

CITY COUNCIL

For City Clerk's Use:

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APPROVED

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DENIED

Reso No. _____

File No. _____

Ord No. _____

Agenda Item No.: 14

Date: April 28, 2010

TO: Honorable Mayor and Members of the City Council

FROM: Barbara J. Redlitz, Director of Community Development

SUBJECT: General Plan Update Draft Land Use Study Areas (Case No. PHG 09-0020)

RECOMMENDATION:

It is requested that Council (1) Review and comment on the draft land use study areas that will receive further analysis; and (2) Direct staff to work with the General Plan Issues Committee to identify recommended land use alternative scenarios for inclusion in the EIR.

FISCAL ANALYSIS:

A total of \$935,432.00 remains available for the General Plan Update for Fiscal Years 2009-2010. An additional \$170,000 in federal stimulus grants was awarded to the City for preparing a Climate Action Plan in conjunction with the General Plan Update that will help defray several technical studies that would otherwise have been required. The Expenses to date have been for the one staff position that includes the salary of the staff Project Manager and minor, incidental expenses. Completing the General Plan Update will rely on the continuation of funding for staff support and anticipated consultant contracts to prepare technical studies and the Environmental Impact Report.

It is expected that the General Plan EIR could cost between \$300,000 and \$500,000 to complete. Mandatory costs will include the EIR, and related technical studies for air quality, traffic, biology, archaeology/cultural resources, noise, and Housing Element analyses (to the extent in-house housing staff are not available to assist in the update).

GENERAL PLAN ANALYSIS:

The pending General Plan update is anticipated for the 2012 General election. The Plan will meet current legal requirements and includes the City's Vision for 2050, as well as addressing the City Council's Action Plan requirements. The Housing Element (a component of the General Plan) has a separate, specific, update schedule that has been extended to December 2012 so it can be coordinated with other Regional Planning efforts, and will be coordinated with the remainder of the General Plan Update to ensure they are consistent.

BACKGROUND AND PREVIOUS ACTION:

The City Council reviewed and commented on the draft General Plan Introduction containing the community vision, goals, objectives, and Quality of Life Standards on March 24, 2008. Staff is in the process of collecting community comments and is proceeding as directed with

edits necessary to update the remaining text, address legal requirements, and reflect the General Plan Issues Committee's recommendations on key principles. All Information, reports, and presentations have been available to the public and posted on the General Plan website (www.escondido.org/gp-update) where opportunities for citizens to submit comments are also provided. Additionally, all reports, updates, and agendas continue to be transmitted to an email list of approximately 160 people.

DISCUSSION:

The primary focus of the General Plan Update involves assuring the long-term sustainability of Escondido's future by promoting quality, managed growth, ensuring the adequate provision of infrastructure, preserving perimeter viewsheds, and respecting and enhancing the character of established single family neighborhoods. Staff has conducted a preliminary review and analysis of potential land use amendment areas involving Smart Growth areas, a full range of employment land use areas, and minor "clean-up" amendments to correct inconsistencies with current land use patterns.

During the public workshop and General Plan Issue Committee meetings potential areas for evaluating in the General Plan update were identified and discussed. Staff conducted a preliminary analysis of all potential areas (Attachment 1); details regarding each area and staff recommendations are included in separate attachments (Attachments 2-18). The nature of Land Use Study Areas includes:

1. Employment Opportunity Areas

Several potential study areas involve expanding Escondido's employment lands by reassigning residentially designated areas. These include areas east of I-15 along Imperial Drive (Attachment 2); areas north and south of the Escondido Research Technology Center (ERTC) (Attachments 6 and 7); at the Felicita Avenue/I-15 interchange (Attachment 8), and Nutmeg Street at Centre City Parkway (Attachment 11). Based on prior research, Escondido's percentage of land devoted for employment purposes is comparably less than surrounding communities. This has been noted as an explanation for the out-migrating pattern of Escondido commuters involving a disproportionate number of residents seeking employment outside the community affecting the "jobs/housing" balance. Identifying new areas in the community for employment purposes, and enhancing existing employment sectors, have been identified as priorities based on responses received in many citizen surveys and recommendations from the General Plan Update Issues Committee.

Additional study areas aimed at enhancing existing employment areas include south and east of the I-15/ Highway 78 interchange (Attachments 3 and 4); properties south of the Mercado Area (Attachment 5); and areas bounded by I-15, West Valley Parkway and Ninth Avenue (Attachment 10), and in the Downtown Specific Plan Area (Attachment 18). An evaluation of these areas could include improving aesthetics and/or transitioning land uses to more employee-intensive, higher quality and higher paying employment.

The potential employment study area not recommended for further employment analysis is the Deer Springs / I-15 interchange (Attachment 9); based on its remoteness, impacts to community character, lack of infrastructure, or previous community opposition.

2. Residential / Transit Intensification Areas

Accommodating additional population above Escondido's existing General Plan residential capacity is proposed to be clustered in specific mixed-use "nodes" in concert with "Smart Growth" principles. Based on existing and projected transit patterns that serve Downtown, East Valley Parkway, and South Escondido Boulevard, focused infill development will be close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources. Study Areas for establishing these mixed-use development nodes are properties bounded by I-15, West Valley Parkway and Ninth Avenue (Attachment 10); Nutmeg Street at Centre City Parkway (Attachment 11), area around the intersection of East Valley Parkway and Ash Street (Attachment 12); properties in the vicinity of Felicita Avenue where it intersects Centre City Parkway and Escondido Boulevard (Attachment 15); area around Citracado Parkway and Centre City Parkway (Attachment 16); and in the Downtown Specific Plan Area (Attachment 18).

Early in SANDAG's "Smart Growth" identification process all regional shopping centers in the county (including Westfield Shopping Town) were included as population receptor sites due to their proximity to major freeways and the smart growth principle of combining multiple uses on a single site. Upon further consideration staff is recommending that this area not be considered for residential development due to the unknown long-term redevelopment prospects for suburban shopping malls. Additionally, while the long-term buildout of the Sprinter rail line includes connecting Downtown to Westfield's, incorporating a residential component would be premature. Incorporating a residential component at this time could limit more desirable redevelopment opportunities in the future that would benefit by the site's highly visible location, proximity to I-15, and large single land use under limited ownerships. Staff feels that the other residential / transit intensification areas will provide sufficient opportunities for accommodating anticipated population growth.

3. Educational Focus Area

The area between Palomar College's satellite campus (East Valley Parkway at Midway Drive) and Palomar Hospital's downtown facility is proposed for evaluating opportunities for attracting and clustering educational institutions (Attachment 13). Studies consistently link growth of a local economy with access to higher education. Being economically competitive is synonymous with being educationally competitive. Policies promoting East Valley Parkway as the area for attracting and locating higher educational universities, technical colleges, vocational schools, and job training facilities are recommended to foster Escondido's sustainability and promote a more educationally competitive environment that provides a direct path to employment.

4. Corrective / "Clean-Up" Amendment Areas

Several changes in land use and ownership patterns have occurred since the last General Plan Update that warrant re-designation. Most notably is the acquisition of several properties by public agencies (including the City) for dedication as either permanent open space or other municipal/governmental purposes. Reclassifying properties to reflect their appropriate designation will establish a more accurate map for planning purposes. Note: These areas are not identified on the accompanying attachments.

5. Public Land Classifications

The General Plan currently includes "Public Land" (P) as the sole designation identifying properties owned by public entities that customarily serve a variety of purposes. In this manner, the City's police firing range, Hale Avenue Resource Recovery Facility, Daley Ranch Open Space Preserve, active park sites, and Indian Tribal Lands are all identified with the same General Plan "P" land use designation. Staff recommends that classifications for the "Public Land" designation be refined to provide a more detailed identification of the actual/intended land use for more accurate planning purposes. Note: These areas are not identified on the accompanying attachments.

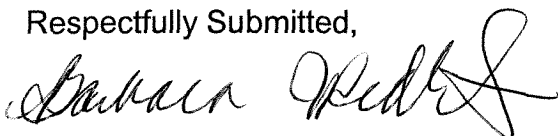
It is expected that certain study areas would be deleted from further analysis based on preliminary conclusions. Based on City Council direction only study areas that staff feels warrant further analysis will be recommended in order to minimize the EIR scope of work and costs associated with preparing subsequent technical studies. Upon City Council direction, staff proposes to convene the General Plan Issues Committee to recommend and comment on various alternative General Plan scenario maps. Public outreach would occur to solicit input on the draft text and map amendments between June and August 2010. This information would be brought back to the City Council in August where recommendations would be made on the preferred and/or range of land use alternatives that would be selected for a thorough evaluation in the General Plan EIR.

Staff has posted the Draft General Plan Introduction, Vision, Goals, & Quality of Life Standards on the City's website for public review and is receiving comments. Draft chapters pertaining to Economic Prosperity, Growth Management, Land Use and Circulation will be posted on the website shortly. Staff proposes to solicit consultant qualifications in the next several weeks in order to commence interviews and consultant selection by early summer to prepare the General Plan EIR and Climate Action Plan.

Following is a detailed Action Plan containing the anticipated milestones necessary to keep the General Plan Update on track for the November 2012 election:

- Identify and prepare text amendments, develop alternative Land Use scenarios, and commence public review by the end of June 2010.
- Complete Workshops on the Draft General Plan document by July 2010
- City Council selection of preferred and/or range of General Plan alternatives by August 2010
- Execute final Consultant Contracts by August 2010
- Complete the Screencheck EIR by March 2011
- Commence the 45 Day Public Review Process of the Draft EIR by June 2011
- Complete the Final EIR by September 2011
- Complete Planning Commission Meetings by January 2012
- Complete City Council Hearings by March 2012
- Transmit all information to the County Clerk as necessary to place the General Plan on the November 2012 General Election by August 2012

Respectfully Submitted,

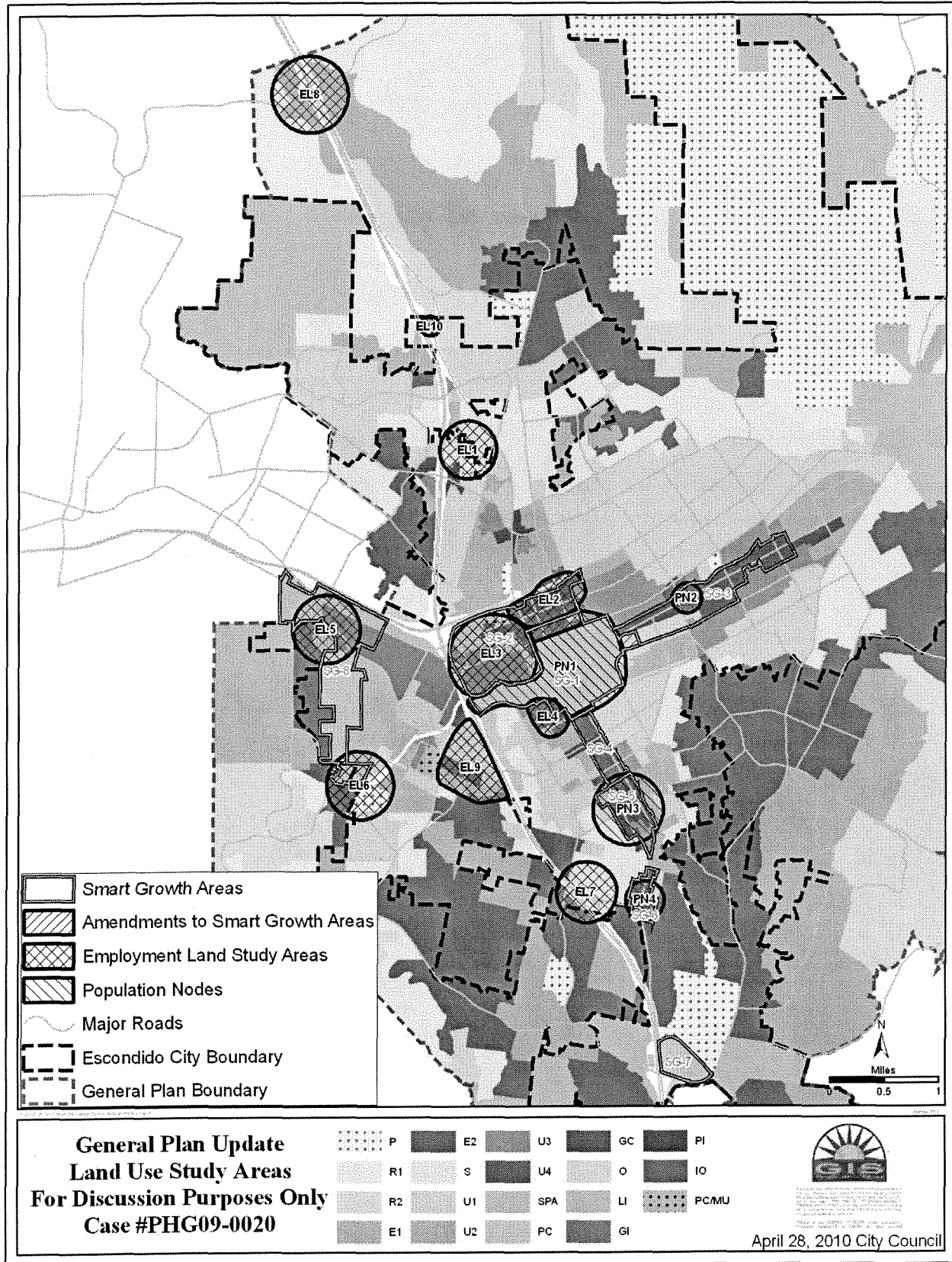


Barbara J. Redlitz, AICP
Director of Community Development



Jay Petrek, AICP
Principal Planner

ATTACHMENT 1



ATTACHMENT 1 (Continued)

AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Recommendation
EL-1 (Attachment 2)	75	Suburban, General Commercial Parks / Open Space	Employment (Industrial, Biomedical, Office Park	Further analyze to amend land use from residential to employment.
EL-2 (Attachment 3)	100	General Commercial	Employment	Retain current GP designation Candidate for "Mission Avenue Area Plan" that could extend from I-15 to Gamble that addresses land use and development standards, gateway features etc. Land use focus should be for employment uses, residential uses should not be allowed in this area in order to preserve employment opportunities.
EL-3 (Attachment 4)	175	General Industrial Light Industrial General Commercial	Employment, Biomedical, Office Park, Regional Attraction	Further analyze to amend from Industrial to Industrial Office based on proximity to services, freeway and central location. Land use focus should be for employment uses, residential uses should not be allowed in this area in order to preserve employment opportunities.
EL-4 (Attachment 5)	40	Industrial Office	Employment, Biomedical, Office Park	Retain current GP designation. Candidate for "Area Plan" or expand Downtown SPA to address land use and development standards, gateway features, etc.
EL-5 (Attachment 6)	80	Light Industrial General Industrial Estate I Estate II	Employment, Biomedical, Office Park, Industrial Office	Further analyze to amend from Industrial and Residential to Industrial / Medical Office based on proximity to services, freeway and gateway location, and to other industrial areas. Consideration should be for strong intensification of development pattern along Auto Parkway given proximity to Nordahl Transit Station.
EL-6 (Attachment 7)	75	Public Estate II SPA	Employment, Biomedical, Office Park, Industrial Office	Further analyze to amend from Industrial and Residential to Industrial Office based on proximity to services, Citracado Parkway, HARRF and to other industrial areas. OPTION: Consider amending only properties on east side of Citracado Parkway within Escondido's current Sphere of Influence.
EL-7 (Attachment 8)	80	Suburban Estate II	Employment, , Office Park, Commercial Office	Further analyze to amend from residential to Commercial Office use based on proximity to services, freeway and gateway location (see letter from property owner representative).
EL-8 (Attachment 9)	100	Rural I Rural II	Employment, Biomedical, Office Park, Industrial Office	Delete from further study due to remoteness, lack of infrastructure and past resident opposition.
EL-9 (Attachment 10)	90	Planned Commercial Estate II Urban II Urban IV	Smart Growth Mixed Use Area	Further analyze as potential Smart Growth Area with focus on Mixed -Use Commercial / Office / Residential and /or expansion to autopark based on proximity to services, freeway and gateway location (see letter from property owner representative)
EL-10 (Attachment 11)	10	Estate II	Employment Office or Urban II	Further analyze to amend from residential to employment land use or higher density residential.

ATTACHMENT 1 **(Continued)**

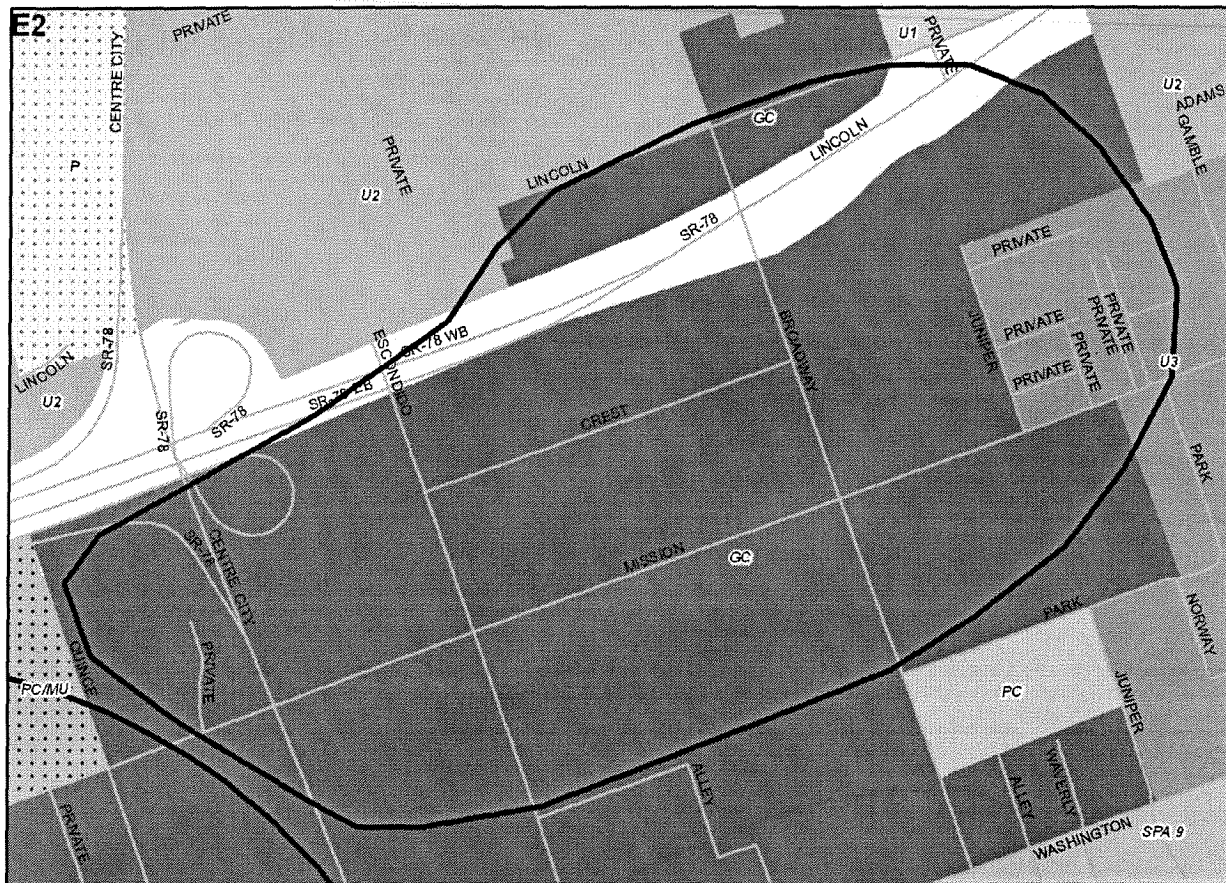
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Recommendation
PN1/SG-1 (Attachment 18)	450	SPA	Smart Growth Mixed Use Area Population Node	Further analyze as a primary node for Mixed-Use Retail / Office / Residential node. Expand SPA boundary to include all of the Mercado area, areas north of Washington Avenue, south of Fifth Avenue and east of Palomar Hospital consistent with Interim Downtown Specific Plan. Consider this area as the primary receptor for additional population growth and focus it around an expanded Grape Day Park.
PN2 / SG-3 (Attachment 12)	25	General Commercial	Smart Growth Mixed Use Area Population Node	Further as potential node for Mixed-Use Retail / Office / Residential based on proximity to services. Include a General Plan implementation program bolstering this area of the East Valley Parkway by focusing residential mixed use in this area and strengthening Channel Trail pedestrian linkage to Washington Park and Downtown.
PN3/SG-5 (Attachment 15)	80	General Commercial Urban II, Urban III Urban IV	Smart Growth Mixed Use Area Population Node	Further analyze as a secondary node for Mixed-Use Retail / Office / Residential node based on proximity to services. This area should be considered as a secondary receptor for future population growth.
PN4/SG-6 (Attachment 16)	35	General Commercial Urban III	Smart Growth Mixed Use Area Population Node	Further analyze as a tertiary node for Mixed-Use Retail / Office / Residential node based on proximity to services and gateway location. This area should be a receptor for future population growth.
SG-3 (Attachment 13)	300	General Commercial & Office	Smart Growth Mixed Use Area	Further analyze for incentivizing and concentrating educational facilities based on proximity to services and similar uses. Analyze refining Area Plan to cluster high intensity residential mixed-use projects in the vicinity of Ash Street & Valley Parkway while retaining commercial, office and educational uses in the remaining areas, strengthen Channel Trail pedestrian linkage to Washington Park and Downtown.
SG-4 (Attachment 14)	75	General Commercial	Smart Growth Mixed Use Area	Include a General Plan implementation program bolstering this area for retail and office uses and discouraging residential along Escondido Blvd between 6 th and 13 th Avenues.
SG-7 (Attachment 17)	80	Planned Commercial	Smart Growth Mixed Use Area	Eliminate from further study based on intent to focus residential and employment development in the downtown and urban core. A residential component could limit more desirable redevelopment opportunities in the future that would benefit by the site's highly visible location, proximity to I-15, and large single land use under limited ownerships.

ATTACHMENT 2



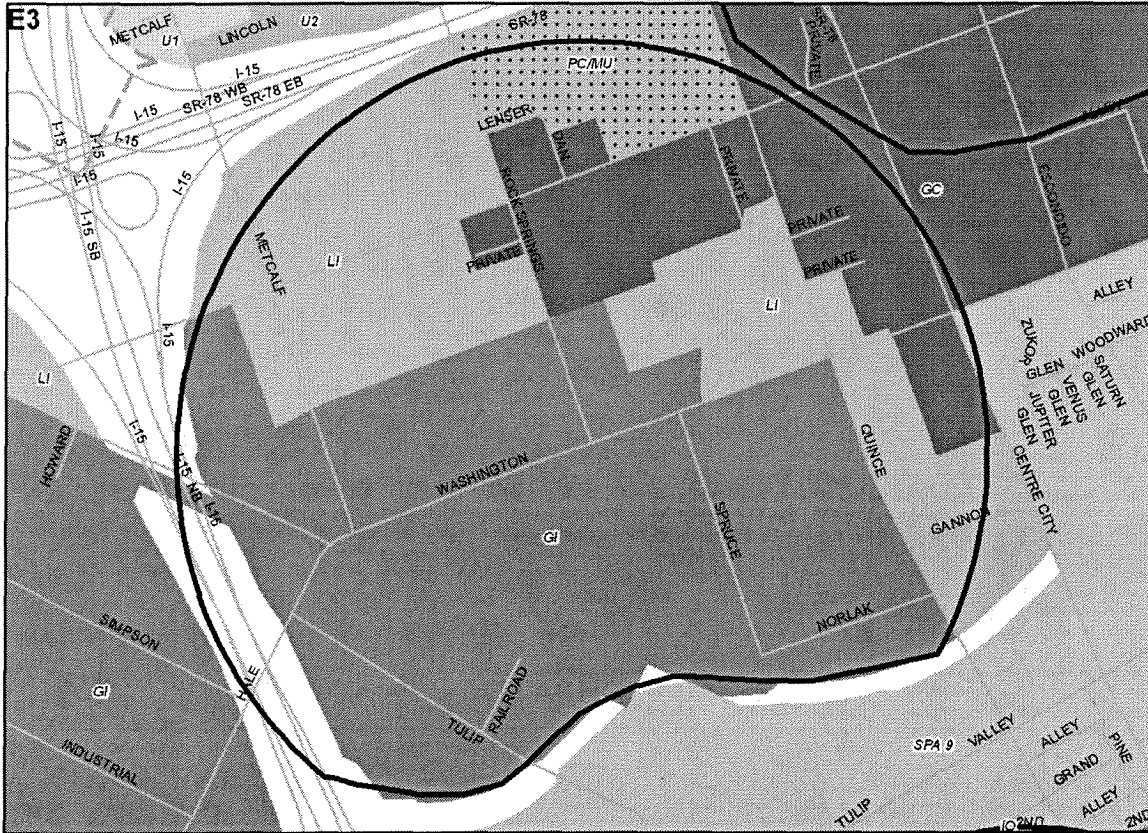
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-1 Imperial Drive Area	75	Suburban General Commercial Parks / Open Space	Employment (Industrial, Biomedical, Office Park	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Yes Transit Convenient: No Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Yes, on-and –off ramp at El Norte Parkway Development Status: Primarily underdeveloped Surrounding Land Uses: <i>North:</i> Vacant & Multifamily <i>South:</i> Office, open space, vacant <i>East:</i> Centre City Parkway <i>West:</i> I-15 Environmental Considerations: Noise, traffic, some habitat Comments: Good proximity to I-15, CCP and El Norte, vacant status of properties, ability to assemble land and master plan area makes this a potential site for employment land. Topographically isolated from adjacent areas would minimize compatibility impacts. Streets and infrastructure appear to be extended to serve the area without significant major upgrades. Freeway visibility calls for higher design standards to ensure attractive appearance.
		Recommended Action		
		Further analyze to amend land use from residential to employment.		

ATTACHMENT 3



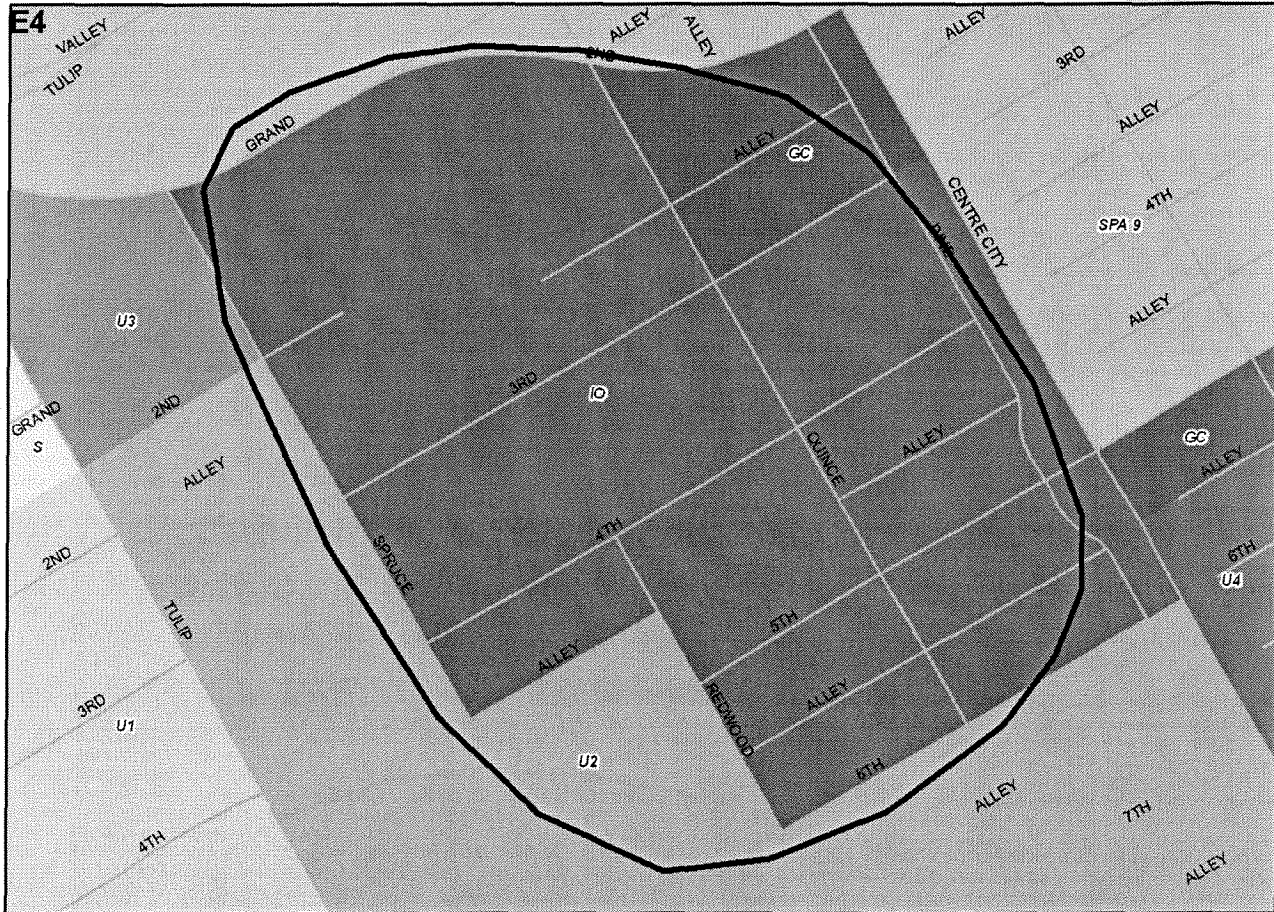
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-2 Highway 78 Terminus	100	General Commercial	Employment <i>Smart Growth Area</i>	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Marginal Transit Convenient: Yes Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Yes, on-and –off ramp at Broadway and CCP Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Highway 78 & Multifamily <i>South:</i> Commercial <i>East:</i> Multifamily <i>West:</i> Commercial Environmental Considerations: Noise, traffic, odors Comments: Proximity to I-15 and Broadway establishes the area as a gateway to the community. Fragmented ownerships, smaller lots, and relatively built-out status could make assembling properties challenging. Low-intensity commercial development suggests opportunity for intensification. Consideration could be given to establishing a second “Auto Park” given current and previous dealerships in the area. Topographically level. Streets and infrastructure serve the area without significant major upgrade requirements. Freeway visibility calls for higher design standards to ensure attractive appearance.
		Recommended Action		
		Retain current GP designation Candidate for “Mission Avenue Area Plan” that could extend from I-15 to Gamble that addresses land use and development standards, gateway features etc. Land use focus should be for employment uses, residential uses should not be allowed in this area in order to preserve employment opportunities.		

ATTACHMENT 4



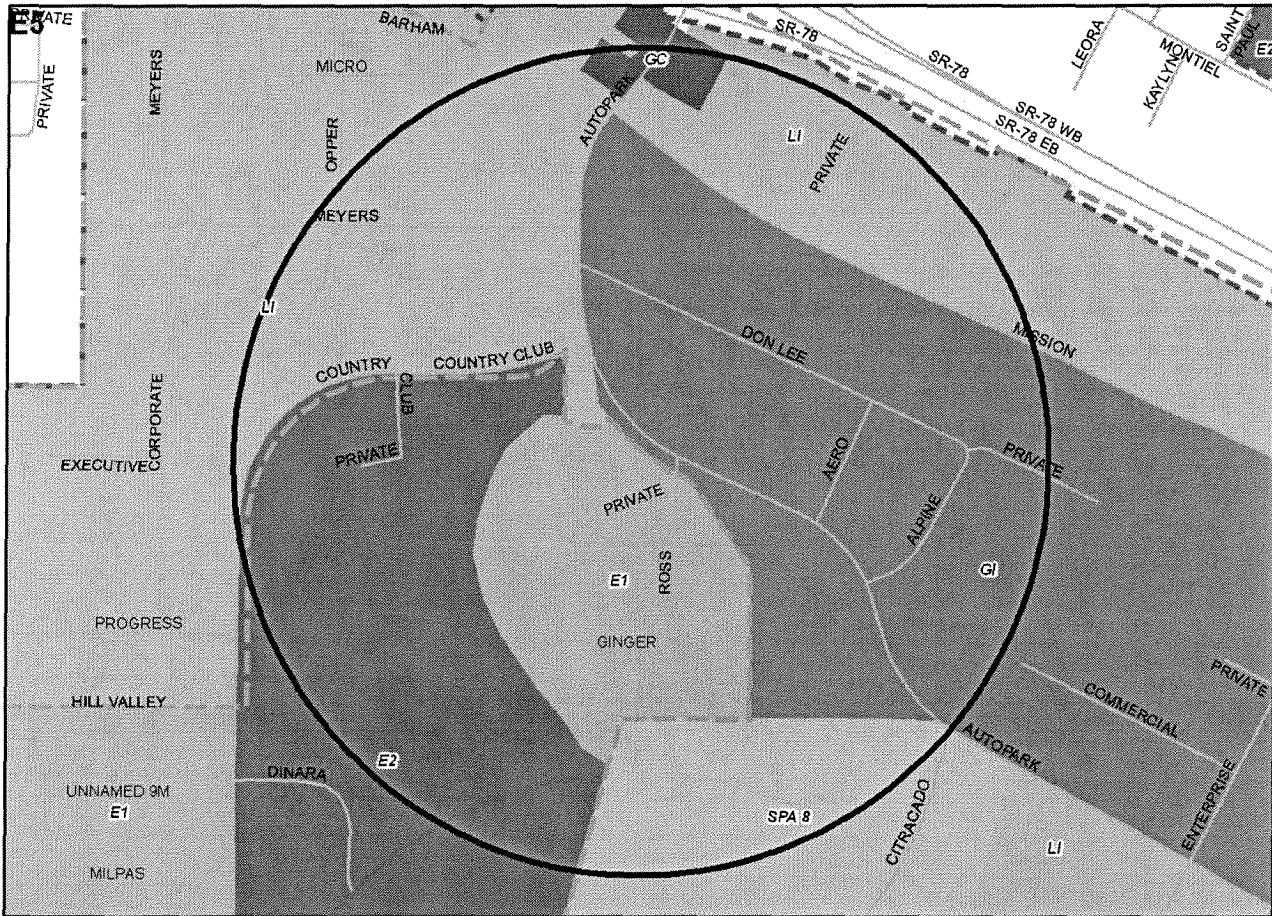
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-3 I-15 & 78 southeast quadrant	175	General Industrial Light Industrial General Commercial	Employment, Biomedical, Office Park, Regional Attraction <i>Smart Growth Area</i>	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Yes Transit Convenient: Yes Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: High visibility, on-off access limited to CCP and West Valley Parkway Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Highway 78 & Multifamily <i>South:</i> Commercial & Transit Center <i>East:</i> Commercial <i>West:</i> I-15 and Industrial Environmental Considerations: Noise, traffic, odors, hazardous chemicals Comments: Proximity to I-15 and Broadway is a gateway to the community. Area contains fragmented ownerships in a relatively built-out condition. Area contains Hazardous Chemical Overlay Zone. Low-intensity development suggests opportunity for intensification. Assembling land would be attractive for industrial office park or regional sports/entertainment facility; incompatible uses would require relocation. Topographically, the area is level. Streets and infrastructure serve the area without significant major upgrade requirements. Freeway visibility calls for higher design standards to ensure attractive appearance.
		Recommended Action		
		Further analyze to amend from Industrial to Industrial Office based on proximity to services, freeway and central location. Land use focus should be for employment uses, residential uses should not be allowed in this area in order to preserve employment opportunities.		

ATTACHMENT 5



AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-4 Between Second and Sixth Avenues along Quince, Redwood and Spruce Streets	40	Industrial Office	Employment, Biomedical, Office Park,	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Minimal Transit Convenient: Yes Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: access at West Valley Parkway Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Commercial (Downtown SPA) <i>South:</i> Multifamily <i>East:</i> Commercial (Downtown SPA) <i>West:</i> Multifamily Environmental Considerations: Noise, traffic, odors, hazardous chemicals Comments: Proximity to I-15 establishes this areas as a gateway to Downtown. Area contains fragmented ownerships in a built-out condition with uses that are difficult to relocate making assembly challenging. Area contains minor slopes. Current uses pose compatibility issues with surrounding residential. Sewer, water, drainage street upgrades needed. Area lacks street improvements. Level Topography. Gateway status calls for higher design standards to ensure attractive appearance.
		Recommended Action		
		Retain current GP designation. Candidate for “Area Plan” or expand Downtown SPA to address land use and development standards, gateway features, etc.		

ATTACHMENT 6



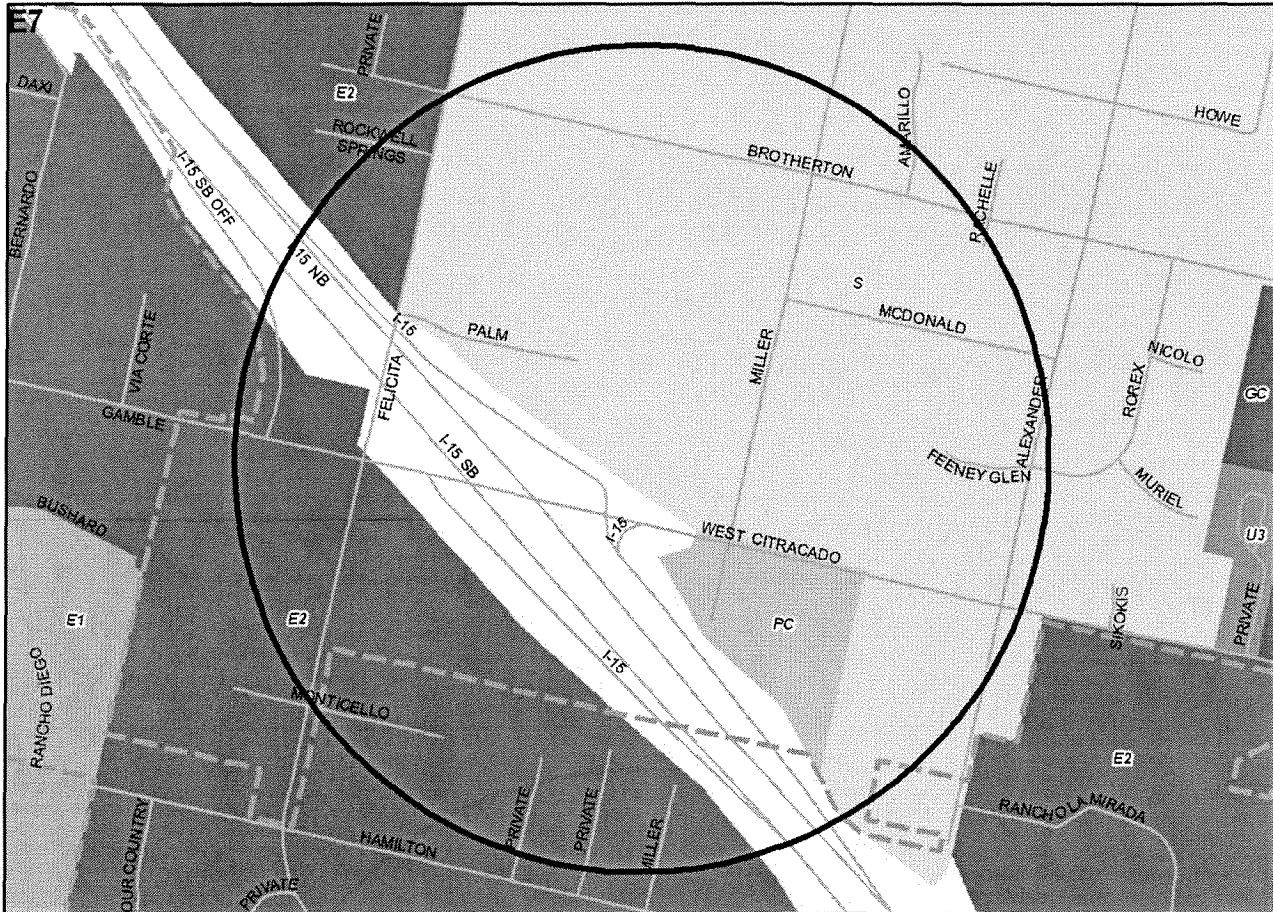
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-5	80	Light Industrial General Industrial Estate I Estate II	Employment, Biomedical, Office Park, Industrial Office	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: yes Transit Convenient: Yes Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to 78: access at Nordahl Development Status: Primarily Developed, some vacant area Surrounding Land Uses: <i>North:</i> highway 78 <i>South:</i> ERTC and half-acre residential <i>East:</i> ERTC and industrial <i>West:</i> industrial and half-acre residential Environmental Considerations: Noise, traffic, odors, hazardous chemicals Comments: Proximity to SR 78 and Nordahl transit station establishes this as a city gateway. Area contains fragmented ownerships in a built-out condition. If amended, the existing residential uses would be considered non-conforming. Area contains minor slopes. Sewer, water, drainage street upgrades needed. Gateway status calls for higher design standards to ensure attractive appearance.
		Recommended Action Further analyze to amend from Industrial and Residential to Industrial / Medical Office based on proximity to services, freeway and gateway location, and to other industrial areas. Consideration should be for strong intensification of development pattern along Auto Parkway given proximity to Nordahl Transit Station		

ATTACHMENT 7



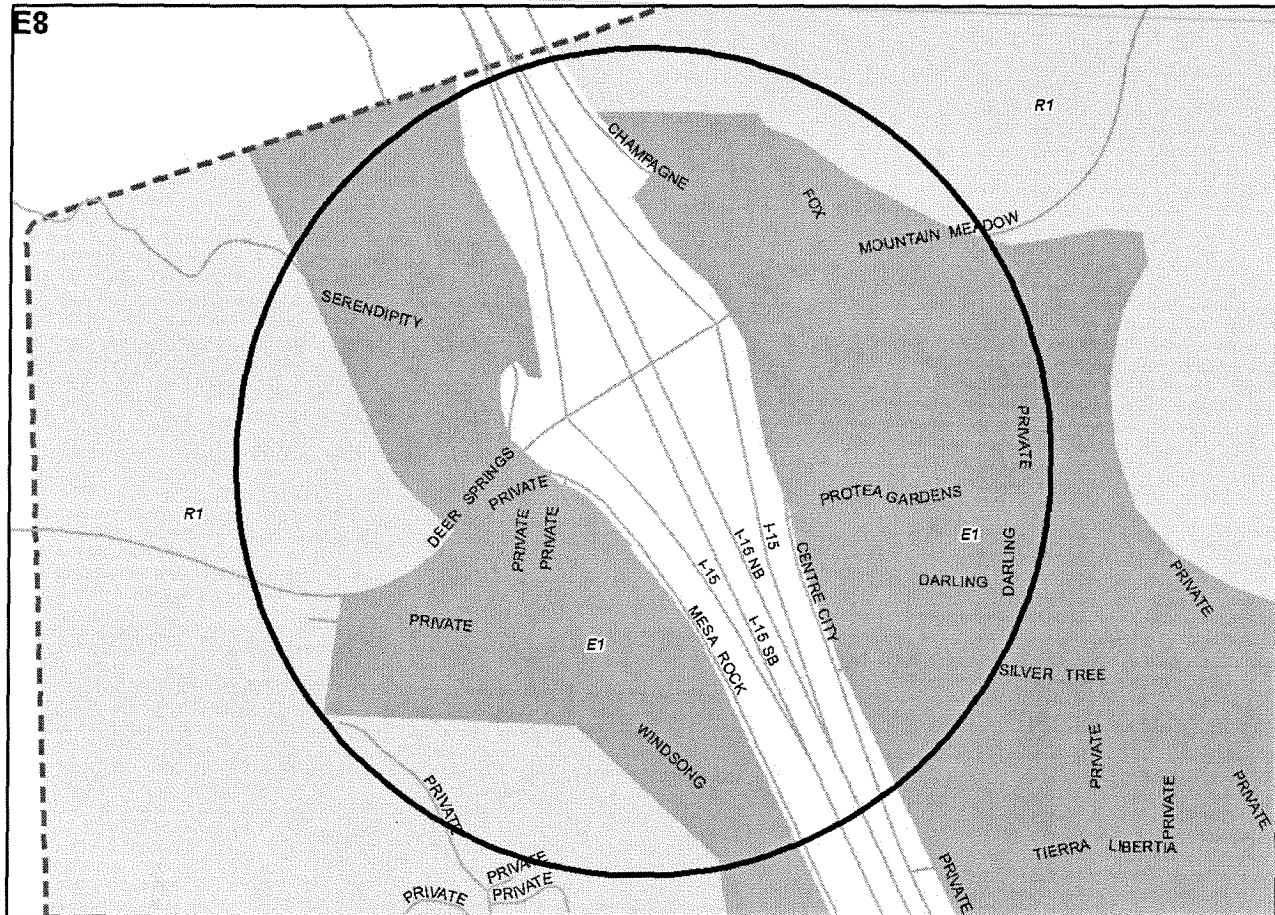
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-6	75	Public Estate II SPA	Employment, Biomedical, Office Park, Industrial Office	<p>Goal Addressed: Expand /intensify employment opportunities</p> <p>Land Assemblage Opportunity: yes</p> <p>Transit Convenient: Yes</p> <p>Pedestrian Oriented: No</p> <p>Proximity to Water & Sewer: Yes</p> <p>Proximity to 78: access at Nordahl / Citracado</p> <p>Development Status: Primarily underdeveloped residential</p> <p>Surrounding Land Uses: <i>North:</i> ERTC, industrial park, single family residential <i>South:</i> Single family residential and Mobile Home Park <i>East:</i> Single family residential <i>West:</i> Escondido Creek, single family residential</p> <p>Environmental Considerations: Noise, traffic, odors, biology, cultural</p> <p>Comments: Proximity to existing employment areas and HARRF establish this area as a contender for expanding employment area. Certain areas may require sewer pumping to HARRF. Areas lacks infrastructure. Escondido Creek form natural boundary on west side establishing limit of expansion. If amended, the existing residential uses would be considered non-conforming. Area contains minor slopes; cultural resources known to be in the area, habitat mitigation likely given proximity to creek. Portion of area outside Sphere of Influence.</p>
		Recommended Action		
		<p>Further analyze to amend from Industrial and Residential to Industrial Office based on proximity to services, Citracado Parkway, HARRF and to other industrial areas.</p> <p>OPTION: Consider amending only properties on east side of Citracado Parkway within Escondido's current Sphere of Influence.</p>		

ATTACHMENT 8



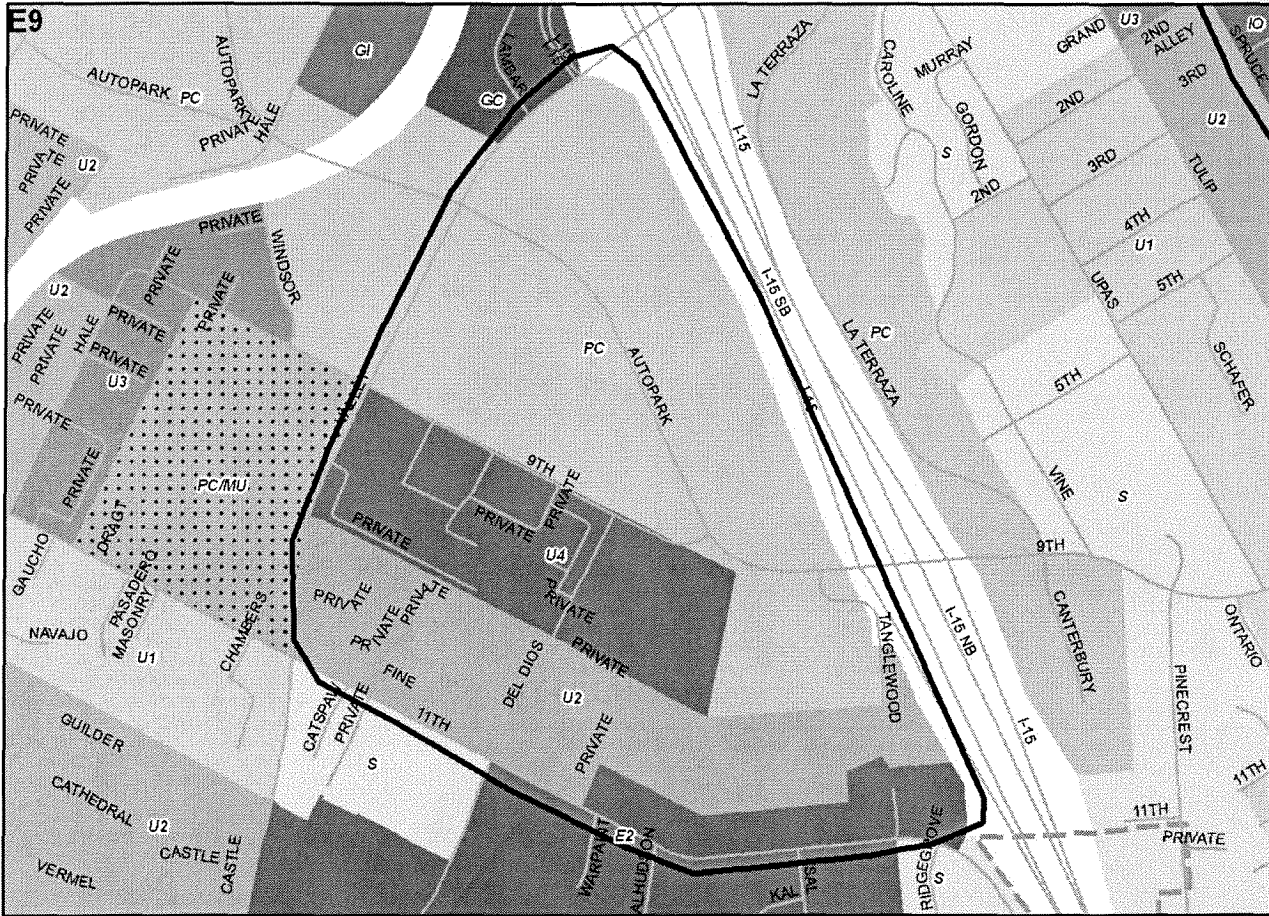
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-7	80	Suburban Estate II	Employment, , Office Park, Commercial Office	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: yes Transit Convenient: No Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Direct access at Felicita Exit Development Status: Primarily Developed, some vacant area Surrounding Land Uses: <i>North:</i> Single family residences, churches, daycare facility <i>South:</i> Single family residential, fire station <i>East:</i> Single family residential <i>West:</i> single family residential, church, Environmental Considerations: Noise, traffic, community character (potential height issues) Comments: Proximity to I-15 and access ramps establishes this as a city gateway. Medical / Office use exist in the area. Fragmented ownerships exist in a semi built-out condition. If amended the existing residential uses would be considered non-conforming; other large users (churches, daycare) could recycle or integrate with office uses. Area is level; sewer, water, street, drainage upgrades needed. Gateway status calls for higher design standards to ensure attractive appearance. Proximity to homes may warrant height restrictions on office development.
		Recommended Action		
		Further analyze to amend from residential to Commercial Office use based on proximity to services, freeway and gateway location (see letter from property owner representative).		

ATTACHMENT 9



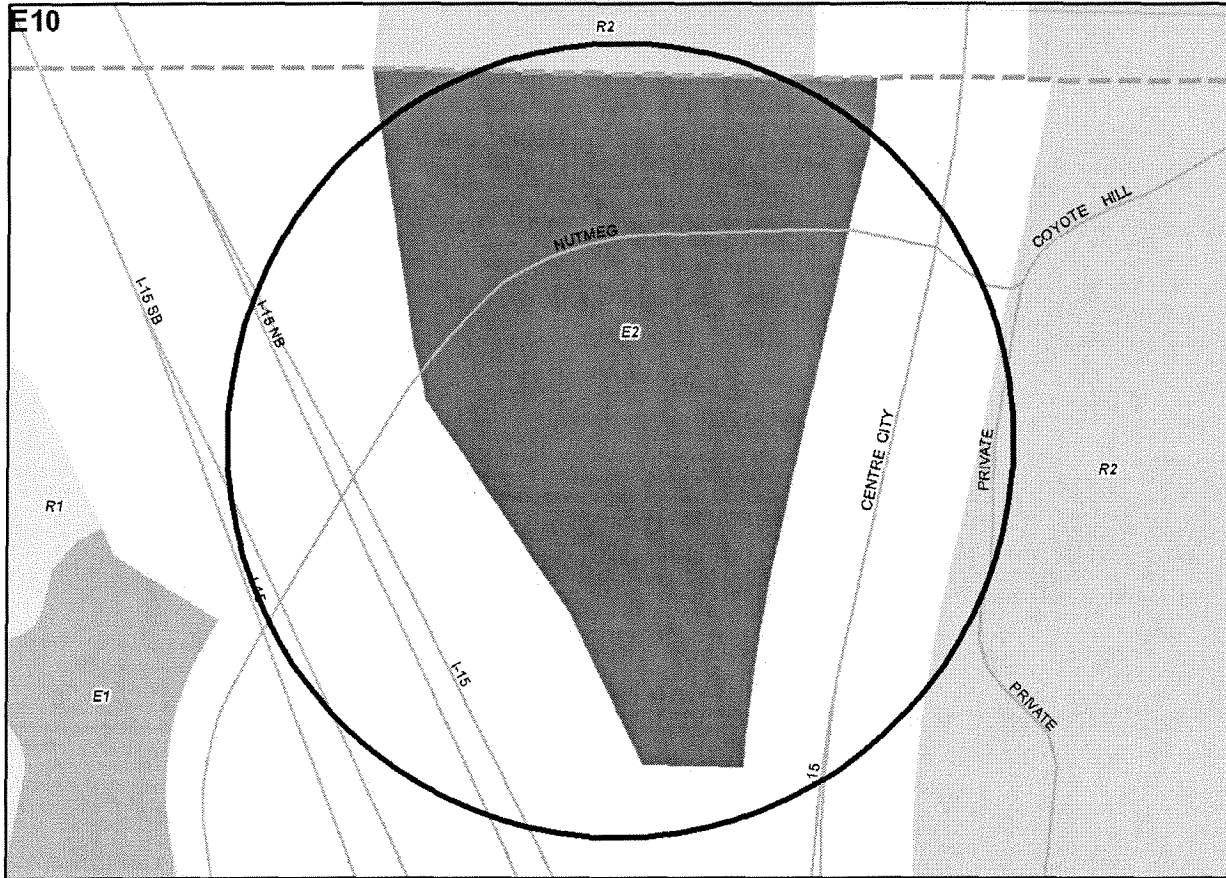
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-8	100	Rural I Rural II	Employment, Biomedical, Office Park, Industrial Office	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: yes Transit Convenient: No Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Access at Mountain Meadow / Deer Springs Development Status: Primarily underdeveloped residential and agricultural. Surrounding Land Uses: <i>North:</i> Vacant & gas station (former Merriam Mountain Project) <i>South:</i> Vacant and single family residential <i>East:</i> Vacant and single family residential (steep terrain) <i>West:</i> Vacant and single family residential (steep terrain) Environmental Considerations: Noise, traffic, character Comments: Area has been studied numerous times for possible employment uses; residents in area are opposed. Good access from I-15; however, area is isolated and distanced from municipal services. Street upgrades and sewer improvements needed. If amended the existing residential uses would be considered non-conforming. Area contains minor slopes.
		Recommended Action		
		Delete from further study due to remoteness, lack of infrastructure and past resident opposition.		

ATTACHMENT 10



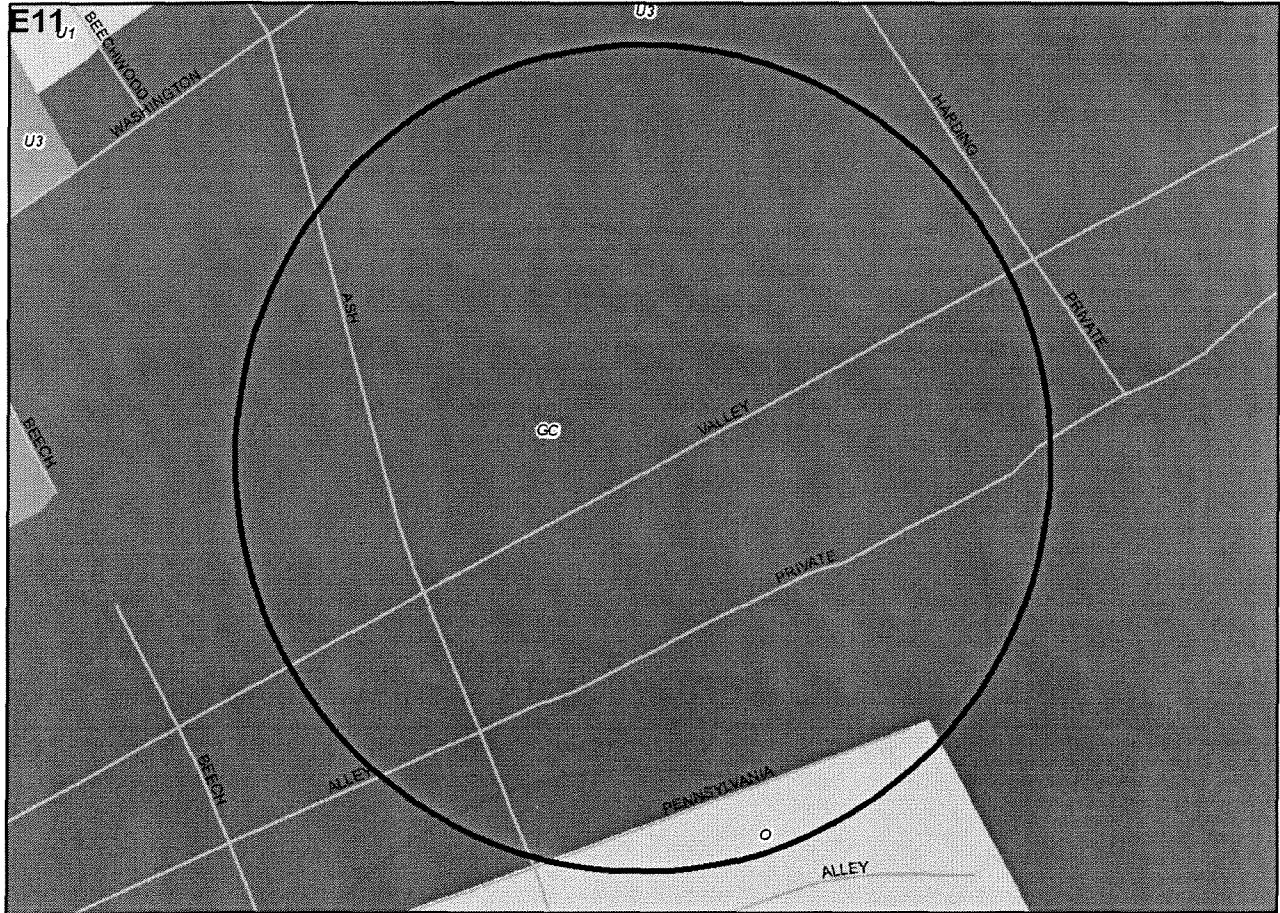
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-9	90	Planned Commercial Estate II Urban II Urban IV	Smart Growth Mixed Use Area	<p>Goal Addressed: Expand /intensify employment opportunities</p> <p>Land Assemblage Opportunity: yes</p> <p>Transit Convenient: Yes</p> <p>Pedestrian Oriented: No</p> <p>Proximity to Water & Sewer: Yes</p> <p>Proximity to I-15: Direct access at Ninth and West Valley Pky</p> <p>Development Status: Primarily Developed</p> <p>Surrounding Land Uses: <i>North:</i> Single family residences, churches, daycare facility <i>South:</i> Single family residential, <i>East:</i> Interstate 15 <i>West:</i> single family residential, church,</p> <p>Environmental Considerations: Noise, traffic, community character (potential height issues)</p> <p>Comments: Proximity to I-15 and access ramps establishes this as a city gateway. Area is in proximity to high speed rail stop. Area contains retail, school, and residential uses. Area is level; sewer, water, and utilities currently serve the area. Gateway status calls for higher design standards to ensure attractive appearance.</p>
		<p align="center">Recommended Action</p> <p>Further analyze as potential Smart Growth Area with focus on Mixed – Use Commercial / Office / Residential and /or expansion to autopark based on proximity to services, freeway and gateway location <i>(see letter from property owner representative)</i></p>		

ATTACHMENT 11



AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
EL-10	10	Estate II	Employment Office / or Urban II	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: No Transit Convenient: No Pedestrian Oriented: No Proximity to Water & Sewer: No Proximity to I-15: Access at CCP and I-15 Development Status: Vacant Surrounding Land Uses: <i>North:</i> Vacant <i>South:</i> I-15 and CCP Roadways <i>East:</i> CCP and single family residential <i>West:</i> I-15 and single family residential Environmental Considerations: Noise, traffic, character, habitat Comments: Area contains slopes on the north side. Good visibility from I-15 with convenient freeway access. Isolated from other employment study areas, and smaller than all other study areas with minimal opportunities for consolidating with other properties. Municipal services are south of the site along CCP. Street upgrades and sewer improvements needed.
		Recommended Action		
		Further analyze to amend from residential to employment land use or higher density residential.		

ATTACHMENT 12



AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
PN2 / SG-3	25	General Commercial	Smart Growth Mixed Use Area Population Node	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Marginal Transit Convenient: Marginal Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Approximately three miles east Development Status: Developed Surrounding Land Uses: <i>North:</i> Commercial <i>South:</i> Commercial and Office, <i>East:</i> Commercial <i>West:</i> Commercial Environmental Considerations: Noise, traffic, Comments: This is the center of the East Valley Parkway Area Plan. Primarily developed with retail uses, the area is a gateway for westbound SR 78 travelers coming from Ramona and/or SD Wild Animal Park. Area is level; sewer, water, and utilities currently serve the area.
		Recommended Action Further as potential node for Mixed-Use Retail / Office / Residential based on proximity to services. Include a General Plan implementation program bolstering this area of the East Valley Parkway by focusing residential mixed use in this area and strengthening Channel Trail pedestrian linkage to Washington Park and Downtown.		

ATTACHMENT 13



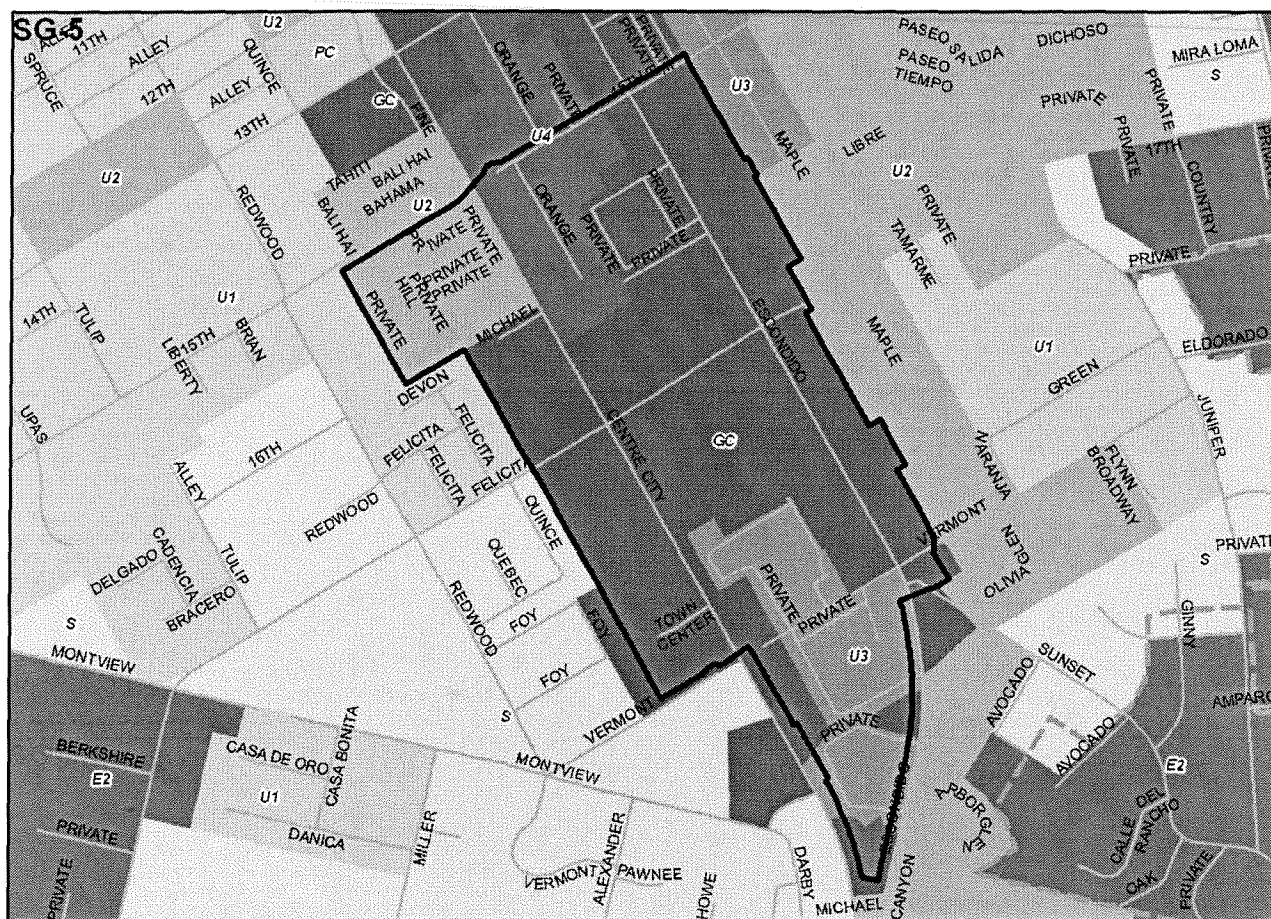
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
SG-3 East Valley Parkway Area Plan	300	General Commercial & Office	Smart Growth Mixed Use Area	Goal Addressed: Expand /intensify employment opportunities Land Assemblage Opportunity: Marginal Transit Convenient: Marginal Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Approximately 3 miles east Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Commercial and Multifamily Residential <i>South:</i> Commercial, Office, Multifamily Residential <i>East:</i> Multifamily Residential <i>West:</i> Commercial (Downtown SPA) Environmental Considerations: Noise, traffic, character Comments: Area is level; sewer gravity flows to HARRF, water, and utilities currently serve the area. Area Plan calls for higher design standards to ensure attractive appearance.
		Recommended Action		
		Further analyze for incentivizing and concentrating educational facilities based on proximity to services and similar uses. Analyze refining Area Plan to cluster high intensity residential mixed-use projects in the vicinity of Ash Street & Valley Parkway while retaining commercial, office and educational uses in the remaining areas, strengthen Channel Trail pedestrian linkage to Washington Park and Downtown.		

ATTACHMENT 14



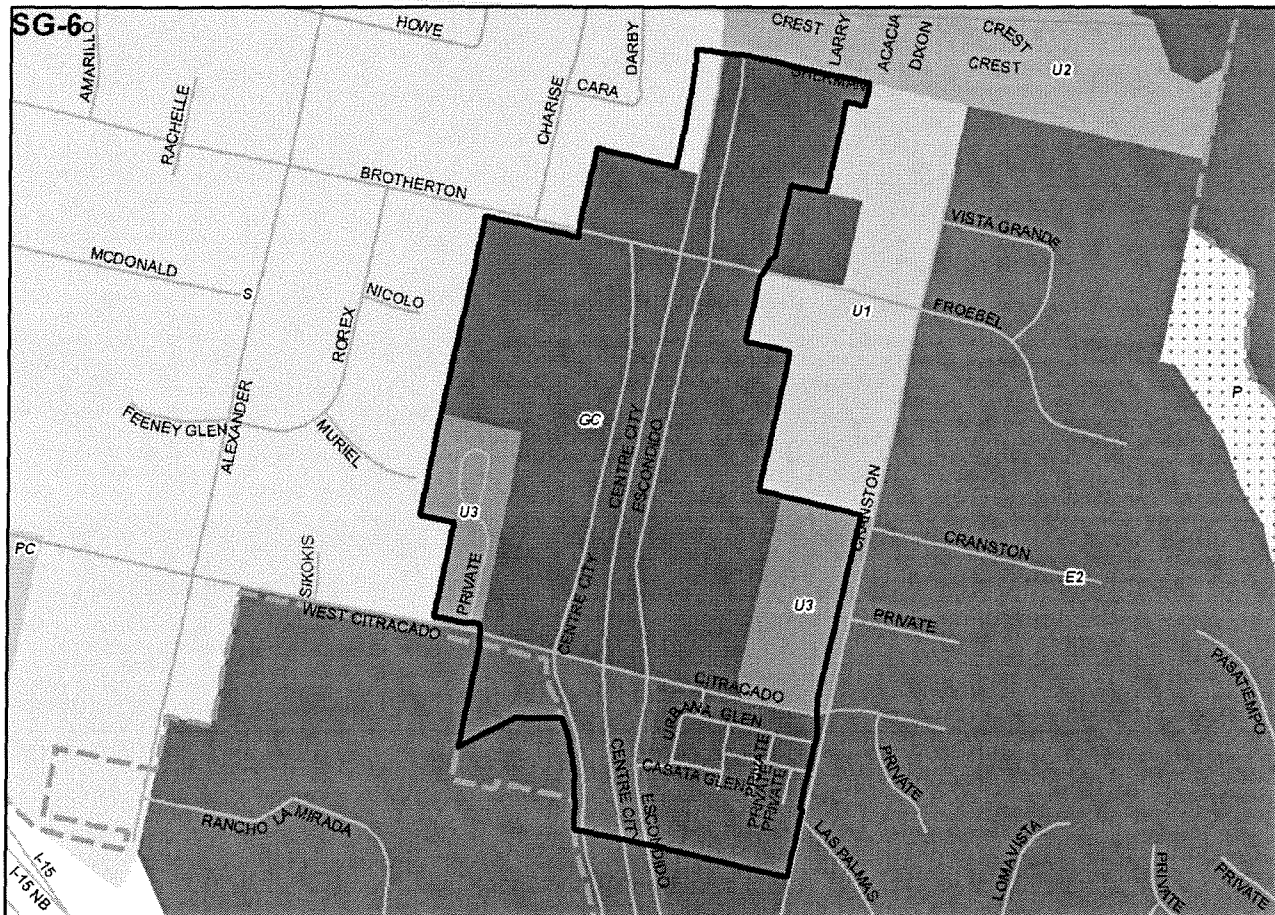
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
SG-4 South Escondido Blvd. (northern portion)	75	General Commercial	Smart Growth Mixed Use Area	Goal Addressed: Expand /intensify Mixed-Use opportunities Land Assemblage Opportunity: Marginal Transit Convenient: Yes Pedestrian Oriented: Yes
		Recommended Action		Proximity to Water & Sewer: Yes
		Include a General Plan implementation program bolstering this area for retail and office uses and discouraging residential along Escondido Blvd between 6 th and 13 th Avenues.		Proximity to I-15: Access at Ninth and I-15 Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Commercial <i>South:</i> Commercial <i>East:</i> Single family residential (Old Escondido Neighborhood) <i>West:</i> Single family and higher density residential Environmental Considerations: Noise, traffic, character Comments: Primarily developed with small scale retail uses. Area is level; gravity sewer to HARRF, water, and utilities currently serve the area. Rapid Transit Bus Line uses this area.

ATTACHMENT 15



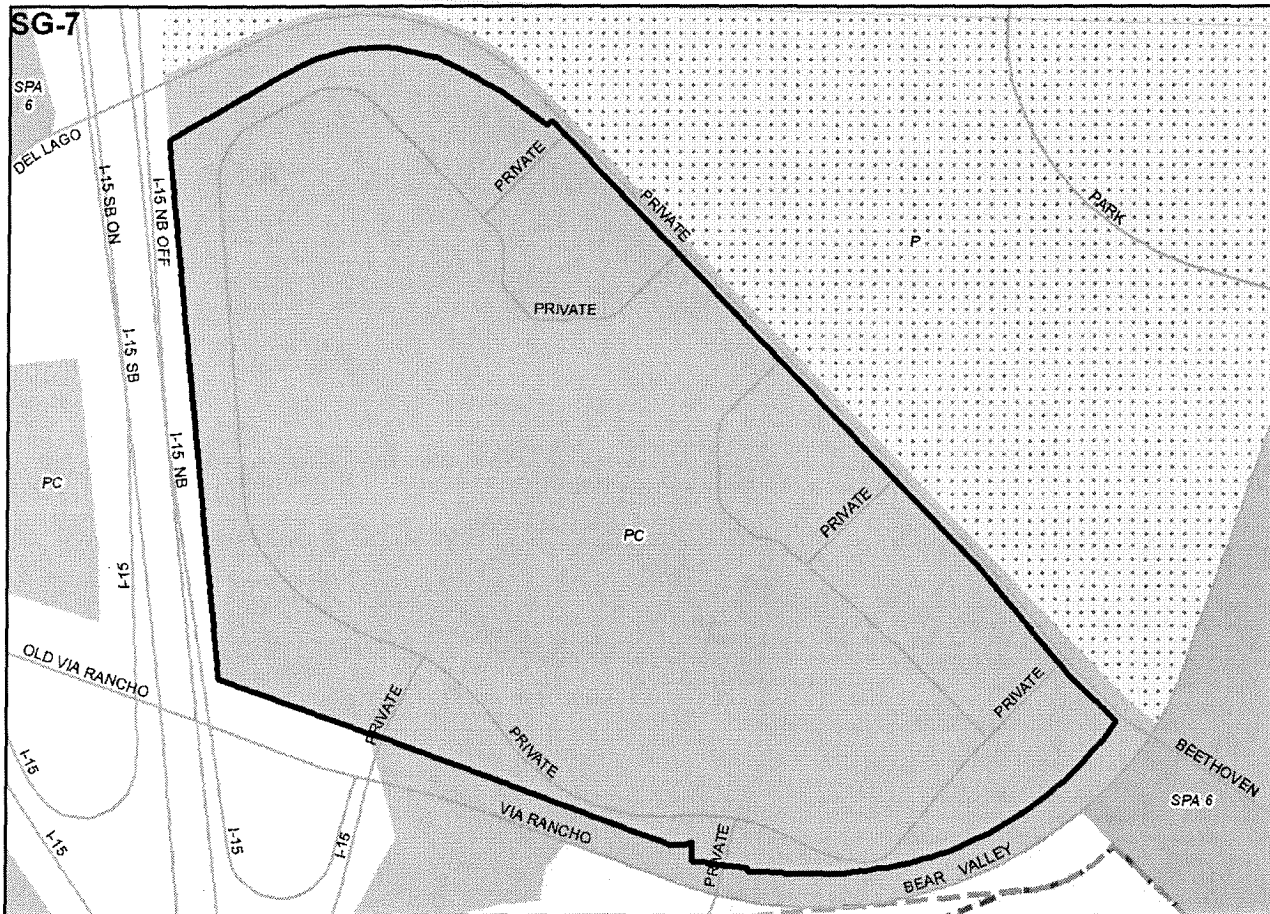
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
PN3/SG-5 South Escondido Blvd. (central portion)	80	General Commercial Urban II Urban III Urban IV	Smart Growth Mixed Use Area Population Node	<p>Goal Addressed: Expand /intensify Mixed Use opportunities</p> <p>Land Assemblage Opportunity: Yes</p> <p>Transit Convenient: Yes</p> <p>Pedestrian Oriented: Yes</p> <p>Proximity to Water & Sewer: Yes</p> <p>Proximity to I-15: Accessed at I-15 and Felicita</p> <p>Development Status: Primarily Developed</p> <p>Surrounding Land Uses: <i>North:</i> Commercial <i>South:</i> Commercial and residential, <i>East:</i> Multi-family residential <i>West:</i> Single family residential</p> <p>Environmental Considerations: Noise, traffic,</p> <p>Comments: Primarily developed with small and mid-size retail uses. Area is level; sewer gravity flows to HARRF, water, and utilities currently serve the area. Rapid Transit Bus Line uses this area, future rail stop at CCP and Felicita.</p>
		Recommended Action		
		Further analyze as a secondary node for Mixed-Use Retail / Office / Residential node based on proximity to services. This area should be considered as a secondary receptor for future population growth.		

ATTACHMENT 16



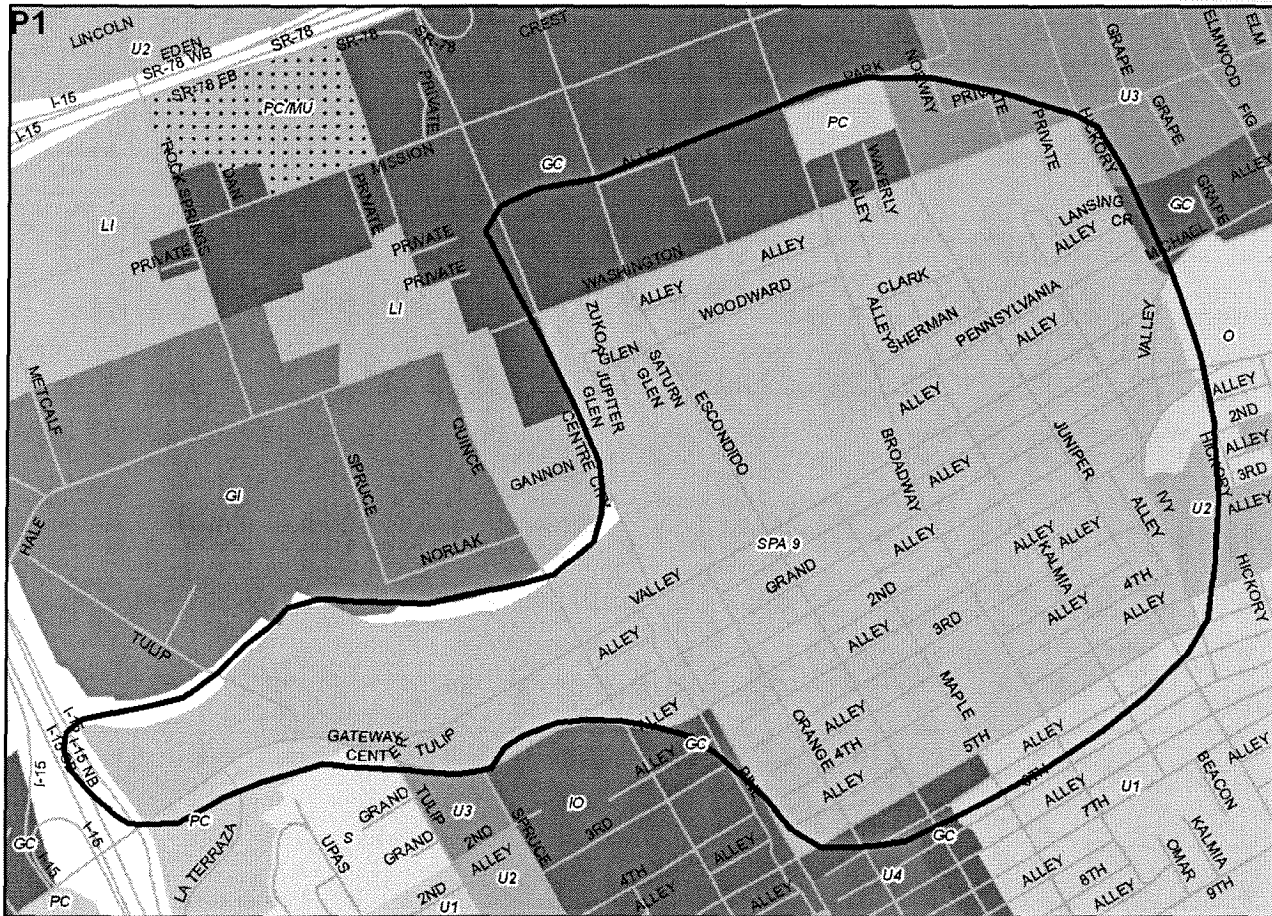
AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
PN4/SG-6 South Escondido Blvd. (southern portion)	35	General Commercial Urban III	Smart Growth Mixed Use Area Population Node	<p>Goal Addressed: Expand /intensify Mixed-Use opportunities</p> <p>Land Assemblage Opportunity: Marginal</p> <p>Transit Convenient: Yes</p> <p>Pedestrian Oriented: Yes</p> <p>Proximity to Water & Sewer: Yes</p> <p>Proximity to I-15: Access at Ninth and I-15</p> <p>Development Status: Primarily Developed</p> <p>Surrounding Land Uses: <i>North:</i> Commercial <i>South:</i> Commercial <i>East:</i> Single family residential (Old Escondido Neighborhood) <i>West:</i> Single family and higher density residential</p> <p>Environmental Considerations: Noise, traffic, character</p> <p>Comments: Area is a gateway into the community. Primarily developed with small scale retail uses and a mixed-use project. Area is level; sewer requires pumping to HARRF, water, and utilities currently serve the area.</p>
		Recommended Action		
		Further analyze as a tertiary node for Mixed-Use Retail / Office / Residential node based on proximity to services and gateway location. This area should be a receptor for future population growth.		

ATTACHMENT 17



AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
SG-7 Westfield Mall	80	Planned Commercial	Smart Growth Mixed Use Area	Goal Addressed: Expand /intensify Mixed Use opportunities Land Assemblage Opportunity: Yes Transit Convenient: Yes Pedestrian Oriented: No Proximity to Water & Sewer: Yes Proximity to I-15: Accessed at I-15 Via Rancho Parkway Development Status: Developed Surrounding Land Uses: <i>North:</i> Kit Carson park <i>South:</i> Commercial and Open Space <i>East:</i> Residential and Golf Course <i>West:</i> I-15 and Commercial Environmental Considerations: Noise, traffic, Comments: Area is level; sewer requires pumping to HARRF, water, and utilities currently serve the area. Rapid Transit Bus Line uses this area, future rail stop proposed from transit center.
		Recommended Action		
		Eliminate from further study based on intent to focus residential and employment development in the downtown and urban core. A residential component could limit more desirable redevelopment opportunities in the future that would benefit by the site's highly visible location, proximity to I-15, and large single land use under limited ownerships.		

ATTACHMENT 18



AREA	Approx. Acres	Current GP Designation(s)	Proposed GP Designation(s)	Comments / Analysis
PN1/SG-1 Downtown Specific Plan	450	SPA	Smart Growth Mixed Use Area Population Node	Goal Addressed: Expand /intensify Mixed Use opportunities Land Assemblage Opportunity: Yes Transit Convenient: Yes Pedestrian Oriented: Yes Proximity to Water & Sewer: Yes Proximity to I-15: Accessed at I-15 and West Valley Parkway Development Status: Primarily Developed Surrounding Land Uses: <i>North:</i> Commercial <i>South:</i> Commercial and residential, <i>East:</i> Residential, Commercial and Office <i>West:</i> Industrial Environmental Considerations: Noise, traffic, historic, Comments: Downtown establishes several districts that focus land uses. Primarily developed with small and mid-size business establishments. Area is level; sewer gravity flows to HARRF, water, and utilities currently serve the area. Area is served by NCTD Transit Station and Rapid Transit Bus Line.
		Recommended Action		
		Further analyze as a primary node for Mixed-Use Retail / Office / Residential node. Expand SPA boundary to include all of the Mercado area, areas north of Washington Avenue, south of Fifth Avenue and east of Palomar Hospital consistent with Interim Downtown Specific Plan. Consider this area as the primary receptor for additional population growth and focus it around an expanded Grape Day Park.		

**LOUNSBERY FERGUSON
ALTONA & PEAK LLP**

ATTORNEYS AT LAW

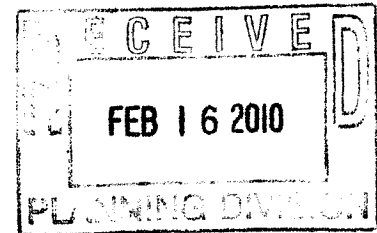
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OF COUNSEL:
GARTH O. REID

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JOHN W. WITT

February 10, 2010

Jay Petrek, Senior Planner
City of Escondido Planning Department
201 N. Broadway
Escondido, CA 92025



Jonathan Brindle, AICP
Planning Director
Escondido Planning Department
201 North Broadway
Escondido, CA 92025

Re: Escondido General Plan Update
Smart Growth and Economic Development Opportunity Area

Dear Messrs. Petrek and Brindle:

This firm represents Apartment Investment and Management Company (AIMCO) with respect to its two properties in Escondido, Hidden Cove I at 910 Del Dios Hwy and Hidden Cove II at 1575 Tanglewood Lane (previously "The Acres").

AIMCO proposes that the triangular area bounded by Eleventh Avenue on the south, Valley Parkway on the west, and I-15 on the east (see attached map) be evaluated as a Smart Growth Opportunity Area and as an area for future economic development as part of Escondido's General Plan Update.

AIMCO believes that the existing combination of high density housing, intense commercial activity, and convenient transportation in this area (hereinafter referred to as the "Ninth Avenue Triangle") meets the criteria for designation as a "Smart Growth" areas. AIMCO also believes its proposal is consistent with the recommendation of Citizens Issue Committee that the I-15 corridor be studied for Smart Growth and economic development opportunities,

Jay Petrek, Senior Planner

Jonathan Brindle, AICP

February 10, 2010

Page 2

NINTH AVENUE TRIANGLE DESCRIPTION:

Since the completion of I-15, the past two decades have seen the transformation of the Triangle from low density residential to a transitional area in which there is intense commercial in the north and east, intense residential along Ninth Avenue, and lower density residential in the south.

Residential Component

Within the Triangle there are now approximately 979 residential units, including apartments, condominiums, mobile home park spaces and single family units.

The Hidden Cove properties are improved with apartment buildings, offering one-bedroom and two-bedroom units:

	<u>Hidden Cove I</u>	<u>Hidden Cove II</u>
Parcel Number:	235-090-40-00	235-090-38-00
Address:	910 Del Dios Hwy	1575 Tanglewood Lane
Acreage:	8.24	13.79
Zoning:	PD-R 22	PD-R 11.5
Land Use:	Multi-family Residential 334 units 26, 2-story buildings	Multi-family Residential 118 units 15, 2-story buildings
General Plan:	U4	U2
Zoning Code:—	Heavy Multiple Residential (R-4)	Light Multiple Residential (R-2)
Special District:	Felicita/ Tier 2 A	Felicita/ Tier 2A
Existing Density:	22 dwelling units/ acre	11.5 dwelling units/ acre
Allowed Density:	24 dwelling units/ acre	12 dwelling units/ acre
Restrictions:	Residential	Residential

The residential densities of the Hidden Cove properties are mirrored in the other projects along Ninth Avenue from Del Dios Road to Valley Parkway, including Archstone Apartments (approximately 264 one and two bedroom units)¹ and The Nines Town Homes (22 two bedroom townhomes).

South of Ninth Avenue to Eleventh is a mixture of condominiums, apartments and single family dwellings, including Ponderosa Mobilehome Park (104 spaces); the Diamond Pointe Apartments (23 three bedroom units); Jackson Pendo town home condominiums (42 units); Pepper Tree

¹ The City of Escondido has approved a 264 unit condominium-conversion for this property by Archstone-Smith (Tract 913).

Jay Petrek, Senior Planner
Jonathan Brindle, AICP
February 10, 2010
Page 3

Luxury Apartments (28 two and three bedroom units)²; and, approximately a dozen single-family homes. South of Ninth Avenue, there are also a number of vacant lots.

On Tanglewood Lane, east of Hidden Coves II, there is a condominium complex (Camden Cove with 24 two-bedroom units) and single-family homes. All residential units are within walking distance of Del Dios Middle School and the commercial, retail and employment centers north of Ninth Avenue.

Commercial Component

Within the Triangle there are now approximately 25 retail and wholesale trade businesses, including Target, Toys R Us, and the new Lexus dealership; and, 23 service businesses, including food, telecommunications, financial, medical, and beauty salons. As evidenced by the recent opening of the Lexus dealership on Ninth, the commercial transformation of the Triangle is ongoing. Immediately adjacent to the west are additional businesses, including Home Depot, Albertsons, Staples and the Sports Authority.

The existing mixture of commercial, high-density residential and transit corridors make the Ninth Avenue Triangle ideal for Smart Growth and mixed-use opportunities. Recent development trends suggest that commercial development should be encouraged along the Ninth Avenue frontage while residential density is increased between Ninth Avenue and Eleventh Avenue. Further, consideration should be given to linking the three major dealerships in the southern portion of the Triangle with the existing Auto Park on the northern boundary of the Triangle.

SAN DIEGO ASSOCIATION OF GOVERNMENTS ("SANDAG") SMART GROWTH AREAS:

The San Diego Regional Comprehensive Plan identifies seven categories of Smart Growth and establishes land use and transportation targets for each of these areas.

² The City of Escondido has approved a 28 unit condominium-conversion for this property by Stu Wilson (Tract 945).

Jay Petrek, Senior Planner
Jonathan Brindle, AICP
February 10, 2010
Page 4

Land Use and Transportation Targets:

<u>Smart Growth</u> <u>Place Type</u>	<u>Minimum</u> <u>Residential</u> <u>Target</u>	<u>Minimum</u> <u>Employment</u> <u>Target</u>	<u>Minimum Transit Service</u> <u>Characteristics</u> ³
1. Metropolitan Center	75 du/ac	80 emp/ac	Regional Services
2. Urban Center	40 du/ac	50 emp/ac	Light Rail/ Rapid Bus
3. Town Center	20 du/ac	30 emp/ac	Light Rail/ Rapid Bus*
4. Community Center	20 du/ac	N/A	High Frequency Local Bus
5. Rural Village	10.9 du/ac	N/A	N/A
6. Special Use Center	Optional	45 emp/ac	Light Rail/ Rapid Bus
7. Mixed-Use Transit Corridor	25 du/ac	N/A	High Frequency Local Bus

SANDAG has designated eight Smart Growth Areas in Escondido (see attached map). Three are “existing” and five are “potential” as they require a change in land use. The three existing Smart Growth Areas are: (1) Town Center planned for the Valley Parkway at the Escondido Transit Center; (2) Mixed-use transit corridor planned for the Mission Road area, east of I-15; (3) Special use center planned for the Nordahl Sprinter Station at the southwest corner of Mission Avenue and Nordahl Road, west of I-15.

The five potential Smart Growth Areas include: (1) a Mixed-Use Transit Corridor along East Valley Parkway; (2) a Mixed-Use Transit Corridor along south Escondido Boulevard; (3) a Community Center around Felicita Avenue and Center City Parkway; (4) a Community Center around Citracado Parkway and Center City Parkway; and, (5) a Community Center around North County Fair.

Ninth Avenue Triangle Qualifications

The Triangle currently meets the housing density, employment targets and transit service thresholds necessary to be designated as an “existing” Town Center Smart Growth Area.

³ Regional = Designed for longer distance trips with stations spacing every 4-5 miles on average (e.g., commuter rail such as the Coaster, future freeway-based Bus Rapid Transit (BRT) routes).

Light Rail/ Rapid Transit = Designed for medium distance trips with station spacing about every mile on average (e.g., Trolley and Sprinter services, future arterial based “rapid transit” routes)

Light Rail/ Rapid Transit* = In Town Centers, areas can be connected to light rail and rapid bus services by a five minute local transit connection or shuttle service.

High Frequency Local Bus = Designed for shorter-distance trips with frequent stops (e.g. current local bus services)

Jay Petrek, Senior Planner
Jonathan Brindle, AICP
February 10, 2010
Page 5

The Triangle is served by a bus stop on West Valley Parkway and Ninth Avenue, with service by a bus that stops at least once an hour going eastbound (to Escondido Transit Center) and going westbound (to Solana Beach). This bus does not transfer directly to the Sprinter (a light rail system that travels east-west along highway 78) but does stop/ start at stations that do transfer to the Sprinter and stops at the Escondido Transit Center (1.4 miles or 4 minutes away). In addition, there is another bus stop just outside of the Triangle at Auto Parkway and Hale Avenue. This bus also stops once an hour heading westbound to Palomar College Transit Center and eastbound to the Escondido Transit Center. This bus stops at Nordahl road and the Sprinter Station at California State University San Marcos.

Given the proximity of the bus stop on West Valley Parkway to a connection to the Sprinter, the Triangle currently meets the criteria for Light Rail/ Rapid Transit, required for a Town Center Smart Growth Area.

With appropriate land use changes as part of the Escondido General Plan update, the area could also qualify for several of the other place types, such as Urban Center, Town Center, Special Use Center or Mixed Use Transit Corridor.

Hidden Cove Properties Qualifications

Hidden Coves I has a General Plan designation of U4 which allows up to 24 dwelling units per acre; Hidden Coves II has a General Plan designation of U2 allowing a maximum density of 12 du/ acre. Increasing the density of these properties is appropriate since they are along transit routes, adjacent to major and secondary thoroughfares, and near a school, shopping centers, entertainment areas and employment centers.

As currently zoned, The Hidden Cove properties do not meet the SANDAG employment targets. However, the Properties will support commercial or office uses along their Ninth Avenue frontage. If the land use is changed to mixed use, allowing commercial and office use on the Ninth Avenue frontage, the minimum employment targets would be independently attainable.

The Hidden Cove Properties are most closely served by the bus stop on West Valley Parkway and Ninth Avenue, and therefore include fixed-route local bus services and otherwise meet the definition for "High Frequency Local Bus", which does not require a specific number of buses or bus stops.

CONCLUSION

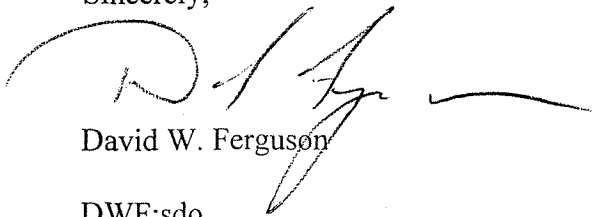
Except for the Nordahl Sprinter Station, all of the currently designated Smart Growth Areas in Escondido are east of I-15. Inclusion of the Ninth Avenue Triangle would provide a Smart Growth area in the critical I-15 corridor.

Jay Petrek, Senior Planner
Jonathan Brindle, AICP
February 10, 2010
Page 6

The designation would recognize, and take advantage of, the land use transition that has been naturally occurring in the Triangle for the past 20 years and which has already placed residences, schools, retail business, employment centers and transportation facilities within walking distance of each other. Further, the designation would promote the consolidation of the commercial growth west and north of Valley Parkway with the new commercial nexus at the intersection of Ninth and I-15. Finally, the designation would be compatible with surrounding residential and commercial land uses west of Valley Parkway and residential land uses south of Eleventh Avenue.

Thank you for your consideration of this proposal. Please feel free to contact me if you have any questions or desire further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. W. Ferguson', with a long horizontal flourish extending to the right.

David W. Ferguson

DWF:sdo
Enclosures

Ninth Avenue Triangle



Existing Escondido Smart Growth Areas





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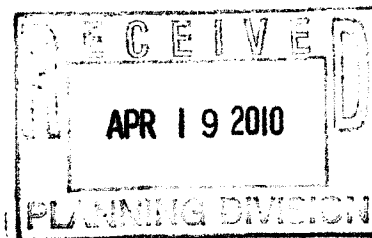
ASSOCIATED COUNSEL:
OMAR T. PASSONS

WRITER'S EMAIL:
KSULLIVAN@PSHLAWYERS.COM

April 16, 2010

Via Email (jpetrete@escondido.org) and Regular Mail

Mr. Jay Petrek
Senior Planner
City of Escondido
Planning Division
City Hall, First Floor
201 North Broadway
Escondido, CA 92025



Re: General Plan Amendment Request; 7-Acre Property Located At The Northeast Corner Of Miller Avenue and Citricado Parkway.

Dear Mr. Petrek:

Our firm represent the Butler Family Trust ("Trust") regarding its approximately 7-acre real property located at the northeast corner of Miller Avenue and Citricado Parkway (APNs 236-360-15 and 236-360-32)(the "Property.") This letter requests that the City of Escondido include a General Plan Amendment request regarding the Property as part of the City's pending General Plan Update process and related studies.

The Property currently has a General Plan designation of Suburban.

As part of its pending General Plan Update, the Trust requests that the City study an amendment to the General Plan designation for the Property from Suburban to Planned Commercial. The Trust would seek ultimately to develop a Planned Commercial (or some comparable revised/new General Plan category) use on the Property that would allow both (a) commercial and/or medical offices on the first 2 or so floors of a building, and (b) workforce housing on the top 1 or 2 floors of the building.

Considering that the new Palomar Pomerado Hospital will soon be operational on the western end of Citricado Parkway, and an extension to Citricado Parkway is planned to link the Property to the Hospital, the mixed commercial office/medical office and workforce housing uses would be consistent with the future land uses to be developed along portions of that main road.

The requested consideration and study of such a General Plan Amendment (to Planned Commercial) for the Property would further the City's policy of creating new employment lands within Escondido. The Property is well-suited for such an employment land use given its



April 16, 2010

Page 2

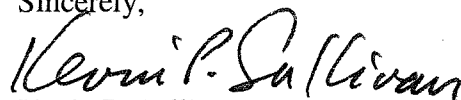
location at the interchange of I-15 and Citricado Parkway. The new General Plan designation for the Property would also fill a need to provide workforce housing proximate to the residents' workplaces.

Alternatively, if the Planned Commercial designation with mixed commercial office/medical office and workforce housing uses is not seen as appropriate for the area, then the Trust requests that the City study a General Plan Amendment for the Property from Suburban to Commercial Office. Such a change would also further the City's policy to create new employment lands in Escondido.

The Trust asks that this letter be presented to the City Council at its upcoming meeting regarding the General Plan Update. The Trust also asks that the City include the requested General Plan Amendments for the Property -- to either Planned Commercial or Commercial Office -- as part of the studies and analyses to be performed relating to the City's General Plan Update.

Thank you for your consideration of this letter. Please contact me if you have any questions about this matter.

Sincerely,


Kevin P. Sullivan, Partner

Copy: Mr. Gary Lockard (via email)