



Bill Martin, AICP
Director of Community Development
Planning Division
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4671 Fax: 760-839-4313

November 30, 2016

Jason Han
New Urban West, Inc.
16935 W. Bernardo Drive, Ste. 260
San Diego, CA 92127

RE: Proposed Villages Specific Plan – SUB 16-0009

Dear Mr. Han:

The Planning Division has reviewed the information you provided in your submitted application and have determined the application to be incomplete. The following items must be submitted to expand/clarify your request and/or provide information necessary to analyze the impacts of the proposed project. Please contact the Planning Division to determine which items are necessary for the application to be determined complete.

A. Code Enforcement

The intent of the code enforcement process is to protect our community's environment, character, and property values. It is recognized that on occasion property owners may unknowingly violate code by taking prohibited actions, creating certain nuisances, or failing to apply for proper permits. Through this entitlement process, the Code Enforcement Division will work with the applicants and the property owner to resolve outstanding code enforcement issues and assist in achieving their resolution. Please contact the Code Enforcement Division and be prepared to submit a Code Enforcement Schedule to resolve any outstanding code enforcement violations. The Code Enforcement Schedule should document all previously documented violations (within the past calendar year); their current status (i.e. open or closed); and, if applicable, the next steps towards voluntary compliance.

B. General Comments on the Villages Proposal

1. Staff has reviewed the proposal and have the following suggestions.
 - a) Mix of Uses: Staff suggests increasing the mix and location of neighborhood serving uses (small markets, coffee shop, etc). Included in this suggestion is

expanding the uses of the farmers market to a small market (not just fruits and vegetables).

- b) Increasing road network connections: If feasible, please provide additional road connections to the north. This would benefit traffic distribution and increase the road capabilities.
2. Provide colored photos of entire site, structures, and adjoining properties.
 3. City staff is in receipt of the draft Geotechnical Report, Phase 1 Assessment, and Transportation Impact Analysis. The acceptability of these environmental technical studies will be discussed in greater detail as the project progresses. Some preliminary comments on the Transportation Impact Analysis is provided as Attachment 4.
 4. Please prepare a Draft Initial Study (IS) which will determine the potentially significant resource areas, which supporting technical analysis may be necessary and, importantly, which resource areas can be determined to be less than significant with no further analysis necessary. Prior to reviewing the Draft IS, staff has determined the following additional technical studies are required for incorporation into the EIR:
 - Greenhouse Gas Analysis
 - Air Quality Impact Analysis
 - Cultural Resources Report
 - Biological Technical Report
 - Noise Impact Analysis
 - Visual Impact Report including photo-simulations
 - Storm Water Management Plan
 - Preliminary Drainage Study/Hydro-Modification Plan*
 - A complete on and offsite drainage analysis should be submitted with project application to determine the extent of on and offsite drainage improvements required for the project.

**Please note that the Drainage Study and Hydro-Modification Plan will be reviewed when there is a complete application showing an acceptable level of street improvements.*

5. Proposed General Plan Amendment (GPA) Written Findings:
 - a) Provide draft language and exhibits for any text and/or map changes proposed by the General Plan Amendment.
 - b) The written findings should explain that despite the previous and existing land use condition of the golf course, the General Plan designation is not “open space” or

“recreation” but has a residential land use designation that would yield XX amount of housing.

6. Provide an Integrated Agricultural Operations Plan, or similar program, that addresses the imposition of conditions and/or safeguards of the ag-site to protect the health and safety of surrounding residents. The plan must detail the process for application, review and administration of interim or recurring special uses, and the process to suspend authority to operate. The purpose of this program will be to establish regulations for agricultural operations, ag-related transport to the farm-to-fork restaurant, onsite or offsite consumption, and/or sale of urban agricultural products in accordance with all local, state, federal laws.
7. Comments from the Department of Transportation and Department of Fish and Game are enclosed and incorporated with this reference, as Attachments 2 and 3.

C. Tentative Map (TM)

1. Cover page: Insert the requisite project data on the cover sheet: Total acreage, average density, and minimum lot size by village.
2. Remove the title “Vesting” from the TM.
3. Cover page: Provide a list of all proposed deviations from adopted city standards, including a list of streets, the number of total lots by village that fall below 7,000 square feet, and any others project features that are not easily discernable.
4. Cover page: Break down the lot tabulation to differentiate between active and passive open space and/or recreational areas. Demonstrate that the parkland available matches or exceeds the General Plan’s level of service.
5. Provide lettered open space lots for all encroachment parcels intended to be conveyed to neighboring property owners.
6. Show proposed offsite improvements.
7. Guest parking could be an issue for areas where units are concentrated. Please provide a parking exhibit or other information to show adequate parking management of the project site.

8. The Villages proposal consists of both detached and attached housing units. All assembled 6-pac housing units are proposed in Village 3 (13 total 6-pacs, resulting in 78 new attached housing units). The proposed specific plan discusses a need to assimilate transitions through open space buffering and design contexts. Efforts should be made to consider the placement and integration of future housing to respond to the unique built environment and as-built residential scale.
 - a) Based on the as-built analysis provided in Figure 2-5 of the proposed specific plan (on page 25), neighboring residential communities are predominately detached single family housing units, excepting:
 - Fairway Park (adjacent to the country club house in Village 1);
 - Cortez Glen (removed from Village 3);
 - Golden Circle Drive (adjacent to the north side of Village 1);
 - Avenida de Aquacate (removed from the north side of Village 2), and
 - Lark Glen (dividing the eastern portion of Village 2).
 - b) It is important to note that none of the neighboring duplex communities are immediately adjacent to Village 3, where the new 6-pac housing units are proposed. Design context sensitive transitions in some areas may be needed to supplement the zoning standards and/or the assortment of potential housing prototypes may have to be reconsidered.
9. Drainage and stormwater-related comments:
 - a) A portion of the project site and downstream area is currently located within FEMA designated flood plain. The drainage study and EIR should include an evaluation of project impact on the flood plain and the need for revision to the existing Flood Insurance Rate Map.
 - b) Sheet 3: Sections A-A, B-B, and D-D appear to show that existing storm water flows across the property will be directed into channels represented in these cross-sections. It is not clear how the flows would be mitigated, or even how soil in these channels would be stabilized.
 - c) Define the gradient along these channels and identify if there is sufficient retention time to provide treatment.
 - d) Sheet 10: Does the east side of "N" Street get treated before it goes into Nutmeg?
 - e) Sheet 11: How does the north end of "M" Street get treated?
 - f) Sheet 11: How does the maintenance road (also presented in Section E-E) get treated?
 - g) Does HOA Basin Lot B-8 treat offsite flows from La Brea?

- h) The application does not appear to provide mitigation for existing storm water flows within the Upper San Marcos Creek watershed to address downstream issues relating to the San Marcos Lake. Please contact the Environmental Programs Division for more information.

10. Fire-related comments:

- a) Provide a note on the TM stating fire access roadways shall be rated to 75,000 lbs.
- b) Emergency access roadways shall be a minimum of 24 feet in width.
- c) Show all emergency access gates on the plans.
- d) Provide a note on the TM stating emergency access gate that are automatic shall have Knox Switches and Opticom Receivers, manual gates shall have either a Knox padlock or Knox Box.
- e) Show fire hydrant locations on the TM.

11. Traffic and Engineering-related comments:

- a) A number of interior streets do not meet Design Standards with request for design exemption. In order for Engineering to consider the exemptions, an exhibit should be prepared and submitted with TM indicating traffic safety signing and striping features proposed to provide adequate sight distance by parking restriction and proper signing and striping to alert the drivers. The exhibit will become a part of TM for EIR. Design exception will be considered for interior cul-de-sac streets only. Street "A" approaching Country Club lane, Street "K" approaching Country Club lane and Street "N" approaching La Brea St. should be redesigned to meet standards.
- b) Provide through access to Golden Circle Drive from the proposed cul-de-sacs on Street "C" and consider the functionality of "K" Street and whether this is an efficient use of project-related space.
- c) Project streets design do not include traffic calming measures. Intersections at A/B Streets and Gary Lane/B Street need to have horizontal deflections to increase pedestrian and bicyclist access and safety. Others may be necessary depending on the desired community character context, functionality, and/or additional comments from the City's Traffic Engineer.
- d) A signing and striping plan for the project including all stop control intersections and traffic calming measures should be submitted with the complete application. The plan should evaluate adequacy of street parking for the project.
- e) Sheet 10: Include frontage improvements on Nutmeg St. All other sheets lack design detail related to Grading and Street improvements.

- f) Rolled curb is only allowed on private streets.
- g) A revised TIA should be submitted for our review with the complete application. Attached is the City's initial comments related to TIA. In addition to attached comments we need clarification on use of Series 11 versus Series 12 SANDAG model. Initial conversations with the City were to use Series 11.

12. Utilities-related comments:

- a) Show all manholes on the TM and provide Rim/Inv. elevations. Also show direction of sewer flows.
- b) Sheet 2: Show/identify water district boundaries.
- c) Sheet 3: Sections A-A needs to show the location of the waterline. Provide easement for waterline purposes.
- d) Sheet 4: For each section, please list all applicable streets or identify on plans. A cross section is provided for private drives, but private streets are not.

D. Specific Plan Document

CHAPTER 1

1. Vision Statement and Objectives:

Policy, objectives, and other intent statements should be provided on the front end of this chapter, following a brief introduction and/or introductory plan information. The following comments will help outline the organization of this section.

- a) City officials and administrators will use these goals, policies, and objectives in this section to evaluate and make decisions about city facilities and services. Therefore it is important to have the document be self-implementing.
 - It is important to have a clear policy framework (i.e. themes) so there is opportunity to create a vision that can be created and maintained to reflect commonly-shared priorities. This effort can systematically lead the discussion provided in the *planning principles* section (on page 31) or the *benefits* section(s) on pages 7 and 16.
- b) Consider the relationship of this vision framework to the Escondido General Plan.
 - The themes should cover information to the topics covered by the General Plan. This is separate from the written analysis in Chapter 6.

- c) Policies should be written to consider how the project will be implemented and if there are specific limitations. Explain the relationship between the policies and the standards and regulations.
 - The specific plan must address policies and standards for parks and recreational facilities. Any required fee or dedication must be consistent with these policies and standards pursuant to Government Code Section 66477 (otherwise known as the Quimby Act). The amount and location of land to be dedicated or the fees to be paid shall bear a reasonable relationship to the use of the park and recreational facilities by the future residents.
- d) The proposed specific plan's *planning framework* (page 31 et. seq.) provides principles or specific plan tenets to demonstrate how the new development would fit into the existing community. These themes should fall in line with Chapter 1's policy, objectives, and other intent statements. Central themes provide a good starting point to evaluate changes and improvements of the ECC, on which the rest of the proposed specific plan can build. Add a statement of how the plan's vision framework applies to the plan's regulatory application.

2. Plan Benefits:

- a) It may be helpful to organize the *benefits* section(s) on pages 7 and 16 by theme (i.e. goals and policies) or the vision framework to connect the vision to the proposed return on investment.
- b) In accordance with Land Use Policy 11.4 of the Escondido General Plan, a community benefit must be demonstrated in order to proceed forward with specific plan adoption. Although this has been addressed in the first submittal, additional detail and/or information is needed to understand the actual derived benefit.
- c) "Age-targeted homes for seniors" is listed as a plan benefit on page 7; however, it is unclear how this will be achieved. As a result, some sections of the site plan may have to feature single-story homes and/or promote universal access design treatments. It is acknowledged that senior housing does not actual *need* to be single-story, but there needs to be a greater effort to consider the livability of these designated housing units.
- d) "Providing a selection of housing types" on page 7 confers a standard that future housing will supplement the standards of the specific plan. A section of the proposed specific plan provides for only three housing prototypes, as well as assembled 6-pac housing units. The underlying, existing land use designation of the General Plan calls for a range of housing types and designs consistent with existing forms and patterns where appropriate. For this reason, a larger assortment of potential housing prototypes that are compatible with existing

development may be needed to advance these principles. Alternative compliance with this requirement may be utilized, if justified.

- e) Fiscal analysis should be provided (in a separate document) to verify the numbers utilized in the *financial benefit* section on page 18. A separate Stabilized Fiscal Impact study is not needed at this time.

CHAPTER 2

- 3. Figure 2-5 on page 26 should be revised to include more information about the scale of surrounding housing units (i.e. the number of stories). This will help, in part, to identify context sensitive areas.

CHAPTER 3

- 4. Development and Use Regulations:

Section 65451 of the Government Code mandates that specific plans consist of 1) the distribution, location, and extent of the uses of land; and 2) standards and criteria by which development will proceed. Although this statutory requirement has been referenced in the proposed planning document, a stronger regulatory framework needs to be added to carry out the plan and guide future development. This will also help create rules and design standards for future projects so that the community can be confident that they will fit in with existing neighborhoods.

- a) The specific plan must provide proposed development standards for all uses of land, not just residential components. Determine to what extent there will be restrictions to development or uses under the specific plan proposal, and where uses and activities will be established based on existing local ordinances and code provisions.
- b) A specific plan adopted by ordinance will be implemented by regulations and measures contained in the plan itself. The specific plan for the ECC will be adopted by ordinance. Since the plan must be regulatory by design, the plan's standards and regulations must promote the General Plan's statement of development policies. Please add a discussion of the relationship between the vision framework and how they will be implemented through future projects.
- c) Zoning laws or standards define how a property may be used and developed. It regulates where a building may be placed on a lot, building size and height, as well as parking and open space requirements. It is acknowledged that current zoning regulations for the City of Escondido are not equipped to permit the type of

housing, transitional open space buffer, and mix of uses proposed in the draft specific plan for the ECC. New development standards are necessary to allow the development and types of use standards that accommodate the proposed application. Accordingly, please add the following development and/or land use regulations to Chapter 3. (Additional diagrams and/or descriptions may also be necessary to show the distribution of potential restrictions for land use categories established by the proposed specific plan.)

- Non-residential site (country club, etc.):
 - Site, such as building coverage.
 - Building placement, such as setbacks or build to range. Must also address the placement of parking provisions.
 - Building height and mass, such as total height and step-backs or articulation.
 - Building frontage, such as pedestrian access points and other required building elements including signage.
 - Measurements and exceptions, such as auxiliary structures.
 - Classifications of uses, supplemental uses, temporary use standards, and a permitted use table. This will include the restaurant, farm stand, and open space and recreational areas.
 - Parking requirements.
 - Landscaping requirements for the site and parking area.
 - Fences and walls.
 - Performance standards (such as noise, lighting, special use, and agricultural operations).
- Residential site (three unique villages):
 - Development standards for homeowner installed improvements, where permitted (i.e. room additions, accessory units, patio covers, gazebos, outdoor fireplaces, pools/spas, etc.)
 - Side entry standards for Lots 44, 203, and 210
 - Measurements and exceptions.
 - Classifications of uses, supplemental uses, temporary use standards, and a permitted use table.
 - Accessory units.
 - Fences and walls.
 - Performance standards.
- Alternatively, sections of the Escondido Zoning Code could apply in-lieu of any new specific plan standard or regulation by stipulating that “*if any criterion, measure or standard is not addressed, the Municipal and Zoning Codes are made applicable by this reference.*”

CHAPTER 4

5. Landscaping design standards:

- a) Buildings and landscapes that convey a sense of scale is something that will be important for this project in key areas, where project design needs to be sensitive to the surrounding environment. Provide the proposed landscape concept map described in the proposed specific plan, which covers all HOA maintained areas. On the landscaping plan, please provide a reference to an *Integrated Agricultural Operations Plan* to separately address the shared common space for the community garden and farm stand.
- b) Employ hydrozoning techniques when feasible, to reduce the amount of irrigation needed. Locate drought-tolerant species further away from plants that require heavier irrigation so that they are not overwatered.
- c) Use a coordinated landscape palette to establish a sense of visual continuity in the design of a site. This applies throughout the property and offsite improvement areas, potentially. Coordinate plant selections with those already established on abutting properties.

6. Residential lot and design placement:

The way in which windows, doors, garage doors, and details give a sense of a building's size and presence to the street. Each detached single-family housing unit should be positioned in a way that creates a well-defined street frontage and conveys a sense of scale. Repeated garage door design often associated with a tract development.

7. General architecture design standards:

- a) There is a dynamic relationship among the design variables that are addressed in this section. Some images are provided on pages 59, 60, and 61 to convey the desired architecture for the three villages. It is unclear if these images will become a statement of policy for subsequent, systematic implementation. Additional detail may be needed.
- b) In nearly all cases, front-entry living is the prominent feature of the selected images (pages 59 to 61). The three prototypes show heavy use of front' garage entry.
- c) The proposed specific plan suggests that there will be 81 permutations of floor plans, elevation, and color scheme; however, it is unclear how this will be achieved or implemented through phased development.
- d) Provide architectural design standards for non-residential components.

- e) Scale and massing: Identify in each village where building mass and scale will be reduced through variation in height of the architectural elements. Provide single-story elements or prototype to respond to highly sensitive areas.
8. Clubhouse design standards:
- a) The proposed club house and restaurant should have a sequence of spaces that leads from the public realm, then transitions into a “semi-public” area and then ends with the private building entry. This progression may be rather extended, and include a sidewalk area and then a courtyard or patio, with a walkway that leads to a building entrance.
 - b) Orient the primary entrance of the clubhouse and restaurant to building to face a primary street, an active plaza or pedestrian way. When facing a secondary street, enhance the character of that street and
 - c) Parking is needed to be adjacent to the street. The visual impacts of parking within the development should be minimized and be buffered from public ways in order to promote a walkable neighborhood. Provide a visual buffer where a parking lot abuts a public sidewalk, path, or street. Note that “buffering” does not mean fully screening the parking, but it does require creating a visual “filter” that softens the view of parked cars. A low site wall or art may be used as a buffer in combination with landscaping. The materials should be compatible with those of the building and feature artistic design elements to the extent feasible.
 - d) Provide bike parking and other provisions; and design it to be integral to the site and to be safe, accessible, and easy to use.
9. Trail system design standards:
- a) Provide trail standards. Provide shade, seating, public art and water fountains to promote their use. Use furnishings that accommodate the needs and abilities of all ages.
10. Open space design standards:
- a) Design open space to be a positive asset to the project. Orient balconies, decks and windows to the open space. Coordinate hardscape materials with building materials.
 - b) Provide a list of uses for open space to guide future HOA.

11. Walls and fences:

- a) Provide a more descriptive wall and fencing plan and standards for the three villages. Use high quality materials such as brick and stone that corresponds to the intended aesthetic of the associated village. Its materials should be compatible with those of the building and feature artistic design elements to the extent feasible.
- b) Provide details for all proposed walls associated with grading. Retaining walls should be terraced to minimize their visual impacts. Landscaping should be incorporated to enhance the design of sloping sites.
- c) Clarify if there will be walls and fences around all community/amenity facilities (i.e. there is no wall around one of the tot lots) and if there will be solid walls used to help reduce the physical and visual impact of some used spaces (i.e. surrounding neighborhood adjacent to the clubhouse).
- d) Annotate that all dog parks will be to be in an enclosed space with transitional access control, if needed.

12. Lighting:

- a) Provide a community lighting plan and light standards that is sensitive to the existing condition of the “night skies” or legacy light ambiance of the golf course setting.
- b) Design lighting to be pedestrian-scaled. Fixtures shall be shielded to minimize light pollution of nighttime skies.

13. Park design standards:

- a) Provide a park amenity plan, which identifies conceptual park designs. Although it is noted elsewhere in the document, this section should similarly describe which facilities are designed for public use (i.e. the passive parkland, the trails, and the parks located along walking trails) and which provisions are intended to be for the residents and/or available to any paid membership.

14. Sign design standards:

- a) Provide for a community sign plan and sign standards for parks and gateway locations where a monument sign is desired.
- b) Provide sign design standards for non-residential components.
- c) Sign fixtures shall be designed to minimize light pollution of nighttime skies.

15. General design standards comment:

- a) There should be some discussion or added statement of how the plan's design standards accomplish or achieves the vision framework. This would apply to open space standards, recreational space standards, park standards, circulation and mobility (i.e. roadway standards).

CHAPTER 5

16. Processing overview section:

- a) List any and all financing measures necessary for implementation of each of the plan's proposals and other capital improvements. List and describe all projects and cost estimates, and the measures in which each specific plan proposal will be financed. Scenario based planning may be necessary for some of the amenities. In this section, it will be necessary to discuss the operation of the farm and farm stand.
- b) Identify the phasing of the specific plan proposal, including capital improvements. (Certain public amenities and infrastructure should be included in earlier phases of the project.
- c) The Specific Alignment Plan must be submitted and reviewed prior to being deemed complete.
- d) Discuss whether the proposed specific plan directly imposes exactions in association with the General Plan's capital improvement policies.
- e) Any Specific Plan amendment shall be amended in the same manner as it was created. The proposed specific plan states on page 68 that some amendments may be processed as administrative. Please revise to state that "*the enactment and subsequent amendment of this specific plan is a legislative act subject to Government Code Sections 65453 and 65353.*" Include allowance for administrative adjustments, granting Director the authority to modify standards by up to 25 percent if the intent of the specific plan has been met or exceeded in an alternative way.

CHAPTER 6

17. General Plan conformance:

- a) Government Code Section 65464 provides general guidance for the conformance and consistency requirement – suggestions for style, organization, and format are

derived from best practices and/or other local agencies. This section will have to be revised in order to demonstrate that it is furthering the objectives and policies of the General Plan and not obstructing their obtainment.

- b) In accordance with State law, a specific plan may not be adopted or amended unless the proposal is consistent with the local agency's General Plan. Furthermore, Land Use Policy 11.2 of the Escondido General Plan allows for additional areas to be designated for a specific plan provided that the specific plan furthers the goals and objectives of the General Plan more effectively than existing land use designations. The outline of policies in the enclosed table represents some of the key policies that may influence the site plan and/or planning process moving forward.

Sincerely,



Mike Strong
Assistant Planning Director
City of Escondido

ATTACHMENTS:

- 1- General Plan Conformance Issues Table
- 2- Department of Fish and Wildlife comment letter, dated November 18, 2016
- 3- Department of Transportation comment letter, dated November 23, 2016
- 4- Preliminary comments on the TIA

CC: Bill Martin, Community Development Director
Jay Petrek, Assistant City Manager
Project file

Attachment 1

General Plan Conformance Issues Table

Key Existing General Plan Goal or Policies	Relevant City Comment
<p>Pursuant to the Urban I General Plan Land Use Designation:</p> <ul style="list-style-type: none"> A range of housing types and designs consistent with existing forms and patterns where appropriate. 	<ul style="list-style-type: none"> Might require more than three housing prototypes; and/or Efforts should be made to respond to unique design contexts, where building mass and scale is reduced through variation in height of the building and architectural elements or other similar scaled transitions.
<p>Pursuant to the Urban I General Plan Land Use Designation:</p> <ul style="list-style-type: none"> A highly interconnected linear street system facilitating traffic flow 	<ul style="list-style-type: none"> Some cul-de-sacs push out to local roads.
<p>Community Character Policy 1.1 – New development projects shall be at an appropriate density or clustered intensity based upon their compatibility with the majority of the existing surrounding land uses.</p>	<ul style="list-style-type: none"> Since the minimum lot size is lower than the surrounding design context, additional context sensitive zoning regulations and design standards may be needed.
<p>Community Character Policy 1.7 – Incorporate iconic signage, artwork, landscaping, and/or architecture characterized as uniquely Escondido at gateway locations to define a sense of entry and strengthen community identity.</p>	<ul style="list-style-type: none"> Review and approval of a community sign program and landscaping program.
<p>Complete Streets Policy 2.3 – Promote integrated transportation and land use decisions that enhance human-scale smart growth development served by complete streets, which facilitate multimodal transportation opportunities.</p>	<ul style="list-style-type: none"> Human scaled development may require more variation in building frontage. While each village design theme is unique, there needs to be a defined difference in building placement, massing, and form within itself. Additional multimodal connections and support facilities are needed to safely and conveniently connect trails systems and to provide multimodal access to the country club.
<p>Complete Streets Policy 2.4 – Evaluate access safety, and convenience of various transportation</p>	<ul style="list-style-type: none"> Review and approval for a Specific Alignment Plan for Country Club Lane

<p>modes for every project involving the following eight user groups: pedestrians, children, disabled individuals, seniors, bicyclists, transit riders, motorists, and goods and services.</p> <p>Complete Streets Policy 2.8 – Promote the provision of multimodal access to activity centers such as commercial centers and corridors, employment centers, transit stops/stations, schools, parks recreation areas, and tourist attractions.</p>	<p>with specialized intersection control without compromising operation, and safe routes to transit access to boarding areas.</p> <ul style="list-style-type: none"> - Identify and manage internal roadway stress points to benefit all roadway users. Locate walkways to animate the pedestrian network and connect people to outdoor spaces, factoring in the needs and abilities of people of all ages. - Provide additional detail in the <i>infrastructure</i> section on page 44 to show how internal roadway intersections will be designed. Intersections at A/B Streets and Gary Lane/B Street need to have horizontal deflections to increase access and safety.
<p>Bicycle Network Policy 4.3 – Promote bicycling as a common mode of transportation and recreation to help reduce traffic congestion and improve public health.</p>	<ul style="list-style-type: none"> - Enhance connectivity within a project and to adjacent properties. - Provide convenient access from a development to nearby trails and bicycle routes.
<p>Transit System Policy 5.8 – Require that new developments incorporate transit-supporting facilities into the project design, where appropriate.</p>	<ul style="list-style-type: none"> - Add detail on transit and Lyft/Uber connections, if applicable.
<p>Public Facility Financing Policy 3.2 – Require larger developments to prepare a fiscal impact analysis and a public facilities financing plan that articulates infrastructure and public facilities requirements, as well as costs and funding mechanisms which document the effects upon the city’s operating budget.</p>	<ul style="list-style-type: none"> - Provide a fiscal impact analysis.
<p>Public Facility Phasing Policy 4.2 – Require phased and interim facilities improvements which promote community identity and character, reserve and enhance the fiscal viability of existing and planned infrastructure, and minimize the disruption to existing residents.</p>	<ul style="list-style-type: none"> - Submission of a construction schedule, phased development plan and capital improvement plan

Attachment 2

Department of Fish and Wildlife comment letter,
dated November 18, 2016



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDWARD G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



November 18, 2016

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(760) 839-4556



**Subject: Response to Request for Comments on Case SUB 16-0018;
PHG 16-0018; ENV 16-0010; The Villages**

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced submittal and offers the following comments:

1. The proposed project may contain wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in any subsequent evaluation of the project. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by CDFW.¹ Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
 - b) The CDFW also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, any subsequent documentation for the project should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²

2. CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals in any subsequent documentation for the project should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
3. Any subsequent documentation should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year and include the following information.
 - a) A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). CDFW recommends that floristic, alliance-based

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

- b) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - c) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.
4. Any habitat impacts should be mitigated at loss ratios in a manner compliant with section 5.2.1 and Table 5-2 of the draft Escondido Subarea Plan. This would require offsite mitigation, preferably from Daley Ranch or from within the City's FPA. Any selected mitigation receiver sites should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, lighting, noise, recreational activity, exotic species, impacts to nearby public lands, open space, adjacent natural habitats, riparian ecosystems, any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP), and wildlife corridor/movement areas.
 5. CDFW recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a

³ Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

6. CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
7. The Polyphagous and Kuroshio Shot Hole Borers (SHBs) are invasive ambrosia beetles that introduce fungi and other pathogens into host trees. The adult female (1.8-2.5 mm long) tunnels galleries into the cambium of a wide variety of host trees, where it lays its eggs and propagates the *Fusarium* fungi species for the express purpose of feeding its young. These fungi cause *Fusarium* Dieback disease, which interrupts the transport of water and nutrients in at least 43 reproductive host tree species, with impacts to other host tree species as well. With documented occurrences throughout Southern California, the spread of SHBs could have significant impacts in local ecosystems. Therefore, with regard to SHBs, we recommend the following:
 - a. an analysis of the likelihood of the spread of SHBs as a result of the invasive species' proximity to above referenced activities;
 - b. figures that depict potentially sensitive or susceptible vegetation communities within the project area, the known occurrences of SHB within the project area (if any), and SHB's proximity to above referenced activities; and
 - c. Best Management Practices (BMPs) which eliminate or reduce impacts of the project on the spread of SHB. Examples of such BMPs include:
 - i. education of on-site workers regarding SHB and its spread;
 - ii. reporting sign of SHB infestation, including sugary exudate ("weeping") on trunks or branches and SHB entry/exit-holes (about the size of the tip of a ballpoint pen), to the Department and UCR's Eskalen Lab;
 - iii. equipment disinfection;
 - iv. pruning in infested areas where project activities may occur;
 - v. avoidance and minimization of transport of potential host tree materials;
 - vi. chipping potential host materials to less than one inch (1" <), prior to delivering to a landfill;
 - vii. chipping potential host materials to less than one inch (1" <), prior to composting on-site;
 - viii. solarization of cut logs; and/or
 - ix. burning of potential host tree materials; and
 - x. reporting suspected infestations to the Eskalen Lab at UC Riverside (eskalenlab.ucr.edu).

Mike Strong
City of Escondido
November 18, 2016
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Please refer to UCR's Eskalen lab website for more information regarding SHBs:
<http://eskalenlab.ucr.edu/pshb.html>.

Thank you for the opportunity to comment on this project,



Eric Hollenbeck
Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
South Coast Region 5
3883 Ruffin Road
San Diego, CA 92123
(858) 467-2720

Attachment 3

Department of Transportation comment letter,
dated November 23, 2016

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

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November 23, 2016

11-SD-15

PM 32.9

Proposed GPA 16-0009

Mr. Mike Strong
City of Escondido
201 N. Broadway
Escondido, CA 92025-2798

Dear Mr. Strong:

The California Department of Transportation (Caltrans) has reviewed the Proposed General Plan Amendment and Tentative Tract Map for the Escondido Country Club area near Interstate 15. Caltrans would like to make the following comments:

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Mr. Mike Strong
November 23, 2016
Page 2

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy; therefore, please refer to the policy for more information and requirements.

<http://www.dot.ca.gov/hq/traffops/signtech/signdel/policy/13-02.pdf>

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

If you have any questions, please contact Keri Robinson of the Development Review branch at Keri_robinson@dot.ca.gov or (619) 688-3193.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Development Review Branch

Attachment 4

TIA Review and Comments

Reference	Review Comments
General	Trip distribution needs to be revised as it does not reflect the distribution from the SANDAG model select zone run. See comments on Figure 7-1 below.
	Trip Generation (general): Please discuss with staff the potential approach which would assume a detailed breakdown of trips for all project uses (e.g. ancillary uses) then apply a reasonable reduction rate based on an estimation of how many non-vehicular trips could be expected (walking, biking, golf-carts). This scenario would also apply a reasonable capture rate for the proposed mix-use and recreational opportunities on-site.
	In general, please expand the discussion of existing conditions in terms of multi-modal infrastructure (existing and Mobility Element Plan) as well as project's proximity to mass transit (bus, major freeways, or Sprinter).
	The site plans show project roadways connecting to Gary Ln. Please evaluate the new intersection at Gary Ln and project driveways. Need to consider project trips accessing Gary Ln.
	Please discuss with staff the incorporation of Vehicle Miles Traveled (VMT) Analysis pursuant to SB 743 and OPR's proposed changes to the CEQA Guidelines. Staff understands that without specific state guidance or locally adopted thresholds, a full analysis is not required. However, a discussion of the project's expected VMT should be included within the TIA (also to be incorporated into the GHG Analysis).
Figure 3-1	Please include the intersection of El Norte/Rees Rd in the study. The amount of added traffic would exceed ADT threshold per TIA guidelines.
Table 6-2	<ol style="list-style-type: none"> 1) Please add the corresponding jurisdiction to the table. 2) Segment 1, please use 10,000 as capacity. Parking is allowed on the road. Per TIA guidelines, roadway capacity should be 10,000 for local collector with parking. Do not deviate from city's guidelines. 3) Please include Bennett Ave between El Norte Pkwy and Toyon Glen in the study. This portion of roadway is within the city. The amount of traffic added to this roadway segment would exceed ADT threshold per TIA guidelines. 4) Firestone Drive is a residential street. Based on city's standard plans, the capacity of residential street is <2,000. Please use 2,000 as roadway capacity for this segment. 5) Roadways or intersections outside of the city boundary may need to be included based on TIA guidelines from the respective agencies.
Figure 7-1	<ol style="list-style-type: none"> 1) 39% of distribution is low on Country Club Lane between El Norte Pkwy and Golden Circle. The SANDAG model select zone run shows 55% on this roadway. Please adhere to data provided by SANDAG. 2) The distribution along Country Club Lane between Country Club Lane and La Brea should be higher with the 55% distribution from comment #1.

Reference	Review Comments
	<p>3) The total of the distribution on roadways leading to the project site is less than 100% (Country Club south of Golden Circle, Firestone Dr, Nutmeg, and Country Club east of Nutmeg). Please revisit and revise distribution.</p> <p>4) El Norte Pkwy between Bennett and Rees has 24% project traffic while the next segment is 29%. The % should be the same on these segments.</p>
Figure 7-2	<p>1) At intersection #5, about 1/3 of the traffic going straight through on La Brea St from one side of the project site to the other. Is this correct? Internal trips are not assumed in the trip distribution.</p> <p>2) The sums of all the trips coming in/ out of the project driveways do not reflect the total in/out trips generated as shown on Table 7-1. Please revise project traffic volumes and revise analyses accordingly.</p>
Section 8.0 Cumulative Projects	<p>1) Please explain the rationale for basing the cumulative growth rate at 5 years.</p> <p>2) Please list the cumulative projects within the TIA rather than referencing Appendix D.</p>
Table 9-2	Why Segment 7 LOS is A for Exist+Cum+Project?
Mitigation Measures	<p>1) Provide operational analysis for the proposed mitigation to demonstrate that the mitigation proposed is effective.</p> <p>2) TRA-2: Need to evaluate feasibility of the proposed mitigation. Widening on El Norte Pkwy may be required and the associated impacts due to widening may need to be evaluated in the EIR. Near-term analysis indicated the southbound approach would fail with the project. Please also consider measure for the southbound approach.</p> <p>3) TRA-4: This is within Caltrans Right-of-Way and measure will be subjected to Caltrans' approval. The proposed mitigation measure may require widening and modification to the ramp. May need to include the associated impacts due to this measure in the EIR.</p> <p>4) TRA-8: In addition to the overlap RT phase, it is recommended restriping the WB approach to include two WB through lanes at the intersection.</p> <p>5) TRA-10: Contribute a fair-share towards roadway improvements on this roadway in the future.</p> <p>5) Firestone Drive, a residential street, is shown to be utilized as an access to and from El Norte Pkwy. The project needs to provide measures, such as traffic calming, on Firestone Dr. so that the residential characteristic of the roadway would remain.</p> <p>6) Add mitigation measure: contribute a fair-share towards signal timing and coordination for future signalized intersections along the corridor.</p>
Conclusions	For the impacts/mitigation measures which are contributions to the fair-share program. Rationale must be provided that ensures mitigation can be implemented by the City. Is there a program which plans for these improvements in the future? Timing noted? Is other funding available to fund the improvements?