens or the disabled.
- d) The Vision descriptions paint a false picture of how the Trails will connect the community. For a project called the 'Trails', a realistic and accessible trail amenity needs to be built to promote mobility, safety and access for all its users.
- e) The trails are likely to be used only for walking and exercise and rarely for commuting or shopping. The trails were built for golf carts and not pedestrians, so they are going to have to be reworked and renovated.
- f) It appears that most of the amenities can be misinterpreted to be for public benefit and will most likely end up being for use by the new housing residents only. This is not how it was presented in the community meetings. What will ensure that new developments will not restrict access to amenities to their residents only? (even if only by obscurity and presentation?)

Our Community Council, therefore, strongly objects to the New Urban West proposal for 1,200 additional housing units in CMR. We could support a proposal for 200-250 total units, to include a mixture of starter homes, condos, and apartments consistent with the existing community. The proposal we could support would include the topics we have covered in this memorandum and also incorporate the redlined remarks we have made on the Trails at Carmel Mountain Ranch Design Guidelines ([see attachment](#)).

Sincerely,

The Carmel Mountain Ranch/Sabre Springs Community Council  
\*approved on 7/14/2020