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Director of Community Development

January 9, 2009

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Via E-Mail & U.S. Mail

RE: County of San Diego Draft General Plan Update

To Whom It May Concern:

Thank you for the opportunity to review and comment on the County of San Diego's Draft General Plan Update ("GP Update"), comments of which are due on or before January 16, 2009. On behalf of Pardee Homes, below in strike-out/underline format please find our comments and proposed revisions to the GP Update document. We believe these suggested revisions make good planning sense and will result in a better general planning document.

I. Vision and Guiding Principles (Chapter 2 of the GP Update)

- Guiding Principle 2 (p. 2-7): As population growth continues in the San Diego County, more compact development should occur within existing and planned communities to reduce these impacts. *[Note: See Chapter 3, Land Use Element, Guiding Principles for Land Use, p. 3-6 for reference to this insertion.]*
- Guiding Principle 9 (p. 2-14): To reduce the costs of construction and maintenance, development in the County should be developed more compactly and in proximity to existing and planned infrastructure and services. New development located near existing and planned infrastructure and services would be served in a more efficient manner and would require less extensive roads and infrastructure, as defined by Guiding Principle 2. *[Note: See Chapter 3, Land Use Element, Guiding Principles for Land Use, p. 3-6 for reference to this insertion.]*

II. Land Use Element (Chapter 3 of the GP Update)

- Goals and Policies for Land Use Element - Policy LU-1.4 (p. 3-21): **Leapfrog Development.** Prohibit leapfrog development that is inconsistent with the Community Development Model and Community Plans. Leapfrog development is defined as Village densities located away from established Villages ~~or outside established water and sewer service boundaries and where water and sewer services are unavailable.~~

III. Mobility Element (Chapter 4 of the GP Update)

- Guiding Principles for Mobility (p. 4-3): Requiring new development to pay their fair share of road and related infrastructure costs through participation in the County's Transportation Impact Fee (TIF) program minimizes public costs while ensuring the infrastructure is available to support the increased demand for services.
- Goals and Policies For Mobility Element - Policy M-3.2 (p. 4-14): **Traffic Impact Mitigation.** Require development to contribute its fair share through participation in the County's Transportation Impact Fee program toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and, when appropriate equestrian.
- Goals and Policies For Mobility Element - Regional Transportation Coordination and Facilities – Context (p. 4-15): State highways serve intra-county traffic and include State Routes 67, 76, 78, 79, and 125. The design of these roadways varies according to the volume of traffic they carry and ranges from freeway-style construction to two land rural roads with at-grade intersections. Generally, these roads require a larger right-of-way so they can be expanded if future traffic volumes warrant. If a larger right-of-way is required, then the requesting agency shall be required to purchase the additional right-of-way.
- Mobility Element Network Appendix (Figure M-A-8 on p. 23) – “Fallbrook Mobility Element Network”: [Note: *Insert the number 26 on Figure M-A-8 to indicate the segment of Pankey Road from Pala Mesa Drive to SR-76.*]

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IV. Housing Element (Chapter 6 of the GP Update)

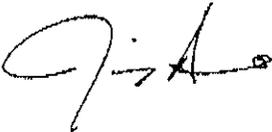
- Key Issues – Compliance with State Requirements (p. 6-6): The Land Use Element identifies a density range of ~~10.9~~ 6.0 to 30 dwelling units per acre for multi-family development. [Note: 6.0 is in line with SANDAG multi-family guidelines.]
- Goals and Policies for Housing Element – Housing Development, Goal H-1, Policy H-1.9 (p. 6-13): Affordable Housing through General Plan Amendments. For project applications submitted after the effective date of this General Plan Update, require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project.

V. Safety Element (Chapter 7 of the GP Update)

- Hazardous Materials – Goals and Policies, Goal S-11, Policy S-11.5 (p. 7-21): Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas or ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

Thank you for providing us with the opportunity to comment upon the GP Update documents. We look forward to working with DPLU staff as this County program proceeds through its approved process.

Sincerely,



Jimmy Ayala, AICP
Director of Community Development