

Response to Comment Letter I30

**Rick Elkin**  
**August 8, 2017**

**I30-1**

The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. This comment is included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project. The comment does not raise an environmental issue.

**I30-2**

The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City has an application process for land development proposals, which complies with the California Environmental Quality Act statute and California Environmental Quality Act Guidelines. As stated in Section 1.2.1 of the EIR, the Project includes several recreational and social amenities, including but not limited to a swimming pool, a gym, a fitness center, trails, banquet facilities, a courtyard, a convenience grocery store, and a small concert/performance facility. The Project's density and compatibility with the surrounding area were analyzed in Section 3.1.5, Land Use, of the EIR. As stated in Section 3.1.5, the Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5

**Comment Letter I30**

Thank you for the opportunity to meet you and to look at the renderings/maps/elevations of The Villages proposed project for the abandoned Escondido Country Club property in Northwest Escondido. I was impressed with the diversity of comments and questions I overheard amongst the attendees.

I30-1

I have several comments I wanted to convey for the planning commission's consideration:

A) I was amazed at how similar the plan was to 'The Lakes' plan that was rejected by Escondido voters under Proposition H. That was a hard fought and expensive campaign that citywide voters defeated by a 2 to 1 margin. The people spoke and said NO to a high density, houses only design. Where are some of the ideas the community has submitted, i.e., age in place senior care, day spa, outdoor theatre, etc.?

I30-2

B) I was not impressed with the traffic mitigation plans. All it does is slow down cars; it does not increase the number or types of access/exit paths. This is already a traffic calmed, golf cart zone area. Adding hundreds of new cars will create all kinds of new dangers and congestion. Just slowing things down is insufficient to address the near 100% increase in car traffic. It will force people to use residential streets that are not designed to handle that load. In an emergency, there are only two ways out, both off of the same artery, Country Club Lane.

I30-3

C) The computer generated elevations were not representative of the frontage, the parking/spaces or garage access, the setbacks or the landscaping. They were focused on street views of the 'open spaces' between developments and near easements and maintenance/walking paths. This is not representative of what the community will look like and how it will/walk not integrate into the existing character of the community. Did your department produce those graphics or did the developer? To be fair, this should be done for the benefit of the local residents so they can be well informed of the potential impact this new development will have, both positive and negative.

I30-4

D) Why is an infill project that will occupy property that winds through a fifty year-old neighborhood need to change the name and identity of the entire community? Would the planning commission recommend that we rebrand the entire community as "The Villages"? (see attached)

I30-5

E) If the commission is going to approve nearly 400 new homes that will appeal to an entirely different demographic than the iconic Country Club area that has traditionally been marketed to seniors (who enjoyed a golf course for much of their outdoor activities) shouldn't the city require the developer to provide a public recreational area for all of the new, much younger families that will ultimately dominate the neighborhood? Where are these kids going to go for recreation (soccer, skateboarding, bicycling, etc.)? This part of Escondido has no Hilltop, Kit Carson or Woodland Park.

I30-6

F) Finally, I was informed that the EIR requires that when builders remove indigenous trees, they must replace them (sometimes on a 2 for 1 basis). But this ignores the historic importance of community identity, such as the tall stands of eucalyptus trees. Imagine what would become of Scripps Ranch if all of the iconic eucalyptus trees suddenly disappeared? Infill projects must take unique aspects of the existing community into consideration when imposing new construction in areas with historical significance.

I30-7

I got the impression that the commissioners were already 'sold' on the builders submission. Please remain attentive to the concerns of those citizens whose vital interests will be directly affected by the redevelopment of the golf property. **It is not the function of the planning commission to determine what the owner/developer needs to make a profit.** It is your job to protect and promote the interests of the voters and existing residents of Escondido. When placed into the context of the fifty year history of the ECC development, any new construction should enhance and reflect the iconic history of the community that has evolved from its origins in 1964.

I30-8

Thank you for your attention to this important matter!

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|  | <p>dwelling units per acre. The Project includes 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre. Therefore, the Project is consistent with the density assigned by the City’s General Plan.</p> <p><b>I30-3</b> The City acknowledges the commenter’s opinion regarding the proposed traffic mitigation. The City does not agree that the mitigation is insufficient to handle the additional vehicles resulting from the Project. The Project’s Street Alignment Plan (SAP) would “provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation” (EIR page 2.7-1). The EIR states that the SAP has the following goals, as further explained in the EIR and Appendix 2.7-1 (EIR pages 2.7-1 through 2.7-2):</p> <ul style="list-style-type: none"> <li>• Traffic Calming – the intent of the SAP features is to reduce speeds on the roadway. Volumes are well within the existing capacity of the roadway, and while some cut through traffic from I-15 [Interstate 15] to SR-78 [State Route 78] may be occurring, the existing traffic counts indicate the majority of traffic is from Escondido. Therefore, reductions in volume may occur</li> </ul> |
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|  | <p>with the calming features, but that is not the express goal.</p> <ul style="list-style-type: none"> <li>• Multi-Modal Encouragement – the Project envisions that its public amenities including the bar/grill and event space, as well as its HOA [homeowner’s association] facilities will be seen as amenities to both its non-contiguous villages as well as the broader community along the Country Club Lane corridor. Separate from the SAP, the Project is providing a comprehensive trails network to encourage multi-modal (non-automobile) circulation throughout the vicinity. To augment this vision, and to complete the roadway’s bicycle circulation classification, the SAP focuses strongly on improving the pedestrian and bicycle users’ experience by providing enhanced crosswalks and large, buffered bike lanes to encourage bicycle circulation.</li> <li>• Enhanced Aesthetics – The</li> </ul> |
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existing community had previously enjoyed an identity strongly connected to the previous golf course use. The Project intends to maintain this sense of community, and to integrate its residences with not only the proposed land uses, but with design features throughout the SAP that will provide community character as well as traffic calming benefits. Noteworthy and attractive features such as the roundabouts will provide a unique, identifying characteristic, and will capitalize on the already attractive mature landscaping and medians along the corridor.

Appendix 2.7-2 of the EIR (page 1) clarifies that the improvements proposed in the SAP include roundabouts at Golden Circle Drive and La Brea Street, intersection enhancements at Firestone Drive (all-way stop control with pedestrian crosswalks and curb bulbouts), traffic signals with pedestrian crosswalks at Gary Lane and Nutmeg Street, and narrowed lanes and buffered bike lanes to calm traffic speeds and provide an enhanced multi-modal experience.

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|  | <p>Appendix 2.7-2 goes on to explain that “the Project would include community-serving commercial and recreational facilities, which would reduce not just Project VMT [vehicle miles traveled], but are also expected to reduce existing community-wide VMT” by locating restaurant and retail uses in the community and accessible by non-vehicular transportation (Appendix 2.7-2, page 2). The proposed buffered Class II bike lanes would also “provide a high level of comfort for cyclists” (Appendix 2.7-2, page 2). Intersection improvements (stop/signal control, cross walks, and bulbouts) “would work in conjunction with the proposed trails to encourage and facilitate pedestrian circulation along the corridor” (Appendix 2.7-2, page 2). In sum, the community-serving amenities and multi-modal enhancements would work together to reduce vehicular travel from the Project and in the community and encourage bike and pedestrian use.</p> <p><b>I30-4</b> The City acknowledges the comment and does not agree that the visual simulations were not adequately representative of the Project. The visual simulations were prepared by the environmental consultant under the review and direction of the City. Key Views 1, 3, 4, 6, 7, and 8 (shown on Figure 3.1.1-1) are directed at proposed homes and depict the landscaping, setbacks, walking paths, and bulk and scale of the homes (see Figures 3.1.1-2, 3.1.1-4, 3.1.1-5, 3.1.1-7, 3.1.1-8, and</p> |
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|  | <p>3.1.1-9). Key View 2 illustrates the proposed Clubhouse (see Figure 3.1.1-3). Key View 5 illustrates an open space area with homes in the background (see Figure 3.1.1-6). Pursuant to the California Environmental Quality Act, the visual simulations analyzed must be representative of public views. It is not clear which visual simulations the commenter is referring to, but the City does not agree that they are focused on street views of open spaces.</p> <p><b>I30-5</b> The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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><b>I30-6</b> The comment expresses concern regarding whether adequate recreational facilities will be provided to support the Project. As analyzed in Section 3.1.8, Recreation, of the EIR, the Project incorporates an extensive Open Space System that includes approximately 4 miles of walking trails, a series of pocket parks, and environmental drainage/landscape features that act as buffers. The greenbelt, which includes a series of pocket parks along the 4 miles of meandering trails that interconnect the three proposed residential villages, is approximately 29 acres. The</p> |
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|  | <p>walking trails and pocket parks would be open to the surrounding neighborhoods and the Escondido Country Club community. More intensive active recreational facilities, including a gym, swimming pool, and tennis/pickle ball courts, would be located on site in proximity to the new Clubhouse. These private facilities would be available to the new residents that purchase homes and to nearby residents who choose to purchase membership for the Clubhouse. Additionally, the developer would be required to pay the City's park fee of \$4,129 per dwelling unit, minus the eligible parkland provided on site by the Project. This payment of \$1,618,568 would ensure that the City's established parkland and recreational facility standards are met with respect to the additional needs created by the development. Due to the payment of the park fees and the development of on-site open space and recreation areas, increase in the use of existing neighborhood parks is not expected to result in substantial deterioration or adverse effects to the existing park, and impacts would be less than significant. The comment does not raise any specific issues related to the analysis provided in the EIR.</p> <p><b>I30-7</b> As stated in Section 2.2.1 of the EIR, the City establishes regulations and standards for the preservation, protection, and selected removal of mature and protected trees. A City-issued vegetation removal permit is required before clearing, pruning, or</p> |
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|  | <p>destroying vegetation and before any encroachments by construction activities that disturb the root system within the dripline (i.e., the outer extent margin of a tree’s canopy) of any mature and protected trees. Mature and protected trees are further defined in the EIR. As stated in Sections 2.2.3 and 2.2.4 of the EIR, the Project would result in potentially significant impacts to 601 mature trees and 18 protected trees. Therefore, as described in Section 2.2.5, the EIR applies Mitigation Measure M-BI-3, which requires the applicant to replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City’s Director of Community Development. With implementation of this mitigation measure, potential impacts to mature and protected trees would be less than significant.</p> <p><b>I30-8</b> The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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> |
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Comment Letter I31

**From:** [Kristin Blackson](#)  
**To:** [Kristin Blackson](#)  
**Subject:** FW: The Villages; ENV 16-0010; SUP 16-009; Feedback  
**Date:** Tuesday, July 18, 2017 8:58:00 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Garyemasd@aol.com [Garyemasd@aol.com]  
**Sent:** Tuesday, July 18, 2017 9:37 AM  
**To:** Kristin Blackson  
**Cc:** Sam Abed; John Masson; Ed Gallo; Michael Morasco; Olga Diaz; mslater.2014@cox.net  
**Subject:** The Villages; ENV 16-0010; SUP 16-009; Feedback

To: Kristin Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

Re: The Villages - Escondido Country Club  
 ENV 16-0010; SUP 16-009

One of the essential elements of this planned development is the proposed construction of 392 residential homes. The purpose of this document is to focus on the number of allowable units given several factors as a starting baseline for reviewing the proposal.

Those several factors include, amongst others that need to be considered:

- 1) Current Zoning, R-7 (7,000 SF) Generally interpreted, this allows 3.6 units per acre which includes allowance for streets, sidewalks, utilities, etc.
- 2) Pre-existing Covenants Claims/rights to open space on the property, granted to secondary developers of the condominiums along several of the fairways, adjacent to the course.
- 3) Slopes
- 4) Flood Planes
- 5) Wet Lands
- 6) Culturally Sensitive Areas

By now, the Planning Department should have been requested by the Mayor and/or one or more of the City Councilmen to establish a starting point of the number of buildable acres currently existing, based upon the above factors. If not, I specifically request such to assist the Council in considering this proposal as an initial reference point prior to any consideration of possible amendments of land use.

**Brief Background:**

An overview of the past actions and intentions for this property is in order to guide any current consideration of this matter. I understand the following to be true, but remain open to changes given your

I31-1

I31-2

I31-3

I31-4

Response to Comment Letter I31

Gary Erickson  
 July 18, 2017

**I31-1** The City of Escondido (City) acknowledges the comment as an introduction to comments that follow.

**I31-2** The commenter lists several factors to consider in relation to the Project. Each factor that relates to environmental topics was analyzed in the Environmental Impact Report (EIR) in the following sections. The comment does not raise any specific issue related to the adequacy of the EIR.

**Zoning:** As stated in Section 3.1.5, Land Use (page 3.1.5-12), “the Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance.” Additionally, the following is stated in Section 3.1.5 (page 3.1.5-14):

The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre.

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|  | <p>The Project's density relates to both the land use designation and the zoning.</p> <p><b>Pre-existing Covenants:</b> This comment does not pertain to an environmental issue; therefore, no response is required.</p> <p><b>Slopes:</b> As discussed in Section 3.1.3, Geology and Soils, all slopes would be drained and properly maintained to reduce erosion.</p> <p><b>Flood Plains:</b> Section 3.1.4, Hydrology and Water Quality (page 3.1.4-2), states that the Project site is not located in a 100-year flood hazard zone. Federal Emergency Management Agency Insurance Rate Maps indicate the Project site is not located within a mapped flood hazard area. Drainage from the site would flow off site to downstream San Diego County flood control facilities.</p> <p><b>Wetlands:</b> Disturbed wetland was found to occur on the Project site as discussed in Section 2.2, Biological Resources. The disturbed wetland area covers 0.04 acres of the site. With appropriate mitigation, which shall provide for replacement of impacted sensitive habitat in an amount to satisfy a no-net-loss standard, impacts would be less than significant.</p> <p><b>Culturally Sensitive Areas:</b> As stated in Section 2.3, Cultural Resources (page 2.3-22), no cultural</p> |
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|  | <p>resources have been identified within the Project site or documented in previous studies. An archaeological resources monitoring program, along with other mitigation, shall be implemented that would mitigate potentially significant cultural impacts and ensure that, in the event that any previously undetected cultural resources are encountered, resources are appropriately dealt with. 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. No further response is required.</p> <p><b>I31-3</b> The City has an application process for land development proposals that complies with the California Environmental Quality Act (CEQA) and CEQA Guidelines. The EIR is not a decision-making document. Rather, the EIR is an informational document that will inform decision makers and the public about the potential significant effects of the Project, identify possible ways to minimize these significant effects, and describe reasonable alternatives to the Project. CEQA Guidelines, Section 15126.6(a), states “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation” (14 CCR 15126.6(a)). The range of alternatives required in an EIR is subject to</p> |
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department has all the files and historical documentation.

1-Original Development: 1950's - 1960's

The files define the original Master Plan for the area, highlighting the golf course as the central masterpiece/showcase and as an Open Space area. The Planning Department at the time proceeded along these lines. For some unknown and undocumented reason, the "Open Space Zoning" designation never made it onto the City's General Plan and was not recognized until more recently. This oversight has led to the many current challenges and controversies surrounding the future of the property.

2-Secondary Development

After the original developer built most of the area, several pockets of small acreage remained directly adjacent to the course. In time secondary developers submitted plans which were approved and led to amending the zoning requirements such that more condominiums could be built in those pockets and with covenants to offsetting square footage to Open Space upon the course to make up any deficiencies to meet the zoning requirements. It is presumed and perhaps you can clarify that those Open Space areas exist directly adjacent to each pocket development to facilitate their use and enjoyment. Areas one would expect to be directly encumbered to the current condominium property owners and part of their legal property description.

3-Bankruptcy & Change of Ownership - 2012

Following early course operations, a couple bankruptcies ensued with subsequent owners. Then the course enjoyed successful, profitable operations for over 30 years under American Golf and Goldman Sachs. When La Jolla Development bought it and ran it, another situation eventually developed as a result of the financial crisis of 2008-10 which affected their other holdings, leading to them declaring overall bankruptcy. The property was then purchased by the current owner in late 2012. Actions were then implemented to close the on-going golf operation and initial discussion ensued by the new owner of developing the property, (i.e. a change of use).

4-Neighborhood Petition & Council Declaration

In response to those early discussions, the surrounding property owners organized, solicited signatures, and submitted a petition in early 2013 to the Council requesting declaration of the course property as Open Space in accordance with the original intent of the first General Developer.

The City Council, perhaps with input and guidance of the Planning Department (?), voted 5-0 to declare the property as Open Space.

5-Legal Challenge

The owner in response to the City's vote initiated legal action to his property rights based on the zoning shown on the General Plan. Neither at that time or at the time of his original purchase does it appear any search of the property's files was undertaken to fully understand what restrictions, if any, may exist which could impact the future use of the property.

6-Ballot Propositions H

The owner then chose to press his rights position and expedite his development plans by succeeding in having Prop H placed onto the November 2014 ballot. Said Prop H proposed a development of approximately 400 new residential units, surprising close to the current proposed 392 units.

The City's voters resoundingly defeated Prop H as too many units onto the space and aesthetically, a misfit to the surrounding long established neighborhood.

7-City Council Reverses Decision-2016

I31-4  
Cont.

the "rule of reason" (14 CCR 15126.6(f)).

The EIR evaluates the following four alternatives in detail: (1) No Project/No Development Alternative, (2) 158-Unit Reduced-Density Alternative, (3) 138-Unit Reduced-Density Alternative, and (4) 279-Unit Reduced-Density Alternative (EIR page 4-6). Therefore, the EIR considers an adequate range of potentially feasible alternatives to foster informed decision making and public participation.

**I31-4**

The City acknowledges the comment's description of past development on the Project site.

**I31-5**

The City has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. CEQA requires an evaluation of the Project. The Project includes the development of 392 residential units on approximately 109 acres and includes a series of actions (see Table 1-1, Proposed Discretionary Approvals and Permits (EIR page 1-16)). The EIR is not a decision-making document. Rather, the EIR is an informational document that will inform decision makers and the public about the potential significant effects of the Project, identify possible ways to minimize these significant effects, and describe reasonable alternatives to the Project. The City shall practice its decision-making power to decide if the Project or one of the alternatives shall be approved or denied. This

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| <p>After the owner received a favorable legal decision regarding his property rights and "negotiations" with the City, the City Council voted 3-2 to allow development of the course property subject to final approval of plans by the neighborhood.</p> <p>Again, the above review surrounding potential development all rise from the General Plan not being updated by the Planning Department as intended "Open Space" some 50+ years ago.</p> <p><b>Buildable Acres:</b></p> <p>So the remaining question on the table today is " <b>What number of buildable, unencumbered acres exist within the course property?</b> ".</p> <p>While the Planning Department seems to be the party to define this, there is yet no statement to answer the question that I am aware of. In 2016, ECCHO, a neighborhood group of homeowners, at their expense tasked several parties with Planning expertise, and with approval of the Planning Department, to do an initial search of the property files in an attempt to find an answer.</p> <p>The search was initiated and while most of the files were reviewed, funds ran out prior to a total review. The results and findings of what was reviewed were summarized in a White Paper, dated 1/26/2017. The Planning Department and City Council were provided copies to assist in future guidance in answering the question.</p> <p><b>Summary:</b></p> <p>In summary, I believe it is the Planning Department's duty and responsibility to answer this open question. This needs to be done before consideration of any proposed amendments or changes to the General Plan so that a baseline is established.</p> <p>Therefore, unless such action has already been completed and a statement can be provided, I would request the Planning Department initiate whatever action is required to do this and publish the results of their review along with the pertinent factors upon which it is based <u>prior to</u> submitting their recommendations for any proposed development of this property to the City Council.</p> <p>Respectfully submitted,<br/>         Gary Erickson<br/>         2021 Via Alexandra<br/>         92026</p> <p>cc: City Council<br/>         M. Slater, ECCHO President</p> | <p>I31-4<br/>Cont.</p> <p>I31-5</p> <p>I31-6</p> <p><b>I31-6</b> comment does not raise an environmental issue; therefore, no further response is required.</p> <p>See response to I31-5. Additionally, CEQA requires that an EIR specify the existing physical environmental conditions to establish the "environmental baseline" against which project impacts may be evaluated (14 CCR 15125(a)). Environmental impacts generally should be examined in light of this baseline environment as it exists when a project is approved (14 CCR 15125(a)). The EIR properly considered the Project's effects against the existing environmental baseline, which has been established as required under CEQA.</p> <p>The EIR is not a decision-making document. Rather, the EIR is an informational document that will inform decision makers and the public about the potential significant effects of the Project, identify possible ways to minimize these significant effects, and describe reasonable alternatives to the Project. The City shall practice its decision-making power to decide if the Project or one of the alternatives shall be approved or denied.</p> |
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Comment Letter I32

From: [Kristin Blackson](#)  
 To: [Kristin Blackson](#)  
 Subject: FW: ECC-The Villages ENV 16-0010; SUB 16-009 :Traffic Feedback Issue  
 Date: Tuesday, July 18, 2017 8:57:15 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

From: Garyemasd@aol.com [Garyemasd@aol.com]  
 Sent: Tuesday, July 18, 2017 1:55 PM  
 To: Kristin Blackson  
 Cc: John Masson; mslater.2014@cox.net  
 Subject: ECC-The Villages ENV 16-0010; SUB 16-009 :Traffic Feedback Issue

Ms Kristin Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

I'm beginning to review the EIR/Specific plan submitted by NUM for this property, one of my immediate concerns is that of the traffic impact that would be brought on by some 300 new residences.

I currently reside on Via Alexandra, which intersects with Nutmeg St. at the south end of the "S" curve between El Norte Parkway and Country Club Lane. That specific intersection is situated in such a position that limited visibility exists for oncoming southbound Nutmeg traffic. Once a driver checks for oncoming traffic it can become dangerous getting out onto Nutmeg if one is heading south as vehicles come over the crest just to the north of the intersection. I have seen several close calls, given this situation.

This is particularly true during the "morning rush hour" time of the day as volume peaks, since many drivers use this Local Collector Street to gain access the I-15 S entrance off El Norte Parkway, just to the south. While better visibility exists to northbound traffic, just the rise in the number of vehicles will further increase the difficulty in gaining access and erodes safety.

Reviewing the specifics of The Villages Specific Plan, on page 57, it clearly states that there will be NO CHANGES to Nutmeg for any increased impact from their project. This concerns me on two fronts:

1-the first is the increased traffic of construction vehicles and workers during the building phase, unless in particular larger/heavier vehicles carrying loads of supplemental materials (fill, building material, etc)

are prohibited from using this street (not to speak of the noise factor associate with numerous trips, and

2-the significant increase in local traffic from this new community, once established.

Given the number of planned homes, the number of vehicles per residence, the number of general and local daily trips that will be taken, I believe will add significantly to Nutmeg's volume. This, again, with no planned improvements.

Therefore, I request your department (or request to the developer) to conduct an updated traffic study to determine the current traffic load and the impact this new development will have upon those numbers, along with any stated conditions and assumptions. Secondly, I ask for remediation to improve the safety factor of this intersection, since the life I save may be my own or that of my loved one!

I32-1

I32-2

I32-3

I32-4

Response to Comment Letter I32

Gary Erickson  
 July 18, 2017

I32-1

As shown in Figure 2.7-14 of Section 2.7, Transportation and Traffic, of the Environmental Impact Report (EIR), all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to Interstate (I-) 15, which relies on the California Department of Transportation (Caltrans) to allow the proposed mitigation measure to be completed. The proposed Project would therefore not create a significant impact to traffic congestion, as mentioned in the comment.

I32-2

The City of Escondido (City) acknowledges the commenter's concerns regarding visibility at the intersection of Via Alexandra and Nutmeg Street. As stated in EIR Section 2.7, Transportation and Traffic, Mitigation Measure M-TR-4 would require the constructions of interim improvements in the existing right-of-way on southbound Nutmeg Street between La Paloma Avenue and Via Alexandra to provide a wider travel lane, and curb, gutter, and sidewalk improvements to the satisfaction of the City engineer. These improvements will enhance vehicular, pedestrian, and bicycle circulation and will increase

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|  | <p>capacity to mitigate the Project’s impact. Through widening the travel lane on Nutmeg Street and clearing of trees within the public right-of-way, sight visibility northerly of the driveway intersection will be improved. With implementation of these improvements, the near-term significant direct and cumulative impacts from the proposed Project would be reduced to less than significant.</p> <p><b>I32-3</b> The commenter is correct, and this has been revised in the Specific Plan. The commenter’s subject segment of Nutmeg Street is classified as a Local Collector on the City’s Circulation Element. This calls for a 64-foot paved width in 84 feet of right-of-way. Currently, the subject segment provides approximately 32 feet, and therefore does not meet the City’s Circulation Element standard. The addition of daily Project traffic requires mitigation, which is provided via: (1) widening of the substandard subject section to provide curb/gutter/sidewalk to enhance multi-modal mobility and to accommodate pedestrians outside of the roadway, and 2) restriping and improving the El Norte Parkway/Nutmeg Street signalized intersection to provide dual southbound left-turns to more efficiently move traffic from the Nutmeg Corridor to the El Norte Parkway corridor during the AM peak hour. Further project features that will improve corridor operations include; 1) signalization of the Country Club Lane/Nutmeg Street intersection to the north as part of</p> |
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the SAP, and; 2) half-width frontage improvements to Nutmeg Street south of Country Club Lane with development of Village 3. Collectively, these mitigation measures and Project features will improve corridor throughput to mitigate the Project's impacts.

As stated in Section 2.7, Transportation and Traffic, of the EIR, Caltrans' construction practices require temporary traffic control planning during any activities that interfere with the normal function of a roadway to ensure efficient ingress/egress of vehicles. Construction will be broken up into phases. This in and of itself distributes traffic both temporally and spatially as compared to full buildout traffic from the Project, which generates 4,280 average daily trips (ADT) and is analyzed in the Draft EIR. The worst-case period of construction traffic will relate to the import of fill material with heavy vehicles. Of this import period, four phases are proposed. Of these four phases, "Phase 3" is the worst case from a traffic perspective, generating 218 ADT (436 ADT adjusted to reflect the heavy vehicles), over a period of 19 days. LLG prepared a supplemental analysis of these trips dated September 12, 2017, and appended to these responses as Appendix 8-3. That analysis supports the conclusion of the TIA that no construction-related impacts would occur.

In regards to noise associated with construction

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|  | <p>vehicle trips, the City restricts the times of day when construction may occur (i.e., 7 a.m. to 6 p.m. Mondays through Fridays, 9 a.m. to 5 p.m. on Saturdays and not at all on Sundays or public holidays). With implementation of the City’s noise restrictions, construction impacts would be less than significant.</p> <p>See response to I32-1. As stated in response to I32-2, Mitigation MeasureM-TR-4 will include improvements to Nutmeg Street. All additional project trips were included in the modeling and are thus accounted for in mitigation measures for the proposed Project. This 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 or necessary.</p> <p>As shown in Table 2.7-1, Existing Traffic Volumes, Nutmeg Street has been thoroughly analyzed on three major segment of this road including El Norte Parkway to north of Country Club Lane. Table 2.7-7 shows the near-term street segment operations for Nutmeg Street, and 2.7-11 shows the 2035 street segment operations for Nutmeg Street. This analysis is based on the <i>Transportation Impact Analysis: The Villages (TIA), Specific Alignment Plan (SAP), and the Villages VMT Evaluation (VMT Evaluation)</i>, all prepared by Linscott Law and Greenspan, traffic engineers. This comment is included in the Final EIR</p> |
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for review and consideration by the decision-makers prior to a final decision on the Project. No further response is required or necessary.

**I32-4** See response to I32-2.

Please let me know how you plan to address my concern.

Respectfully submitted,  
Gary Erickson  
2021 Via Alexandra  
92026

cc: Councilman Masson  
M. Slater, ECCHO President

↑ I32-4  
↑ Cont.

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Comment Letter I33

Spencer Hardy

**From:** Kristin Blackson <kblackson@escondido.org>  
**Sent:** Monday, July 24, 2017 9:59 PM  
**To:** Kristin Blackson  
**Subject:** FW: ECC-The Villages ENV 16-0010; SUB 16-009: Feedback

Kristin Blackson, Contract Planner  
 City of Escondido  
 kblackson@escondido.org

**From:** Garyemasd@aol.com [Garyemasd@aol.com]  
**Sent:** Monday, July 24, 2017 11:11 AM  
**To:** Kristin Blackson  
**Cc:** Sam Abed; John Masson; Ed Gallo; Michael Morasco; Olga Diaz; mslater.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009: Feedback

Kristin Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido, CA

Ms Blackson,

As I start the review process of this EIR, my red flag has gone up while reading its summary. Whenever I see terms like:

- Zone Change
- "revitalize an existing residential area"
- "unique homes"
- "blighted condition"
- "Implement timely public facilities within existing service areas without burden or cost to existing residents....."

I33-1

it immediately brings to mind the classic situation ... where Party #1 creates a problem, then proposes and "lobbies" a solution to the problem upon Party #2 who has to bless and finance the solution and/or forego certain freedoms/benefits/liberties, and in the solution garners unreasonable flexibility and control over the on-going solution for itself, Party #1.

That pretty well sums up the situation we now face with this proposal/EIR/Specific Plan.

Remember:

- Baseline: Up until the sale of the ECC to the present landowner, the golf course was an ongoing, profitable operation with mowed, maintained fairways and club house facilities which existed in a vibrant, tranquil, established neighborhood for several decades, not necessarily the description of a decaying, run-down, vacant area.
- Closure of ECC: Upon obtaining title, the landowner then took actions to cancel tournaments, country club social functions such as weddings, reunions, etc., all of which contributed to the profitable operations. Fences were then construction surrounding the property.
- Declared plans to develop: Having succeeded in driving the golf operation into the red, Landowner then declared the need to pursuing other land uses. One of the first good neighbor acts was to spread chicken manure on some fairways to "maintain an already closed course".
- Resulting deterioration of property: The landowner then ceased to conduct on-going, routine maintenance such as mowing, hazardous tree trimming, fence mending, etc. unless driven to do so by resident/city action. This pretty well is guaranteed to provide the "blighted condition" currently.
- The solution: Bring in a third party to address and resolve the "new" conditions "at hand".

I33-2

Response to Comment Letter I33

Gary Erickson  
 July 24, 2017

I33-1

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter. The comment restates information contained in the Draft Environmental Impact Report (EIR) and does not raise an environmental issue within the meaning of the California Environmental Quality Act (CEQA). The City has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The comment and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. 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.

I33-2

The comment raises issues related to the baseline and history of the site. Regarding baseline, CEQA requires that an EIR specify the existing physical environmental conditions to establish the "environmental baseline" against which project impacts may be evaluated (CEQA Guidelines Section 15125(a)). Environmental impacts generally should be examined in light of this baseline environment as it exists when a project is approved (CEQA Guidelines Section 15125(a)). The EIR properly considered the

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|  | <p>Project’s effects against the existing environmental baseline, which has been established as required under CEQA and considers the state of the property at the time the Notice of Preparation was issued.</p> <p>Courts have determined an EIR properly describes the existing environment even where the existing condition arose by a prior applicant or an owner that illegally altered the site. For example, in <i>Riverwatch v. County of San Diego</i> (1999) 76 Cal.App.4th 1428, 1451-1453, the court upheld the baseline of a disturbed, degraded site where part of a proposed mining site had been illegally disturbed by the site’s owners and predecessors, and was subject to enforcement action (Id. at p. 1452). The court held the proper baseline was the existing condition even though that condition was caused by the illegal activity of the applicant owner. “[I]n general, preparation of an EIR is not the appropriate forum for determining the nature and consequences of prior conduct of a project applicant” (Id.).</p> <p>Likewise, in <i>Banning Ranch Conservancy v. City of Newport Beach</i> (2012) 211 Cal.App.4th 1209, 1233, the court held the appropriate baseline was the existing condition of the site even though the site was degraded only by illegal mowing. Relying on <i>Riverwatch v. County of San Diego</i>, supra, the court reiterated that “any illegal activities affecting the baseline</p> |
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environmental condition are best addressed by enforcement agencies,” not in an EIR (Id.).

Similarly, the court in *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 371, upheld an existing condition baseline even though there were claims of prior zoning violations that the City of Eureka was responsible for enforcing. The court nevertheless found the more prudent method of addressing alleged illegality was first relying on “direct enforcement by the agencies charged with the responsibility” of enforcement (Id. at 370). Even where the alleged violations may have been relevant to the city’s consideration of the project approval requested, the court found it was not a CEQA consideration (Id. at 371).

As explained in these cases, CEQA requires evaluation of a project against existing environmental conditions, regardless of how those conditions came about. The EIR thus properly considered the Project’s effects and established Project objectives in comparison to existing, blighted conditions at the site. The manner in which the blighted conditions were created is immaterial to the EIR. In addition, the City’s enforcement obligations or authority are not impacted by the Project or the EIR.

Regarding zoning, Section 3.1.5 of the Draft EIR describes and analyzes the Project’s land use, zoning

and design compatibility. Appendix 3.1.5-1 to the Draft EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project's potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the Draft EIR concludes that the Project does not conflict with the City's General Plan policies. The comment does not raise an issue related to the adequacy of this land use and zoning analysis as provided in the Draft EIR.

Regarding aesthetics, Section 3.1.1 of the Draft EIR describes and analyzes the Project's bulk, scale and architecture. The Project would not result in significant visual or aesthetic impacts. As stated in Section 3.1.1, Aesthetics (EIR page 3.1.1-19):

The significance determination as to whether the Project would result in substantial degradation of visual character and quality is based on the analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area.

The Project's impact on public facilities is addressed in Section 3.1.7 of the EIR and concludes the Project would not result in significant impacts relative to

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|  | <p>public facilities and services.</p> <p>Regarding traffic, as analyzed in EIR Section 2.7, Transportation and Traffic, all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to Interstate (I-) 15, which relies on the California Department of Transportation (Caltrans) to allow the proposed mitigation measure to be completed. If implemented, Mitigation Measure M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level that is less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the Draft EIR, if the Project is approved.</p> |
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-Such proposed solution incorporates:  
 -The Villages, a community within a community, of its own character and style, set off and isolated somewhat by a so-called buffer zone between the old and the new, to be called "Open Space".  
 -The "Open Space" calls for it to be turned over to the City and forever more maintained with some un-addressed nor defined maintenance burden upon the existing residents at a time that the City has limited funds for already existing public parks and facilities.  
 -Zoning changes that brings much higher density of residential units by putting forth the argument that the new density is consistent with the density of much smaller developments adjacent to the existing course. Such justification obscures the fact those developments adjacent to existing fairways got their density adjustment by being given the rights to covenants to compensating area into the golf course to meet the existing zoning requirement of R-1-7. This rationale of justification deteriorates the quality of life in the long term for the existing community.  
 -"unique homes" such as Monterey Spanish, not necessarily designed to fit with the aesthetic style of the existing surrounding neighborhood established in the original community master plan some 50+ years ago.  
 -Introduces an undue burden upon the facilities required to service a large increment of 392 homes, particularly upon traffic and existing quality of life in the surrounding neighborhood.

So why do we appear to have the present solution for consideration? Succinctly stated, it would seem that the landowner and the applicant want to squeeze the absolute maximum return on investment to the detriment of the existing neighborhood and community.

Since the city only has one chance to get this right, let's not rush into "giving away the farm" to resolve the current "bighted" mess the current proposal suggests. Let's see a solution that is more creative and respects the current zoning codes already in place for good reason. Therefore, carefully weigh the tradeoffs being suggested in this proposal and clearly point out the Pros as well as the Cons with your recommendation to the City Council.

Respectfully submitted,  
 Gary Erickson  
 2021 Via Alexandra  
 92026

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 133-2  
 Cont.  
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 133-4

**I33-3** The City has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The comment and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. 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.

**I33-4** The City acknowledges the comment and notes it expresses the opinions of the commenter. The Draft EIR is not a decision-making document. Rather, the Draft EIR is an informational document that will inform decision makers and the public about the potential significant effects of the Project, identify possible ways to minimize these significant effects, and describe reasonable alternatives to the Project.

The EIR considers a reasonable range of alternatives. The EIR evaluates four alternatives in detail: (1) No Project/No Development Alternative, (2) 158-Unit Reduced-Density Alternative, (3) 138-Unit Reduced-Density Alternative, and (4) 279-Unit Reduced-Density Alternative (EIR Chapter 4 and page 4-6). As required under CEQA, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). As stated in Section 4.7.1 of the EIR, it is

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|  | <p>assumed the existing R-1-7 zoning would remain the same under the two reduced-density alternatives (158-Unit and 138-Unit); therefore, all lots would be a minimum of 7,000 square feet. The Project's environmental documents will be presented to the City for final decision with the Project as currently proposed, and with an analysis of the range of alternatives presented in the EIR.</p> |
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Comment Letter I34

**From:** Garyemasd@aol.com [Garyemasd@aol.com]  
**Sent:** Tuesday, August 01, 2017 8:34 AM  
**To:** Kristin Blackson  
**Cc:** John Masson; Bill Martin; mslater.2014@cox.net  
**Subject:** Thanks!!! ECC-The Villages

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

It was a pleasure to meet you yesterday at the Open House/Public Feedback session. As a planner we understand your role is to conduct an unbiased review of a proposed development project and evaluate the plan's adherence to and compliance with standing/mandated laws, regulations, and statutes at the city, county & state levels. It is not to weigh in on the overall merits of whether the proposed development is an appropriate fit to the community on an aesthetic, size, etc. standpoint. That decision will ultimately rest with the Planning Commission, the City Council, and hopefully, directly with the immediate neighborhood of the development as previously assured by one of the Councilmen.

More specifically, I shared several points of feedback/refinement for consideration with the aides at the Open House. I will be submitting them shortly, once they have been finalized, for consideration into the Final EIR.

You commented that it is acceptable to make comments to the Specific Plan at this time, but that is difficult in the recognition that a Final Specific Plan has just been submitted for review. Spending time now on the current Draft would, IMHO, be wasted time, give it's such a large document. Therefore, hopefully, the Final version can be posted on the web site and comments received. It should be noted that there are several inconsistencies between the EIR and the Draft Specific Plan along with outright mis-statements of fact that hopefully have been addressed. An example is the Draft S.P. implied reference to no changes being made to Nutmeg St., yet the EIR, Chapter 7.7, M-TR-4, specifically identifies proposed changes. Another is mislabeled references to Figures or the artist's same residence sketch of supposedly two different themed villages.

In closing, your diligence and hard work to clearly assemble the appropriate report so the next levels can weigh the merits of the proposal is noted.

Appreciatively,  
 Gary Erickson  
 2021 Via Alexandra  
 92026

I34-1  
 I34-2  
 I34-3  
 I34-4

Response to Comment Letter I34

Gary Erickson  
 August 1, 2017

- I34-1** The City of Escondido (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 will include the comment as part of the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project.
- I34-2** The commenter requests that the Final Specific Plan be posted online. The City acknowledges the comment and notes that the Final Specific Plan will be posted online. The California Environmental Quality Act requires the City to respond to any comments received on the draft environmental document. When all public comments are addressed, the environmental document is then finalized for adoption by the decision makers. The comment does not raise any specific issue regarding that analysis.
- I34-3** The commenter claims there are inconsistencies between the EIR and Specific Plan. Regarding changes to Nutmeg Street, the City does not agree that the Specific Plan implies no changes. The Specific Plan (page 62) describes restriping associated with El

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|  | <p>Norte Parkway between the southbound on-ramp to Interstate 15 and the Nutmeg Street/Nordahl Road intersection. The Specific Plan (page 62) also states that traffic-calming measures for West Country Club Lane will be constructed between Nutmeg Street and Golden Circle Drive.</p> <p><b>I34-4</b> The commenter expresses concern regarding mislabeled references to figures and discrepancies in the graphical representations of villages in the EIR. In response to this comment, the inconsistencies have been resolved in the Final EIR. The comment does not provide specific concerns related to the adequacy of any specific section or analysis of the EIR. 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> |
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Comment Letter I35

**From:** Garyemad@aol.com  
**To:** Kristin Blackson  
**Cc:** John Maason: mslater.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009:::Traffic-Roundabouts  
**Date:** Wednesday, August 9, 2017 11:09:54 AM

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

I think this would be a first for Escondido!

The Draft Specific Plan, 3/16/17, p. 18, makes reference to existing resident concerns regarding the unsafe speeds along CCL in the project area and that this drove the proposing of "calming" measures. One could surmise this observation results from the currently posted limits and the implied speeds of traffic. I dare say that if any through street in the city is polled, almost all will raise this same issue.

But speeds are not set by emotions, but by the roadway's construction and design, vehicle capacity requirements, and the safety level required.

That said, it is worth noting that the posted speed limits of the Gary Lane to La Brea section of CCL have never been studied (to my knowledge) and changed from the time when the golf course was in operation (2012) and golf carts traversed across it between fairways. So what some see as a speeding issue might actually be reasonable speed for the four lane sections of that thoroughfare.

Nonetheless, in the EIR, it is proposed to use roundabouts as one of the "calming" devices along Country Club Lane at 3 intersections to address the "concerns", namely:

- 1-Golden Circle Currently controlled by stop signs on CCL NB and CC Clubhouse Exit SB. The primary flow is CCL WB and is able to make the LH turn on a yield basis to Golden Circle EB traffic.
- 2-Gary Lane (a minimal roundabout given its implied design) Currently controlled by stop signs.
- 3-La Brea Currently controlled by stop signs.

These would be single lane by design given the current space constraints it appears. Unstated is whether there is actually a significant traffic issue at any of these intersections that requires such a solution as shown by the presented data. These roundabouts are being therefore touted as an "aesthetic enhancement feature" for the neighborhood.

Before quickly adopting this "mitigating" or "enhancement" factor, it may be appropriate to consider some of the pros and cons.

In some respects roundabouts can improved the flow of traffic at busier intersections,for the primary flow direction. At the same time, however they can interject a difficulty factor for any parties trying to enter the primary roadway from the secondary street. This results from the fact that during periods of heavier vehicle flow, there can be a continuity factor introduced, as vehicles do not have to stop their travel for a stop sign or signal in the primary direction. Wait/delay times during these periods can be expected to increase for the secondary roadway drivers.

In fact, at the proposed single lane roundabout, a two lane thoroughfare is reduced to a single lane to enter the roundabout, creating a pinch point during high volume periods. While perhaps "slowing" vehicle motion, it introduces additional safety consideration for the merging drivers. An example is the La Brea/CCL intersection. Compared to signal control which adapt to directional flow volumes, roundabouts can reduce roadway capacity.

I35-1

I35-2

I35-3

Response to Comment Letter I35

Gary Erickson  
 August 9, 2017

I35-1

The City of Escondido (City) acknowledges the commenter's information regarding speeding issues along Country Club Lane. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft Environmental Impact Report (EIR). 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.

I35-2

The City does not agree that potential traffic issues are not disclosed in the EIR. As stated in Section 2.7.2.3 of the Transportation and Traffic section, the Project would result in potentially significant direct impacts at Intersections #8 (El Norte Parkway/Woodland Parkway) and #9 (El Norte Parkway/Country Club Lane), because the Project contribution to the delay would exceed the allowable 2.0 second threshold. The Project would improve operations at five intersections along Country Club Lane with the provision of the proposed Street Alignment Plan (SAP) and the associated capacity enhancements with the proposed roundabouts, signals, and all-way stop control.

The City would like to clarify that while the roundabouts provide aesthetic enhancements, the purpose of the

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|  | <p>roundabouts is to improve operations at intersections (as previously discussed), provide traffic calming, and enhanced public safety; see Section 2.7.2.3. Roundabouts are proposed at Golden Circle Drive, Firestone Drive, and La Brea Street. Vertical deflection would be added on the approach and departure sides roundabouts to reduce entering speeds and align vehicles into the roundabout. Ramp transitions may be provided on the approach and departure deflections at the roundabout to allow cyclists to leave the roadway and dismount to the sidewalk if they do not desire to take the lane through the roundabout. Therefore, the roundabouts are more than just an “aesthetic enhancement feature” for the neighborhood.</p> <p><b>I35-3</b> The City acknowledges the comment and notes it expresses the opinions regarding the efficiencies of roundabouts. The commenter does not provide substantial evidence for the claims that roundabouts can increase wait/delay times and reduce roadway capacity. Roundabouts are considered the highest flowing of traffic control alternatives (signals, stop controls). Caltrans has determined the roundabout is the safest intersection control. According to the Caltrans highway design manual, roundabouts experience few angle or crossing collisions. Roundabouts reduce the frequency and severity of collisions, especially when compared to the performance of signalized intersections in high speed</p> |
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| <p>Another consideration results from the expected type of traffic that will encounter the roundabout. Assuming no posted restrictions, trucks, in particular those longer in length such as firetrucks, semis, trailers, etc. will need to be able to safely proceed through the roundabout. Important to this action is the operating radius of the circular lane, width of the lane, and the number of lanes designed into the roundabout (single in this case).</p> <p>Also of consideration is the design of the inner curb. Some design a low, soft inner curb to facilitate longer vehicle navigating through the layout that may otherwise be forced to "jump" the curve. While functionally helpful, either way, this inner curb potentially introduces another longer term issue, namely appearance maintenance, since traversing over the inner curve undoubtedly will leave tire marks. In fact, Sedona, AZ which uses a number of roundabouts on primary thoroughfares found out the hard way that they have to send out cleaning crews every few weeks to power-wash away these unsightly marks!</p> <p>A further consideration is the safe biking corridor at a roundabout. Being different than that at a stop sign or signal, bikers and pedestrians have to <u>exert a higher degree of caution</u> at these locations because of the more continuous flow of vehicles through the roundabouts. Vehicles do not stop for a look/see analysis before restarting their motion. And in a continuous flow of traffic, the driver has to initially concentrate on the vehicle traffic in the roundabout already or in the process of entering from the left which could designate priority prior to their entrance. Once into the roundabout choosing to exit onto the secondary roadway, the driver has only potentially has a split second to identify bikers/pedestrians about to enter/moving across the secondary entrance/exit they want to take.</p> <p>In Sedona, they have moved roadway crossing for pedestrians and bikers away from the roundabout to provide the added safety factor.</p> <p><b>In summary.</b> I'm not sure roundabouts are the best design solution to what seems to be a purely aesthetic design want given the various vehicle users of Country Club Lane and the tradeoffs.</p> <p>-Have the folks from Lincoff, other Traffic consultants, or the City's Traffic Engineer been asked and rendered any conclusions on this subject that it will be truly beneficial? If so, they should become part of the EIR.</p> <p>-Is the City's Maintenance Department ready for their new cleaning task? And who's to pay for it?</p> <p>Respectfully Submitted,<br/>Gary Erickson<br/>2021 Via Alexandra<br/>92026</p> | <p>environments (Caltrans 2017). The benefits of roundabouts are outlined by Caltrans as follows (Caltrans 2017):</p> <ul style="list-style-type: none"> <li>• Fewer conflict points typically result in fewer collisions with less severity. Over half of vehicle to vehicle points of conflict associated with intersections are eliminated with the use of a roundabout. Additionally, a roundabout separates the points of conflict which eases the ability of the users to identify a conflict and helps prevent conflicts from becoming collisions.</li> <li>• Roundabouts are designed to reduce the vehicular speeds at intersections. Lower speeds lessens the vehicular collision severity. Likewise, studies indicate that pedestrian and bicyclist collisions with motorized vehicles at lower speeds significantly reduce their severity.</li> <li>• Roundabouts allow continuous free flow of vehicles and bicycles when no conflicts exist. This results in less noise and air pollution and reduces overall delays at roundabout intersections.</li> </ul> <p><b>I35-4</b> See response to I35-3. Roundabouts are considered the highest flowing of traffic control alternatives (signals, stop controls). The fire department has reviewed and approved the SAP layout with respect to emergency response times and maneuverability of emergency equipment.</p> |
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|  | <p><b>I35-5</b> The City acknowledges the comment and notes it expresses the recommendations and opinions regarding roundabout design, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required. 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><b>I35-6</b> The City acknowledges the comment and notes it expresses concern for pedestrian and bicycle safety relative to the proposed roundabouts. See response to I35-2. In addition, the U.S. Department of Transportation Federal Highway Administration has identified roundabouts as a proven safety countermeasure because of their ability to roundabouts substantially reduce the types of crashes that result in injury or loss of life (FHWA 2017). Roundabouts are designed to improve safety for all users, including pedestrians and bicycles. They also provide significant operational benefits compared to conventional intersections. On average, roundabouts reduce severe crashes those resulting in injury or loss of life—by 78%–82% (FHWA 2017). Roundabouts have fewer conflict points. A single lane roundabout has 50% fewer pedestrian-vehicle conflict points than a comparable stop or signal controlled intersection. Pedestrians cross a shorter distance of only one</p> |
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|  | <p>direction of traffic at a time since the entering and exiting flows are separated. Drivers focus on pedestrians apart from entering, circulating and exiting maneuvers. Also, the speed of traffic through a roundabout is more consistent with comfortable bicycle riding speed (FHWA 2017).</p> <p><b>I35-7</b> The City acknowledges the comment and notes it summarizes the opinions of the commenter. Please refer to responses to I35-2 through I35-4 regarding the design, application, and purpose of the roundabouts proposed as part of the Project. Therefore, no further response is required. 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><b>References</b></p> <p>Caltrans (California Department of Transportation). 2017. Highway Design Manual. Accessed Sept 26, 2017. <a href="http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0400.pdf">http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0400.pdf</a>.</p> |
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Response to Comment Letter I36

Gary Erickson  
August 9, 2017

Comment Letter I36

From: Garymaed@aol.com  
To: Kristin Blackson  
Cc: John Maeson; mslater.2014@cox.net  
Subject: ECC-The Villages ENV 16-0010; SUB 16-009::Open Space/Recreational Parkland  
Date: Wednesday, August 09, 2017 11:10:08 AM

Ms K Blackson  
Contract Planner  
Planning Department  
City of Escondido

The EIR and associated Specific Plan espouses the virtues of some 48+ acres of Open Space and recreational parkland available to the community as a result of the proposal. However, this is a very misleading, marketing statement for several reasons:

1. The number summarily represents a gross figure, not all of which is truly useable and easily accessible by the public.
2. It includes all ten (10) BMP basins which will have to be enclosed in fencing from a safety standpoint for when they would fill from accumulated collection.
3. It includes areas of high slope gradients.
4. It includes drainage swallows that move water through and away from the property, some of which has special plantings to facilitate filtration and prevent clogging of San Marcos Creek downstream.
5. It includes replanted areas of environmentally sensitive habitat.
6. It specifically RESTRICTS accessibility and open access by calling out an outer boundary permanent fence (chain link & barb wire???) surrounding all such area to, as stated, "DISCOURAGE HUMAN ACCESS"! Additionally, "...signage on the fence to educate and inform..... and TO PROHIBIT ACCESS.". What, did I read that right?

If one considers the situation of the Open Space/golf course property prior to the current landowner's acquisition in 2012, it had open access and unobstructed views for hundreds of feet from abutting properties.

Left unanswered is whether there will be a similar fence or privacy wall for the new residences on the inner side of this space to create in essence a restricted corridor.

While speaking of the fence, it poses a formal line of demarcation between the older, establish neighborhood and the "new community", placed directly into its former core! It does nothing to foster a cohesive spirit of one overall community.

This leads me to a couple questions:

-Just how many acres of Open Space that can be used for recreational purposes are there? The Draft Specific Plan talks about a "Greenbelt" but presents several different figures.

-How can the plan state "open access" yet at the same time significantly restrict entry? (Or is this in reference to the birds?)

-Where can the "outside" community gain access to use the banded 4+ miles of walking trails without having to drive or bike or walk some distance to find and reach entry points? The number of entry points are not clearly called out to determine how conveniently the existing neighborhood can find entry and truly enjoy, nor the availability of nearby parking at those designations.

I36-1

I36-2

I36-3

I36-4

I36-1

The City of Escondido (City) acknowledges the comment as the commenter's opinion and an introduction to comments that follow. This comment is included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project. The comment does not raise an environmental issue.

I36-2

The City agrees that the 48 acres of open space is not entirely open and accessible to the public. It is not the intent of the City to allow public access to open space areas that are established for conservation of biological resources pursuant to the City's Resource Conservation Element goals and policies described in Section 2.2.1 of the EIR. As described in Section 1.2.1 of the EIR, the 48-acre Open Space System includes 29 acres of landscaped greenbelt. The proposed greenbelt would have a series of parks along an approximately 4-mile-long walking trail system. This trail system would be accessible to the public. The remainder of the comments are statements about the Project and do not raise an issues relative to the EIR analysis.

I36-3

The California Environmental Quality Act requires that an EIR specify the existing physical

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| <p>-The EIR/Plan states that the Open Space will not be under the control and responsibility of the Villages HOA. So who will control, care for, and upkeep that area going forward and how will such effort be funded in a way to make sure it is properly maintained without burdening the City directly or indirectly the surrounding, currently existing neighborhood?</p> <p>Respectfully Submitted,<br/>Gary Erickson<br/>2021 Via Alexandra<br/>92026</p> | <p>environmental conditions to establish the “environmental baseline” against which project impacts may be evaluated (14 CCR 15125(a)). Environmental impacts generally should be examined in light of this baseline environment as it exists when the Notice of Preparation was issued. Thus, the EIR properly considered the Project’s effects in comparison to existing baseline conditions at the site. The history of the site and acquisition of the site prior to 2012 is immaterial to the EIR. Regarding fencing, the commenter is correct that the Project includes fencing. The City does not agree that the Project does not foster a cohesive spirit of the overall community. The Project’s recreational areas, including a 4-mile trail and a series of park areas, would be accessible to the public and surrounding community members. Additionally, the social and community amenities for the Project site are available to be patronized by nearby residents, which include but are not limited to a restaurant/bar, a convenience grocery store, a concert/performance facility, and a community farm.</p> <p><b>I36-4</b> Section 1.2.1 of the EIR (page 1-3) describes that the 48-acre Open Space System would consist of 29 acres of landscaped greenbelt and 19 acres of environmental channels and retention basins to convey stormwater from San Marcos Creek through the Project site and stormwater from the Project site. The proposed 29 acres of greenbelt would include four parks along an</p> |
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↑ I36-4  
Cont.

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|  | <p>approximately 4-mile-long walking trail system, which would be accessible to the public (see Figure 1-5, Open Space, Trails, and Parks Plan). The access points, including the main entry and three access points along Country Club land, can be seen on Figure 1-5.</p> <p>As stated in Section 2.2.5 (regarding Mitigation Measure M-BI-2), the applicant will establish an endowment to secure the ongoing funding for the perpetual maintenance, monitoring, and management of the biological conservation easement area by an agency, non-profit organization, or other entity approved by the City. As stated in the Specific Plan (page 4), the trails and neighborhood parks will be accessible to Village residents and existing nearby residents, and will be maintained through the Village homeowner's association fee structure.</p> |
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Comment Letter I37

Ms K Blackson  
Contract Planner  
Planning Department  
City of Escondido

While I have not studied the Draft Specific Plan, 3/16/17, in great detail since it's just that, a Draft, and not the current focus in the review process, my scanning of parts of it immediately points out nomenclature, referencing and disconnect problems.

An example is the reference made to the "abandoned" golf course. If truly abandoned, then the City has the legal rights to assume ownership!!!

Another.....reference is made to Figure 5.9 for an overview of the San Marcos Creek passing through the property, but Figure 5.4 seems to be the correct one.

Both the Specific Plan and EIR make references to a "Country Club Drive" for various points. All my map searches do not identify this roadway anywhere in the vicinity of the project. There is a CCD located several miles south of the project that wouldn't seem plausible to be referenced in these discussions.

Another confusion point is the multiple references to the Open Space, Greenbelt area, and Drainage area. The plan seems to repeatedly call out 48 Acres of Open Space with 19 Acres set aside for Drainage (ie. holding ponds, flow swallows, and the like) which yields 29 Acres for Greenbelt. Yet in other places, reference is made to 32 or 34 Acres of Greenbelt.

An example of a disconnect is the Draft SP doesn't identify any proposed changes to Nutmeg, whereas the EIR includes such.

Hopefully, the developer has carefully reviewed their draft and corrected these and others that are there so the Final Copy can be read with clarity and is accurate to detail and the facts. I look forward to the Planning Department uploading the Final Specific Plan for Public reading.

Respectfully Submitted,  
Gary Erickson  
2021 Via Alexandra  
92026

I37-1  
I37-2  
I37-3  
I37-4

Response to Comment Letter I37

Gary Erickson  
August 11, 2017

**I37-1** The City of Escondido (City) acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City notes the comments regarding the Specific Plan. The revised planning documents are available on the website and available at least 10 days prior to the hearing. The commenter is correct that Figure 5.4 provides the overview of San Marcos Creek drainage.

**I37-2** The City did not find any references to Country Club Drive in the Specific Plan. The commenter does not specify where this was found; therefore, no further response can be provided. In the Environmental Impact Report (EIR), the City found one reference to Country Club Drive on page 2.7-4 of the EIR and page 12 of Appendix 2.7-1, Traffic Impact Analysis. This reference has been corrected to Country Club Lane. This correction to the EIR is presented in ~~strikeout~~/underline format; refer to the errata of the Final EIR. The changes do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the California Environmental Quality Act Guidelines.

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|  | <p><b>I37-3</b> The City did not find any inconsistencies or errors in the EIR regarding the acreage of the greenbelt area. The EIR consistency and accurately states the greenbelt is 29 acres. The updated Specific Plan has been corrected to remove any inconsistencies regarding the acreage of the greenbelt area.</p> <p><b>I37-4</b> The commenter claims there are inconsistencies regarding changes to Nutmeg Street. The City does not agree. Page 62 of the Specific Plan describes the restriping associated El Norte Parkway between the southbound on-ramp to Interstate 15 and the Nutmeg Street/Nordahl Road intersection. The Specific Plan (page 62) also states that traffic-calming measures for West Country Club Lane will be constructed between Nutmeg Street and Golden Circle Drive. The comment does not provide more specificity regarding the claimed disconnect; therefore, no further response can be provided. The City acknowledges the comment's request for the Final Specific Plan; see response to I37-1.</p> |
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Comment Letter I38

**From:** Garymard@aol.com  
**To:** Kristin Blackson  
**Cc:** John Masson; ms18tr.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009::Plan Review & Approval Process  
**Date:** Tuesday, August 08, 2017 2:26:30 PM

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

In reviewing the outlined process currently shown on the City's website, I find several concerns that need to be addressed. Namely:

I. Specific Plan:

A. At the 7/31/17 Open House Review, it was mentioned that the Planning Department had just received a "Final" copy of the Specific Plan.

1. If changes are made to the EIR, is it anticipated that some final adjustment might correspondingly needed to the Specific Plan? If so, then there would be another "Final" copy Specific Plan.

B. When there is a "Final" Specific Plan, there should be a formal date of availability identified on the schedule where it can be accessed online. This date should be sufficiently before the next decision step in the process, namely going before the Planning Commission, to allow reasonable public reading. Hopefully this availability date can be put on the schedule by September 1, 2017.

II. EIR:

A. The 7/31/17 Open House Review focused mainly on the EIR for mitigation of areas where there was significant impact.

1. Anticipating that you will receive reasonable feedback which likely will drive further changes to the EIR, and will lead to a "Final" version of it.

B. When there is a "Final" EIR, there should be a formal date of availability identified on the schedule where it can be accessed online. This date should be sufficiently before the next decision step in the process, namely going before the Planning Commission. Hopefully this availability date can also be put on the schedule by September 1, 2017.

III. Approval by the Local Neighborhood

A. In a past ECCHO neighborhood informational meeting, Councilman Morasco came before the group and stated that in negotiating a settlement to the STIR/Schlessinger lawsuit, that the City would be solely guiding the review and approval process of any planned development. In addition, he stated that the local neighborhood would have the last say in approving any development.

1. Therefore, a final step in the approval process needs to be added which would entail a local vote of the immediate neighborhood surrounding the property so that they can weigh in.

IV. Remaining Step Milestone Date Notification

A. How will the Planning Department be notifying the public once dates are set for any of the remaining steps in the process? Will such include sending notification to anyone providing feedback for which you have an email address?

I38-1

I38-2

I38-3

I38-4

Response to Comment Letter I38

Gary Erickson  
 August 8, 2017

**I38-1** The commenter provides a general comment requesting the latest version of the Final Specific Plan. The City of Escondido (City) notes the comments, which will be included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project. The comments do not raise environmental issues pertaining to the EIR that require a response.

**I38-2** The commenter provides a general comment requesting the latest version of the Final EIR. The City notes the comments, which will be included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project. The comments do not raise environmental issues pertaining to the EIR that require a response.

**I38-3** The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City notes the commenter's request for a local vote of approval. The City will include the comment as part of the Final EIR for review and consideration by the decision makers

Respectfully Submitted,  
Gary Erickson  
2021 Via Alexandra  
92026

**I38-4**

prior to a final decision on the Project.

The comment does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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.

Comment Letter I39

**From:** Garymaed@aol.com  
**To:** [Kristin Blackson](#)  
**Cc:** [John Maeson](#); [Bill Martin](#); [mslater.2014@cox.net](mailto:mslater.2014@cox.net)  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009:::Feedback Organization  
**Date:** Tuesday, August 8, 2017 2:27:10 PM

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

In reviewing the EIR, there were several areas noted as having significant impact fallout regarding the current proposal. Further, trying to study the public's concern relating to any one of these areas from the feedback received at the February Open House was very difficult.

From the July Open House review, I'm told there has been a lot of feedback being received by the Planning Department. I would request that EIR feedback this time around, particularly those in the form of any signed/authored feedback, be identified in a simple code system related to the impact areas and ranking in the order of most significant/popular feedback area along with perhaps a "General" and "Other" category or two. Further in listing the feedback that they then be collated in general like groups with the higher ranking impact area taking precedence, and so on. This should greatly improve the analysis and concerns raised by the public for anyone trying to subsequently study this.

If not already planned, I would request that the EIR's feedback be forwarded along to the next parties in the reviewing process for their reference when considering the next action step.

Respectfully Submitted,  
 Gary Erickson  
 2021 Via Alexandra  
 92026

I39-1

Response to Comment Letter I39

**Gary Erickson**  
**August 8, 2017**

I39-1

The City of Escondido (City) acknowledges the comment, and notes it expresses the requests related to the Environmental Impact Report response-to-comments process. The City will provide all responses to comments to the decision makers for consideration prior to the hearing. The responses to comments are assembled in Chapter 8 in the Final Environmental Impact Report. The responses are categorized and electronically bracketed so the commenter can clearly review the response. For issues that are frequently raised, a common response is prepared and provided as part of the introduction to Chapter 8. This format is standard practice for lead agencies, including the City.

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Comment Letter I40

**From:** Garyemasd@aol.com [mailto:Garyemasd@aol.com]  
**Sent:** Wednesday, August 09, 2017 11:09 AM  
**To:** Kristin Blackson <kblackson@esccondido.org>  
**Cc:** John Masson <jmasson@esccondido.org>; mslater.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009:Alternative Development Plans  
 Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

Re: The ECCHO Development Plan

In the EIR, Chapter 4, Project Alternatives, reference is made to two "alternatives" submitted by the ECCHO organization, which for analysis were combined by the Planning Department. My understanding is that ECCHO is not a licensed developer.

While they did make reference to two lesser number of residences to be built on the site in their submitted White Paper, 1/25/17, based upon "usable acreage" after an incomplete analysis of the ECC's property files in the Planning Department, it is a far stretch to take these numbers and build a "plan" around them for comparison. In grossing up of those numbers into an Alternative Plan, a lot of assumptions are being made and not completely stated.

For example, a reasonable extension of the 138 residence number could be the inclusion of a 9 hole Executive or an 18 hole Par 3 Golf Course which retains some of the golf element along with significant Open Space, yet accommodates development.

Then to make the comparative statement that either of these alternatives (138/158) would not provide a wide-range of lots sizes is a very presumptive conclusion. Why, because inherent in it is that any development has to provide a substantial number of lot sizes, particularly when the zoning is R-1-7 which has been in place for many years should be and needs to be the guiding standard. Secondly, one would ask, "How many lot sizes is enough?". And so on.....

What likely may result is an improvement in the quality of life in the community by less density and more visually open space to enjoy as has been in the past. Such a plan would maintain the general theme established when the Planned Retirement Community was designed 50 years ago and also maintain the custodianship of the property those original developers called for in subsequent ownership.

And additionally, likely result in more realistic architectural styles fitting better with the existing neighborhood of mostly single story family homes rather than creating an unsought uniqueness and differentiation. And interestingly, the single story style is being increasingly sought out by the baby boomer generation entering retirement years and downgrading. Hmmmmm

My last point is this. The Planning Department must be careful in accepting all the Objectives (in part which makes up the Developer's marketing strategy to sell units and attempt to get approval) as the proposal seeks to establish these as the bars by which to compare other proposals. There are other measures as or more important to the existing neighborhood in weighing what the "Best" Alternative may be. And perhaps, just perhaps, that "Best" Alternative may still be out there to be submitted!

So, if you're going to go down this path, you need to better justify the rationale behind this alternative and be careful of the conclusions and inferences drawn.

Respectfully Submitted,  
 Gary Erickson  
 2021 Via Alexandra  
 92026

I40-1

I40-2

I40-3

Response to Comment Letter I40

Gary Erickson  
 August 9, 2017

I40-1

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter relative to the alternatives selected for analysis in the Environmental Impact Report (EIR). The EIR considers a reasonable range of alternatives. The EIR evaluates the following four alternatives in detail: (1) No Project/No Development Alternative, (2) 158-Unit Reduced-Density Alternative, (3) 138-Unit Reduced-Density Alternative, and (4) 279-Unit Reduced-Density Alternative (EIR page 4-6). As required under the California Environmental Quality Act, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). The 158-Unit and 138-Unit Reduced-Density Alternatives were also selected for analysis because they were proposed by the Escondido Country Club Homeowners' Association during the public scoping process to lessen Project impacts (EIR page 4-4). The EIR considers an adequate range of potentially feasible alternatives to foster informed decision-making and public participation.

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|  | <p><b>I40-2</b> The City acknowledges the comment and notes it expresses the commenter’s opinion regarding a reduced density alternative; see response to I40-1. The City has discretion to reject mitigation or alternatives if it deems them infeasible, meaning they are not capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, environmental, social, technological, legal, or other factors (California Public Resources Code, Sections 21061.1, 21081(a)(3); 14 CCR 15091(c)(3), 15364). The City also may reject an alternative if it considers the alternative undesirable. The City will consider the feasibility and desirability of alternatives in making its decision concerning whether to approve the Project or an alternative (California Public Resources Code, Section 21081(a)(3)).</p> <p><b>I40-3</b> The City acknowledges the comment and notes it expresses the opinions of the commenter. The EIR’s description of Project objectives properly states the underlying purpose of the Project (<i>Habitat and Watershed Caretakers</i> 2013). Specifically, the EIR states the following (EIR pages 1-1, 1-2, 4-2, 4-3):</p> <p style="padding-left: 40px;">The underlying purpose of the Project is to revitalize an existing residential area surrounding the Escondido Country Club community, and to develop a new community with unique homes and</p> |
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|  | <p>interrelated open space and recreation amenities on 109 acres near existing and planned infrastructure, services, and jobs in the vicinity of the North San Diego County Interstate 15 (I-15) corridor. Project implementation is guided by the following statement of Project objectives:</p> <ol style="list-style-type: none"><li>1. Eliminate the blighted condition of the current Project site and abate hazards to public health and safety.</li><li>2. Assist the City in implementing the General Plan's housing goals by increasing the City's housing stock and diversifying the range of housing opportunities.</li><li>3. Provide a variety of housing types and designs within interrelated villages located adjacent to an existing, established residential community.</li><li>4. Create an interrelated open space system including a greenbelt with walking trails, pocket parks, and landscape areas, in addition to active recreation facilities, to facilitate an active and healthy lifestyle for residents, thereby assisting the City in implementing</li></ol> |
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|  | <p>the General Plan’s community health and services goals.</p> <ol style="list-style-type: none"><li>5. Provide a place for the community to gather, socialize, dine, and recreate thereby assisting the City in implementing the General Plan’s community health and services goals.</li><li>6. Provide a Specific Alignment Plan as part of the Project that would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation.</li><li>7. Protect privacy of existing residents by providing a landscaped buffer between all new and existing homes.</li><li>8. Implement sustainable design measures to enhance walkability, minimize water usage for both interior and exterior facilities, and maximize energy-saving features; and cluster residential within established single-family villages or neighborhoods to maintain site topography, protect natural resources, and avoid hazards consistent with the</li></ol> |
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|  | <p>City's land use goals.</p> <p>9. Implement timely public facilities within existing service areas without burden or cost to existing residents, visitors, or North San Diego County incorporated and unincorporated communities.</p> <p>These objectives properly state not only the nature of the Project but also its underlying purpose.</p> <p>In selecting alternatives for discussion in the EIR, the City did not reject alternatives simply for failing to meet all Project objectives, but rather, properly considered alternatives that would achieve the most basic underlying Project objectives and/or the Project's fundamental purpose. For instance, the 138- and 158-Unit Reduced-Density Alternatives would not meet four Project objectives and only partially achieve two others; however, they are still evaluated in the EIR. Therefore, the EIR properly considered alternatives even if they would impede attainment of Project objectives to some extent (14 CCR 15126.6(b)).</p> <p><b>References</b></p> <p><i>Habitat and Watershed Caretakers</i>. 2013. 213 Cal.App.4th 1277, 1299–1300.</p> |
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Comment Letter I41

From: Garymasdi@aol.com  
 To: Kristin Blackson  
 Cc: John Masson; mslater.2014@cox.net  
 Subject: ECC-The Villages ENV 16-0010; SUB 16-009:::Caltrans-Traffic Issues  
 Date: Wednesday, August 09, 2017 11:09:45 AM

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido.

Reviewing Section 7.7, Transportation and Traffic, p. 7-12, and further that I have been led to believe that Caltrans has yet to designate/finalize Alternate Emergency Routing (AER) for anything north of 78 I believe plans which affect the potential flows through the ECC area need to be very carefully considered.

From the Open House I understand an initial meeting has taken place with Caltrans, but was specific to the 15SB entrance ramp issue. No finalized actions have yet been taken regarding future Caltrans decisions on that issue.

Given that there has already been several Traffic Alerts this year due to accidents affecting 78WB around the Nordahl intersection which greatly impacted the 15 SB flow north of that interchange, it would seem this is already becoming a reality to be dealt with in the area traffic flows. The representative from Lincott... at the Open House handling Traffic questions admitted that recent traffic studies ONLY dealt with steady-flow conditions in May 2016 without ANY attempt to consider peak or emergency situations. This is an issue.

More specifically would be proposed changes for AER identified at least in:::

1. M-TR-1 Intersection #8. El Norte Parkway/Woodland Parkway.
2. M-TR-2 Intersection #9. El Norte Parkway/Country Club Lane.
3. M-TR-5 El Norte Parkway to I-15 Southbound On-Ramp.
4. M-TR-X Intersection of CCL WB & Golden Circle

The design of only a single lane round-about is of concern as CCL is a four lane thorough-fare for most of it's length. During periods of peak vehicle traffic such as rush hour or emergency alternate routing, this would most likely severely limit flow handling. One alternative is to design and construction a two lane round-about.

This addition also would address the need to increase vehicle flow in the event of an emergency for vehicles trying to come from 15SB to 78WB and use of CCL WB as an alternative Emergency Roadway. The planned single lane round-about would become an impediment to free-flowing two CCL WB approaching lanes. Traffic could potentially become snarled for hours.

In a standard intersection configuration, it would seem advisable to re-stripe CCLWB into a configuration of 1LH, 1 LH-S-RH for its two lanes unless widened further. Possibly, some consideration to a traffic signals may be in order as an alternative unless it is found a dual lane roundabout could be equivalent or better in such circumstances.

5. M-TR-#TBD Segment TBD of CCL (Gary Lane to Intersection with Golden Circle)

This addition would address the need to increase vehicle flow in the event of an emergency and use of CCL WB as an alternative Emergency Roadway. It would seem advisable to re-stripe

I41-1

I41-2

I41-3

Response to Comment Letter I41

Gary Erickson  
 August 9, 2017

I41-1

The California Department of Transportation (Caltrans) did not comment on the Project's effect on its Alternative Emergency Routing (AER) in either the Notice of Preparation or the comments on the completed traffic study. Once approved, it is expected that the Project and its effects will be part of the baseline condition that will be Caltrans' responsibility to consider when finalizing the AER north of State Route 78. Also, traffic impact studies conducted for Environmental Impact Reports (EIRs) are developed to represent the typical weekday 24-hour (average daily traffic) and AM and PM commuter peak hours of traffic. Special and emergency events are atypical and are not included in the EIR traffic studies for local developments unrelated to Caltrans projects.

The comment does not raise any specific issue related to the adequacy of the EIR. 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.

I41-2

As discussed in Section 2.7, Transportation and Traffic, the Project will implement a Specific Alignment Plan (SAP) for Country Club Lane from El Norte Parkway to Nutmeg Street, within which the roundabouts are

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| <p>CCLWB into two WB lanes and if necessary widen the roadway along current Country Clubhouse area to accommodate this. As a minimum, a three lane, 2WB, 1EB would be an improvement for this contingency.</p> <p>6. M-TR-#TBD Intersection of CCL &amp; Gary Lane</p> <p>The proposed round-about to handle Villages traffic and that of the neighborhoods to the north could become an issue in an Emergency flow situation. The single lane round-about proposed would throttle two approaching CCL lanes (if restriped appropriately), especially at times of peak traffic, and seriously affect the ability of Gary Lane traffic to enter into the round-about. This has become the case in Sedona, AZ in their single lane roundabouts on main arteries during high flow periods. In other places Sedona has incorporated DOUBLE LANE roundabouts to handle increased flows to minimize disruptions and safety issues.</p> <p>7. M-TR-#TBD Intersection of CCL &amp; La Brea</p> <p>The proposed roundabout to handle Villages traffic and that of the neighborhoods to the south could become an issue in an Emergency flow situation. The single lane roundabout would throttle two approaching CCL lanes and at times of peak traffic, seriously affecting the ability of the new Villages street from the north traffic to enter into the roundabout and to a lesser degree La Brea lane from the south to enter into the round-about. This has become the case in Sedona, AZ in their single lane round-about during high flow periods. In other places Sedona has incorporated DOUBLE LANE roundabouts to handle increased flows to minimize disruptions and safety issues.</p> <p>8. M-TR-#TBD Intersection of Nutmeg &amp; CCL</p> <p>Today this a somewhat busy intersection due to increased volume of traffic flow, particularly during the morning rush hour. In the event of an emergency diverting 15SB-78WB traffic onto CCL, some measure of increased traffic control, such as signal control, would seem in order in the interest of safety and flow.</p> <p>Further, any plans and reconfiguration of CCL with calming changes beyond the roundabouts should likewise be carefully considered at this juncture, perhaps with modeling of increase peak traffic flows AND also what happens to I15SB traffic levels should either or both LARGE developments under consideration just north of Escondido be approved by the county. This will certainly introduce another level of overall congestion and impact what could happen in an emergency in the ECC area.</p> <p>It has also been brought to my attention, that <u>at least one</u> GPS routing service, namely WAZE, is showing an alternative path for 15SB to 78WB transition of blockage to exit Center City Pkwy and then onto CCL WB to ENP to Woodlands Pkwy. So far, while they may not have any authority, it none-the-less adds an extra element into the appropriate planning before things are finalized and certainly before any construction begins. Others may also recommend such flow, of which, the City has no control, but the impact will seriously be felt upon the local streets around this project.</p> <p>In summary, I request that as a minimum, if not already planned or transacted, that a meeting with Caltrans be held on the Alternative Emergency Routing topic and that any meetings, the prior and these with Caltrans, be summarized in notes and added to the Final EIR, with copies to Caltrans. Secondly, consideration should be addressed in the EIR's traffic section regarding the emergency/peak flow situations.</p> <p>Respectfully Submitted,<br/>Gary Erickson<br/>2021 Via Alexandra<br/>92026</p> | <p>I41-3<br/>Cont.</p> <p>I41-4</p> <p>I41-5</p> <p>I41-6</p> <p><b>I41-3</b></p> <p>proposed. With this plan, the majority of Country Club Lane will be reconfigured to a two-lane divided roadway with the exception of the short segment of La Brea Street to Firestone Drive, which will have two lanes in the westbound direction. The street segments adjacent to the roundabouts proposed at Golden Circle Drive and La Brea Street feature single lanes approaches, as shown on Figures 2.7-1a and 2.7-1b of Section 2.7 of the EIR. Analyses completed with these configurations for the locations identified show acceptable level of service B or better operations at buildout of the community under the Project.</p> <p>Roundabouts are the highest flowing of traffic control alternatives (signals and stop controls). The fire department has reviewed and approved the SAP layout with respect to emergency response times and maneuverability of emergency equipment. The single-lane segments have wide, buffered bike lanes that allow for vehicles to pull over to let emergency vehicles pass.</p> <p>The SAP proposes roundabouts as part of an overall traffic calming approach to the corridor. Traffic signals are not considered and are unnecessary.</p> <p>See the responses to I41-1 and I41-3. The proposed configuration provides adequate capacity for existing and future traffic, and any AER analysis by Caltrans will need to consider the Project's contributions to</p> |
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|  | <p>traffic and the SAP.</p> <p><b>I41-4</b> See the response to I41-1. Furthermore, the Project will signalize the Nutmeg Street and Country Club Lane intersection as part of the SAP.</p> <p><b>I41-5</b> See the response to I41-1. Additionally, the traffic impact study evaluated near-term and long-term cumulative projects. Traffic from these projects were included in the capacity analyses, findings of significance, and proposed mitigation measures.</p> <p><b>I41-6</b> The existing traffic volumes were conducted during peak periods and reflect and cut-through traffic in the area as directed by commercial Global Positioning System software or other means. Regarding a meeting with Caltrans concerning AER, Caltrans did not comment on the Project’s effect on its AER in the Notice of Preparation or the comments on the completed traffic study. Once approved, it is expected that the Project and its effects will be part of the baseline condition that will be Caltrans’ responsibility to consider when finalizing AER north of State Route 78.</p> <p>The City acknowledges the comment and notes it provides factual background information and expresses the opinions of the commentator. 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> |
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Comment Letter I42

From: [Kristin Blackson](mailto:Kristin.Blackson)  
 To: [Kristin Blackson](mailto:Kristin.Blackson)  
 Subject: Fw: ECC-The Villages ENV 16-0010; SUB 16-009:Water, Water  
 Date: Sunday, August 13, 2017 7:01:59 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

From: Garyemasd@aol.com <Garyemasd@aol.com>  
 Sent: Thursday, August 10, 2017 10:12 AM  
 To: Kristin Blackson  
 Cc: John Masson; mslater.2014@cox.net  
 Subject: ECC-The Villages ENV 16-0010; SUB 16-009:Water, Water

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

And is there any to drink for The Villages????

Back in 2014, prior to the imposed mandatory water cutbacks, the Escondido Water Department stated that it was almost at full allocation of its residential capacity. Since that time at least two sizable developments have been approved which will draw upon that limited remaining capacity, namely the Lexington by KB Homes and the Pradera's by Lennar, along with other new residences and apartment buildings.

The EIR, Appendix 3.1.9-1, addresses the mechanics of the suppliers and how water would be delivered to the site, but fails to get into the topic of there being sufficient residential capacity to service the project.

No statement is included clarifying and verifying the availability of capacity from the Escondido Water Department. This needs to be investigated and determined that any usage capacity has not come from the reduction imposed by the recent mandatory cutbacks. If so, this would raise other major issues.

Given the 2014 position, the Escondido Water Department needs to provide a statement that sufficient capacity currently exists to include this project in its projected allocation for residences. Further, an explanation needs to be provided in the EIR identifying any additional allocation from the water supplier to the Escondido Water Department since 2014 that would cover the extra demand made by this project. Additionally a statement is needed clarifying the impact of this project upon remaining capacity.

Respectfully Submitted,  
 Gary Erickson  
 2021 Via Alexandra  
 92026

I42-1

I42-2

Response to Comment Letter I42

Gary Erickson  
 August 10, 2017

I42-1

The City of Escondido (City) notes the comment provides factual background information and expresses concern regarding water supply. As analyzed in Section 3.1.9, Utilities and Service Systems, of the Environmental Impact Report (EIR), “the City of Escondido and Rincon [Rincon del Diablo Municipal Water District] have indicated there would be sufficient potable and recycled water to supply the Project” (EIR page 3.1.9-50). The Project, along with any other cumulative projects, would be required to provide availability and commitment letters demonstrating sufficient water resources and access to available water facilities, and would have to comply with Senate Bills 610 and 221, if applicable. Adherence to these regulations would ensure that the Project would not result in a demand for water that exceeds existing resources or necessitates new or expanded facilities.

I42-2

The City notes the comment expresses concern regarding water supply. As analyzed in Section 3.1.9 of the EIR, “the City of Escondido and Rincon have indicated there would be sufficient potable and recycled water to supply the Project” (EIR page 3.1.9-50). The analysis used regional and local water

demand and supply information from the following four sources: (1) the City of Escondido water service area's 2015 Urban Water Management Plan (UWMP) (City of Escondido 2016), (2) Rincon's 2015 UWMP (Rincon 2016), (3) San Diego County Water Authority's 2015 UWMP (SDCWA 2016), and (4) Metropolitan Water District of Southern California's 2015 UWMP (Metropolitan 2016). This is because the City and Rincon are member agencies of the San Diego County Water Authority, and their supplies, for the most part, are purchased from the San Diego County Water Authority. The City supplies potable water to approximately 26,000 residential, commercial, industrial, and agricultural customers. Through its exchange agreement, Rincon would provide water service to the Project. The Project is designated in the Rincon 958 Zone. Rincon's Engineering Division indicated that Rincon has the capacity to support the proposed residences, contingent upon the applicant completing the necessary improvements to the existing infrastructure to support the added demand. References to substantiate this information are provided in the EIR (see Chapter 5, References). Additionally, a water service availability letter was provided by Rincon on August 29, 2017. A reference to this letter has been added to the EIR (see Section 3.1.9 and Chapter 5). This clarification to the EIR is presented in ~~strikeout~~underline format; refer to the errata of the

Final EIR. The change does not raise important new issues about significant effects on the environment. Such change is insignificant as the term is used in Section 15088.5(b) of the California Environmental Quality Act Guidelines.

**References**

City of Escondido. 2016a. *2015 Urban Water Management Plan*. Prepared by RMC Water and Environment, June 2016.

Metropolitan. 2016. *2015 Urban Water Management Plan*. Draft. March 2016. [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2015\\_UWMP.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2015_UWMP.pdf).

Rincon (Rincon del Diablo Municipal Water District). 2016a. *Rincon del Diablo Municipal Water District 2015 Urban Water Management Plan*. June 28, 2016. <http://www.rinconwater.org/images/Rincon/F2015UWMP.pdf>.

SDCWA. 2016. *San Diego County Water Authority Final 2015 Urban Water Management Plan*. June 2016. [http://www.sdcwa.org/sites/default/files/files/water-management/water\\_resources/2015%20UWMP%20Final%2006222016.pdf](http://www.sdcwa.org/sites/default/files/files/water-management/water_resources/2015%20UWMP%20Final%2006222016.pdf).

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Comment Letter I43

**From:** [Kristin Blackson](#)  
**To:** [Kristin Blackson](#)  
**Subject:** Fvr: ECC-The Villages; ENV 16-0010; SUP 16-009; Pay/Fund As You Go  
**Date:** Sunday, August 13, 2017 7:38:03 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Garyemasd@aol.com <Garyemasd@aol.com>  
**Sent:** Friday, August 11, 2017 12:31 PM  
**To:** Kristin Blackson  
**Cc:** mslater.2014@cox.net; John Masson  
**Subject:** ECC-The Villages; ENV 16-0010; SUP 16-009; Pay/Fund As You Go

Ms Blackson,

I refer to the provision within the EIR which outlines where the developer will make payments for improvements to the support city infrastructure changes as a result of this development plan.

The current provisions are unacceptable for these reasons:

- The Developer is known to not honor or keep commitments made in past projects in the county.
- The payment plan requires stronger prudent management procedures to protect the City.

Therefore, the provisions should be changed such that deposits for such improvements will be made on a pro-rated, pay-as-you-go basis, meaning the developer/sub-developers shall make proportional monthly payments into a holding trust for any units sold and closed in the preceding month, subject to periodic auditing by the City's Accountants.

Further, appropriate Trust Fund(s) should be considered and funded monthly as defined. These fund would be under the control of the City and disbursements made according to applicable accounting/billing procedures, with the funding party being responsible for management of the changes and any cost over-runs.

The Developer has already stated they do not plan to do the actual development roll-out. Therefore, there will be, like Harmony Grove, sub-developers brought into the equation having to meet currently unstated and unknown qualification criteria.

The City should not find that if these sub-parties run into financial difficulties for any reason, that called-for payments are not made under the current EIR payment plan. Maybe NUWI should then become the back-up source liable to make these payments.

There currently is no penalty/provisions/gateways, to my knowledge, should that occur, for the offending party..... Poor custodianship and management.

Respectfully requested,  
 Gary Erickson

I43-1

I43-2

Response to Comment Letter I43

Gary Erickson  
 August 11, 2017

I43-1

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Environmental Impact Report. Therefore, no further response is required. The City will include the comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.

I43-2

The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an environmental issue. The City will include the comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.

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Comment Letter I44

**From:** Garyemasd@aol.com <Garyemasd@aol.com>  
**Sent:** Friday, August 11, 2017 12:31 PM  
**To:** Kristin Blackson  
**Cc:** John Masson; mslater.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009::Ancillary Funded Projects

Ms K Blackson  
Contract Planner  
Planning Department  
City of Escondido

In reading through the EIR and scanning the Draft Specific Plan at this point, a number of ancillary projects, many associated with mitigation, are being proposed and to be funded by someone, the Developer? It would be helpful to have a specific list of all of these attached to the EIR in the form of an Appendix for quick, easy future reference.

At some point these will need to have a funding/cost number associated with them along with management and administrative details to ensure they are properly carried out.

An example is the in EIR, Chapter 7, p. 7-3, reference is made to a "Non-Wasting Endowment" for the biological conservation easement area. But little additional detail is provided on the funding amount, funding source/responsibility, 1-Time/On-going, establishment date, administration, etc.

Further, the list can be used to make sure there are no financial impacts upon the City as committed to by the Developer once the Project is completed.

Respectfully Submitted,  
Gary Erickson  
2021 Via Alexandra  
92026

I44-1

Response to Comment Letter I44

Gary Erickson  
August 11, 2017

I44-1

The comment expresses general concern regarding funding of mitigation measure compliance activities. The City of Escondido acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City of Escondido will include the comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.

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Comment Letter I45

**From:** [Kristin Blackson](#)  
**To:** [Kristin Blackson](#)  
**Subject:** Fw: ECC-The Villages ENV 16-0010; SUB 16-009:Traffic Feedback-Nutmeg St. Issues  
**Date:** Sunday, August 13, 2017 7:38:37 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Garyemasd@aol.com <Garyemasd@aol.com>  
**Sent:** Friday, August 11, 2017 12:31 PM  
**To:** Kristin Blackson  
**Cc:** John Masson: mslater.2014@cox.net  
**Subject:** ECC-The Villages ENV 16-0010; SUB 16-009:Traffic Feedback-Nutmeg St. Issues

Ms Kristin Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

Ref: My 7/18/17 email to you on this subject

Subject: Remediation on Nutmeg St.; Issue-Safety

First, there seems to be a conflict of proposed work/improvements to Nutmeg between the Specific Plan (Draft) and the EIR documents. Taking the EIR as the superceding document presently therefore, I wish to comment further.

I45-1

This past week I was traveling SB on Nutmeg from CCL and prepared to turn into Via Alexandra as usual. However, because of oncoming NB traffic, I had to stop in lane and wait. For the second time in recent months I was almost rear-ended by another driver!!! The situation heightens when 3-4 vehicles stop behind me and the next few SB vehicles make the hill crest and are immediately jammed by the stopped vehicles. Panic time!

I45-2

This again causes me to raise the safety of this intersection and particularly with projected increased traffic from this new development and associated area roadway changes it proposes.

Secondly, I used to live in Valley Verde Mobil Home Park at the southern end of Nutmeg, across from the City Fire Station. Visiting friends there this past week reminded me of similar concerns that exist for those residents since the Nutmeg entrance is the only point of regular use. It is difficult to see NB vehicles coming around the curve to make an entry onto Nutmeg to head in the NB direction. On more than one occasion I've had to use the center median zone space to avoid creating a serious safety situation once committed to entry and then seeing an approaching vehicle. Residents entering the park from the south normally use the median zone as a LH turn lane to not back up traffic and waiting to turn in with oncoming SB traffic.

I45-3

With respect to my earlier comment requesting an updated traffic study, at the Open House I learned that such was conducted. However, it only looked at steady-state conditions (May 2016) and did not take into

I45-4

Response to Comment Letter I45

Gary Erickson  
 August 11, 2017

I45-1

The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. This comment is included in the Final Environmental Impact Report (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.

I45-2

The comment expresses concern regarding safety of the Nutmeg Street/Via Alexandra intersection. As stated in Section 2.7, Transportation and Traffic, Mitigation Measure M-TR-4 would require the constructions of interim improvements in the existing right-of-way on southbound Nutmeg Street between La Paloma Avenue and Via Alexandra to provide a wider travel lane and curb, gutter, and sidewalk improvements to the satisfaction of the City engineer. These improvements will enhance vehicular, pedestrian, and bicycle circulation and will increase capacity to mitigate the Project's impact. Through widening the travel lane on Nutmeg Street and clearing trees within the public right-of-way, sight visibility northerly of the driveway intersection will be improved. With implementation of these improvements, the near-term significant direct and

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|  | <p>cumulative impacts from the Project would be reduced to less than significant.</p> <p><b>I45-3</b> See the response to I45-2. Furthermore, the Project includes mitigation and a Specific Alignment Plan that will improve traffic operations and enhance public safety through (1) signalization of the Country Club Lane/Nutmeg Street intersection to the north as part of the Specific Alignment Plan, and (2) quarter width frontage improvements to Nutmeg Street south of Country Club Lane with development of Village 3.</p> <p><b>I45-4</b> The comment expresses concern regarding the Project traffic study’s omission of peak vehicle flow conditions in its analysis and traffic redirection to Nutmeg Street. Table 2.7-5 of the EIR shows a summary of the Project’s traffic generation. As tabulated, the Project is calculated to generate 4,280 daily trips with 319 total AM peak-hour trips (97 inbound/222 outbound) and 420 total PM peak-hour trips (293 inbound/127 outbound). The commenter does not provide any details or evidence that peak traffic conditions were not analyzed or that vehicles would divert to Nutmeg Street once traffic-calming measures are established along Country Club Lane. Because the comment is general in nature and does not provide any evidentiary support for these claims, a general response is all that is required (<i>Paulek v. California Dept. Water Resources</i> 2014).</p> |
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| <p>account peak vehicle flow conditions (emergency re-routing, etc.) and any ramifications they might introduce. Additionally, that study fails to consider the re-directing aspect of regular Country Club Lane flow, particularly WB, once the calming measures are introduced and drivers choose to divert onto Nutmeg! This is potentially an overall problem that will deteriorate road safety unless addressed more specifically, and lends more credence to the following.</p> <p>Therefore, given these two earlier stated safety concerns, I wish to amend my previous note with the following:</p> <p>1. <u>EIR p. 7-13, M-TR-4 Segment #15</u></p> <p>A. Upon the modification work of Nutmeg (La Paloma to Via Alexandria) that at the Via Alexandria intersection, the new lanes be striped to provide for a LH center turn lane for SB traffic, and</p> <p>B. Incorporate a new egress center lane for traffic exiting Via Alexandria into SB Nutmeg.</p> <p>2. <u>EIR p. 7-13, M-TR-4 Segment #15</u></p> <p>A. In conjunction with the reconfiguration and re-striping of Nutmeg lanes, that at the entrance to the Valley Verde Mobile Home Park, a formal LH turn lane be striped for NB traffic, and</p> <p>B. Add a new egress center lane for traffic exiting the VVMHP into the NB Nutmeg.</p> <p>3. <u>EIR p. 7-13, M-TR-4 Segment #15</u></p> <p>A. The intersection of Nutmeg/La Paloma/Memory Lane at the north end of the Nutmeg S section has its own set of safety issues/difficulties and has been the scene of at least 2-3 accidents in the last 24 mos. Because of the location on the start of the northern curve visibility for Memory Lane exiting to Nutmeg traffic is limited, in part because of bushes and large trees (some untrimmed particularly to the south) on the corner properties. This intersection requires further study for additional remedial action to improve the safety issue and the egress of Memory Lane vehicles, if at all possible, while this construction would take place.</p> <p>Lastly, in further reading through the EIR material, I find that the developer proposes to use a substantial amount of fill in the site grading. This to the tune of some <u>180,000 cubic yards(cy)</u> given that's an accurate number which will not rise. Dividing that by the average size truck load of 16 cy, yields an expected <u>23,500 one-way vehicle trips</u> during normal 5 weekday work hours!!! I will stress again that such traffic <b>NOT be allowed to use the 2-lane Nutmeg St</b>. There are other alternatives that can be used that would better accommodate this sharp rise in a short period of time as the grading phase is undertaken. In fact, all deliveries of equipment, materials, etc. for specifically this site construction should be instructed to not use Nutmeg as a permit condition of project grading and development.</p> <p>Respectfully submitted,<br/>         Gary Erickson<br/>         2021 Via Alexandria<br/>         92026</p> <p>cc: M. Slater, ECCHO Pres.<br/>         L. Hanson, VVMHP HOA Pres.<br/>         D. Hall, Park Place Estates (Via Alexandria/etc.) HOA Pres.</p> | <p><b>I45-5</b> The City acknowledges the commenter’s request for modifications to Nutmeg Street and Via Alexandria. Refer to the responses to I45-2, I45-3, and I45-4. The City does not agree that the Project and mitigation, as proposed, would result in safety concerns. The applicant has adequately addressed the potential impacts of new traffic that would be introduced to these roadways as a result of the Project. However, 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><b>I45-6</b> The City acknowledges the commenter’s request for modifications to Nutmeg Street and a new egress center lane on northbound Nutmeg Street. Refer to the responses to I45-2, I45-3, and I45-4. The City does not agree that the Project and mitigation, as proposed, would result in safety concerns. The applicant has adequately addressed the potential impacts of new traffic that would be introduced to these roadways as a result of the Project. However, 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><b>I45-7</b> The commenter requests further study for additional remedial action to improve safety at the intersection of Nutmeg Street/La Paloma/Memory Lane and the egress of Memory Lane vehicles. The applicant has</p> |
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|  | <p>adequately addressed the potential impacts of new traffic that would be introduced to these roadways as a result of the Project. However, the City acknowledges the commenter's concerns and will consider the visibility issues presented. The comment will be provided as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I45-8</b> The comment expresses concern regarding construction vehicle trips. The commenter is referred to the Construction Traffic Analysis incorporated at Section 12.0 of Appendix 2.7-1 of the EIR. In sum, the analysis noted that, because the Project will be constructed in phases and sub-phases that would not generate more than the Project's 4,500 average daily traffic, no capacity impacts are anticipated to occur during any construction phase. Furthermore, traffic control plans would be prepared to ensure efficient ingress/egress of trucks and equipment and to maintain access to the degree possible to Country Club Lane during construction.</p> <p>While the City considers the above evaluation adequate, in response to this comment, a supplemental construction traffic analysis has been prepared to provide additional detail concerning the potential effects of construction traffic to area circulation. See Final EIR Appendix 8-2. The supplemental analysis</p> |
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evaluated the effects to all street system components analyzed in the Project transportation impact analysis, including peak-hour intersection analysis, daily street segment volume analysis, peak-hour ramp meter analysis, and peak-hour freeway mainline analysis. Confirming the analysis in the EIR, the supplemental analysis determined that Project construction traffic will result in a less-than-significant impact to each of the evaluated roadways, intersections, ramp meters, and freeway segments.

Therefore, this supplemental analysis confirms the Project would result in less-than-significant construction traffic impacts, as previously disclosed. Because no new or more severe significant impacts have been identified, and the EIR was fundamentally correct and adequate, this information is insignificant as the term is used in Section 15088.5(b) of the California Environmental Quality Act Guidelines. Recirculation of the EIR is not required.

**References**

*Paulek v. California Dept. Water Resources.* 2014. 231 Cal.App.4th 35, 47.

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Comment Letter I46

**From:** [Kristin Blackson](#)  
**To:** [Kristin Blackson](#)  
**Subject:** Fw: ECC-The Villages: Specific Plan Feedback  
**Date:** Friday, August 18, 2017 7:51:40 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Garyemasd@aol.com <Garyemasd@aol.com>  
**Sent:** Friday, August 18, 2017 1:35 PM  
**To:** Kristin Blackson  
**Cc:** John Masson: mslater.2014@cox.net  
**Subject:** ECC-The Villages: Specific Plan Feedback

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

After a couple exchanges with Mike Strong and his indication that it will be several weeks before the latest version of the Specific Plan is made available for review, he encouraged me to reply with feedback on the *Draft* Specific Plan, dated 3/16/17. I had preferred to wait until an updated version was available to compare to my checklist which would have been much less tedious from my end. And hopefully a version which corrects for many of these points.

So to Mike's request, I will forward some of the issues I found in my lengthy review of the *Draft* since I have over 15 pages of notes/issues. I will not include all the sub-headings, but simply reference the (page) to which the feedback applies, and let you take it from there.

So, let's begin.

Overall, this is as much of a marketing document as it is a factual building plan with lots of redundancies that sometimes makes it difficult to keep the big picture in mind. An example is the specific reference to "48 acres of Open Space", repeated over a dozen times throughout the document.

1 (2) Buffer of 50-200 Ft: The figures/diagrams presented don't allow an accurate measurement. For example there are segments along the western back of the La Brea extension that appear less than that. But given the minimum referenced in conjunction with the building height specification of 35 Ft, and with new landscape of trees thrown in, it is difficult to believe that the same panorama view that exist prior to any development will not be seriously impacted by a fair percentage of the abutting properties, such that the statement made (4) of "retain existing distant views.....where they currently exist", is an overreach.

Further to this point.....It appears that Village 3, East Part, with all the proposed infill to be brought in, will have a new elevation raised several feet and end up at basically the same level as the existing homes on La Mirada. Again, having new homes with 35 Ft roof lines has to impact their prior distant views as calculated by some simple geometry. So again the statement (5) of "existing distant views maintained" is overreach AND creates an expectation that I seriously doubt can/will be fulfilled. Someone's going to end

I46-1

Response to Comment Letter I46

Gary Erikson  
 August 18, 2017

I46-1

The commenter has provided comments of the Draft Specific Plan dated March 16, 2017. The City of Escondido (City) notes the comments, which will be included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project. The comments do not raise environmental issues pertaining to the EIR; therefore, no additional response is required.

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| <p>of being disappointed.</p> <p>2. (4) Parks: referred to as Private. Confusing in the sense that I believe they are Private/Public, ie. owned/maintained by the VHOA, but for public use.</p> <p>3. (4) Walkability component of the 4+ miles of trails. The trail layout (32) shows limited access points for the surrounding community to easily utilize, whereas there appear to be numerous places for Village residents to access out their back yards and also formal entry points. In part this results from reference to erecting an exterior fence of some sort around all such Open Space/Greenbelt to "discourage human access". Today by comparison, almost all abutting properties can access the "Open Space" of the course through their back yards if they so choose, well at least before someone erected the chain link fencing.</p> <p>Additionally, if surrounding residents wish to reach their few exterior entry trial points or even come into the new Villages, are there adequate parking spaces and bike racks at those points for "walkers"?</p> <p>4. (6) Reference is made under "Sustainability" of "connectivity of existing neighborhoods to the Village Center", with the implication that the trails will do that. However, in reality, looking again at the trails access points (p 32), this is unsubstantiated.</p> <p>For example, anyone living to the north of the property cannot enter at the upper end of Village 1 for example, but must take a circuitous route to reach the Village Center, probably doubling their distance.</p> <p>5. (7) Under "Improve Circulation Connectivity", no mention is made of purported improvements to Nutmeg St., a dis-connect with the EIR. Also, no mention of the Intersection of El Norte Pkwy &amp; Woodland Pkwy changes, which by the way are stated in error in the EIR which would create more commuter headaches than they would solve if implemented as stated.</p> <p>6. (9) "The financial difficulties resulted in the property being foreclosed upon in 2012". Half truth, misleading. The ECC was part of a Holding Company's package of several assets, of which most of the OTHER assets fell upon hard financial times from the 2008-2010 economic recession. ECC and the Stoneridge CC in North Poway were both solvent at the time they were sold out of the bankruptcy proceedings. HOWEVER, the part of the story not stated was that the new ECC landowner took immediate actions to drive the ECC operation into the red to provide a basis to proceed into closure and redevelopment. Those actions taken were done by canceling a number of very viable, profitable financial activities at the course.</p> <p>7. (9) Reference made that "the City of Escondido retained NUWI as the Master Developer." Being checked with M. Strong, but no one has any verification the City did anything as a basis for this statement.</p> <p>8. (12) Speaks to smaller 2,000-4,000 SF lots as representative of surrounding neighborhood, but fails to take into account the those abutting the property have density transfers/giveaways as part of their lot description the brings them up to the R-1-7 zone code. Misleading. Also talks about lot widths, but silent to state lot depths to complete the image.</p> <p>9. (15) Figure 2.5: Data source not provided. Area 12 undefined. Area 3 appears to be incorrectly stated as Duplexes, when in actuality that area is populated with single family homes.</p> <p>10. (18) Speaks to re-establishing the "social fabric" of the community. However, no data is presented which speaks to what percentage of the existing surrounding neighborhood residents were members of the ECC so as to have it as their "social fabric" base. Nice concept, but again a marketing point without support.</p> <p>11. (18) States "The once vibrant Country Club property now lies fallow and a large chain link fence surrounds the abandoned and boarded up Club House." To be perfectly clearly, all part of the new landowner's strategy to create a mess that then most any solution would be an improvement!!! A play of</p> | <p style="text-align: center;">↑<br/>I46-1<br/>Cont.<br/>↓</p> |
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words to create a "White Knight" opportunity....all part of the game! And the applicant might want to be VERY CAREFUL in their choice of terminology and use of the specific term "abandoned", since if true and that it is what they want the property to be classified as, the City has legal right to take over such property!!!

6.(18) Greenbelt stated to have 32 Acres, yet there are other reference throughout the Plan (such as (19)) that give it a different number! Inconsistent.

7.(29) Reference to a "Total Reach Width". Unclear what this is in reference to and how it plays into something.

8.(35) Talks about a Trail System and references "Regional biking and hiking routes", yet none are shown in any references/Figures/Maps to bear this statement out.

9.(35) Speaks to 4 Neighborhood (Village) parks. Also reference Dog Parks and Tot Lots/Parks. Unclear how all these tie together. Is each Neighborhood Park comprised of three components...ie. an Open/Activity Area, A Dog Park, and A Tot Lot????

10.(36) Speaks to painted material for fences/walls. Paint doesn't hold up well in the California sun....a long term maintenance issue.....who's responsibility to maintain?

11.(36) Village Center: Restaurant located at back corner, away from parking lot. Unclear what access/entrance path will be. Will patrons have to walk through Banquets, Outdoor gatherings if underway, to reach it? Wouldn't having the Banquet room next to the out theatre are as a place setting for weddings make more sense???

12(39) Unique theme of Village 1 and Village Center, may well be representative of the 1930's/1940's, but this is 2017 and it does not fit with the prevailing architecture of the surrounding neighborhood. Thought the concept was to compliment and blend into the existing aesthetic style of what's already there?

13(43) Statement made that Village (3) East Part will have (regular vehicle) access both to La Brea and Nutmeg. Not true.

14.(52) Streetscape design. Another disconnect.

15.(54) Street calming....Uses that word "could" include roundabouts. Unclear what will be the deciding factor nor any discussion of other alternatives to achieve goal. Just a talking point?

16.(54) Phasing....Open Space/Trials/Parks....Is each sub-developer responsible for that portion that falls into their section once that area begins development? Unclear how it comes together as a total concept.

17.(58) Has the City signed off for accepting ANY maintenance responsibilities what-so-ever as it relates to this project?

18.(59) Streets w/ complex. Unclear why the City has to take over as public streets when everything else associated with this project is private. Another potential maintenance burden for the City.

19(66) "Mix of services" to be provided....who decides? Unclear where these come from since NUWI has never published a summary list of feedback from their neighborhood "listening" meetings. Community has gone through 50+ years without these and survived. These same services referenced are located conveniently within the surrounding community, so very questionable the support is there, when they should be self-supporting.

20.(66) Can't connect with the premise that creating three distinct Villages qualifies as "fitting in" with the existing community. Could see, for example, where a blend of single story along with two story homes on the same street, like surrounding neighborhood would fit.

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| <p>21. (66) Reference is made in Goal 5 to "avoid hazards", but fails to define what some of those are to know if plan really avoids them!</p> <p>22. (66) Talks about new buildings being at lower elevations that surrounding, existing residences to preserve views. However, according to elevation data, there is very little elevation difference to really bear this out, particularly with roof heights of 35 Ft thrown into the mix. Again, statement made "maintain distant views from existing residences in the area" can't be support with implied designs, layout, and positioning of new buildings.</p> <p>23. (67) Argument trying to be made that the Open Space, with its attractive environment settings and visual relief from the new development is a plus compared to the unobstructed openness and views currently enjoyed by abutting properties. Particularly when there will be two story homes a mere 60' away. Someone's dream?</p> <p>24. (67) Other than roundabouts, no other calming measures discussed. For example, no mention of smart signaling systems which adapt timing to flow conditions.</p> <p>25. (67) Village Center: talks about multi-modal means of accessing for existing residences, but then goes on to make the statement of "keep from traversing through the new residential neighborhoods". But the layout forces existing residents to go onto periphery streets to reach it. Confused!</p> <p>26. (67) Additionally....."promoting a convenient means of access to the amenities". In whose opinion? Layout implies otherwise.</p> <p>27. (68) Goal 3: Definition of integrity counters what is being created by distinct and unique Villages which DO impact the flavor and ambience of the existing neighborhood by contrasting sharply.</p> <p>28. (68) Virtues of a "small" grocery store when there is a 7/11 with more variety and probably cheaper pricing within a couple blocks to it, is questionable. And the Fresh Produce also is questionable since these are already available at a major grocery within a mile of the project.</p> <p>23. (68) Have no idea where some of these "Goals" are coming from....being self-imposed? Goal 7 seems to be mis-applied, anyway, when the goal should be trying to seamlessly fit a new community within an existing one, not to create something with a distinct identity and gives rise to identity division.</p> <p>24. (69) Unclear exactly what overall identity they are trying to create to achieve one overall community. Theirs appears to be different than that sought be a majority of the surrounding neighborhood.</p> <p>25. (70) Makes the statement that guidelines for exterior Village units and adjacent abutting properties are "substantially" similar in character. NO, THEY ARE NOT!</p> <p>26. (70) Statement "ECC closure has resulted in severe visual degradation and stigmatization of the community". And why wouldn't it when it's part of the strategy to force change upon the existing neighborhood. All by design! And furthermore, the owner's failure to properly maintain the property without being cited by the City on numerous occasions to date, is just another part of this game plan!. Makes it easy for someone like this applicant to try to make such points.</p> <p>27. (70) Applicant makes reference to a program of outreach and communications, but in reality just went through the motions, but in the end has put forth their own agenda. Very clear they were not receptive to ideas that didn't fit with their model of what they wanted to create.</p> <p>28. (71). Makes statement of "Reduce need for use of motorized vehicles". If there was even a 1% reduction of our mobile society's use of motorized vehicles, I'd be amazed! Nice to say, imply, but no way to measure to back up claim. More dreaming.</p> <p>29.(71) Make statement of "facilitate annexation into City's Landscape Maintenance District". I have not</p> | <p style="text-align: center;">↑<br/>I46-1<br/>Cont.<br/>↓</p> |
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heard nor seen that the City is willing to accept any of this. May be wishful thinking. And no cost projections provided to even help scope this.

30.(71) Tries to make the assertion that this SPA is THE best solution, as compared to following the existing zoning applicable to the property along with other concepts which might preserve part of a golfing element. All depends on someone's point of view and ulterior motives, perhaps.

31.(72) How can landscape trees in the buffer zone for shade and visual buffer NOT block distant hillside views? Some new principle of science?

32.(73) Comment made for large scale projects....."to create distinct districts that complement the existing community." I'm trying to figure out how "distinct" and "complement" go together and yields a seamless transition in an already existing neighborhood! Does planning have an answer for this?

33.(74) Statement made "change zoning via SPA to get mixture of several land uses." Sure, net result.... can jam in more dwelling units, create another Harmony Grove, and maximize profits!!!! Really?

34.(75) Statement that the "...Open Space... buffers...social-recreational amenities...with the plan that can financially support these planning efforts" No financial assessment is offered to validate such a broad statement.

35.(76) Section 12 talks about...."protect public from risk of natural hazards." Have any been identified?

36.(76) Figure 6.6 Talks about improvement from flood hazards. Any what devices are planned around the stormwater channels and basins when they fill up to insure the public's safety? No discussion.

37.(76) Talks about "Additional multi-modal connections will be incorporated." Really? See no further mention of any specifics; another generalization. Word bites that sound good.

38.(78) Public Facility Financing/Policy 3.3 Makes reference to temporary construction workers. You lost me. Another mis-direct?

39.(78) Reference made to a "Conceptual Phasing Plan". Where is it? Or is it in immaculate conception? Is there plans to build out the Open Space and buffer zone in the first phase to mitigate some of the ensuing plots of remaining dirt pads and weeds after the grading is done and prior to any build-out of a specific Village, for example Village 3, which could take years?

40.(78) Statement made "without disrupting existing residents." In what context is this made? Can one actually believe there will be NO disruptions of water delivery, sewer flows, driving paths, etc.....when some of these are to be re-located, etc.?????

I think I better stop for now. To a layman, this is a document with a lot of flowery language, the stuff that dreams are made of. But the end result is a sardine community jammed into the middle of a pristine, existing neighborhood by glossing over the real desires of the surrounding neighbors and walking over their prior density transfers to open space. This runs the risk of being a building fiasco that the existing residents and City will have to stomach for a loooooooooooooong time!

Respectfully Submitted,  
Gary Erickson  
2021 Via Alexandra  
92026

I46-1  
Cont.

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Comment Letter I47

**From:** Garyemasd@aol.com  
**Sent:** Tuesday, August 15, 2017 11:23 AM  
**To:** Mike Strong  
**Cc:** Bill Martin; Bernadette Bjork; mslater.2014@cox.net; John Masson  
**Subject:** Re: ECC-The Villages: Final Specific Plan Request

Mike,  
 TYVM for the prompt reply in Bill Martin's absence  
 I really didn't know the *draft* Specific Plan was also up for formal review as THAT isn't shown distinctly on the process schedule as such.  
 Further, I understand the Applicant has already submitted a "Final" Specific Plan recently without waiting for further feedback from the EIR review. I found such a lengthy list of "issues" with the *draft* and as you comment it *should have* undergone potentially extensive changes from the earlier *draft*, it would take me further considerable effort to formalize from my notes.  
 Therefore, it would be more productive to work with their latest version where I can simply check off the concern areas and only submit further comment from that revised and updated version. How can this be arranged?  
 My best,  
 Gary Erickson  
 In a message dated 8/15/2017 11:06:54 A.M. Pacific Daylight Time, mstrong@escondido.org writes

Good morning Gary,

You bring up some good questions, and it looks like there might be some opportunity to act on them

The specific plan document has been available for public review and comment since their filing with the City. The version of the document that was studied in the EIR is available online at .

The *draft* specific plan document is expected to undergo extensive review. Changes can still be made as long as it doesn't change the nature of what was studied in the EIR document.

Pursuant to CEQA and environmental review process, a planning document does not need to be finalized to document review and public outreach. Planning documents only become finalized after it is reviewed and considered by the decision-making bodies at a public hearing - and only if it is approved by the ultimate decision-making body. In this case, that is City Council.

The final EIR will be posted in advance of the Planning Commission and City Council meeting. The final EIR will embody the draft EIR, changes or revisions, and all public comment received during the formal EIR comment period.

If you find discrepancies, please let me know what they are so that changes can be made

The public can make comments on the final EIR and all other project-related information as soon as it is posted. It can be made in writing, which can be delivered to the City and made available in the agenda packet, or it can be made orally during the public hearing testimony.

Please let me know if there is anything else that you need

Mike Strong  
 Assistant Planning Director  
 City of Escondido

I47-1

Response to Comment Letter I47

Gary Erickson  
 August 10, 2017

I47-1

The commenter expresses general concerns regarding the conditions of the existing property. The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft Environmental Impact Report (EIR). Therefore, no further response is required. 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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Comment Letter I48

Sent: Thursday, August 10, 2017 10:12 AM  
 To: Kristin Blackson  
 Cc: John Masson;  
 Subject: ECC-The Villages ENV 16-0010; SUB 16-009:Density Giveaways/Transfers/Convenants

Ms K Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

Over the years since the 1960's, development of the master planned ECC community took place in increments, with the applicable zoning code R-1-7 being adhered to. Several instances did arise where developers requested to build a more condensed housing area to fill a small pocket of land adjacent to the golf course. Through negotiations with the Planning Department and approval of the City, the developers were granted the higher density (smaller building lots) along with open space designation onto the golf course to maintain adherences to the zoning code for 7000 SF lots per dwelling unit. Further, the original owners/developers of the ECC so stated that subsequent golf course owners have an obligation to maintain this standard of zoning.

This is clearly documented and recorded in the property's files of the Planning Department and has been summarized to a great extent in a search of those files conducted by experienced, accredited planners back in 2016 with the concurrence of the Planning Department. While not all the files were searched, a very high percentage was completed and which identified approximately 50+ Acres of the golf course being allocated in this manner.

One would expect the granting of those Giveaways or Transfers or Convenants, whatever is the proper designation, by the City to be honored into the future.

Fast forward to the present day. Another development plan is before the Planning Department as noted. That plan requests similar adjustments in zoning to build upon smaller lots, **BUT** in this case do not wish to maintain the historical zoning of R-1-7. There is a reason the General Plan has that designation which is to ensure the aesthetic consistency of the community.

Even if the Developer were to follow a similar approach as earlier parties, **ADDITIONAL OPEN SPACE GIVEAWAYS/TRANSFERS WOULD BE NEEDED BEYOND THOSE WHICH HAVE ALREADY BEEN GRANTED ONTO THE PROPERTY!** However, that is **NOT** what this plan proposes. While it boldly refers to the 48 Acres of Open Space that will result, that area is even less than what has already been set aside! **They cannot double count what's not there to count!** To say otherwise at this point would be an injustice to the planning process, the current owners of those properties with the giveaways/transfers and the City

I48-1

I48-2

Response to Comment Letter I48

Gary Erickson  
 August 10, 2017

I48-1

The commenter expresses general concern regarding the proposed zoning for the Project. The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. As stated in Section 3.1.5, Land Use, of the Draft EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals. Section 3.1.5 of the Draft EIR describes and analyzes the Project's land use and design compatibility. Appendix 3.1.5-1 to the Draft EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project's potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the Draft EIR concludes that the Project does not conflict with the City's General Plan and Zoning Ordinance. The comment does not raise an issue related to the adequacy of this land use and zoning analysis as provided in the Draft EIR; therefore, no further response is provided.

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| <p>There's been a comment made, I understand, that the City no longer follows those old guidelines. If true, that does not provide any basis for undoing what's been already done in the past, retroactively! Such changes would need to be applied going forward and not retroactive to stand the test of rational reasoning and application.</p> <p>So a couple questions.</p> <ul style="list-style-type: none"> <li>-Have in fact those guidelines changed and if so, what is the current approved Policy that applies to such situations?</li> <li>-Does the Planning Department plan to honor past actions as applied and documented in the property files?</li> <li>-Is the Planning Department not going to hold the Developer responsible for the correct application of past grants by City with respect to the property, prior to the current ownership.</li> </ul> <p>And frankly, this is not "taking of property" as might be argued since it was documented into the records and on file at time of this latest ownership change. And it is not a change of the over-all applicable zoning code. He would have that if he'd taken the time to search the files.</p> <p>The City is not attempting to take anything and just needs to follow and honor its past declarations on record in this regard.</p> <p>Respectfully Submitted,<br/>         Gary Erickson<br/>         2021 Via Alexandra<br/>         92026</p> | <p style="text-align: center;">I48-3</p> <p><b>I48-2</b> CEQA requires that an EIR specify the existing physical environmental conditions to establish the “environmental baseline” against which project impacts may be evaluated (CEQA Guidelines Section 15125(a)). Environmental impacts generally should be examined in light of this baseline environment as it exists when the Notice of Preparation was issued. The EIR thus properly considered the Project’s effects in comparison to existing baseline conditions at the site. The history of the site and acquisition of the site prior to 2012 is immaterial to the EIR. The City does not agree that the Project is double counting open space.</p> <p>Section 1.2.1, page 1-3 of the EIR describes that the 48-acre Open Space System would consist of 29 acres of landscaped greenbelt and 19 acres of environmental channels and retention basins to convey stormwater from San Marcos Creek through the Project site and stormwater from the Project site. The proposed 29 acres of greenbelt would include four parks along an approximately 4-mile-long walking trail system, which would be accessible to the public; see Figure 1-5, Open Space, Trails and Parks Plan. The access points, including the main entry, and three access points along Country Club land can be seen in Figure 1-5.</p> <p><b>I48-3</b> The Draft EIR is not a decision-making document. Rather, the Draft EIR is an informational document that will inform decision-makers and the public about</p> |
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|  | <p>the potential significant effects of the Project, identify possible ways to minimize these significant effects, and describe reasonable alternatives to the Project. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. 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> |
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**Comment Letter I49**

8-13-2017

To the Escondido City Counsel and Echo,

I am Brian Fieldman and I live at 1865 Cortez Ave., Escondido, CA 92026, bordering the former Escondido Country Club Golf Course.

At the July 31, 2017 EIR meeting I realized that the application for the building of 392 homes on our Landmark Golf Course is at 94 percent of being accomplished. Why, because 17 of the 18 conditions that would block the huge development have already been ruled as obstacles that are 'LESS THAN SIGNIFICANT- NO MITIGATION REQUIRED OR LESS THAN SIGNIFICANT WITH MITIGATION.

Apparently, the only blockage to this huge building project is one traffic impact.

"Well, let's face it 2200 homeowners in the Country club": one failure with 17 successes will probably convince the Escondido City Council that this project is acceptable.

Yes, acceptable to everyone but the 2000 homeowners who live in the Country Club Neighborhood and the more than 200 homeowners who probably invested their life savings to have a peaceful retirement life sitting in their back yards and seeing greenery, people, trees, birds, animals and everything that a people who have forged ahead all their lives, to watch in their twilight years.

The EIR committee who may be new to the area and never lived here did not show any pictures of what the old country club looked like when they ruled that there was NO PROBLEM with the Aesthetics of rows and rows of houses and condominiums, packed together like military barracks, replacing the peace and tranquility of what we had and what we lost.

Under the EIR category of LESS THAN SIGNIFICANT-NO MITIGATION REQUIRED, the very first category was- **AESTHETICS!**

The dictionary definition of Aesthetics is " **a theory or conception of beauty or art; and taste for an approach to what is pleasing to the senses and especially sight**"

**Rows of impacted, tight fitting houses that block views and abolish greenery, wildlife, peace and tranquility are not Aesthetic.**

All the other impact factors to the area should be much more critically reviewed such as Geology and Soils, Hydrology and Water quality, Land Use, Population and Housing, Public Services, Recreation, Air Quality , Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Material and noise. The somewhat casual conclusion that all these factors have been considered rings very hollow with the people who actually live here.

Making a profit on the part of the developer and builder is the American way but making an EXCESSIVE PROFIT at the expense of 2200 home owners is the old time way of deals in the back room that forget the people who pay the final price for the inequity.

Sincerely,  
Brian Fieldman

I49-1

I49-2

I49-3

I49-4

I49-5

**Response to Comment Letter I49**

**Brian Fieldman**

**August 13, 2017**

**I49-1**

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Environmental Impact Report (EIR). Therefore, no further response is required. 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.

**I49-2**

The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. Therefore, no further response is required. 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.

**I49-3**

The commenter expresses concern regarding the aesthetic impacts of the Project. The City disagrees that the proposal for additional homes in an area with existing homes would result in a visual impact. Project impacts to aesthetics were analyzed in Section 3.1.1, Aesthetics. The City acknowledges the comment and notes it expresses the opinions of the commenter and

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|  | <p>does not raise an issue related to the adequacy of any specific section or analysis of the EIR.</p> <p><b>I49-4</b> The commenter expresses general concern regarding the adequacy of the analysis of impacts to geology and soils, hydrology and water quality, land use, population and housing, public services, recreation, air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, and noise, all of which were analyzed in the EIR in the following sections, respectively: Section 3.1.3, Geology and Soils; Section 3.1.4, Hydrology and Water Quality; Section 3.1.5, Land Use; Section 3.1.6, Population and Housing; Section 3.1.7, Public Services; Section 3.1.8, Recreation; Section 2.1, Air Quality; Section 2.3, Cultural Resources; Section 2.4, Greenhouse Gas Emissions; Section 2.5, Hazards and Hazardous Materials; and Section 2.6, Noise. The comment does not raise any specific issues related to the adequacy of the EIR. The City will include the comment as part of the Final EIR for review and consideration by decision makers prior to a final decision on the Project.</p> <p><b>I49-5</b> The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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> |
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**Comment Letter I50**

There are numerous issues found from my review of the ECC-“VILLAGES” DRAFT EIR that show that this document, and the plan and conclusions that it recommends, are UNACCEPTABLE.

Among the areas of this DRAFT-EIR that have been reviewed, and for which critical commentary has been provided in this memorandum, are:

- (A) ZONING AND PLANNING CHANGES:
- (B) AIR QUALITY
- (C) TRAFFIC
- (D) GREEN-HOUSE-GASES
- (E) BIOLOGICAL RESOURCES
- (F) RECREATION AND PARKLANDS
- (G) FURTHER ANALYSIS OF AIR QUALITY & Air Pollution

Specific review comments are given in each section below.

(A) ZONING AND PLANNING CHANGES

From DRAFT-EIR S-1, P.25, we find:

(NOTE: Sections in italics throughout this review are quotes from the appropriate stated document.)

*Here, the Project site is currently zoned Residential Urban 1, which allows up to 5.5 dwelling units per acre (City of Escondido 2012). The proposed Project involves construction of 392 single-family dwelling units on 109.3 acres, resulting in a density of 3.6 dwelling units per acre.*

There is no support in the ECC community for rezoning lot sizes less than R-1-7. The community is already very densely populated and compact. The Planning Department must be extremely mindful of this fact. If they are not, we will gladly clarify their memories. No word games about the golf course flood plain being suitable in counting for a new building density per acer.

*Because the proposed zoning change would decrease the density of dwelling units per acre from the existing zoning of the site, the Project’s population would already be accounted for in the underlying growth estimates for the basin used as the basis for the RAQS update.*

WRONG. The acreage of the ECC has most probably already be assigned as tradeoffs for smaller than R-1-7 lot sizes on which the ECC neighborhood. The smaller lot sizes were trad-

I50-1

I50-2

I50-3  
Cont.

**Response to Comment Letter I50**

**Frank Freyne  
August 11, 2017**

**I50-1** The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. This comment is included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the Project.

**I50-2** The commenter quotes a statement from the EIR regarding the land use designation of the City’s General Plan and how the Project is consistent. The City acknowledges the commenter’s opinion regarding the minimum lot size R-1-7 and opposition to a rezone for a smaller minimum lot size. The comment does not raise an issue related to the adequacy of the analysis as provided in the Draft EIR.

**I50-3** The commenter expresses concern regarding the proposed zoning for the Project. The City has an application process for land development proposals, which complies with California Environmental Quality Act (CEQA) law and CEQA Guidelines. The Project seeks a zone change to Specific Plan (SP) Zone. As stated in Section 3.1.5, Land Use, of the EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals. Section 3.1.5 of the Draft EIR

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| <p>off in a unique home-town City of Escondido fashion for open space on the golf course. (Note: This purported tradeoff is still lacking a completely documented and verifiable accounting by the City of Escondido.) It is anticipated that, when this accounting is completed, that it will find that over 100% percent of the golf course land was “dedicated” to open-space in this fashion. The Planning Department must do a complete analysis to provide the accounting of this open-space conversion. No DRAFT EIR for the ECC property can be submitted formally to the Planning Commission until this work is completed, critically analyzed by the City and all interested parties, and verified by the entire ECC community.</p> <p><i>Also, the anticipated increase in worker vehicle source emissions is not anticipated to result in air quality impacts that were not envisioned in the growth projections and RAQS.</i></p> <p>WRONG. This conjecture is not self-evident; it must be proved. Special attention must be made to the ECC local area.</p> <p><i>Although the Project would be consistent with the underlying growth projections of the General Plan as shown above, the existing land use (golf course) was included in the current RAQS, which did not provide growth in residential units, population, or vehicle trips. While re-designation of this land use represents minor adjustments to the Project site, the residential land use would represent new designations on this site that were not previously considered in the RAQS and SIP.. Therefore, impacts would be considered <b>potentially significant (Impact AQ-1)</b>.</i></p> <p>WRONG. Any change from the ECC golf course designation is ACTUALLY SIGNIFICANT. Is it not interesting that the ECC golf course is designated as OPEN SPACE in the Regional Air Quality System (RAQS) plans, but for some unexplained reason at some currently unknown date, with presumably the City of Escondido Planning Department “approval”, was changed to R-1-7? This was not transmitted, discussed, analyzed or accepted by the County of San Diego. It is time for the city Planning Department to step up to the plate and explain this.</p> <p>Contrary to the statement above, any new designation for the land use of the “ECC golf course” is not a minor adjustment. It is part of the Open Space acknowledged as such in the RAQS and SIP. It is part of the population density allotments, population centers, vehicle concentration and design of local, arterial and major thoroughfares for the entire San Diego region.</p> <p>From Section 2.1.5, p.25 this statement is made:</p> <p><i><b>M-AQ-1</b> Prior to the San Diego Air Pollution Control District’s (SDAPCD’s) next triennial review of the Regional Air Quality Strategy, the City of Escondido (City) shall coordinate with SDAPCD to amend the growth assumptions using the Project’s Specific Plan. This includes changing the designation of Residential Urban I and R-1-7 to Specific Plan Area and SP Zone within the Project site</i></p> | <p>describes and analyzes the Project’s land use and design compatibility. Appendix 3.1.5-1 to the Draft EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project’s potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the EIR concludes that the Project does not conflict with the City’s General Plan and Zoning Ordinance. The comment does not raise an issue related to the adequacy of this land use and zoning analysis as provided in the EIR.</p> <p><b>I50-4</b> This comment states that the anticipated increase in worker vehicle source emissions is anticipated to result in air quality impacts that were not envisioned in the growth projections of the Regional Air Quality Strategy (RAQS). As discussed on page 2.1-25 of the EIR, the Project’s density will be less than the existing zoning for the proposed Project site. Therefore, the RAQS already accounts for a density that is higher than that of the proposed Project.</p> <p><b>I50-5</b> This comment states that any change from the Escondido Country Club (ECC) golf course designation is actually significant. Within the context of CEQA and evaluating the significance of impacts in</p> |
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| <p>We in the ECC live in a setting in which there is a precarious balance with respect to air pollution. This is causing pulmonary problems now in our community. No such change by the City of Escondido to the RAQS should be supported. M-AQ-1 is a non-starter. This “Villages” project must not be permitted to damage our air quality further.</p> <p>Furthermore, it goes to the major contention for the ECC-“Villages” encounter. A golf course is a golf course. OPEN SPACE --PRIVATELY owned. (This is the current state of the ECC property. Take a look. It is OPEN SPACE—PRIVATELY owned. Any concurrent zoning overlay for residential development has never made sense; it will never make sense. This is not a minor matter for the Escondido Planning Commission, the Escondido City Council, and the San Diego County entities tasked with generating and maintaining the RAQS and the SIP. This issue requires the Escondido Planning Condition to invalidate this EIR; the “Villages” project can not go forward.</p> <p>No zoning changes should be allowed, other than return to the historically justifies OPEN SPACE-PRIVATE. Period. There is no justification for any such changes. We have at hand the documented Escondido City Ordinance 2013-10 and results of Proposition II balloting in 2014. These show the independent choices made by the citizens of Escondido. The ECC neighborhood is fully developed.</p> <p><b>(B) Air Quality</b><br/>See p8 of S- 2.1</p> <p><i>The portion of the SDAB where the Project site is located is designated by EPA as an attainment area for the 1997 8-hour NAAQS for O3 and as a marginal nonattainment area for the 2008 8-hour NAAQS for O3. The SDAB is designated in attainment for all other criteria pollutants under the NAAQS with the exception of PM10, which was determined to be unclassifiable. The SDAB is also currently designated nonattainment for O3, PM10, and PM2.5 under the CAAQS. It is designated attainment for the CAAQS for CO, NO2, SO2, lead, and sulfates.</i></p> <p>The San Diego Air Basin is in nonattainment for diesel exhausts now. But wait, we are going to have more diesel particulate emissions showered upon us here in the ECC.</p> <p>With the changes in diesel engine truck / vehicle inspections that are part of Senate Bill 1- Transportation passed by the CA legislature and signed by Governor Brown on April 28, 2017, the entire issue of air pollution described herein this DRAFT-EIR is inadequate. There will be considerably more diesel engine trucks within unknown , and probably, much higher, pollutants</p> | <p>I50-5<br/>Cont.</p> <p>I50-6</p> <p>I50-7</p> <p><b>I50-6</b> Refer to response to I50-3.</p> <p><b>I50-7</b> This comment states that the Project would add diesel particulate emissions to the ECC. It is understood and is fully disclosed that the project will add temporary emissions from diesel vehicles during construction of the proposed Project. However, once the construction is completed, heavy-duty diesel vehicle emissions are not anticipated to be emitted during operation. As discussed on EIR pages 2.1-28 through 2.1-30, a health risk assessment was prepared for the proposed Project that evaluated the cancer and non-cancer risk of diesel particulate matter on the adjacent residences. It was</p> <p>accordance with the CEQA Guidelines and the City’s guidance, air quality impacts were evaluated. Impact AQ-1 in Section 2.1 of the EIR was identified that showed the proposed Project would be changing the zoning of the site as part of the Specific Plan buildout. To ensure that the zoning change is included in future RAQS, the mitigation measure for that impact (Mitigation Measure M-AQ-1) would require the City to coordinate with the San Diego Air Pollution Control District (SDAPCD) to include the Specific Plan with the next update of the region’s growth assumptions. With implementation of Mitigation Measure M-AQ-1, the impact would be less than significant as the RAQS and SIP would fully incorporate the updated zoning from the Specific Plan.</p> |
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(to include all diesel engine pollutants ) in the area of the ECC. This is due to the nearby Frwy 15 and 78 corridors, as well as the number of trucks taking the Country Club Ln shortcut between the Frwys 15 and 78.

Below are some relevant sections of SB1-Transportation Sections of SBI Transportation and SBI Analysis (201720180sb1\_Senate Environmental Quality (Beall))

*This bill, effective January 1, 2020, would require the Department of Motor Vehicles to confirm, prior to the initial registration or the transfer of ownership and registration of a diesel-fueled vehicle with a gross vehicle weight rating of more than 14,000 pounds, that the vehicle is compliant with, or exempt from, applicable air pollution control technology requirements, pursuant to specified provisions. The bill would require the department to refuse registration, or renewal or transfer of registration, for certain diesel-fueled vehicles, based on weight and model year, that are subject to specified provisions relating to the reduction of emissions of diesel particulate matter, oxides of nitrogen, and other criteria pollutants from in-use diesel-fueled vehicles. The bill would authorize the department to allow registration, or renewal or transfer of registration, for any diesel-fueled vehicle that has been reported to the State Air Resources Board, and is using an approved exemption, or is compliant with applicable air pollution control technology requirements, pursuant to specified provisions.*

*Existing law authorizes the department, in its discretion, to issue a temporary permit to operate a vehicle when a payment of fees has been accepted in an amount to be determined by the department and paid to the department by the owner or other person in lawful possession of the vehicle.*

Let us insert here a more simplified wording that explains what is happening to CA and the CA citizens here. This is taken from a relevant part of the CA State Senate analysis, prepared by CA State Senator Beall, for the use of the CA state senators to read and digest prior to the passage of this bill. Consider the following:

*SEC. 18. Section 43021 is added to the Health and Safety Code, to read: 43021. (a) Except as provided in subdivision (b), the retirement, replacement, retrofit, or repower of a self-propelled commercial motor vehicle, as defined in Section 34601 of the Vehicle Code, shall not be required until the later of the following:*

- (1) Thirteen years from the model year the engine and emission control system are first certified for use in self-propelled commercial motor vehicles by the state board or other applicable state and federal agencies.*
- (2) When the vehicle reaches the earlier of either 800,000 vehicle miles traveled or 18 years from the model year the engine and emission control system are first certified for use in self-propelled commercial motor vehicles by the state board or other applicable state and federal agencies.*

*(c) This section only applies to laws or regulations adopted or amended after January 1, 2017.*

↑ I50-7 Cont.

I50-8 ↓

**I50-8**

determined and is shown in EIR Table 2.1-13 that the cancer and non-cancer risk associated with construction of the Project would be less than significant.

This comment states that due to the changes in state law with respect to Senate Bill (SB) 1, the ECC will be a non-attainment area for particulate matter and detailed measurements of air emissions need to be taken of the site. The SDAPCD and California Air Resources Board (CARB) both operate and maintain air monitoring stations within the San Diego Air Basin to monitor the air pollutants germane to fulfill their obligations within the RAQS and SIP. The decision to increase the number of air monitoring stations lies with the SDAPCD and CARB and would be based on empirical evidence that shows a need for more refined monitoring. It is not a reasonable request for a monitoring station be placed on site due to just one development project. The EIR also showed that emissions from the Project would not exceed levels of significance developed by the City.

*(d) It is the intent of the Legislature for this section to provide owners of self-propelled commercial motor vehicles, as defined in subdivision (a), certainty about the useful life of engines certified by the state board and other applicable agencies to meet required environmental standards for sale in the state. This section is not meant to otherwise restrict the authority of the state board or districts.*

*(e) (1) The state board shall, by January 1, 2025, evaluate the impact of the provisions of this section on state and local clean air efforts to meet state and local clean air goals.*

150-8  
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It is MOST probable that the ECC area will be labeled as “non-attainment” when these needed additions/ corrections to the updated best estimated values for air polluting particulate matter / gasses are included. To obtain these best estimates, detailed measurements will need to be taken by CALTRANS or an accredited public/ university agency. Increasing toxic emissions spilling into an already developed URBAN community, such as the ECC and ECC neighborhood, are a major red flag due to deleterious health outcomes.

This Draft-EIR must be corrected and updated with a new analysis of air pollution to account for all these factors.

From Table 2.1-2 Local Ambient Air Quality Data, the following entry is made:

*Daily exceedances for particulate matter are estimated days because PM10 and PM2.5 are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour ozone, annual PM10, or 24-hour SO2, nor is there a state 24-hour standard for PM2.5. The Escondido monitoring station is located at 600 East Valley Parkway, Escondido, California. The El Cajon monitoring station is located at 10537 Floyd Smith Drive, El Cajon, California.*

*a*

*Measurements of PM10 and PM2.5 are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.*

150-9

For the ECC community, these measurements are clearly unsatisfactory. Reading from El Cajon and several miles away on E Valley Parkway are not suitable. We must have better and more continuous measurements of diesel emissions; to include all particle sizes that can settle into a person’s lungs (PM 2.5 and all other particle diameter sizes, soot, etc.)

Any modeled / calculated data to be used in accessing the feasibility of any project in ECC area requires that better data be obtained on pollutants. This means that a monitoring station must be constructed and situated as close to ECC as possible; certainly within a short TBD of the Frwy15 and 78 intersection. There must also be concurrent collections made in the valley that is

**I50-9**

This comment states that the Project would add diesel particulate emissions to the ECC and the quantification presented in the EIR is insufficient for the site. As indicated in Table 2.1-2 of the EIR, the closest monitoring stations to the proposed Project site were used to determine background air quality conditions. The projects emissions were quantified and disclosed in Tables 2.1-10 and 2.1-11. Because the proposed Project did not exceed the significance thresholds established by the City, a further refined ambient air quality analysis was not needed. Therefore, the assumption that the Project’s emissions would not cause the region to exceed any ambient air quality standard is sufficient. The Project also does not use any atypical construction equipment that would create excessive emissions.

on the ECC property. The current collection points are inadequate in light of SB1-Transportation changes now taking place. Any other measurement scheme would introduce unquantifiable errors and completely unverifiable accuracy into any conclusions on air quality at ECC-“Villages” valley.

The CA Air Resources Board is aware of the lack of knowledge on diesel particle emissions. For example, please see this excerpt from a current CARB report:

*Existing knowledge gaps suggest that specific emission limits on the number of particles or on BC in the emissions from future vehicles is premature. However, advancing the understanding of the nature of those particles in terms of relevant parameters, Besides particle mass, such as particle size, particle number concentration, or BC (black carbon) Content is critical in order to arrive at the best metric for protection of health and the global climate.*

Reference: <https://www.arb.ca.gov/regact/2012/leviiighg2012/levapp.pdfhma>.

As noted by the American College of Allergy, Asthma and Immunology, diesel particles (PM 2.5 micron diameter and up) and soot are damaging to the lungs and can cause severe health issues. The current ECC community should not be subject to more diesel exhausts on very closely situated freeways, more auto / truck traffic in our neighborhood and OPEN SPACE area in our narrow valley, as an “experiment” which accompanies the “Villages” development, to see how we current residents will “react to and handle” worst pulmonary health conditions. We in the ECC neighborhood are not guinea pigs for such an experiment.

It is additionally absurd to consider the extensive use of diesel engine construction equipment for several years within the confines of the narrow valley ECC community

(C) TRAFFIC

There are significant traffic problems in the ECC area at this time. Among these are:

- (1) Traffic density and vehicle speed are both excessive on Country Club Lane.. The density has increased since this is a handy shortcut between the Freeway 15 and points north of the city to tie in with the Freeway 78 West to San Marcos, Vista, Oceanside and Frwy 5. The speed has increased due to the common knowledge that the ECC is not operating as a golf course at the present time. Yes, the yellow signs that say, “Golf Course Zone 78-213” are still in place, as well as the pictures denoting a golf cart zone, but they and the posted speed limits are routinely ignored. This makes walking and crossing Country Club Ln hazardous and makes near misses of pedestrian / auto accidents all too common. These near misses are occurring now; especially at marked golfer pedestrian / golfer



**150-10**

This comment states that the Project would create significant traffic problems in the area including density and vehicle speed, narrow streets, concerns with impacts at I-15 and SR-78, as well as pedestrian safety. Section IV, page 4 of these guidelines state that the geographic study area must include: “All local roadway segments (including all State surface routes), intersections, and mainline freeway locations where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic.” A review of Figure 7–3 from the TIA (Total Project Traffic Volumes) shows a maximum directional peak hour contribution of 60 peak hour trips (northbound, PM at intersection No. 14, I-15 NB Ramps). As such, the freeway segment of I-15 to SR-78 is warranted for analysis and was analyzed. The distribution of these 60 peak hour trips to I-15 and SR-78 at that interchange would reduce the Project contribution to either freeway at that location to less than 50 peak hour trips; therefore analysis at

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| <p>walking points already present. The intersection at Nutmeg / Country Club Ln is a current disaster.</p> <p>(2) Due to the small lots sizes that were used for the ECC area development, autos are routinely parked on both sides of the narrow streets. The narrow streets are another unpleasant part of the postulated future ECC neighborhood development. There is no room for more autos.</p> <p>(3) The Freeway 15 S entrance at El Norte is a constant bottleneck. There is no way that this "bottleneck" can support any more traffic from the proposed "Villages".</p> <p>(4) The Freeway 78 entrances and exits to Woodland are another "bottleneck". Yes, this Escondido EIR may try to ignore this issue since they are in San Marcos. However, this "bottleneck" issue must addressed in any regional planning.</p> <p>(5) Nordahl / Nutmeg between El Norte and Country Club Ln is not a safe road. It is now handling more autos that its' design limit. Walking means that you are taking a risk. Crossing this intersection at present is akin to a "Wild West" experience.</p> <p>A development such as the proposed "Villages" will make the traffic issues significantly worse. There is no way that they can be mitigated. (Note : painting more strip lines on a current ill-maintained and congested roadway is NOT a mitigation.)</p> <p>A noted deficiency in this DRAFT EIR is the lack of a dynamic traffic analysis that considers all possible traffic situations that affect the ECC area. This must include traffic accidents on the Fwyys 15/ 78 that would reroute traffic through the area (including Country Club Ln) due to freeway closure. Isn't it enlightening that SANDAG (or other San Diego County traffic management office) if now providing a mobile phone APP to route traffic through our neighborhood in case of any traffic accidents /congestion!!!</p> <p>Further Note to the City Planning Commission: The usual traffic situation with the on ramps to 15 at El Norte and 78 at Woodland / Barnham in nearby San Marcos must be included in a dynamic traffic analysis. This analysis must include a clear and comprehensive description of all data acquired, computer models, and algorithms used. The DRAFT-EIR is deficient in such an analysis.</p> <p>With respect to Senate Bill743 (September 27, 2013) (cited in Section 2.7-Transportation), there is no demonstration in this DRAFT-EIR that the streets in the ECC community have the roadway capacity to support any increased number of vehicles. Adding a European-style traffic roundabout at the entrance to the ECC , off El Norte, only adds a higher probability of motor vehicle accidents.</p> <p>To reiterate, there is NO WAY that the ECC community can support any "Villages" development with its additional number of vehicles(400? 800? 1000 new vehicles, plus RVs ?) and traffic demands.</p> <p><b>(D) Green-House-Gases</b></p> <p>From DRAFT-EIR 2.4 p.27<br/><i>Emission Reduction Strategies</i></p> | <p>additional freeway segments is not warranted.</p> <p>The same section of the SANTEC/ITE guidelines states that a project must study "all freeway entrance and exit ramps where the proposed project will add a significant number of peak-hour trips to cause any traffic queues to exceed ramp storage capacities". This refers to computerized HCM capacity analyses of ramp intersection Level of Service (LOS), and the evaluation of freeway on-ramp metering, where applicable. The TIA includes capacity analyses of the I-15 Ramps/El Norte Parkway intersections, as well as a ramp meter analysis for the metered I-15 SB on-ramp from El Norte Parkway. Thus, the analysis in the report is consistent with the local and regional guidelines utilized in District 11.</p> <p><b>I50-11</b> This comment expresses concern with respect to the safety of the roundabout. In fact, the Federal Highways Administration has published that they identify roundabouts as a Proven Safety Countermeasure because of their ability to substantially reduce the types of crashes that result in injury or loss of life. Roundabouts are designed to improve safety for all users, including pedestrians and bicycles. They also provide significant operational benefits compared to conventional intersections (Highway Safety Manual, American Association of State Highway and Transportation Officials, Washington, DC 2010)</p> |
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| <p><i>There are no quantifiable construction-related emission reduction strategies (non-mitigation measures) assumed for the construction of the Project.</i></p> <p>Therefore, the conclusion of the DRAFT-EIR is that the ECC community will have to tolerate "excessive" GHG emissions for all the years of the "Villages" construction project. This will continue forever after, IF and ONLY IF the "Villages" project is approved. At least, the ZERO project OPTION is acknowledged; that it is the most benign for GHG emissions. That is, No "Villages" housing development is the Best environmental solution.</p> <p><b>From Assembly Bill 398, passed by 2/3rds vote of CA Legislature and Signed by Gov. Brown July 25, 2017:</b></p> <p><i>The California Global Warming Solutions Act of 2006 establishes the State Air Resources Board as the state agency responsible for monitoring and regulating sources emitting greenhouse gases. The act requires the state board to approve a statewide greenhouse gas emissions limit equivalent to the statewide greenhouse gas emissions level in 1990 to be achieved by 2020 and to ensure that statewide greenhouse gas emissions are reduced to at least 40% below the 1990 level by 2050. The act authorizes the state board to include the use of market-based compliance mechanisms. The act requires the state board to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions and to update the scoping plan at least once every 5 years. The act authorizes the state board to adopt a regulation that establishes a system of market-based declining annual aggregate emissions limits for sources or categories of sources that emit greenhouse gases, applicable from January 1, 2012, to December 31, 2020, inclusive, as specified.</i></p> <p>....</p> <p><i>This bill would, until January 1, 2031, extend the applicability of a regulation that establishes a system of market-based declining annual aggregate emissions limits for sources or categories of sources that emit greenhouse gases to December 31, 2030</i></p> <p>It is acknowledged in this DRAFT-EIR that NO DEVELOPMENT of the ECC will be that only solution that does not generate GHG. The proponents of the "Villages" have two problems: First, they need prove that any construction, use, operation, use, occupation, maintenance, vehicular traffic, etc, and yes, use of charcoal BBQs, within the "Villages" project area; can be measured and verified to meet the 40% mandated reduction (Baseline 1990) by the year 2050. Just postulating something like "best practices" is insufficient. The numbers presented are known in the systems engineering industry as SWAGs (AKA Scientific Wild Anything Goes statements.) Complete independent verification is required. Exactly how much GHGs will be emitted? The</p> | <p><b>I50-12</b> This comment states that the ECC community would have to tolerate excessive GHG emissions during construction if the Project is approved. The proposed Project has taken measures to reduce its greenhouse gas (GHG) emissions as much as possible during construction and operation. In addition, the proposed Project has committed to offsetting emissions that exceed the efficiency metric for the Project, ensuring the proposed Project would not impair the state's ability to meet its GHG reduction goals for 2030.</p> <p><b>I50-13</b> This comment states that the GHG emission estimates were scientific wild anything goes statements and the use of cap-and-trade auctioned compliance certificates is not sufficient to reduce GHG emissions.</p> <p>The Project utilized the California Emission Estimator Model (CalEEMod) version 2016.3.1 to quantify GHG emissions for the Project. As relevant background, CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use development projects. The model quantifies direct emissions from construction and operational activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use,</p> |
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solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.

The model was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with numerous expert consultants and California Air Districts, including the South Coast Air Quality Management District, the Bay Area Air Quality Management District, Placer County Air Pollution Control District, Sacramento Metropolitan Air Quality Management District, the San Joaquin Valley Air Pollution Control District, the San Luis Obispo Air Pollution Control District, and the Santa Barbara County Air Pollution Control District. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California Air Districts to account for local requirements and conditions. The model is periodically updated when modifications are warranted.

The model is broadly accepted by lead agencies and technical experts as a comprehensive tool for quantifying air quality impacts from land use projects located throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable, such as preparing CEQA or

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| <p>number presented in the DRAFT-EIR are SWAGs; they could easily be off by a factor of 1000 (meaning too low by a factor of 1000 or more.)</p> <p>The other problem, the use of cap-and-trade auctioned compliance certificates, will be encumbered by the stated fact that there is a market based declining pool for the purchase of annual certificates. Declining is the operative word. To conclude over the multi-year proposed development, that when the GHG measurements are made over this time period (multi-years) of development of the “Villages”, that there will be sufficient and adequate cap-and-trade auction certificates is not a given. This risk must be included.</p> <p>There is a problem with GHG emissions with this project. Just citing cap-and-trade auction certificates is not a complete answer; it does not remove risk. It does not limit GHG emissions. This would not be Governor Jerry Brown’s recommended approach for complete disruption of an ECC established community in an already urban environment.</p> <p>The response in this DRAFT –EIR is clear: there is no way to reduce GHG other than to restore the golf course, which is the absolute minimum GHG emission solution. Only rebuild one building: the Country Club clubhouse.</p> <p>Two additional issue that must be pursued further by the City Planning Commission: They are both related to the GHG issue. Will there be adequate electric available under the various “Green generated” electrical power mandates? Will there be adequate fresh water that can feasibly be supplied by the Metropolitan Water Agency and other water wholesalers? Will there be adequate electric power to pump the water here? If the “Villages” were to go forward, could they be accommodated with adequate water during drought years? Would this mean rationing for the entire City? (Note: The ECC would use secondary water, not fresh water, for the golf course.)</p> <p>(E) BIOLOGICAL RESOURCES.<br/>Refer to Section 2.2 of the Draft EIR.</p> <p>We also include here some very basic observations on the Aesthetics of the current ECC, and how the DRAFT-EIR plans to destroy as much as possible the aesthetic qualities here present.</p> <p>The chopping down of over 600 mature and protected trees is totally unacceptable. Many have been growing here for over 50 years, all through the operation of the ECC golf course. Yes, one may say that the eucalyptus trees are not native here. Yes, one may say that we live in a semi-arid desert. (Just how much development can we support? Isn’t the current ECC community too densely populated at this time?) But these trees have been growing here for some time; we can say that they are now native. It used to be “discovered” very frequently at every work place and social gathering that almost everyone in CA was born in another state. But, they are Californians now. The same can be said for our trees.</p> <p>Not only do our mature trees add to the aesthetic views, but they take CO2 out of the air. These serve as a noise reduction area; most important to an urban area. Any loss of these trees would be a major loss to our ECC community. The claim to replace these mature trees in a 1:1 ratio (new saplings?) is NOT a satisfactory tradeoff.</p> | <p>National Environmental Policy Act (NEPA) documents, conducting pre-project planning, and, verifying compliance with local air quality rules and regulations, etc.</p> <p>To address the second point of the comment, Mitigation Measure M-GHG-1 requires the project to utilize offsets from a CARB accredited registry, it does not state that the project will utilize cap-and-trade offsets. This project would not be able to purchase offsets in the cap-and-trade market because it is not regulated under the cap-and-trade program. It would be part of the voluntary offset market, which is completely separate from the cap-and-trade offset compliance market, which is fully discussed on page 2.4-19 of the EIR.</p> <p><b>I50-14</b> This comment states several questions regarding the proposed Project, including: will there be adequate electricity available; will there be adequate fresh water; will there be adequate electric power to pump the water; will they have enough water during drought years; and would this mean rationing water for the entire City?</p> <p>As discussed in Section 3.1.2.2.3 of the EIR, the Project would not use excessive amounts of electricity during operation and would power nearly the entire Project with on-site solar photovoltaic systems. Similarly, the electricity associated with water and wastewater production, pumping, treatment, and</p> |
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|  | <p>supply was calculated using the CalEEMod and included in the EIR. The section concluded that the Project would not have a significant impact on regional or local electricity resources.</p> <p>As discussed in Section 3.1.9.2.2 of the EIR, the local water purveyor for the proposed Project, Rincon Del Diablo, would have ample capacity to support the demand of the residences. The green space and vegetated areas are proposed to use recycled water, which the utility also has ample supply and was previously used by the golf course. The analysis was modelled during a peak-year consumption and thus is a conservative assessment of the proposed Project. Therefore, it is not expected that the proposed Project's water demand would cause the City or utility to have to ration.</p> <p><b>I50-15</b> This comment expresses concern about biological resources and aesthetics due to removal of on-site trees. Pursuant to Section 33-1069, every feasible effort and measure to avoid damage to existing trees to remain on site must be taken by the owner and developer during clearing, grading, and construction activities. Section 33-1069 also includes replacement ratios for mature and protected trees. If mature trees cannot be preserved on site, they shall be replaced at a minimum ratio of 1:1. If protected trees cannot be preserved on site they shall be replaced at a minimum</p> |
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| <p>In addition, any loss of the wetlands can not be tolerated. With the golf course in operation, we had our ducks, our hawks and our egrets. We could ensure that any water that flows downstream (Lake San Marcos and the Pacific Ocean lagoon) is clear and clean. There are natural streams and ponds on the ECC. They should not be disturbed. We do not want, nor do we deserve, an in-filled neighborhood that is essentially wall to wall concrete, asphalt, walls of varying heights 4 to 6 feet, and tick-tack houses. So, the "Villages" wants to add in a few "open space" undevelopable land --flood plains for effect. Sorry, this is not a replacement.</p> <p>This is another major factor in the Draft EIR plan that shows clearly that the "Villages" plan is unacceptable.</p> <p>(F) RECREATION AND PARKLANDS<br/>From Section 2.4 p.30</p> <p><i>PDF-AQ-3 Traffic-calming measures for all new streets and existing affected streets and intersections.</i></p> <p><i>PDF-AQ-4 Improve the pedestrian network of the community by constructing an integrated walking and bicycling trail that would connect the villages with the Village Center and adjacent community</i></p> <p>This is all pure speculation due to the current layout of the city: schools, medical offices, hospital, shopping centers, places of worship, etc., as well as to gain access to the listed "nearby" recreation centers in Kit Carson Park / Lake Hodges area in the extreme southern part of the city. The increased vehicular traffic will prevent any increased pedestrian / bicycling activity.</p> <p>The most discernable and organized bicycling activity on Country Club Ln for the last two decades has been the advanced amateur / professional bicyclists in early morning group "peletons" on early Saturday and Sunday mornings. This has been welcomed by our ECC community; it adds to the community spirit and aesthetics. Now, who would want to add a large additional number of vehicles? This area is "borderline" safe at this time for bicycling due to the traffic ignoring the ECC golf course speed limits. Adding the Villages and more traffic; then any bicycling activity might stop completely.</p> <p>Let it be noted that with the current chain link fence around the ECC golf course, there is no nearby open space recreation center. There is no family walking the golf cart paved paths during early morning and late evening, non-golfing activity hours. There is no pool for childrens' swimming nor a tennis court The nearest park spot to take children to play is on Woodland Avenue in San Marcos. An ECC neighborhood family can never consider the use of Grape Day Park in downtown Escondido; this is a daily hangout ground for the homeless vagrants and the burnt-out drug addicts. The Kit Carson park is too far away for a quick trip. Anything that the "Villages" promotes in the form of parklets are most probably restricted areas, covered by HOA fees. In addition, they are situated on well-known ECC flood plain areas. (Note: The ECC golf course could and would improvise when parts of the course were unplayable.) Areas all known to be impassable after a rain. In addition, there is neither acknowledgement nor submitted plan, with financial data, that indicated that the City will operate and maintain them.</p> | <p style="text-align: center;">↑<br/>I50-16<br/>Cont.</p> <p><b>I50-16</b>      This comment expresses concern over loss of waters and wetlands for use as habitat for birds. Based on information reviewed, the features on the site are geographically isolated with no downstream connectivity to a navigable waterway due to their termination within uplands on site or the existing municipal separate storm sewer system. The features have been created wholly within uplands, as evidenced by historical imagery and other maps. As such, the features are geographically isolated and would not qualify as waters of the United States as regulated by ACOE pursuant to Clean Water Act Section 404. However, Mitigation Measures M-BI-1, M-BI-2 and M-BI-3 would ensure that any impacts to wetland/riparian or waterways would be offset by establishment of new, superior habitat to satisfy a no net loss and therefore impacts would be less than significant.</p> <p style="text-align: center;">↑<br/>I50-17</p> <p style="text-align: center;">↑<br/>I50-18<br/>↓</p> <p><b>I50-17</b>      This comment expresses concern about bicycle and pedestrian safety with the addition of additional vehicles in the area. The Specific Alignment Plan and Mitigation measures M-TR-1 through M-TR-8 will ensure that street segments, intersections, and ramp</p> |
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| <p>No surprise that we in the ECC community want to retain our OPEN SPACE-PRIVATE golf course property. Any development on the ECC property would restrict our outdoor recreational activities.</p> <p>(G ) More on AIR QUALITY and AIR POLLUTION</p> <p>We have noted the limited overview of Air Quality analysis in this DRAFT-EIR. Among the sections of interest are:</p> <p>From 2.1.2.3 p.27</p> <p><i>Exhaust from internal combustion engines used by construction equipment and hauling trucks (dump trucks) and vendor trucks (delivery trucks) and worker vehicles would result in emissions of NOx, ROC, CO, SOx, PM10, and PM2.5. The application of architectural coatings, such as exterior/interior paint and other finishes, would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SDAPCD Rule 67.0.1, Architectural Coatings.</i></p> <p>From 2.1.2.3 p.29</p> <p><i>The air dispersion modeling methodology was based on generally accepted modeling practices of SDAPCD (SDAPCD 2015b). Air dispersion modeling was performed using EPA's AERMOD, Version 16216r, modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View, Version 9.3.0.</i></p> <p>However, this analysis, while interesting, is not fully explained. Furthermore, it is incomplete. As noted earlier in this report, air pollution is a major concern to the ECC community and its current residents. We need an updated and more complete air quality analyses. These must include several factors. (1) The corrected values for increased diesel emission from traffic on nearby freeways and surface streets, with attention to the changes in SB1-Transportation law. (2) The changes in air pollution during any and all proposed construction stages for the DRAFT_EIR "Villages", Include rock blasting and other earth moving tasks.(3) The additional changes in air pollution if the "Villages" were to be constructed and occupied. How much would these new residence contribute in a negative way to air quality for the existing ECC community?</p> <p>For each of these situations, a through CFD (Computational Fluid Dynamics) analysis is necessary. The information to be provided should include all experimental parameters used as input (eg, types of contaminants, particle sizes of contaminants); models of buildings / terrain / streets as part of a detailed topology; wind and atmospheric conditions; all chemical reactions and reaction rates used; description of the CFD code used; model assumptions use (eg, boundary conditions, mesh sizes used for computation, etc.),and all verification and validation tests of the code. Without this all this latter information, we have little confidence in the answers provided for air quality and air pollution.</p> | <p>meters will operate at an acceptable level of service.</p> <p><b>I50-18</b> This comment states the concern about lack of public parkland in the area and expects that it will be restricted to homeowners. However, the project proposes an extensive Open Space System that includes approximately 4 miles of meandering trails of approximately 29 acres. The walking trails and pocket parks would be open to the surrounding neighborhoods and the Escondido Country Club Community. The recreational facilities would be privately developed and maintained but will be available for public use.</p> <p><b>I50-19</b> This comment states that the current air quality analysis is insufficient in addressing the increase in emissions from the proposed Project. The EIR utilized industry standard quantification techniques to estimate the emissions and impacts associated with the construction and operation of the proposed Project. It should be noted that in the CEQA Guidelines Section 15151 states:</p> <p style="padding-left: 40px;">“an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.”</p> <p>The analysis prepared within the EIR is considered</p> |
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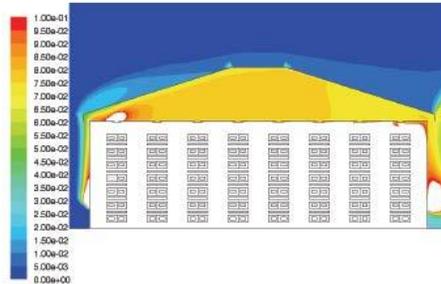
I50-18  
Cont.

I50-19

I50-20

As an example of a more complete analysis, we note a report from Penn State University faculty and students tackling health issues associated with poultry farmers. Airborne viruses are a major concern. We need a better report than this since we are dealing with the health of our present ECC human community. However, this report gives a rough standard of the analyses that should be required for this DRAFT –EIR.

The title of the report is “Contaminant Dispersion Within and Around Poultry Houses Using Computational Fluid Dynamics”, by S. R. Pawar and others.



↑  
I50-20  
Cont.

**I50-20**

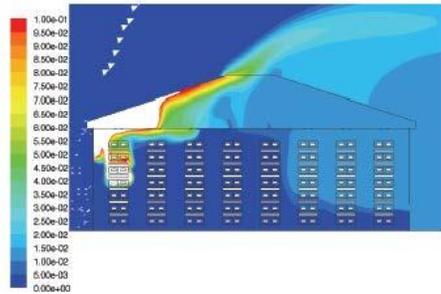
reasonably feasible and state of the industry for the type and magnitude of the proposed Project.

This comment states that a computational fluid dynamics analysis is necessary for each situation of the proposed Project. The EIR utilized industry standard quantification techniques to estimate the emissions and impacts associated with the construction and operation of the proposed Project. It should be noted that in CEQA Guidelines Section 15151 states:

an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.

The analysis prepared within the EIR is considered reasonably feasible and state of the industry for the type and magnitude of the proposed Project. Similarly, as stated in CEQA Guidelines Section 15204(a):

reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not



Contours of Mass fraction of nh3 Feb 27, 2008  
 FLUENT 6.2 (2d, dp, segregated, spe, rhe)

Fig. 16. Comparison of species diffusion contours inside the upstream poultryhouse for Case 1 (downward flow) in the top image and Case 2 (upward flow) in the bottom image

Many other details of the calculations are included in this Penn State University report.

However, we note here that a study of chicken coop related dispersion of particulate matter of many small sized particles, together with the incipient chemical reactions as the material lost water and emitted a strong unique stench, is most appropriate to remind the ECC community of local raw chicken manure incident from April 2014. A complete CFD analysis is required; this cited paper is just one example of the techniques used.

This complete CFD analysis is required in order to have a later complete medical assessment of all the air quality issues that impact the DRAFT-EIR. A list of data needed for an MD assessment can be supplied upon request.

I50-21

require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

**I50-21**

This comment states that a computational fluid dynamics analysis prepared for Penn State University is the type of analysis needed for the proposed Project. The EIR utilized industry standard quantification techniques to estimate the emissions and impacts associated with the construction and operation of the proposed Project. It should be noted that in the CEQA Guidelines Section 15151 states:

an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.

The analysis prepared within the EIR is considered reasonably feasible and state of the industry for the type and magnitude of the proposed Project. Similarly, as stated in CEQA Guidelines Section 15204(a):

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|  | <p>reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.</p> <p>Also, the type of project analyzed in the Penn State University report is unlike the proposed Project as they have starkly different sources of emissions within either project.</p> |
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**Comment Letter I51**

**From:** Kathy Funk <katfunk2@yahoo.com>  
**Sent:** Thursday, August 10, 2017 5:50 PM  
**To:** Mike Strong; Kristin Blackson  
**Cc:** katfunk2@yahoo.com  
**Subject:**

Dear City Planners

I am writing to provide my input as a resident in the Escondido Country Club community regarding the proposed development in the area of the closed golf course property.

I have reviewed the draft EIR document on the city website and wish to provide my input on what I find on this report.

I have some major concerns about the impact that this development will have on the existing community. Currently the neighborhood is clean and quiet. This is one of the factors that drew me to the area. With the proposed new development of 392 homes, I am afraid that much of that appeal will disappear.

One of my primary concerns would be the traffic and the increased noise. Considering that most households nowadays have at least 2 cars, it stands to reason that there would be an increase of nearly 800 additional vehicles going in and out of the neighborhood causing congestion on all surrounding roadways. Some of these are already at unacceptable levels according to the report. As a daily commuter to get to my job each day, considering increased delays at peak hours is certainly "less than appealing".

I am also concerned about the fact that the development is not only taking away the beauty of the golf course that used to be enjoyed by residents but replacing it with 2-story homes. So instead of people enjoying their back patios looking out onto a beautiful green, they will be looking at the wall of a neighboring house. Now, I know that this area will never be a golf course again and, frankly, I'm not a golfer but to destroy what has always been such a lovely community by overcrowding is disheartening. I am not aware of any other 2-story homes surrounding the golf course property.

I know that the 2012 General Plan established the property as R-1-7 zoning to allow for 7000sf lots. If development is inevitable, then I think that the city needs to consider maintaining the existing zoning and not allow the lots sizes to be cut in half! Not only will this prevent overcrowding but it will lessen the impact to the current infrastructure.

Of course the noise and air quality will be a strong factor during development but should certainly be less of a concern if building is minimized.

Bottom line is that there will be a development, but there is the ability to make decisions that will allow things to move forward with the least amount of negative impact.

I trust that the city will be taking all of this input into consideration during any decision making processes.

Regards

Kathy Funk  
 2062 Golden Circle  
 Escondido, CA 92026

I51-1  
 I51-2  
 I51-3  
 I51-4  
 I51-5  
 I51-6

**Response to Comment Letter I51**

**Kathy Funk  
 August 10, 2017**

- I51-1** The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft Environmental Impact Report (EIR). 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.
- I51-2** The comment expresses general concern regarding traffic and noise. These topics were analyzed in the EIR in Section 2.7, Transportation and Traffic, and Section 2.6, Noise. The comment does not does not raise an issue related to the analysis provided in the Draft EIR. Therefore, no further response can be provided. 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.
- I51-3** The City acknowledges the comment regarding visual resources and notes it expresses the opinions of the commentator. As analyzed in Section 3.1.1, Aesthetics, of the Draft EIR, the Project would not result in significant visual or aesthetic impacts. As

stated in Section 3.1.1 Aesthetics (EIR page 3.1.1-19):

The significance determination as to whether the Project would result in substantial degradation of visual character and quality is based on the analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area.

The Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area (EIR page 3.1.1-12). Also, Figure 1-7 from the EIR illustrates surrounding land uses, which includes existing two-story residential development. It should also be noted that the California Environmental Quality Act (CEQA) requires the analysis of public views and public scenic resources. Private views are not considered impacts for CEQA purposes. Nonetheless, the analysis concluded that views of the site after Project implementation would not result in the substantial degradation of visual character.

The commenter also raises concern regarding two-story homes. It should be noted that the Project includes both one-story and two-story units. As previously indicated, there are several areas in the surrounding neighborhood that include two-story homes; see Figure 1-7 from the EIR. Additionally, the

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|  | <p>applicant has revised the Project to increase the number of one-story units provided throughout the Project, which has been reflected in the Tentative Map and Specific Plan. Lastly, the City’s General Plan includes Residential Development Policy 3.10: Encourage proportionate numbers of two-story dwelling units within single family detached subdivisions to promote variety and avoid monotonous streetscapes and visual impacts. The comment does not raise any specific issue related adequacy of the Draft EIR; therefore, no further response is provided. 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><b>I51-4</b> The commenter expresses general concern regarding the proposed zoning for the Project. The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. The Specific Plan process is applied where comprehensive planning is important to achieve a desired vision, as discussed in the City’s General Plan Land Use Element. Specific Plan areas are zoned Specific Plan (S-P) and allow for the Specific Plan document to prescribe development standards and guidelines. The Project’s impacts on the environment, as they relate to the proposed density and lot sizes, are analyzed in the EIR. The City</p> |
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acknowledges the comment and notes it expresses the opinions of the commentator and preference for 7,000 square foot lot sizes. It should be noted that Chapter 4 of the EIR, Project Alternatives, analyzes two reduced density projects under which the existing R-1-7 zoning would remain. Thus, these alternatives would have one large lot size (7,000 square feet) across the entire Project site. The alternatives will be considered for review and consideration by the decision makers prior to a final decision on the Project. No further response is required or necessary.

The commenter also expresses general concern regarding the Project's impact on existing infrastructure. The comment does not specify which infrastructure is a concern. Section 3.1.9, Utilities and Service Systems, of the EIR analyzes infrastructure such as water supply, wastewater/sewer service, stormwater, and solid waste, all of which were found to have less than significant impacts with Project implementation. Section 2.7, Transportation and Traffic, of the EIR analyzes the Project's impacts to the circulation network and infrastructure. The analysis found that all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to Interstate (I-) 15, which relies on Caltrans to allow the proposed mitigation measure to be

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|  | <p>completed. Additionally, with implementation of the Specific Alignment Plan (SAP) and Mitigation Measures M-TR-1 through M-TR-8, street segments, intersections, and ramps meters would all operate at an acceptable LOS level. Additionally, Appendix 3.1.5-1, City of Escondido General Plan Policy Consistency Analysis Table, covers the consistency of the Project with applicable infrastructure related policies from the City’s General Plan. Therefore, the City does not agree that the infrastructure is not sufficient to accept the additional homes proposed by the Project, and the commenter does not provide any substantial evidence to indicate such.</p> <p><b>I51-5</b> The City acknowledges the comment regarding general concern about noise and air quality and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. While there is expected to be this noise and dust during construction activities, the amount would not be greatly reduced in any of the alternatives considered in Chapter 4 of the EIR, and can be completely mitigated by mitigation measures proposed for 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.</p> <p><b>I51-6</b> The City acknowledges the comment and notes it</p> |
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|  | <p>expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. 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> |
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Comment Letter I52

**From:** Kristin Blackson  
**To:** Jonathan Frankel  
**Cc:** Mike Strong  
**Subject:** FW: Comments on Draft EIR, ENV 16-0010; SUB 16-0009  
**Date:** Wednesday, July 05, 2017 6:16:04 AM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Erica Garcia [Erica.Garcia@welkgroup.com]  
**Sent:** Thursday, June 29, 2017 5:16 PM  
**To:** Kristin Blackson  
**Cc:** ericagarcia540@gmail.com  
**Subject:** Comments on Draft EIR, ENV 16-0010; SUB 16-0009

Good afternoon Kristin,

First of all, I'd like to thank you for the thorough and informative Notice of Availability of the Draft Environmental Impact Report mailed to all residents of the proposed project plan area, formerly the Escondido Country Club Residents.

Second, I'd like to provide my comments on the Draft EIR, by section, below:

2.6.5 Noise  
 As identified, noise levels during construction from equipment and blasting have raised my levels of original concern.

Question: Can residents learn more about how the City of Escondido plans to oversee the mitigation plans for noise, if the plan is approved and construction is underway for the residents currently residing in impacted areas?

2.7.3 Transportation and Traffic  
 As identified in the Cumulative Impact Analysis, significant cumulative impacts at Intersections #8, #12, and #9 would cause levels of original concern to rise further in my case, as I use those intersections currently both for daily commute to my office in San Marcos and for pleasure to local shopping. The additional cumulative impacts at Segment #15 and Segment #17 further raise my concerns, as those are daily access points to my home. Further identified are significant long-term cumulative impact at Intersection #8 and #9 already mentioned as previous concerns, but those are concerns that would last far beyond the construction of the proposed Village Project plan.

Even with mitigation of those impacts noted above, freeway access is a serious and unavoidable impact that will affect all residents of North Escondido for I-15 ramps.

Being that mitigation of I-15 ramps is controlled by Caltrans, the EIR of existing traffic volumes should be enough to push this project for a revision or reduction in proposed housing units.

3.1.7 Public Services | Schools

I52-1

I52-2

I52-3

I52-4

Response to Comment Letter I52

Erica Garcia  
 June 29, 2017

**I52-1** The City of Escondido (City) acknowledges the comment as an introduction to comments that follow.

**I52-2** Construction noise levels are anticipated to exceed the applicable City noise restrictions when equipment is operating less than approximately 200 feet from existing residences in the Project vicinity, without implementation of mitigation measures. Consequently, short-term construction noise would result in a potentially significant impact, without mitigation measures. With implementation of Mitigation Measures M-N-1 through M-N-6, noise impacts would be reduced to less than significant. As analyzed in Section 2.6.2.3, the shortest distance between potential blast locations and existing residences is approximately 100 feet (property lines are as close as 50 feet, but the OSMRE standard is based upon distance to residence, rather than property line). Based on the reference blasting noise level, the closest residential receiver will experience noise levels approaching 93 dBA Lmax over the course of the blast, which will likely occur for only a few seconds. As required to comply with the more general construction noise limit of 75 dBA Leq 1-HOUR, blasting would be limited to no more than 3 minutes within any given hour. Although some blasting noise

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| <p>The current capacity of Reidy Creek Elementary School is 685 students and an enrollment of 623 students, yet it is estimated that the Project would generate approximately 116 new elementary school students. That is not considering those elementary school students not yet of age for enrollment into the Reidy Creek Elementary School, of which I personally know we have 7 pre-elementary age children in my cul-de-sac alone, who will all be entering Elementary school at the same time. Thus exceeding current capacity of Reidy Creek Elementary School and jeopardizing the public service of schooling for my children.</p> <p>Given this was not listed as an impact concern, I do have significant concerns for the education of our youth in the City of Escondido if the project, as submitted, is approved and believe the Draft EIR does not fully mitigate the concerns toward public schools in the area of impact.</p> <p>Thank you for the opportunity to share my concerns and voice my objection of this project. I am available if additional questions may arise.</p> <p>Best Regards,</p> <p>Erica Garcia<br/> <a href="mailto:ericagarcia540@gmail.com">ericagarcia540@gmail.com</a><br/>         (760)703-7060<br/>         1650 Foxfire Place<br/>         Escondido, A 92026</p> | <p>I52-5</p> <p><b>I52-3</b> may be noticeable to nearby residents, the single-event, temporary noise levels generated by the blast will not exceed the OSMRE and the CFR standards for air blasts, and therefore noise impacts due to blasting were determined in the Environmental Impact Report (EIR) to be less than significant (EIR page 2.6-11).</p> <p>The commenter is correct in stating the Project would result in significant cumulative impacts at Intersections #8, #12, #9, and Segments #15 and #17. Mitigation Measures M-TR-1, M-TR-2, M-TR-4, M-TR-6, and M-TR-7 would reduce the identified impacts to less than significant levels. The commenter’s concerns are noted.</p> <p>I52-6</p> <p><b>I52-4</b> As stated in Section 2.7, Transportation and Traffic, Mitigation Measure M-TR-3 along with the associated adaptive signal control proposed, and Mitigation Measure M-TR-5 would reduce impacts to I-15 ramps to levels less than significant with the approval of Caltrans. However, neither the applicant nor the City of Escondido can assure that Caltrans will permit the improvement to be made. The City acknowledges that there are significant and unavoidable impacts associated with the project, as disclosed in the Draft EIR. Per CEQA Guidelines, Section 15093, if the County were to certify the Final EIR, the City would be required to make a statement of overriding consideration to show that the economic, legal, social,</p> |
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|  | <p>technological, or other benefits, including region-wide or statewide environmental benefits of the project outweigh the unavoidable adverse environmental effects. The City acknowledges the commenter's opposition to the project. The information will be provided in the Final EIR for review and consideration by the decision makers. 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><b>I52-5</b> As stated in Section 3.1.7 Public Services, the majority of the Project site (located on the eastern portion of the site) is served by Escondido Union School District (EUSD) and Escondido Union High School District (EUHSD). A portion of residents fall into the San Marcos Unified School District (SMUSD). EUSD would have sufficient capacity to serve the 33 middle school and 116 elementary school students generated by the Project. The addition of 149 extra students into the EUSD and 55 extra students into the EUHSD would not represent a significant impact because both districts have adequate capacity to support these students. Students in the easterly portion of the Project site would attend Reidy Creek Elementary School, which is within the EUSD. Additionally, the Project would be required to pay the City of Escondido School District Residential Impact Fee to ensure that adequate school facilities are</p> |
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|  | <p>available to children residing in new residential developments and overcrowding does not occur. As such, the Project would not result in significant impacts on schools.</p> <p><b>I52-6</b> The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment.</p> |
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Comment Letter I53

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Monica Giotta [Mgiotta@cox.net]  
**Sent:** Tuesday, July 25, 2017 3:57 PM  
**To:** Sam Abed  
**Cc:** Kristin Blackson  
**Subject:** The Villages project & EIR

Dear Mayor Abed:

I am writing to state my opposition to The Villages Project proposed for the former Escondido Country Club. Listed below are specific concerns I and my husband have, referencing topics in the EIR.

First, let me say that I attending a 'kitchen table' meeting held by NUWI. Linda Bailey and Jason Han avoided the topic of housing density. When asked directly, he noted the property owner was asking a very high price and he said 'well, we need to make money on this project!' That sent a chill down my spine because I knew the project would be high density due to Mr. Schlesinger's greed.

I53-1

EIR sections TR-2 and TR-3 regarding traffic:

The explanation in the EIR about traffic mitigation is a cop out. The City cannot shift the inevitable traffic problem caused by an extra 392 households to Caltrans. The City must act responsibly and only approve a development with a modest number of units. Traffic on El Norte and Nutmeg is backed up already at specific parts of the day. And we all know that 15 South is very difficult with large traffic volume through large parts of the day. I travel frequently for my job and I already schedule flights based on Escondido traffic, avoiding large blocks of time.

I53-2

I don't see that Firestone Drive is mentioned in the EIR. Firestone Drive is one of the few roads in and out of the Country Club neighborhood (along with CC Lane and Nutmeg). It is a 'pass-through' street already during rush hours with vehicles trying to access El Norte Parkway.

BI-4 Trees:

It breaks my heart to read the 'easy' mitigation of 601 mature trees and 18 protected trees. The mitigation is to just plant new trees. Most trees planted in new developments are small (15 ft or less) specimens. They will never provide much shade and they will not be preferred homes for birds. How does a small crape myrtle equal a mature oak tree? It just doesn't.

I53-3

BI-CUM-1 Nesting Birds:

Response to Comment Letter I53

Monica Giotta  
 July 25, 2017

**I53-1** The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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.

**I53-2** The comment addresses concerns regarding traffic, which received extensive analysis in the EIR. As shown in Table 2.7-14 of Section 2.7, Transportation and Traffic, all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15 which relies on Caltrans' approval to implement the proposed mitigation measure. If implemented, Mitigation Measure M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable

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| <p>The impact is noted as less than significant. Clearly, all birds and wildlife will need to move on as they will no longer nest or live in a construction zone and in the resulting very dense housing. The walking paths and small strips of land will not mitigate this loss. But dense housing will pack in more animals of the human variety. Living like rats with little space between you and your neighbors – yes that should result in animal-like behavior quickly.</p> <p>I understand the need for more housing in Southern California and for affordable housing. Regarding 'affordable': with the price Mr. Schlesinger is asking for the property and his greed, do you believe any of the housing proposed will be 'affordable'? I doubt that a proposed small NUWI duplex is below \$400K. Regarding the need for more housing in Escondido: does the need justify maximum density? Why can't a development be moderate in density? That would make it more livable and more attractive. And in the case of ECC, would more closely match the existing neighborhood and history of this community. My husband and I have visited the NUWI development in Harmony Grove with side-by-side houses (too close!), extremely small lots, and almost nonexistent driveways. That is not in character with the ECC neighborhood.</p> <p>What is the purpose of NUWI's 279 unit alternative in the EIR? Are they hedging their bets because they know 392 units is too dense?</p> <p>I don't believe any City Council member should trust Mr. Schlesinger. He has shown his true nature throughout the course of this ordeal with the chicken manure, the lawsuits against homeowners, his bluster, his hatred. He holds considerable power over the outcome of this project due to the price he is asking for the property. If he commanded lower price, NUWI could propose a reduced density. And will he and NUWI keep their promises on proposed amenities? I have read about developers renege on promises to build community centers and parks, etc. Based on his history, Mr. Schlesinger would be my #1 bet to renege on promises!</p> <p>And please don't forget the City voted on Prop H already and Mr. Schlesinger lost. This 392 unit development is close to the 400+ from Prop H. Please consider the vote of the citizens of Escondido.</p> <p><b>Please support one of the ECCHO-proposed smaller developments for the Country Club property.</b></p> <p>Sincerely,<br/>         Monica Giotta<br/>         1842 Firestone Drive<br/>         mgiotta@cox.net</p> | <p>I53-3<br/>Cont.</p> <p>I53-4</p> <p>I53-3</p> <p>The comment expresses concern regarding impacts to trees and biological resources, which received extensive analysis in the EIR. As stated in Section 2.2 Biological Resources, no impacts on special-status species are anticipated. Impacts to raptors are expected</p> |
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for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers with the EIR, if the Project is approved. The other mitigation proposed regarding traffic would not rely on Caltrans.

As stated in Section 2.7.1, the study area for the traffic analysis includes 17 existing intersections, 19 street segments, 1 freeway ramp meter, and 1 freeway segment, which, are listed and include Firestone Drive, contrary to the commenter's claim. The Project would improve operations at five intersections along Country Club Lane (Intersections #2 through), including the Country Club Lane/Firestone Drive Intersection #4 – with the provision of the SAP and the associated capacity enhancements with the proposed roundabouts, signals, and all-way stop control.

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|  | <p>to be less than significant, and with implementation of Mitigation Measures M-BI-1, M-BI-2, and M-BI-3, impacts to biological resources would be reduced to less than significant.</p> <p>The Project applicant shall prepare and submit to the City of Escondido (City) and/or other responsible agencies of the Project for approval a Restoration Plan for the establishment/reestablishment and enhancement of sensitive habitat within the Project's open space. The Restoration Plan shall provide for replacement of impacted sensitive habitat, i.e., wetland/riparian sensitive natural communities and jurisdictional wetlands and waters in an amount to satisfy a no-net-loss standard for both function and spatial area of wetland and non-wetland resources. The Restoration Plan shall include 5 years of maintenance and monitoring to ensure the restoration effort is successful (EIR page 2.2-22).</p> <p>The Project will be consistent with the City's Mature and Protected Tree Ordinance. The Project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The Project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City's Director of Community Development (EIR</p> |
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|  | <p>page 2.2-23). This will mitigate the removal of tree and other impacts to natural resources on-site. 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><b>I53-4</b> The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City does not agree that the project is the maximum density. The Project’s density and consistency with the surrounding environment were analyzed in Section 3.1.5, Land Use, of the EIR. As stated in EIR Section 3.1.5:</p> <p style="padding-left: 40px;">The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-</p> |
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density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.

Therefore, the proposed density is consistent with the City's General Plan. The Project is not inconsistent with the surrounding environment as the commenter claims; see also Section 3.1.5.1.1, Surrounding Land Uses, and Figure 1-9, Surrounding Land Uses of the EIR.

CEQA Guidelines Section 15126.6(a) states:

[a]n EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The range of alternatives required in an EIR is subject to the “rule of reason” (CEQA Guidelines Section 15126.6 (f))

The EIR considers a reasonable range of alternatives. The EIR evaluates four alternatives in detail: (1) No Project/No Development Alternative; (2) 158-Unit Reduced-Density Alternative; (3) 138-Unit Reduced-Density Alternative; and (4) 279-Unit Reduced-Density Alternative (EIR Chapter 4 and page 4-6). As

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|  | <p>required under CEQA, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). The 158-Unit and 138-Unit Reduced-Density Alternatives were also selected for analysis because they were proposed by the Escondido Country Club Homeowners' Association (ECCHO) during the public scoping process to lessen Project impacts (EIR page 4-4). The EIR considers an adequate range of potentially feasible alternatives to foster informed decision making and public participation.</p> |
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Comment Letter I54

The Villages EIR Comment Card

Name Monica Giotta  
 Address 1842 Firestone Dr  
 City Escondido State CA Zip 92026  
 Phone (760) 570-0211 Email mggiotta@cox.net

Comments

I disagree with the EIR as submitted in that  
I do not believe the traffic, environmental,  
and noise problems that will result with  
the Villages project ~~will~~ be mitigated.  
The proposed picture renderings of the Project  
are disturbing dense.  
I support either one of the 2 lowest  
density projects proposed.  
In addition, I ask that the R1-7  
Zoning be maintained.  
Thank you for this opportunity to provide  
Comments.

154-1  
154-2  
154-3  
154-4

Please return to the box provided, or email your comments to Kristin Blackson (kblackson@escondido.org) by August 11.

Response to Comment Letter I54

Monica Giotta  
 July 31, 2017

I54-1

The comment addresses the general subject areas of traffic, environment, and noise, which were analyzed in the Environmental Impact Report (EIR); please refer to Section 2.7, Transportation and Traffic; Section 2.2, Biological Resources; and Section 2.6, Noise. The comment does not raise any specific issue regarding that analysis. The City of Escondido (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.

I54-2

The commenter expresses general concern regarding density. The Project's density and compatibility with the surrounding area were analyzed in Section 3.1.5, Land Use, of the EIR. As stated in Section 3.1.5 of the EIR:

The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development

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|  | <p>within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.</p> <p>Therefore, the proposed density is consistent with the City’s General Plan. The reduced density alternative would include fewer units; however, the footprint of disturbance to construct the reduced number of residences would be roughly the same as the Project because the lot sizes would be larger, which is why this alternative was dismissed. The comment does not raise any specific issue regarding the analysis provided in the EIR. 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><b>I54-3</b> The commenter expresses general concern regarding the proposed zoning for the Project. The City has an application process for land development proposals, which complies with California Environmental</p> |
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|  | <p>Quality Act (CEQA) law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. As stated in Section 3.1.5, Land Use, of the EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals. Section 3.1.5 of the EIR describes and analyzes the Project’s land use and design compatibility. Appendix 3.1.5-1 to the Draft EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project’s potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the EIR concludes that the Project does not conflict with the City’s General Plan and Zoning Ordinance. The comment does not raise an issue related to the adequacy of this land use and zoning analysis as provided in the EIR.</p> <p><b>I54-4</b> The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the EIR. 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> |
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Comment Letter I55

**From:** Kristin Blackson  
**To:** Kristin Blackson  
**Subject:** FW: Escondido Country Club-The Villages Case Number SUB 16-0009  
**Date:** Friday, July 21, 2017 9:25:08 PM

Kristin Blackson, Contract Planner  
 City of Escondido  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

**From:** Thad Giotta [thadgio@cox.net]  
**Sent:** Wednesday, July 19, 2017 10:08 AM  
**To:** Kristin Blackson  
**Subject:** Escondido Country Club-The Villages Case Number SUB 16-0009

Regarding: **Escondido Country Club-The Villages Case Number SUB 16-0009**

From: Thaddeus Giotta  
 1842 Firestone Dr.  
 Escondido, Ca 92026.

I'm writing this because I think the proposed project is an outrage. The majority of the people in this area have previously voted against this measure and here we are still debating it. Admittedly I have not read the complete measure in detail but the sections I have read have me very worried.

I55-1

I think most of us could accept some development (when done correctly with the community buying into it) but the proposed project with around 400 housing units is completely unacceptable. Adding hundreds of cars and the increase in noise to an area not originally meant for housing development is going against the will of the majority.

I55-2

The two areas that stand out to me are the traffic and noise. As stated in the measure trying to get on to the I-15 south is going to be a nightmare. There is already a delay here but adding potentially hundreds of additional cars is ludicrous.

As stated in the measure:

"Traffic. El Norte Parkway / I-15 SB Ramps (Caltrans)

I55-3

**RAMP METER OPERATIONS COMPARISON**

*Significant Impacts*

**Table C** summarizes the comparison of significant impacts at the freeway on-ramp location in the study area, El Norte Parkway to I-15 southbound. As shown in **Table C**, with either the *Proposed Project* or the *ES Alternative*, **this on-ramp would remain a significant direct and cumulative impact**.

Noise: The measure states an increase in noise citing it in dBs. A 6dB increase in audio noise doubles it and a 3dB is half that amount. So when the study seems to make it seem insignificant with a 1, 2

I55-4

Response to Comment Letter I55

Thaddeus Giotta  
 July 19, 2017

**I55-1** The City of Escondido (City) acknowledges the comment letter, and notes it expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft Environmental Impact Report (EIR). For that reason, the City provides no further response to this comment.

**I55-2** The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required. 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.

**I55-3** The commenter refers to the significant traffic impact located at the El Norte Parkway/Interstate (I-) 15 southbound ramp. The Draft EIR includes Mitigation Measure M-TR-5, which would provide an additional Single Occupancy Vehicle (SOV) lane to the southbound on ramp. If implemented, Mitigation Measure M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans,

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|  | <p>the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the Draft EIR, if the Project is approved.</p> <p><b>I55-4</b> The City has an application process for land development proposals, which complies with California Environmental Quality Act (CEQA) law and CEQA Guidelines. CEQA requires the City to respond to any comments received on the draft environmental document. When all public comments are addressed, the environmental document is then finalized for adoption by the decision maker. The comment addresses general concern regarding noise, which was analyzed in Section 2.6, Noise, of the Draft EIR. Project noise impacts, Impact N-1 through Impact N-4, were addressed through Mitigation Measures M-N-1 through M-N-6, thus reducing all</p> |
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| <p>or 3 dB increase in various areas, it is a very significant amount.</p> <p>Please vote against this measure. Going against the will of the majority I think will hurt the city of Escondido.</p> <p>Thank you</p> | <p style="text-align: right;">↑ I55-5<br/>Cont.</p> <p style="text-align: right;">  I55-6</p> <p><b>I55-5</b>    The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required. 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><b>I55-6</b>    The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required. 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> |
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**Response to Comment Letter I56  
Thad and Monica Giotta  
August 18, 2017**

**Comment Letter I56**

**From:** Monica Giotta  
**To:** Mike Strong; dblackson@escondido.org; Sam Abed; John Masson; Olga Diaz; Ed Gallo; Michael Morasco  
**Subject:** EIR document concerning Escondido Country Club  
**Date:** Friday, August 18, 2017 10:37:43 AM

I previously submitted comments on the Environmental Impact Report for the former Escondido Country Club property. In general, my husband and I feel the EIR is biased toward the proposed high-density (392 units) development. We initially thought the EIR was completed by the Escondido City Planning Department but learned it was drafted by a company chosen by NUWI. The EIR certainly aims to please the organization paying their fees.

We feel very stressed about the future of the former golf course and don't know what our future here will be.

I am writing today to reiterate our concerns as follows:

1. Quality of life in Escondido: The renderings of the proposed Village development I viewed at the 7/31/17 meeting show a monolithic wall of dense development not appropriate for the area and history of NW Escondido. While more housing is needed in San Diego County, it should be development that is livable and promote a healthy community, not trying to maximize developer profit. The proposed Village walking paths and limited green space will not mitigate the deleterious effects of living in a jam packed development. The proposed development is more appropriate for inner-city in-fill projects such as in downtown San Diego.
2. Environmental concerns: We have enjoyed the bountiful natural world in the NW part of Escondido since 1998. We are saddened that the EIR states that environmental concerns can be mitigated. Losing mature trees is devastating. We will lose animal and bird species that have enjoyed this area for so long. This summer, as we saw our local common egrets and red-tailed hawks, it makes us ill that they will be forced to move on. The songbird diversity here is fantastic – in my home office I see multiple species on a daily basis, including bluebirds, mockingbirds, orioles, black phoebes, hummingbirds, California towhees, goldfinches, chickadees, etc. They will not survive in the proposed development with limited open space heavily used by humans.
3. Traffic concerns: Highway 15 is a nightmare already at certain times of the day. Pushing the mitigation off to Caltrans is a cop-out. The City must consider the impacts of proposed housing developments on freeway access and local streets.

We ask you to reject the proposed 392-unit Villages development. Please consider one of the ECCHO-proposed alternatives of less than 160 housing units.

Thank you for reviewing our concerns,

Thad & Monica Giotta  
 1842 Firestone Dr.  
 Escondido, CA  
[mgiotta@cox.net](mailto:mgiotta@cox.net)

I56-1  
 I56-2  
 I56-3  
 I56-4  
 I56-5

**I56-1**

The City acknowledges the comment and notes it expresses the opinions of the commenter. As stated in Chapter 6, List of EIR Preparers, of the EIR, the lead agency is the City of Escondido and the City reviewed and verified all contents of the EIR. Pursuant to CEQA, the EIR is required to analyze the proposed project. It should be noted that the EIR considered a reasonable range of alternatives. The EIR evaluates four alternatives in detail: (1) No Project/No Development Alternative; (2) 158-Unit Reduced-Density Alternative; (3) 138-Unit Reduced-Density Alternative; and (4) 279-Unit Reduced-Density Alternative (EIR Chapter 4 and page 4-6). As required under CEQA, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). The 158-Unit and 138-Unit Reduced-Density Alternatives were also selected for analysis because they were proposed by the Escondido Country Club Homeowners' Association (ECCHO) during the public scoping process to lessen Project impacts (EIR page 4-4). Therefore, in addition to analyzing the proposed project, the EIR considers an adequate range of potentially feasible alternatives to foster informed

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|  | <p>decision-making and public participation.</p> <p><b>I56-2</b> The City acknowledges this comment, which expresses the opinions of the commenter. The Project’s compatibility with the surrounding environment were analyzed in Section 3.1.5, Land Use, of the EIR. As stated in EIR Section 3.1.5:</p> <p>The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.</p> |
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|  | <p>Therefore, the Project is consistent with the surrounding development and existing densities; see also Section 3.1.5.1.1, Surrounding Land Uses, and Figure 1-7, Surrounding Land Uses of the EIR. The surrounding land uses consist of single-family residential development that includes detached residences on a variety of lot sizes (ranging from 2,300 square feet to 7,000 square feet), attached residence/duplexes (ranging from 2,000 square feet to 4,000 square feet), and several common-interest developments. Overall, densities range from 2.7 to 8.3 dwelling units per acre; see Figure 1-7, Surrounding and Uses.</p> <p>Additionally, as analyzed in Section 3.1.1, Aesthetics, of the Draft EIR, the Project would not result in significant visual or aesthetic impacts. As stated in Section 3.1.1 Aesthetics, “The significance determination as to whether the Project would result in substantial degradation of visual character and quality is based on the analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area” (EIR page 3.1.1-19). The Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area (EIR page 3.1.1-12).</p> <p><b>I56-3</b> The comment expresses concern regarding impacts to trees and biological resources, which received</p> |
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|  | <p>extensive analysis in the EIR. As stated in Section 2.2 Biological Resources, no impacts on special-status species are anticipated. Impacts to raptors are expected to be less than significant, and with implementation of M-BI-1, M-BI-2, and M-BI-3, impacts to biological resources would be reduced to less than significant.</p> <p>The Project applicant shall prepare and submit to the City of Escondido (City) and/or other responsible agencies of the Project for approval a Restoration Plan for the establishment/reestablishment and enhancement of sensitive habitat within the Project's open space. The Restoration Plan shall provide for replacement of impacted sensitive habitat, i.e., wetland/riparian sensitive natural communities and jurisdictional wetlands and waters in an amount to satisfy a no-net-loss standard for both function and spatial area of wetland and non-wetland resources. The Restoration Plan shall include 5 years of maintenance and monitoring to ensure the restoration effort is successful (EIR page 2.2-22).</p> <p>The Project will be consistent with the City's Mature and Protected Tree Ordinance. The Project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The Project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement</p> |
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|  | <p>trees shall be determined on a case-by-case basis by the City’s Director of Community Development (EIR page 2.2-23). This will mitigate the removal of tree and other impacts to natural resources on-site. 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><b>I56-4</b> The comment addresses concerns regarding traffic, which received extensive analysis in the Draft EIR. As shown in Table 2.7-14 of Section 2.7 Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15 which relies on Caltrans’ approval to implement the proposed mitigation measure to be completed. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. The City acknowledges the commenter’s concerns regarding this mitigation measure. However, there is no other feasible mitigation to reduce this impact to less than significant. It should be noted that if a project results in significant and unavoidable</p> |
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|  | <p>environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers with the Draft EIR, if the Project is approved. The other mitigation proposed regarding traffic would not rely on Caltrans and would be implemented.</p> <p><b>I56-5</b> The City acknowledges this comment, which expresses the opinions of the commenter, general opposition to the Project and preference for one of the proposed alternatives considered in the EIR. The comment does not raise any specific issue related adequacy of the Draft EIR; therefore, no further response is provided. 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> |
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**Comment Letter I57**

Hi Kristin,

I have received the July issue of the ROCC News and read the proposed traffic improvements suggested by the developers of this project. While these improvements are needed, they fall short of what is really needed to handle traffic in this area.

As a longtime resident (17 years) of Sunset Heights I have seen traffic grow substantially in this area, especially at the intersection of Nutmeg and El Norte Parkway. This intersection represents the only 15 freeway access for northwest Escondido.

What needs to happen to mitigate existing and future traffic increases is to put a southbound on ramp to the 15 freeway at Country Club and a northbound off ramp from the 15 freeway to Country Club. This will alleviate the sole burden of freeway access for northwest Escondido from El Norte Parkway and freeway 15. This will also help the bottle neck that occurs at Nutmeg and El Norte Parkway.

When the country club development was proposed this was the very first thought I had. Likely it will take the combined efforts of the city of Escondido, Urban West, Caltrans and Sandag. These efforts should be put forth to ensure the quality of life in northwest Escondido now and into the future. Without these, I believe traffic and freeway access in northwest Escondido will be a nightmare.

Sincerely,

David Graff  
1850 Skyhill Place  
Escondido, CA 92026

I57-1

I57-2

I57-3

**Response to Comment Letter I57**

**David Graff**  
**August 4, 2017**

**I57-1**

The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. The comment does not raise any specific issue regarding the analysis of the Environmental Impact Report (EIR). This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I57-2**

The comment addresses general concern regarding traffic, which was analyzed in Section 2.7, Traffic, of the Draft EIR. As shown in Table 2.7-14 of Section 2.7, Transportation and Traffic, all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to Interstate (I-) 15, which relies on Caltrans' approval to implement the proposed mitigation measure. Because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the

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|  | <p>lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.</p> <p>The City has an application process for land development proposals, which complies with California Environmental Quality Act (CEQA) law and CEQA Guidelines. CEQA requires the analysis of the EIR address direct, indirect, and cumulative environmental impacts caused by the Project. This does not include existing environmental impacts. The commenter is requesting the project “mitigate existing and future traffic increases,” which is not the responsibility of the EIR. 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><b>I57-3</b> Refer to I57-2.</p> |
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Comment Letter I58

**From:** Rob Grasso <rgrasso1@cox.net>  
**Sent:** Sunday, August 13, 2017 3:11 PM  
**To:** Kristin Blackson  
**Subject:** EIR Comments

Environmental Impact Report comments:

The entire EIR consists of political rhetoric and mitigation plans to hide the actual impact of inserting 396 homes into the existing community.

For example, traffic. The EIR's primary mitigation plans for the increased traffic is "traffic calming". Traffic calming doesn't work. Just ask people who live in areas where it is the solution. In our Country Club neighborhood we already have problems with speeding and stop sign violations, especially on Country Club Lane and Golden Circle Drive. The majority of cars that even slow down for the stop signs don't actually stop. When those intersections become cross streets the accident rate will undoubtedly go up. And if you have ever tried to turn left entering the neighborhood on Country Club Lane from El Norte, onto Golden Circle at peak traffic times you will know what a mess that is.

The EIR addresses things like the freeway on ramps. While I admit this might be an issue, the real issues are within the Escondido Country Club neighborhood. The streets in the neighborhood are narrow to begin with. And since the Country Club has closed there has been a large influx of young families into the neighborhood whose children play out front because they don't have backyards. So adding traffic, especially speeding traffic, to these narrow streets is asking for accidents. And the streets can't be widened because that would eliminate on street parking and in most of the neighborhoods the driveways are so short you can't park a pickup truck on them without blocking the sidewalk.

And who is going to pay for all the street changes, like the proposed roundabouts? The City of Escondido has already gone on record stating that they don't have the money to maintain any additional streets or changes to the existing streets. So the new HOA would have to take ownership, but I don't think they can own a public street and even if they could what motivation would they have to maintain them?

Schools are another issue. Because this is no longer a golfing community, the people who buy the new homes will tend to be families, many with school age children. While there are 3 elementary schools that currently serve the area, they all require either bus transportation or someone to drop off and pick up (adding to the traffic issues). But more importantly, despite what the EIR says, these schools are at capacity. They already run morning and afternoon sessions for pre-K and K because they can't handle them all at once. And there is only one middle school and one high school within reasonable reach. And "reasonable" is a relative term. They both will require busses or personal transportation as they are too far to walk.

The bottom line is that the neighborhood does not have the infrastructure to accept an additional 396 homes. While the developer provides "mitigation" plans, they don't really address the issues and definitely don't take the personal and physiological issues in consideration.

Rob and Sandy Grasso  
 1907 Lorri Way  
 Escondido, CA 92026

I58-1

I58-2

I58-3

I58-4

Response to Comment Letter I58

**Rob and Sandy Grasso**  
**August 13, 2017**

**I58-1**

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Environmental Impact Report (EIR). 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.

**I58-2**

The City acknowledges the comment regarding traffic mitigation and notes it expresses the opinions of the commenter. As described in Section 2.7, Transportation and Traffic, of the EIR, the analysis includes assessment of the traffic calming measures and the effect on traffic. The traffic violations described by the commenter are not the responsibility of the Project applicant, but rather the City's police department. This comment has been acknowledged by the City. The study area for the traffic analysis provided in the EIR includes 17 existing intersections, 19 street segments, 1 freeway ramp meter, and 1 freeway segment, which are located within the jurisdiction of the City of Escondido, City of San Marcos, County of San Diego, or California Department of Transportation (Caltrans). Therefore,

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|  | <p>the analysis adequately analyzed both free and neighborhood traffic.</p> <p>Additionally, the commenter expresses general concerns regarding funding of the proposed street infrastructure. The source of funding for public improvements is immaterial to the EIR. The improvements are part of the project conditions and would be required to be constructed and implemented. The improvement would all be privately financed.</p> <p><b>I58-3</b> The comment raises general concerns regarding the capacity of nearby schools. Regarding Escondido Union School District (EUSD) and Escondido Union High School District (EUHSD), Section 3.1.7, Public Services, concluded that:</p> <p>Currently, EUSD elementary schools have a capacity of 12,391 students with an enrollment of 11,663 students and EUSD middle schools have a capacity of 5,640 students with an enrollment of 5,156 students; thus, EUSD would have sufficient capacity to serve the 33 middle school and 116 elementary school students generated by the Project (Kroon, pers. comm. 2017; Ed-Data 2017). EUHSD currently has a capacity of 8,253 students with an enrollment of 7,714; thus, EUHSD would also have sufficient capacity to</p> |
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serve the 55 high school students generated by the Project (EUHSD 2016). The Project's payment of residential impact fees, as well as the availability of space at EUSD and EUHSD, would ensure that the Project would not represent a cumulatively considerable contribution to this cumulative impact.

Furthermore, as stated in Section 3.1.7, Public Services, regarding the San Marcos Unified School District, the EIR found that:

the Project would introduce approximately 17 elementary students, 5 middle school students and 4 high school students to the SMUSD (SMUSD 2017). The Woodland Park Middle School is currently over capacity; however, the Project's addition of 5 students to this school would not warrant expansion or construction of new school facilities or otherwise need to be analyzed, indirectly, for parts of the physical environment related to changes in school attendance.

Therefore, EUSD, EUHSD, and SMUSD schools would be able to accommodate students introduced by the Project, and no further response is required. The City will include the comment as part of the Final EIR

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|  | <p>for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I58-4</b> The commenter expresses general concern regarding ability of existing infrastructure to handle the Project. The comment does not specify which infrastructure is a concern. Section 3.1.9, Utilities and Service Systems, of the EIR analyzes infrastructure such as water supply, wastewater/sewer service, stormwater, and solid waste, all of which were found to have less than significant impacts with Project implementation. Section 2.7, Transportation and Traffic, of the EIR analyzes the Project’s impacts to the circulation network and infrastructure. The analysis found that all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15 which relies on Caltrans to allow the proposed mitigation measure to be completed. Additionally, with implementation of the Specific Alignment Plan (SAP) and mitigation measures M-TR-1 through M-TR-8, street segments, intersections, and ramps meters would all operate at an acceptable LOS level. Additionally, Appendix 3.1.5-1, City of Escondido General Plan Policy Consistency Analysis Table, covers the consistency of the Project with applicable infrastructure related policies from the City’s general plan. Therefore, the City does not agree that the infrastructure is not sufficient to accept the</p> |
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|  | <p>additional homes proposed by the Project, and the commenter does not provide any substantial evidence to indicate such.</p> <p>Additionally, the commenter expresses general concerns regarding personal and physiological issues. Pursuant to CEQA, the EIR analyzes environmental issues and topics. The City notes the commenter's concern regarding personal and psychological issues. 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> |
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**Comment Letter I59**

**From:** Erin <erin@bsidephotography.com>  
**Sent:** Wednesday, August 16, 2017 2:32 PM  
**To:** Sam Abed  
**Cc:** Olga Diaz; Ed Gallo; John Masson; Michael Morasco; Kristin Blackson  
**Subject:** Country Club EIR

To the governing members and leaders of my home;

For the last several years, I have been standing by watching the events unfold below my home on the former Country Club golf course. I have idly stood by feeling I had no right to have an opinion or use my voice because my home I purchased two years ago sits just outside the city jurisdiction and I fall within the unincorporated San Diego County territory. Or perhaps because I have not been a member of this particular community long enough. Or perhaps I feel since I am just outside, it is "their" community - the homeowners and residents who live right on this land that will, and I do not deny it *will*, be developed.

I59-1

However, that development will and does effect my and my family's health and safety and I have been a resident of Escondido for the last 13 years, so after reading the complete Environmental Impact Report, which is by far not an easy thing to read or understand, taking a copious amount of time to decipher what is being reported and what is actually being said, I am very concerned and feel compelled to write.

As you all are aware, the men and women who write these reports are analysts, working on a time frame with limited information leaving an undisclosed margin of error within their reports. Furthermore, there are so many factors that just cannot be conveyed with scientific data. There are many things that engineers and numbers might say should work in theory, but in reality, it just doesn't.

I59-2

These EIRs exist because there *will* be a significant impact on our human environment with the addition of a staggering 392 homes on 109 acres.

I59-3

**Response to Comment Letter I59**

**Erin Grummel**  
**August 16, 2017**

**I59-1** The City acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the EIR. 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.

**I59-2** The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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.

**I59-3** The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. CEQA requires the City to respond to any comments received on the draft environmental document. When all public comments are addressed, the environmental document is then finalized for adoption by the decision-maker. The comment addresses general subject areas, which received extensive analysis in the EIR. The comment does not raise any specific

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| <p>There are so many factors that are not quantifiable that this report alludes to having concrete data. For instance, there is a possibility there could be an influx of 392 or more students into the surrounding school districts. A highly unlikely probability but with millennials becoming the largest age group of home buyers at 34% of the market and 66% being married couples and 62% having children under the age of 18 in the home, the possibility isn't so absurd. With these simple statistics, we can at least safely assume there could be a realistic highest influx of 90-165 students in a district that is near and over capacity already. With SB 50 limiting our cities ability to mitigate the impact of school facilities, that leaves a huge concern for me, a mother of a school aged child, with the condition and overcrowded and thereby dangerous situations my child and these children could face.</p> <p>Another area the report did not seem to truly account for was the additional approved developments that are currently under construction. This report is basing traffic patterns on already outdated information. They cannot have an accurate assessment of the potential impact this development will have on the area when we do not yet know with any certainty what impact those developments will have on our area.</p> <p>I have many other concerns about the plants and animals as well as the noise. I cut down one tree on my one acre property and I watched how drastically it effected the raptor's migratory and breeding patterns, their feeding patterns, the rodent population. There is a delicate balance in nature and over 600 mature trees being removed cannot be mitigated by planting a few new trees in their place. That is something that will alter our land irreversibly. One of the reasons Escondido is so well loved is the way we have been able to preserve these majestic mature trees within our community. I have been witness to so many people coming from other areas of San Diego County and stop in awe and wonder because of these very trees.</p> <p>I have taken hours of my day to read this report so that I may accurately convey my concerns directly about this report to you in hopes that my voice is heard among all the other citizens of this community. Many of us are fighting to preserve our community. So many of these large scale developments are happening all around Escondido. And with what success is it improving our actual communities? I do think New West is on the right track trying to fit within Escondido's Smart Growth plan and housing growth goals. But the line between greed and profit is thin. Claiming this is the bare minimum to make this project succeed is an insult to the residents and community they are coming into the literal middle of. To build a community, we must all work together on every side. Each of us doing our part for the success of all, not just one or two. There is a middle ground that would serve the Country Club community, the city of Escondido, the land developer and the land owner. And it is my hope that my elected officials can negotiate that compromise successfully.</p> <p>A final thought before I leave you there. Could the project alternatives (reduced units) simply not be meeting the project objectives because the entity seeking the general plan amendment</p> |  | <p>I59-4</p> <p><b>I59-4</b></p> <p>issue regarding that analysis. 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>The comment expresses general concern regarding school capacity. This topic was analyzed in Section 3.1.7, Public Services, of the EIR. The analysis determined that (EIR page 3.1.7-11):</p> <p>Based on student generation rates provided by EUHSD, it is estimated that the Project would generate approximately 116 elementary school students, 33 middle school students, and 55 additional high school students once complete.</p> <p>In total, this represents approximately 204 school-age children that would attend elementary and middle school in the Escondido Unified School District (EUSD) and high school in the Escondido Unified High School District (EUHSD). Based on San Marcos Unified School District (SMUSD) generation rates, the Project would generate approximately 17 elementary students, 5 middle school students and 4 high school students (SMUSD 2017). The analysis determined that the EUSD and EUHSD would have adequate capacity to accommodate the projected increase in student enrollment from the Project. The SMUSD has capacity to accommodate additional</p> |
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|  | <p>students expected from the Project, with exception to Woodland Park Middle School, which is over capacity by 229 students. However, the Project’s addition of 5 students to this school would not be a substantial increase to warrant expansion or construction of new school facilities or otherwise need to be analyzed, indirectly, for parts of the physical environment related to changes in school attendance. The Project would be required to pay the required school impact fees and the City of Escondido School District Residential Impact Fee, which would ensure that adequate school facilities are available to children residing in new residential development and overcrowding does not occur.</p> <p><b>I59-5</b> The comment expresses concern regarding the EIR’s lack of consideration of nearby developments that are under construction. Section 1.7, List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area, provides a list of projects that were considered during the preparation of the EIR and the cumulative analysis. Table 1-3 Cumulative Projects identifies 78 individual projects that were considered in the EIR. In each environmental impact analysis section, a separate cumulative analysis was prepared that looked at the geographic scope of the cumulative analysis (for example, Section 2.1.3 is the Cumulative Impact Analysis for Air Quality). The City will include the comment as part of the Final EIR for</p> |
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|  | <p>review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I59-6</b> The comment expresses general concern regarding biological resources and noise. These topics were analyzed in Section 2.2, Biological Resources, and Section 2.6, Noise. Mature and protected trees that would be removed by the Project would be replaced at a minimum 1:1 ratio for impacted mature trees and at a minimum 2:1 ratio for impacted protected trees, as described in M-BI-3 (EIR page 2.2-23). This would reduce impacts to mature and protected trees to less than significant.</p> <p><b>I59-7</b> The comment expresses general concern regarding the Project. The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. 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><b>I59-8</b> The City acknowledges the comment, but it does not raise environmental issues concerning the adequacy of the EIR. 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> |
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Comment Letter I60

Thank you for hosting this past Monday to allow additional questions and information distribution following the EIR submission.

I wanted to provide my additional comments, which I have found to still not be adequately addressed by the EIR and supporting documentation:

Drainage and Aesthetics - I did not buy my home with the understanding that I would be looking out my master suite window to see a drainage pond behind a new row of tightly packed 2 story houses. The proposed development of detached and attached dwellings on lots averaging less than half of the current zoning is not compatible with our current neighborhood. You might as well place a wall around the old ECC and the new development areas because that is what the aesthetics will become for those who bought on the greenways and open space.

Traffic - Our streets were not designed to add approximately 800 vehicles from new residents. The proposed traffic increase would require expansions on the already traffic-burdened El Norte/I-15 southbound on ramp, though the developer is unsure a construction project would be allowed. The developer has not displayed a plan to address such an improvement to the on ramp and lacks my trust that space/land in the area nor CalTrans would accommodate such a plan. Commuters are currently dashing through our streets in order to avoid the I-15 / 78 interchange which is a serious safety concern, for me this is especially apparent at the intersection of Bennett and Firestone Dr getting to or from El Norte Parkway. The short intersection is blind corner and has no stop signs in place currently, with an added 400 vehicles potentially using the shortcuts through our neighborhood, the intersection will only become that much more dangerous.

Noise & Air Quality - Construction will take years. The noise and dust will eliminate my quiet enjoyment of living and my poor rescue dogs will no longer have a relaxing end of life environment. I have adopted senior dogs to love and care for them in their last years and one of those dogs is also blind. The noise of construction will be truly detrimental to his health and happiness. As he only has sounds, hearing the constant noise of construction behind my home will cause him confusion, stress and seriously damage his quality of life. That is not to mention what the noise and dust will do to my young children. How much fun will it be for them to play in the backyard during days while tractors push dirt, debris and dust into the air and eventually their noses? My children will lose the years of their lives to play in our backyard. While most of our residents are seniors, I am not and I strongly urge against the zoning change and construction of 392 homes in our community - it just doesn't fit to our community, our aesthetics, the community traffic space. What kind of smell will be created for those living directly behind a drainage pond? I do not want to imagine trying to enjoy my evening from my backyard balcony and having to smell the aroma of a drainage pond after a hot summers day. Would you like that in your backyard?

1650 Foxfire Place, Escondido CA 92026  
 \*\*\* Erica Guglielmetti Garcia, MBA San Diego, CA t: 760.703.7060 | e: egugliel@sbcglobal.net

I60-1

I60-2

I60-3

I60-4

Comment Letter I60

Erica Guglielmetti Garcia  
 August 4, 2017

I60-1

The City acknowledges the comment as an introduction to comments that follow. This 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

I60-2

The commenter expresses concerns regarding aesthetics and zoning. The Project was designed to be consistent with the surrounding environment. The Project's compatibility with the surrounding environment was analyzed in Section 3.1.5.1.1, Surrounding Land Uses; see also Figure 1-7, Surrounding Land Uses of the EIR. The surrounding land uses consist of single-family residential development that includes detached residences on a variety of lot sizes (ranging from 2,300 square feet to 7,000 square feet), attached residence/duplexes (ranging from 2,000 square feet to 4,000 square feet), and several common-interest developments. Overall, densities range from 2.7 to 8.3 dwelling units per acre; see Figure 1-7, Surrounding and Uses. The Project's proposed density is 5.3 dwelling units per acre, which is consistent with current designation in the Land Use Element of the General

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|  | <p>Plan (Residential Urban I), which allows for up to 5.5 dwelling units per acre. It should also be noted that in response to this comment and others, the applicant has revised the project design as follows: (1) reflect a larger minimum lot size of 3,630 square feet for all proposed residential lots, and (2) increase the number of one-story homes to 62 total units, representing 15% of all residential lots in each Village.</p> <p>Additionally, as analyzed in Section 3.1.1, Aesthetics, of the Draft EIR, the Project would not result in significant visual or aesthetic impacts. As stated in Section 3.1.1 Aesthetics, “The significance determination as to whether the Project would result in substantial degradation of visual character and quality is based on the analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area” (EIR page 3.1.1-19). The Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area (EIR page 3.1.1-12).</p> <p><b>I60-3</b> As discussed in Section 2.7, Transportation and Traffic, of the EIR with implementation of mitigation measures M-TR-1 through M-TR-7, all impacts associated with transportation and traffic would be reduced to less than significant, with the exception of Impact TR-11, because the improvement would be located within the</p> |
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jurisdiction and control of the State of California (Caltrans), and neither the applicant nor the City of Escondido can ensure that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers with the Draft EIR, if the Project is approved.

The Project will also implement a Specific Alignment Plan (SAP) for Country Club Lane from El Norte Parkway to Nutmeg Street. The SAP would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation. Traffic calming measures would be introduced along West Country Club Lane to reduce traffic speeds, encourage pedestrian and bicycle use, and improve public safety.

Appendix 2.7-2 at page 1 of the EIR clarifies that the improvements proposed in the SAP include:

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|  | <p>roundabouts at Golden Circle Drive and La Brea Street; intersection enhancements at Firestone Drive (all-way stop control with pedestrian crosswalks and curb bulbouts); traffic signals with pedestrian crosswalks at Gary Lane and Nutmeg Street; and narrowed lanes and buffered bike lanes to calm traffic speeds and provide an enhanced multi-modal experience. These improvements will increase public safety at these intersections.</p> <p><b>I60-4</b> Construction impacts related to noise and air quality were analyzed extensively in the EIR; see Section 2.1, Air Quality, page 2.1-26 and Section 2.6, Noise, pages 2.6-9 and 2.6-14. Impacts were found to be less than significant with mitigation (M-AQ-2, M-N-5 and M-N-6). The comment is general in nature and does not provide any specific comments regarding the analysis provided in the EIR. Odors were addressed in Section 2.1, Air Quality, of the EIR and were found to be less than significant. Given that the comment is general, a general response is all that is required (<i>Paulek v. California Dept. Water Resources</i> (2014) 231 Cal.App.4th 35, 47). Therefore, no further response is required. 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> |
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