

Comment Letter L2



MARK WARDLAW
DIRECTOR

County of San Diego
PLANNING & DEVELOPMENT SERVICES
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August 8, 2017

Kristin Blackson
Contract Planner
City of Escondido
201 North Broadway
Escondido, CA 92025

Via e-mail to: kblackson@escondido.org

RESPONSE TO COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT – THE VILLAGES ESCONDIDO COUNTRY CLUB – CITY OF ESCONDIDO

Dear Ms. Blackson,

The County of San Diego (County) reviewed the City of Escondido's (City) request for comments on the Draft Environmental Impact Report (DEIR) for The Villages Escondido Country Club dated June 28, 2017 (Project). The County previously submitted a comment letter dated December 16, 2016 (Attachment A).

The County appreciates the opportunity review the project, and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this project.

SHERIFF'S DEPARTMENT

1. The project is located within the primary jurisdiction of the City of Escondido. However, this proposed development immediately borders the City of San Marcos, and the County Sheriff Department's primary enforcement jurisdiction.
2. The Sheriff's Department has concerns about the increased level of vehicular traffic that will result by significantly increasing the population density in the area.
3. The subject area consists of congested San Marcos access roads and may result in an increase in assistance calls for service from Escondido Police Department, which could require additional staffing.

VECTOR CONTROL PROGRAM

1. The County Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV).

L2-1

L2-2

L2-3

L2-4

Response to Comment Letter L2

County of San Diego
Planning and Development Services
Mary Kopaskie Brown
August 8, 2017

L2-1

The City of Escondido (City) acknowledges the comment as an introduction to comments that follow and acknowledges consideration of the letter sent to the City on December 16, 2016, during preparation of the Environmental Impact Report (EIR). The comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

L2-2

The comment provides factual background information and expresses concerns from the County of San Diego Sheriff's Department regarding the increased level of vehicular traffic that will result by significantly increasing the population density in the area. As shown in the analysis in Section 2.7, Transportation and Traffic, and specifically in Table 2.7-14, intersections will operate at a level of service (LOS) C or better, and roadway segments will be mitigated to below a level of significance, with exception the El Norte Parkway on-ramp to Interstate 15, which relies on the California Department of

	<p>Transportation to allow the proposed mitigation measure to be completed. Additionally, with implementation of the Specific Alignment Plan and Mitigation Measures M-TR-1 through M-TR-8, street segments, intersections, and ramps meters would operate at an acceptable LOS. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p>L2-3 The Project’s demand on the Escondido Police Department is analyzed in Section 3.1.7.2.2 of the EIR. The comment states that the Project area consists of congested City of San Marcos access roads and may result in an increase in assistance calls for service from Escondido Police Department, which could require additional staffing. As described in Section 3.1.7, Public Services, in the EIR, the City requires the applicant to pay a fee of \$4,623 per dwelling unit to ensure that the City’s established public facility standards, including police response services, are met with respect to the additional needs created by such development. Through payment of the development fee and implementation of the traffic control plan, the Project would not result in the need for new emergency or police facilities.</p> <p>L2-4 The commenter provides factual background information regarding the County of San Diego Vector</p>
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Ms. Blackson
August 8, 2017
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2. The VCP respectfully requests that the design features described in the DEIR address potential impacts from possible mosquito breeding sources created by the project and that the project be designed and constructed in a manner to minimize those impacts. Specifically:
 - a. Ensure construction-related depressions created by grading activities, vehicle tires, tree pits and landscaping do not result in depressions that will hold standing water.
 - b. Ensure BMPs (described in the DEIR, page 3.1.4-12, paragraph 2), detentions basins (described in the DEIR, page 3.1.4-14, paragraph 2), and channels (described in the DEIR, page 3.1.4-14, paragraph 2) do not create a potential mosquito breeding source. Please note, any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.
3. The VCP has the authority, pursuant to state law and County Code, to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector-breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.
4. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at:
http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf
 The California Department of Public Health Best Management Practices for Mosquito Control in California is available at:
<http://www.cdph.ca.gov/HealthInfo/discord/Documents/BMPforMosquitoControl07-12.pdf>
5. If you have any questions regarding VCP comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov.

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L2-4
Cont.
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L2-5

Sincerely,



MARY KOPASRIE BROWN, AICP, MCIP
Chief, Advance Planning Division
Planning & Development Services

Attachments:

Attachment A: County of San Diego NOP comment letter dated December 16, 2016

E-mail cc:

Jason Paguio, Policy Advisor, Board of Supervisors, District 3
Vincent Kattoula, CAO Staff Officer, LUEG
Deena Ravor, Project Manager, Sheriff's Department
Erin Jensen, Administrative Analyst, DEH

Control Program, and requests that the Project Design Features described in the EIR address potential impacts from possible mosquito breeding sources created by the Project and that the Project be designed and constructed in a manner to minimize those impacts. The City will ensure that the Project's on-site drainages are designed in a manner that prevents mosquito breeding habitat from being created or sustained on site.

L2-5

Please see the response to L2-4. The City notes the comment provides factual background information and does not raise an environmental issue within the meaning of the California Environmental Quality Act. The City appreciates the reference information that will be considered during review of the Project. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

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