

Response to Comment Letter I83

Carolyn Richardson
July 23, 2017

Comment Letter I83

From: Carolyn [ecottage@cox.net]
Sent: Sunday, July 23, 2017 10:59 AM
To: Sam Abed; Olga Diaz; Ed Gallo; John Masson
Cc: Michael Morasco; Kristin Blackson
Subject: Escondido Country Club Development

Dear Mayor Abed and City Council members,

I write as a concerned citizen who has lived in the Escondido area for 32 years.

Please consider the environmental impact, if 392 dwellings are built in the Escondido Country Club area.

Traffic – this alone, is a major drawback to the plan! Traffic would be terrible, especially on Nutmeg, as that is where one accesses the freeway and grocery stores.

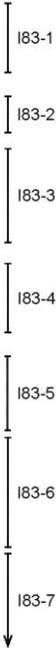
Density - is not compatible with the surrounding area. While there are some condos tucked into the hillside to the south, they are not dense condo developments, such as the new developer wants to build. The amount of people and cars for those numbers of units, will greatly impact getting in and out of the area causing traffic jams and making the area very "urban", instead of suburban, as it now is.

Aesthetically/City Planning - one of the charms of the North end of Escondido is that it has many views of the surrounding hills. To put condos where it has once been open space, seems to be going way overboard, of no "happy medium". If people want condo living, there are many new condos in central Escondido for sale right now (and not selling right away...)

Fairness – the people who live in the ECC area, bought their homes with a golf course view. To have to live with condos in their backyard, because the golf course went out (deliberately bought NOT to renew the course, and take the land cheap) is not an equitable compromise for the people of the area, and the development will impact all of them...with the traffic.

It seems that open space and parks are not the priority of the Council...or else why this bid? But if that is the case, the second best solution would be for lower density development with more open space...and in keeping with lower density and the aesthetics of the area. For me, that means single family homes, or one story patio type homes, such as on the hillside above the Country club (north side)...and far fewer than 392!! Just drive on Nutmeg (as small two lane road, and think about 392 x 2 – because most dwellings will have at least 2 people (or more!!!) driving cars there every day..!!!

In any case, I urge you to limit the building to **many less homes** than are currently being requested. It makes much better sense to craft a nice development It that everyone can live with, than to cram a bunch of dwellings in an area that will be hugely impacted by such a change. Please do not let the developers convince you 392 homes are necessary, because the bottom line is about money for them....They do not have the community interests at heart. But, you all have the power to impact



I83-1

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.

I83-2

The comment addresses general concern regarding traffic and noise, which were analyzed Section 2.7, Transportation and Traffic, of the EIR. Regarding the performance of the circulation system, as shown in Tables 2.7-14, 2.7-15, and 2.7-16 in Section 2.7 Transportation and Traffic, with mitigation incorporated, potentially significant impacts at all roadway segments and intersections will be less than significant with one exception. The Project would result in a significant impact to the El Norte Parkway on-ramp to Interstate 15 (I-15) southbound during the AM peak hour. Because the improvement necessary to mitigate the identified impact would be located within the jurisdiction and control of the California Department of Transportation (Caltrans), the City cannot ensure at this time that Caltrans will permit the improvement to be made. Therefore, although the

	<p>impact can and may be mitigated to a less than significant level, the impact at this location is considered significant and unavoidable.</p> <p>If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a 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>I83-3 Refer to Response 2 above regarding traffic. 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, on page 3.1.5-14:</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</p>
--	---

	<p>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>I83-4 The comment addresses general concern regarding aesthetics. As analyzed in Section 3.1.1, Aesthetics, of the EIR, the Project would not result in significant visual or aesthetic impacts. As stated in Section 3.1.1, Aesthetics: <i>“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”</i> (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). The comment does not raise any specific issue related 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>
--	---

<p>Escondido for the better, now and for the future</p> <p>Lest you think I live in the area, I do not. I just care about North Escondido as a long time citizen. I have always found it pleasant. It has been a special, affordable, haven for many seniors, small families, and people who love the outdoors. It is not a "city center" kind of place. It is suburban/rural.</p> <p>Thank you for your consideration.</p> <p>Carolyn Richardson 3515 Lomas Serenas Dr. Escondido, CA 858-610-4684 ecottage@cox.net</p>	<p style="text-align: center;">↑ I83-7 Cont.</p> <p>I83-5 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 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>I83-6 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>I83-7 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.</p>
--	--

Comment Letter I84

From: padrog1@aol.com <padrog1@aol.com>
Sent: Thursday, August 17, 2017 1:17 PM
To: Kristin Blackson
Subject: Response to DIR for the Villages - re Traffic Issues

The traffic mitigations to the proposed Villages development are inadequate. Placing more striping and more turn lanes on more streets results in having more vehicles stack up at more points. Case in Point - Highway 125 moves vehicles northward from south Chula Vista, until they are dumped into a quagmire of traffic at the highway 94 intersection. Who in their right mind wants to be anywhere near that area from 3:30 - 6 PM? It is foolish to believe that traffic will not be changed for the worse on Bennett, Firestone or Nutmeg.

The answer is fewer homes. I am not anti-growth. I am anti-greed. Fewer homes will impact the community less and be more acceptable to the existing residents. There is enough blame to go around - the City was asleep at the wheel by allowing the golf course to be zoned residential. The citizens living around the golf course were negligent for not being pro active to save the golf course before it failed. And Schlesinger has not shown the slightest interest in the wishes of the residents.

Mark Rogers
 1967 David Drive
 Escondido, CA 92026

I84-1

I84-2

Response to Comment Letter I84

**Mark Rogers
 August 17, 2017**

I84-1

The comment addresses general concern regarding traffic and noise, which was analyzed Section 2.7, Transportation and Traffic, of the 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. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The comment does not raise any specific issue related 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>I84-2 The City acknowledges the comment and notes it provides preference for a reduced density alternative as well as 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>
--	--

Comment Letter I85



Debbie Rose
1411 Westwood Place
Escondido, CA 92026
Cdnrose55@gmail.com

July 27, 2017

City Planning Division
Attn: Mike Strong & Kristen Blackson,
Ref: Draft EIR for Escondido Country Club

The Escondido Country Club (ECC) area was not designed to handle 392 additional homes. Building this high-density project will negatively impact the surrounding community.

I85-1

The EIR states that leaving the zoning at R-1-7 will decrease the proposed traffic increase by 63%. This would meaningfully lessen a significant impact of the proposed project. As stated in the EIR the proposed 392 homes would "result in a significant, unavoidable long-term cumulative impact at the I-15 southbound on-ramp at El Norte Parkway".

I85-2

There is also no guarantee that CalTrans will widen the El Norte/ I-15 south on-ramp in the foreseeable future, if at all. The County of San Diego is also looking to add 2100+ homes just north of the ECC at Deer Springs (Sierra Newland) which will ultimately add to the gridlock especially at the interchange of I-15 and SR-78 and with more and more traffic using Country Club Lane to shortcut to west bound SR-78. Traffic calming roundabouts (traffic circles) will not decrease the number of vehicles driving on Country Club Drive, they'll simply slow it down. The current speed limit on this road is 25 mph. If this were enforced calming would not be needed.

I85-3

An R-1-7 zoning with 158 new homes would have a lower impact on air quality, noise and traffic (per EIR page 4-21).



Response to Comment Letter I85

Debbie Rose
July 27, 2017

I85-1

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.

I85-2

The comment addresses general concern regarding traffic, which was analyzed in Section 2.7, Transportation and Traffic, of the EIR. Cumulative projects that were reasonably foreseeable were included in the cumulative analysis in the Transportation and Traffic section and all other impact sections. 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. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F

	<p>representing the worst operating conditions. According to the City’s General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The comment does not raise any specific issue related 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> <p>I85-3 This comment states the preference for a reduced density alternative. The following is stated in Section 3.1.5, Land Use (EIR page 3.1.5-12):</p> <p>The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City’s General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon</p>
--	--

One of the items listed as an objective in the EIR is the addition of "interrelated villages located adjacent to an existing, established residential community". Shouldn't any new housing plan be designed to merge and blend with the surrounding community? Why would anyone think that having separate (but interrelated) villages (with different architectural designs) would be inclusive with the community?? This is NUWI's objective not the City's objective or the community's objective. Almost every point in the EIR is based on and compared to NUWI's objectives.

Other objectives deal with the City's General Plan for community health and services goal ie: recreational facilities and having a place to "gather, socialize and recreate". These included a pool, gym, community center and a professionally managed community farm. As I stated in a letter to the City Council the addition of these items by NUWI is just lipstick on a pig to get people to accept 392 new homes. ECCHO's alternative plan included an area for commercial property (Figure 4-1B) where the clubhouse stands which could include a restaurant, hair salon (which was taken out when SITR bought the property), coffee shop or other places to socialize. There are gyms and parks nearby that residents can utilize and if the home lots are a proper size they can have gardens in their own yards and won't need a "professionally managed" community garden. Community gardens are great, but they're intended for people that don't have yards. If the R-1-7 zoning is upheld, the new homes will have yards!!

In the appendixes of the Scoping plan I have read many comments in letters from people living around the golf course about flood plains within the old golf course and that these have not been taken into account in NUWI's proposed plan and, in fact, houses are projected to be built on areas that flood in the winter. This is a serious issue. When these new houses are sold will the new owners be told their home is built on a flood plain?

The EIR mentions the City's obligation to build new homes and the State of CA's requirements for affordable housing. I'm sure that the general plan is in accordance with these requirements. I am fairly certain that the ECC, however, was not included in the affordable housing plan as it wasn't available for building the last time the General Plan was updated. This piece of land is a kind of windfall for the city. HOWEVER, that does not mean that a high-density housing project should be jammed in to ease the pressure on other areas of the city.

In general, the noise and air pollution during a long construction period and the increased traffic and gridlock from having 392 homes crammed into our community,

185-4

185-5

185-6

185-7

185-8



issuance of the foregoing approvals.

Appendix 3.1.5-1, City General Plan Policy Consistency Analysis Table, analyzes whether the Project is consistent with relevant adopted local land use policies. The policy analysis provided in the EIR concluded that the Project would not conflict with the General Plan and Zoning Ordinance. Additionally, the landscape and site planning would buffer the existing residents from the new homes and the Project's villages would retain the character of the surrounding land (EIR page 3.1.5-13, 3.1.5-14).

Additionally, the comment addresses general subject areas, Air Quality, Noise, and Traffic which received extensive analysis in the EIR. The comment does not raise any specific 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.

I85-4

The following is stated in Section 3.1.1, Aesthetics (EIR page 3.1.1-12):

The pad elevations for the new residential development have been designed to be lower than the existing development in most areas so that existing near views of the golf course are replaced by views of the landscaped Greenbelt/Open Spaces.

	<p>The Greenbelt/Open Space areas would enhance the screening and buffering of views from surrounding residences and roadways (namely West Country Club Lane, La Mirada Street, La Brea Street and Portola Avenue). Additionally, the Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area... The Project would not substantially interrupt or obstruct available views from any scenic vistas. No designated scenic vistas would be impacted by the Project.</p> <p>The Project includes a Specific Plan proposal and detailed design guidelines, which provide a framework for requiring the development to be context sensitive and be appropriately sited, scaled, and designed to complement the existing environment. The design guidelines require that the Project be designed to relate to community character, design context, and site design. The Specific Plan design guidelines would ensure appropriate scale of development and an aesthetically pleasing architectural character. Therefore, the Project would not adversely affect public views. In many areas, the site is set back at an appropriate distance and shielded by vegetated slopes or context sensitive landscaping. Therefore, impacts relative to the substantial degradation of visual character and quality as</p>
--	---

	<p>a result of implementation of the Project would be less than significant (EIR page 3.1.1-19). 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>I85-5 The following is stated in Section 3.1.8, Recreation (EIR pages 3.1.8-8 and 3.1.8-9):</p> <p>The Project would replace an abandoned golf course and would result in an increase of approximately 392 single-family dwelling units in the City and provide approximately 48 acres of open space. 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 Project’s recreational facilities would be privately developed and maintained; however, they are available for public use... 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 park land and recreational facility standards are met with respect to the additional needs</p>
--	--

	<p>created by the development.</p> <p>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>I85-6 As discussed in Section 3.1.4.1.1, portions of the City are within a FEMA 100-year flood zone. However, the Project site is not located in a 100-year flood hazard zone (Appendix 3.1.4-1; City of Escondido 2012, Figure VI-7). 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>I85-7 The following is a Project objective stated in the EIR (EIR page S-1):</p> <p style="padding-left: 40px;">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.</p> <p>This is an adequate and reasonable objective for a development project and has been reviewed and accepted by the City. 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 as lot sizes would be larger. For these reasons this alternative was dismissed. The City will include the</p>
--	---

along with the citizens repudiation of Prop H should halt this proposed project. The trade-off between what the community gains versus what it loses don't pencil out.

Respectfully

Debbie Rose

↑
I85-8
Cont.
↓

I85-8

comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the Project.

Regarding general concerns about traffic, see response to I85-2. Additionally, the comment addresses general subject areas, Air Quality and Noise which received extensive analysis in the EIR. The comment does not raise any specific issue regarding that analysis.



INTENTIONALLY LEFT BLANK

Comment Letter I86

From: Anne Sanchez [anneosanchez@gmail.com]
Sent: Tuesday, July 25, 2017 8:31 PM
To: Kristin Blackson
Subject: Escondido Country Club Zoning

Dear Kristen,

I am writing you today to let you know that I am against a zoning change on the Escondido Country Club property. In 2012 the ECC property was designated as R-1-7 zoning.

I have been a homeowner in the Escondido Country Club since 2006. The developer proposes the building of 392 dwellings on the ECC property.

This plan will affect me as a homeowner. Our streets are not designed to accommodate approximately 800 vehicles from new residents. Our present El Norte and I-78 intersections and on ramps are overly burdened.

I highly object to the planned design of two-story detached dwellings on lots averaging less than 1/2 of designated zoning. This does not fit the plan of this community as it was originally designed.

I would support a plan more in keeping with the present neighborhood layout. Please consider something more like 158 lots with 7,000 sq. ft. Minimum lots.

I am respectfully:
 Anne Sanchez
 1884 Sunbury St.
 Escondido, CA 92026
anneosanchez@gmail.com

I86-1
 I86-2
 I86-3

Response to Comment Letter I86

Anne Sanchez
 July 25, 2017

I86-1 The City notes the comment expresses the opinions of the commenter, provides factual background information, and does not raise an environmental issue within the meaning of CEQA. 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.

I86-2 The comment addresses general concern for 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 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 implement the proposed mitigation measure. The proposed Project would therefore not create a significant impact on the side streets to I-15/SR-78, as mentioned in the comment. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General

	<p>Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. 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>I86-3 The following is stated in Chapter 3.1.5, Land Use (EIR page 3.1.5-12):</p> <p>The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City’s General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.</p> <p>Additionally, the landscape and site planning would buffer the existing residents from the new homes and</p>
--	---

	<p>the Project’s villages would retain the character of the surrounding land (EIR pages 3.1.5-13, 3.1.5-14). Therefore, the proposed Project does not conflict with the General Plan and Zoning Ordinance. The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy 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>
--	---

INTENTIONALLY LEFT BLANK

Comment Letter I87

The Villages EIR Comment Card

Name PETE SEDEN
 Address 1953 ROCKHOFF LN
 City ESCONDIDO State CA Zip 92026
 Phone (760) 480-1983 Email _____

Comments

As I understand, the 110 acres are classified as R-1-7 according to the General Plan. That should be what it remains, i.e. best option available to developers, I realize they want it changed, but it should NOT be an option. If the City Council would have been doing their job ^{worded} right, it should be totally green space & we would not be going thru this evolution now. Because of this year mistake, the City Council over the folks in the Escondido CC area on this one. They should do the right thing. Prop it also told them that 61% of Escondidoans want it to remain green space I mean really, why are we having this discussion? Are you afraid of being sued? I ask you to do what is RIGHT. Do what the folks in the Escondido CC area desire & what the people in Escondido voted for. Please do your job.

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

187-1
187-2
187-3

Response to Comment Letter I87

Pete Seden
 July 31, 2017

I87-1 The following is stated in Chapter 3.1.5, Land Use (EIR 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. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City's General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.

Appendix 3.1.5-1, City General Plan Policy Consistency Analysis Table, analyzes whether the Project is consistent with relevant adopted local land use policies. The policy analysis provided in the EIR concluded that the Project would not conflict with the General Plan and Zoning Ordinance. Additionally, the

	<p>landscape and site planning would buffer the existing residents from the new homes and the Project’s villages would retain the character of the surrounding land (EIR page 3.1.5-13, 3.1.5-14). The City acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy 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> <p>I87-2 The following is stated in Section 3.1.8, Recreation (EIR pages 3.1.8-8 through 3.1.8-9):</p> <p>The Project would replace an abandoned golf course and would result in an increase of approximately 392 single-family dwelling units in the City and provide approximately 48 acres of open space. 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 Project’s recreational facilities would be privately developed and maintained; however, they are available for public use. Additionally, the developer would be required to pay the City’s park fee of \$4,129 per dwelling unit,</p>
--	---

	<p>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.</p> <p>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>I87-3 The 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.</p>
--	---

INTENTIONALLY LEFT BLANK

Comment Letter I88

From: Kristin Blackson
 To: Kristin Blackson
 Subject: Final Country Club Development EIR
 Date: Monday, July 24, 2017 10:02:21 PM

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

From: dstorms8@gmail.com [mailto:dstorms8@gmail.com]
 Sent: Monday, July 24, 2017 9:33 AM
 To: Sam Alford; Olga Diaz; Ed Gallo; John Mason; Michael Morasco; Kristin Blackson
 Subject: Country Club Development EIR

We live close to the proposed NUIAI Escondido Country Club development. We have read the EIR and we are opposed to the number of homes as stated in the plan. This community already has congested traffic in the mornings and evenings, plus limited roadways, school and water issues are also a concern. We welcome new homes, but this far exceeds the size of community expected when we purchased here in Escondido. Please look at another EIR that is more realistic in addressing adding to an existing planned community of homes such as this.
 Sincerely,
 Deborah Storms

I 188-1
 I 188-2
 I 188-3
 I 188-4

Response to Comment Letter I88

Deborah Storms
 July 24, 2017

- I88-1** 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.
- I88-2** As discussed in Section 2.7, Transportation and Traffic, 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. This is because the improvement would be located within the jurisdiction and control of the State of California Department of Transportation (Caltrans), and neither the applicant nor the City of Escondido can ensure that Caltrans will permit the proposed mitigation measure.
- I88-3** Schools are discussed in Section 3.1.7 of the EIR, and the Project was found to have a less than significant impact on Escondido Union School District (EUSD) and Escondido Union High School District (EUHSD). Additionally, the Project would be required to pay the City of Escondido School District Residential Impact

	<p>Fee to ensure that adequate school facilities are available to children residing in new residential developments and overcrowding does not occur.</p> <p>Water is discussed in Section 3.1.9, Utilities and Service Systems. The proposed Project involves 392 residences, a Clubhouse, community farm, and landscape irrigation, which would require 350,784 gpd of potable water for the Project based on the average demand. The Project was not expressly included by name in the projected land uses in the 2015 Urban Water Management Plan (UWMP); however, the UWMP forecasts are based on the potential future development of available land, including sites such as the Project. Therefore, the UWMP estimates can be relied upon in a determination of adequacy of water supply for the Project. As discussed in Section 3.1.9.2.2, based on the UWMP estimates, as well as future recycled water available from the HARRF, it was concluded that water supply impacts would be less than significant.</p> <p>I88-4 The 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.</p>
--	--

Comment Letter I89

City Councilmembers:

The only reason to approve "The Villages" overcrowded Specific Plan for 392 dwelling units that changes and takes exceptions to current zoning, is to satisfy the avarice of the ECC property owner and developer, but increases the risk of noise for all Escondido city and ECC community residents.

Using information from the EIR and by limiting development to 158 dwelling units meeting R-1-7 zoning requirements, noise could have less impact than "The Villages" as identified below:

Significance of Impacts Prior to Mitigation

When the entire assemblage of construction equipment is working right at the edge of the construction zone in each phase, within 50 feet of existing residences, construction noise levels are anticipated to range from 87 to 90 dBA Leq. Assuming relatively steady work, this would result in an exceedance of the City's construction noise limit of 75 dBA Leq HOUR, and conservatively assuming other construction may occur within 0.25 miles of the site during this timeframe, would also result in a cumulatively considerable contribution to a cumulative impact.

The exact location of buildings and HVAC equipment within the Village Center is unknown, but it is possible HVAC equipment could be located closer than 250 feet from existing or proposed residences, which could result in HVAC noise levels at adjacent residences that exceed the City's daytime limit of 50 dBA Leq for single-family residences.

The exact location and orientation of loudspeakers for amplified sound systems within the Village Center is unknown, but sound levels from a wedding event or dance function at adjacent residences that could exceed the City's daytime limit of 50 dBA Leq for single-family residences.

At the closest backyard boundary in the west segment of Country Club Lane, the predicted future traffic noise level would marginally exceed the "normally acceptable" limit of 60 dBA CNEL (by 1 dB), while the closest backyards along the east segment of West Country Club Lane and along Nutmeg Street would exceed this limit by up to 5 dBA CNEL.

It is possible that some minor structural damage to the closest residences (i.e., within 100 feet), could occur because of blasting activities during construction.

I89-1

I89-2

I89-3

I89-4

I89-5

I89-6

I89-7

Response to Comment Letter I89

Jerry Swadley

July 28, 2017

I89-1

The comment addresses the general subject area of noise, which was analyzed in the EIR; please refer to Section 2.6, Noise. 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.

I89-2

As stated in Chapter 4, Project Alternatives, of the EIR the "Operational traffic trips would be reduced by 67percent under the 138-unit alternative and 63 percent under the 158-unit alternative compared to the Project. However, as previously stated, even if no Project trips were added, on-site exterior traffic noise levels experienced under the worst-case scenario (Year 2035 + Project) would still be significant; therefore, a trip reduction of 67 percent or 63 percent would not affect overall future noise exposure levels, or eliminate any of the required mitigation measures" (EIR page 4-12). Therefore, impacts related to noise would not be significantly reduced under the Two-Reduced Density Alternatives (158 and 138 Units). 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>I89-3 The commenter is referencing Section 2.6.2.3, Analysis, of the Noise Section in the EIR where impacts regarding construction noise are recognized. In Section 2.6.6, Significance of Impacts After Mitigation, this impact is reduced to below a level of significance through the implementation of M-N-1. 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>I89-4 The commenter is referencing Section 2.6.2.3, Analysis, of the Noise Section in the EIR where impacts regarding HVAC equipment are recognized. In Section 2.6.6, Significance of Impacts After Mitigation, this impact is reduced to below a level of significance through the implementation of M-N-2. 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>I89-5 The commenter is referencing Section 2.6.2.3, Analysis, of the Noise Section in the EIR where impacts regarding loudspeakers are recognized. In Section 2.6.6, Significance of Impacts After Mitigation, this impact is reduced to below a level of significance through the implementation of M-N-3. 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>60% fewer houses meeting current zoning requirements means less risk of increased noise for existing ECC residents. Please vote NO on “The Villages”</p> <p>Jerry Swadley 1959 David Drive Escondido, CA 92026 (760) 294-8670 Home (760) 703-9991 Cell Swadley1@cox.net</p>	<p style="text-align: center;"> 189-8</p> <p>I89-6 The commenter is referencing Section 2.6.2.3, Analysis, of the Noise Section in the EIR where impacts regarding traffic near residences are recognized. In Section 2.6.6, Significance of Impacts After Mitigation, this impact is reduced to below a level of significance through the implementation of M-N-4. 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>I89-7 The commenter is referencing Section 2.6.2.3, Analysis, of the Noise Section in the EIR where impacts regarding blasting are recognized. In Section 2.6.6, Significance of Impacts After Mitigation, this impact is reduced to below a level of significance through the implementation of M-N-5 and M-N-6. 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>I89-8 As stated in Chapter 4, Project Alternatives, in the EIR under the Two Reduced Density Alternatives (158 and 138 Units), “Impacts would be similar as the Project and mitigation would still be required” (EIR page 4-12). 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>
--	---

INTENTIONALLY LEFT BLANK

Comment Letter I90

City Councilmembers:

The only reason to approve "The Villages" overcrowded Specific Plan for 392 dwelling units that changes and takes exceptions to current zoning, is to satisfy the avarice of the ECC property owner and developer, but increases the risk of hazards and hazardous materials being uncovered for all Escondido city and ECC community residents.

I90-1

Using information from the EIR and by limiting development to 158 dwelling units meeting R-1-7 zoning requirements, hazards and hazardous material could have less impact than "The Villages" as identified below:

I90-2

Fire Hazards: "The Villages" is surrounded by existing residential development and is within an existing Escondido Fire Department (EFD) service boundary. This provides opportunities to accommodate new households in an area that is already served and accessed by EFD. The EFD provides fire protection and emergency medical services to the City and, through a contractual arrangement established in 1984, the Rincon Del Diablo Fire Protection District. 60% fewer houses will lessen the demand on the EFD and response times.

I90-3

Without mitigation, impacts associated with hazards and hazardous materials would be potentially significant.

I90-4

For purposes of this EIR, the historical presence of two former Underground Storage Tanks (USTs) would be considered a potentially significant impact.

I90-5

Two floor drains in a garage near the clubhouse, and two clarifiers north of the maintenance building, were observed which would be a potentially significant hazards impact.

I90-6

The potential presence of Asbestos-containing materials (ACMs) in the existing buildings on the property during demolition would be a potentially significant impact.

I90-7

The existing structures may contain lead-based paint, which could pose a threat to human health if disturbed, and would be a potentially significant impact.

I90-8

The property and surrounding area were historically used for agricultural purposes and due to the possible historical use of pesticides and heavy metal-containing herbicides, residual contamination may exist on site, the uncovering of which could represent a potentially significant impact.

I90-9

Response to Comment Letter I90

Jerry Swadley
August 8, 2017

I90-1

The comment addresses the general subject area of hazards and hazardous materials, which were analyzed in the EIR; please refer to Section 2.5, Hazards and Hazardous Materials. 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.

I90-2

As stated in Chapter 4, Project Alternatives, of the EIR the "The potentially hazardous conditions that were identified as part of the Project would still be present under the reduced-density alternatives; development would still be required to implement all mitigation measures to reduce potential impacts. Impacts to hazards and hazardous materials would not be reduced or avoided under these alternatives" (EIR page 4-12). Therefore, impacts related to hazards and hazardous materials would not be significantly reduced under the Two-Reduced Density Alternatives (158 and 138 Units). The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final

	<p>decision on the Project.</p> <p>I90-3 The commenter is referencing Section 2.5.2.2, Analysis, of the Hazards and Hazardous Materials Section of the EIR where an impact regarding wildland fires is recognized. The Project would be required to pay a development impact fee per dwelling unit, which would ensure fire response times are adequately met throughout the City; refer to Section 3.1.7, Public Services. Therefore, impacts with regards to wildland fires would be less than significant. 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>I90-4 The commenter is referencing Section 2.5.4, Significance of Impacts Prior to Mitigation, of the Hazards and Hazardous Materials Section, of the EIR where potentially significant impacts with regards to hazards and hazardous materials are identified. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-1 through M-HZ-4 and PDF-HZ-1. 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>I90-5 The commenter is referencing Section 2.5.2.2, Analysis, of the EIR where impacts regarding two</p>
--	--

	<p>former Underground Storage Tanks are recognized. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-1. 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>I90-6 The commenter is referencing Section 2.5.2.2, Analysis, of the Hazards and Hazardous Materials Section in the EIR where impacts regarding two floor drains are recognized. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-1. 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>I90-7 The commenter is referencing Section 2.5.2.2, Analysis, of the Hazards and Hazardous Materials Section in the EIR where impacts regarding asbestos-containing materials are recognized. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-2. 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>60% fewer houses meeting current zoning requirements means less potentially disturbed land decreasing the risk of hazards and hazardous materials being uncovered requiring mitigation.</p> <p>Please vote NO on “The Villages”</p> <p>Jerry Swadley 1959 David Drive Escondido, CA 92026 (760) 294-8670 Home (760) 703-9991 Cell Swadley1@cox.net</p>	<p>I90-10</p> <p>I90-8 The commenter is referencing Section 2.5.2.2, Analysis, of the Hazards and Hazardous Materials Section in the EIR where impacts regarding lead-based paint are recognized. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-3. 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>I90-9 The commenter is referencing Section 2.5.2.2, Analysis, of the Hazards and Hazardous Materials Section in the EIR where impacts regarding contaminated soils are recognized. In Section 2.5.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-HZ-4. 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>I90-10 See response to I90-2.</p>
--	---

Comment Letter I91

City Councilmembers:

The only reason to approve "The Villages" overcrowded Specific Plan for 392 dwelling units that changes and takes exceptions to current zoning, is to satisfy the avarice of the ECC property owner and developer, but increases the risk of impacting Biological Resources for all Escondido city and ECC community residents.

I91-1

Using information from the EIR and by limiting development to 158 dwelling units meeting R-1-7 zoning requirements, could have 60% less impact on Biological Resources than "The Villages" as identified below:

I91-2

Significant impacts to nesting birds could occur if suitable nesting habitat is removed during the general bird breeding season (January 15 to September 15).

I91-3

"The Villages" would impact approximately 0.29 acres of wetland/riparian sensitive natural communities.

I91-4

"The Villages" would impact approximately 2.56 acres of wetland and jurisdictional waters.

I91-5

"The Villages" would result in unavoidable impacts to up to 601 mature trees and 18 protected trees.

I91-6

"The Villages" would potentially contribute to a cumulatively considerable impact to nesting birds.

I91-7

"The Villages" would potentially contribute to a cumulatively considerable impact to jurisdictional waters and wetlands.

I91-8

"The Villages" would potentially contribute to a cumulatively considerable impact to mature and protected trees.

I91-9

60% fewer houses meeting current zoning requirements means significantly less impact to and mitigation for Biological Resources.

I91-10

Please vote NO on "The Villages"

Jerry Swadley
1959 David Drive
Escondido, CA 92026
(760) 294-8670 Home
(760) 703-9991 Cell
Swadley1@cox.net

Response to Comment Letter I91

**Jerry Swadley
August 10, 2017**

I91-1

The comment addresses the general subject area of biological resources, which were analyzed in the EIR; refer to Section 2.2, Biological Resources. 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 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.

I91-2

As stated in Chapter 4, Project Alternatives, the "development would still occur under the reduced-density alternatives and although fewer units would be developed, the footprint of disturbance to construct the reduced number of residences would still result in impacts to biological resources and would be the same compared to the Project. Impacts to biological resources would not be reduced or avoided under the two alternatives" (EIR page 4-11). Therefore, impacts related to biological resources would not be significantly reduced under the Two-Reduced Density Alternatives (158 and 138 Units). The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior

	<p>to a final decision on the Project.</p> <p>I91-3 The commenter is referencing Section 2.2.2.2, Analysis, of Section 2.2 in the EIR where impacts regarding nesting birds are recognized. In Section 2.2.6, Significance of Impacts After Mitigation, these impacts are reduced to below a level of significance through the implementation of M-BI-1. 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>I91-4 The commenter is referencing Section 2.2.2.2 of Section 2.2 where impacts regarding riparian habitat are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-2. 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>I91-5 The commenter is referencing Section 2.2.2.2 of Section 2.2 where impacts regarding wetland and jurisdictional waters are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-2. 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>I91-6 The commenter is referencing Section 2.2.2.2 of the Section 2.2 where impacts regarding mature and protected trees are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-3. 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>I91-7 The commenter is referencing Section 2.2.3, Cumulative Impact Analysis, of the Section 2.2 where cumulative impacts regarding nesting birds are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-1. 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>I91-8 The commenter is referencing Section 2.2.3 of Section 2.2 where cumulative impacts regarding wetland and jurisdictional waters are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-2. 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>I91-9 The commenter is referencing Section 2.2.3 of Section 2.2 where cumulative impacts regarding mature and</p>
--	---

	<p>protected trees are recognized. In Section 2.2.6, these impacts are reduced to below a level of significance through the implementation of M-BI-3. 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>I91-10 See response to I91-2.</p>
--	--

Comment Letter I92

July 26, 2017

Escondido City Planning
 Attention: Kristin Blackson
 kblackson@escondido.org

Re: EIR Report comments regarding Escondido Country Club Development or The Villages by ROCC

Dear Ms. Blackson,

I am writing this in strong opposition to a specific part of this development within M-TR-4 Segment #15, the widening of Nutmeg between Via Alexandra and La Paloma Ave. I own my home at 1001 Turtle Dove Lane which is a small cul-de-sac in the middle of this stretch off Nutmeg Street. Widening this small section of the roadway will not improve the flow of traffic, and in fact would only allow for further violation of safe speed limits. The speed limit is now 25 MPH and this will not change.

I92-1

Nutmeg Street is a 2-lane, undivided roadway. It is a Class-III bike route defined by ca.gov as "a shared roadway that provides for shared use with pedestrians or motor vehicle traffic, typically on lower volume roadways." There is no municipal requirement to add a designated bike lane. Furthermore there are several class-II and class-III bike routes available within the immediate area. Nutmeg is, and should remain by design a "lower volume roadway". These improvements are excessive and extremely harmful to homeowner safety, property rights and values. This entire development with its current density will completely overwhelm the area with traffic congestion. This is repeatedly confirmed in the EIR report.

I92-2

I92-3

By way of supporting material I am attaching several photos.

1) 1002 Turtle Dove Lane, faces Nutmeg Street, and currently has curb, gutter and sidewalk required at the time this home was built in 2003, I believe. The curb and gutter was extended at that time across the street to my corner at 1001 Turtle Dove Lane.

I92-4

2) When I purchased my home in 2003 I consulted with the City of Escondido about the placement of my own fence and the possibility of future sidewalks and curbs. I was advised to replicate the setback used on 1002 and assume a possible future extension of that sidewalk across the street to my property where the curb and handicap cutout already exists. This clearly establishes the setback precedent.

I92-5

3) The opposite side of the street is already complete with sidewalks, curbs and gutters.

I92-6

4) Class III Bike Lane as defined by ca.gov.

I92-7

I am greatly concerned at the developer's assumption and arrogance that there is an entitlement to encroach on private property bringing traffic to my doorstep, destroy my fencing, and a 50' pine tree and greatly reducing property values further for myself and my neighbors, who would lose extensive landscaping, and stucco walls previously permitted by the city. This area is not blighted in any way, but continues to suffer congestion and added traffic from development in the surrounding area. In December 2016 I refinanced my home and there was a stated deduction of value due to traffic on Nutmeg in the appraisal.

I92-8

Nutmeg Street is a lower volume street by definition (25 MPH) and requires the slowing of traffic, which would not be accomplished at all with this plan. This highly residential neighborhood is clearly identified

I92-9

Response to Comment Letter I92

Drucilla Thiercof
 July 26, 2017

I92-1

The City of Escondido (City) acknowledges the commenter's opposition to the widening of Nutmeg Street between Via Alexandra and La Paloma Avenue. The 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-foot 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 the following: (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 Design Features that will improve corridor operations include the following: (1) signalization of the Country Club Lane/Nutmeg Street intersection to the north as part of the SAP, and (2) half width frontage improvements to Nutmeg Street

	<p>south of Country Club Lane with development of Village 3. Collectively, these mitigation measures and Project Design Features will improve corridor throughput to mitigate the Project’s impacts. Therefore, the City disagrees that the widening will not improve traffic flow. The violation of speed limits is a matter concerning police enforcement. The City notes this concern; however, it does not raise issues relative to the analysis provided in the EIR.</p> <p>I92-2 The City notes the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. 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>I92-3 Nutmeg Street as described above is a “Local Collector” on the City’s Circulation Element. As such, it is intended to provide collector service to the adjacent neighborhoods. The only segment of Nutmeg Street that is significantly impacted by the Project is the substandard, existing 32-foot-wide section proposed to be improved.</p> <p>The City does not agree that the proposed improvements are excessive or harmful to homeowner safety, property rights and values. The City does not agree that the Project’s density will completely overwhelm the area with traffic congestion. As shown</p>
--	---

	<p>in Table 2.7-14 of Section 2.7, Transportation and Traffic, in the EIR, 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. The commenter does not provide substantial evidence for these claims; therefore, no further response can be provided.</p> <p>I92-4 The City notes the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. 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>I92-5 The City acknowledges the comment and notes it expresses the opinions of the commentator regarding a setback precedent, 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 CEQA law and CEQA Guidelines. 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>I92-6 The City notes the comment provides factual background information and does not raise an</p>
--	--

	<p>environmental issue within the meaning of CEQA. 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>I92-7 The City notes the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. 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>I92-8 The improvements are proposed within the existing right-of-way; no private property is proposed to be taken or harmed through development of the proposed Project. The 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.</p> <p>Regarding the blighted conditions of the Project site, the EIR correctly discloses the existing condition of the site. 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 does not claim that the</p>
--	---

in the EIR, even after suggested improvements at major intersections, as still having "significant direct impact" from this new development in its current density. Widening the road would only encourage traffic to accelerate through the neighborhood faster not slow it down.

I understand there is no stopping some kind of final development of the once lovely Escondido Country Club. I take great exception to the term "blighted" used to describe that area in the developers' promotional material. The current and previous owners are directly responsible for the current condition of this once beautiful neighborhood. While they claim 250 homeowners support their proposal that is a very small fraction of those in opposition.

This development company, simply for greater profits, should not be allowed to further devalue Nutmeg Street. Widening this small segment of an already overused "lower volume" roadway will not improve traffic flow. An effort should be made to slow traffic through this area. Most of us were hoping for something to slow the traffic, to mitigate traffic speeds (i.e.: speed bumps) and to do what we have heard for years from the city: to encourage and promote traffic to use other major surrounding roads and highways. It is my hope you will give serious consideration to denying this current density plan and suggestion to widen Nutmeg Street.

Thank you for this opportunity to respond.

Sincerely,



Drucilla Thiercof, 1001 Turtle Dove Lane, also the following neighbors:

Seiko Taba, 1002 Turtle Dove Lane

Kenneth Cox, 1002 Turtle Dove Lane

Doug and Chris Malama, 2038 Nutmeg Street

Ignacio and Alejandro Gonzalez, 2034 Nutmeg Street

Roma Kreeger, 2021 Nutmeg Street

I92-9
Cont.

I92-10

I92-11

surrounding area is blighted.

I92-9

The comment erroneously conflates the posted speed limit with the roadway segment's classification and purposes. As discussed in responses to I92-1 and I92-3, the subject section of Nutmeg Street is classified as a Local Collector, and is also not currently built to that standard. It is therefore not a residential street.

Table 2.6-15 of the EIR traffic section shows that the proposed mitigation measure to widen and improve Nutmeg Street within the existing right-of-way, in conjunction with other Project Design Features and mitigation measures (see response Thierfoc-1) would in fact reduce the Project impact to this segment to below a Level of Significance.

The primary benefit of the widening is to provide curb/gutter/sidewalk to serve multimodal road users (i.e. cyclists and pedestrians). The improvement is not intended to affect speed or volume on Nutmeg Street. The City will continue to be responsible for conducting periodic speed surveys, establishing an appropriate speed limit based on 85th percentile speeds, and policing the roadway accordingly.

I92-10

The 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. Regarding the

Existing curbs, gutters and sidewalks in designated area.



blighted condition of the Project area, please refer to response to I92-8. Additionally, the manner in which the blighted conditions were created is immaterial to the EIR. The City's enforcement obligations or authority are not impacted by the Project or 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.

I92-11

See responses to I92-1, I92-3, and I92-9. The City acknowledges the comment and notes it 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.

1002 Turtle Dove Lane: curbs, sidewalk, landscaping and walls.



1001 Turtle Dove Lane existing curb and handicap cutout, fence, landscaping, 25MPH





**CLASS III
BIKE ROUTE**

A Class III Bike Route is a signed shared roadway that provides for shared use with pedestrians or motor vehicle traffic, typically on lower volume roadways. There is nothing different about the roadway, only that it has signs posted identifying it as a bike route.

A local example of a Class III bike route is California Street in Eureka. Arcata's "Bicycle Boulevards" on 10th and I Streets are also considered Class III Bike Routes.

Comment Letter I93

Comments - Escondido Country Club/ Villages Draft EIR

J. Thomas
18/14/2017

Introduction

I have reviewed the Draft EIR. I am a property owner and a business owner in the immediate area. I may be able to add a somewhat unique perspective as I am interested in the economic health as well as maintaining the quality of life for those who reside and will reside in this community.

I think the city has a unique opportunity to help create a new use for the country club property that updates and refreshes this part of Escondido. The process to realize this opportunity has been improved by the California CEQA process that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible.

I will direct my comments to the Draft EIR documentation of impacts. I will focus on impacts that are inadequately addressed and mitigations that fall short of the goals of the General Plan. I will use the contents of the DEIR Summary Section to organize several of my detailed comments.

Comment Summary

The Village's project is a massive overreach that will have a lasting dramatic and possibly deadly impact on the City of Escondido and the residents of the surrounding ECC community. The Village plan represents a uniquely Southern California approach that has been very successful in wiping out 85% of the most endangered natural environment in North America, the Coastal Chaparral. While the area is no longer natural habitat, this approach is even more unacceptable for an urban infill project.

The applicant wants to move over 1 Million cubic yard of fill and rock to build a 392 residential units. That is about 71,000 cubic feet per unit. This approach to building was created in the 1950's and only continues to exist because cities with little respect for our remaining open space continue to allow it. The voters of Escondido took a look a close look at a clone of this project and soundly rejected it. Because the owner is arrogant and refuses to learn from his mistakes, the city must once again let the developer know that the city does not want this rehashed Proposition H project.

Many of the residents of homes surrounding the project are seniors and retired. The massive amount of construction required to stuff this large number of housing units into these three tightly packed clusters will make an unacceptable impact on their lives. There is no way to successfully mitigate the years of construction noise, air pollution, dust, and construction traffic. I did not find a schedule commitment for the construction project, however, the fact that construction will be phased indicates that it may be stretched out over a decade. For the survivors of years of living in a war zone, life will not return to normal. The traffic on Country Club, Nutmeg, El Norte, and Nordahl will be impossible to navigate. The Southbound ramp to the 15 will backup through the Nutmeg/ El Norte intersection each morning. The gridlock will make it impossible to access the local businesses. After construction, residents will living in a noisy, cramped neighborhood with little to recommend it.

The open space that is loudly touted by the applicant is largely made up of waste land that is not suited for development. Unlike some of the city parks, it has little recreational value for the thousands of nearby residents including the 1,200 or so new residents who live in tightly packed homes with no yards.

I93-1
I93-2
I93-3
I93-4

Response to Comment Letter I93

John A. Thomas
July 26, 2017

I93-1 The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. 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.

I93-2 The City notes the comment provides factual background information and opinion about the Project and does not raise an environmental issue within the meaning of CEQA. 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.

I93-3 Construction will be phased as the comments suggests. This in and of itself distributes traffic both temporally and spatially as compared to full buildout traffic from the Project, which generates 4,280 ADT and is analyzed in the EIR.

The worst-case period of construction traffic will relate to the import of fill material with heavy

<p style="text-align: center;">Comments - Escondido Country Club/ Villages Draft EIR J. Thomas 18/14/2017</p> <p>The area will look and feel like low end public housing since there is no space between units and insufficient open space to compensate for the congestion.</p> <p>The final project approved should not overload the existing roadways. Please don't degrade this area with years of construction and cause Los Angeles gridlock.</p> <p>I continue to support a much smaller size development with fewer units and creation of more usable park and recreation space. I do not believe that the open space managed by a HOA will be accessible to all. The meager useful open space included in the plan will be of marginal benefit. Public use land should be owned by the city and maintained by the city and it should be sufficient to offer real recreational potential.</p> <p>General Comments</p> <p>A. The DEIR is a very long document. It is complex and hard to navigate or search since it is delivered the public for review as 48 .PDF documents. Here are the items that I think should be included in the table of contents.</p> <ol style="list-style-type: none"> a. Project Schedule: What is the timeline from start to completion of the project. How long will residents have their neighbor look and sound like a war zone. How long will their lives be disrupted? b. How many days of blasting will occur and on what schedule. c. Can NUWI please provide details of it's finances and its ability to fund initial phases of this project. If economic conditions change will they go bankrupt and abandon the project like other builders have in the area. d. How will NUWI perform all of the planned grading and paving including blasting with disrupting the lives of residents? How can NUWI ensure that the site will always allow residents access to all areas of the neighborhood when they haven't been able to maintain the fences on the property. e. NUWI typically sells off portions of each project. What is their plan for managing compliance of other entities that actually do the construction? <p>Comments on Table S-1 Summary of Significant Effects</p> <ol style="list-style-type: none"> 1. <u>AQ-2, AQ-, AQ-CUM-1 Daily Construction Emissions Exceed City's Significance Thresholds</u> <ol style="list-style-type: none"> a. The applicant erroneously states that air quality would be restored simply by being mindful of the type of equipment being used on the site. How will they monitor and prove that this weak mitigation is effective. b. The applicant should be required to submit grading plans and schedule to indicate the duration of excessive construction air quality impacts so that residents with breathing difficulties can make arrangements to vacate the vicinity. The city and the applicant should clearly indicate the point of contact for residents experiencing breathing difficulties. <p style="text-align: right;">2 Page</p>	<p>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. That analysis supports the conclusion of the TIA that no construction related impacts would occur.</p> <p>I93-4 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 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>I93-5 Refer to response to I93-3.</p> <p>I93-6 The City acknowledges the comment and notes it expresses concern about the schedule and request for information related to blasting and construction as well as 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.</p>
--	---

- c. The applicant should install air quality monitoring equipment to identify NOx and other air contaminant hot spots and provide weekly reports of levels and mitigation measures proposed to resolve problems.
- d. Applicant should clear up if construction activity air quality analysis included crew transportation to the site, as well as the 22,500 truck trips into and leaving the site to haul in needed fill.
- 2. N-1 Construction Noise Levels
 - a. The mitigation proposed results in high and possibly damaging noise level risks for an undisclosed period of years. The project should be reconfigured to eliminate high levels of noise at all residences. Residences that will experience high noise levels should be listed in the Final EIR. The applicant should offer residents with an option to monitor noise DBA levels at their residence.
 - b. Residents that will experience high noise level and are vulnerable to it's impacts should be provided alternative housing at no additional cost to them. This offer should be made to infirmed and to senior citizens that spend most of their time at their residences.
- 3. N-3 Noise Levels generated by the villages after construction
 - a. Please clarify how a event's that are featured at the Villages commercial center will be monitored so that those responsible for the event will know that they are in compliance with the city's limits.
- 4. M-N-6 Noise and Vibration Generated by Blasting
 - a. The final EIR should have provisions that indicate how homeowners will know if blasts impacting their residents are within the city's limit for shaking the crap out of your home, over and over again.
 - b. The applicant must describe procedure for an independent agency ascertaining blast damage to nearby structure, and the process for resolving disputes and ensuring restitution is made for all blast vibration damage.
- 5. M-TR-5 Traffic Impacts on El Norte at I-15 Southbound Ramp
 - a. The delays will be completely unacceptable and not mitigation is proposed. The Southbound ramp to the I-15 will experience severe impacts from the thousands of extra vehicles pouring out of the Villages. When the ramp backs up, it will impact the El Norte/ Nutmeg intersection. It will make it impossible for cars to clear the intersection due to the ramp backup.
 - b. If there is a wildfire many of the residents of this area will likely be burned to death in their cars. Traffic will back up from the 15. There will be gridlock and nobody will be able to move.
 - c. The state does not require the applicant to perform an analysis of the interaction of intersection delays. The city should however require proof by analysis that any approved plan will not result in an unacceptable situation such as gridlock due to the interaction of the El Norte Southbound ramp and El Norte/ Nutmeg traffic.
 - d. I believe the Data used in the analysis is either out of date or in error. I have timed my delays at the El Norte/ Nutmeg intersection over a period of 10 trips and found my



I93-7

The comment addresses general concern regarding construction equipment compliance. The City shall be responsible for monitoring of M-AQ-2 which provides restrictions of construction equipment. 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.

I93-8

The comment addresses general concern regarding air quality. This issue has been analyzed and discussed in Section 2.1, Air Quality. As stated in the EIR (EIR page 2.1-18), “for the purposes of modeling, it was assumed that construction of the Project would commence in January 2018 and would last approximately 66 months, ending in June 2023.”

The City acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise a specific 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.

I93-9

The comment addresses general concern regarding noise, which was analyzed in Section 2.6, Noise, of the EIR. The Project would be required to implement Mitigation Measures M-N-1 through M-N-6, thus

	<p>reducing noise related impacts to a less than significant level. The mitigation would reduce potential impacts associated with noise and not result in high noise levels. The comment expresses the opinions of the commentator, and does not raise a specific 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>I93-10 The comment addresses general concern regarding noise after construction, which was analyzed in Section 2.6 of the EIR. Refer to response to I93-9. Additionally, as with any event within the City, City staff are responsible for enforcing compliance with the municipal code, including the City noise limitations.</p> <p>I93-11 As indicated in Figure 2.6-2 in Section 2.6 of the EIR, some blasting will occur in central and southern portion of the proposed Village 3. 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</p>
--	--

	<p>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 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 EIR to be less than significant (EIR page 2.6-11).</p> <p>I93-12 The commenter refers to the significant traffic impact located at the El Norte Parkway/I-15 southbound ramp. The EIR includes Mitigation Measure M-TR-5, which would provide an additional Single Occupancy Vehicle (SOV) lane to the southbound on ramp. If implemented, 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 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</p>
--	--

	<p>(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>I93-13 The comment addresses concern for fire hazards, which were analyzed and discussed in Section 2.5, Hazards and Hazardous Materials, of the EIR. The following is stated in Section 2.5 (EIR page 2.5-5):</p> <p style="padding-left: 40px;">The Project is surrounding on all sides by existing residential development and is within an existing Escondido Fire Department (EFD) service boundary... EFD addresses fire emergencies (structure, vegetation, and automobile); medical aid emergencies (all chief complaints including vehicle accidents); special rescue emergencies (confined space rescue, trench rescue, low angle rescue, high angle rescue, and water rescue); hazardous materials incidents (including explosive devices and weapons of mass destruction); and mass disaster incidents (earthquakes, flooding, and wind) (City of Escondido 2016).</p> <p>The City will include the comment as part of the Final EIR for review and consideration by the decision</p>
--	---

average delay to be almost twice the delay used in the analysis. The final EIR should be based on current data that reflects the current traffic patterns.

6. Other Traffic Impacts

- a. None of the roadway and intersection analysis addressed the foreseeable problem of entering and exiting the Vons shopping center at the El Norte/ Nutmeg intersection. Access is currently a problem. If you pump thousands of additional cars through this intersection, it will become inaccessible during rush hour.
- b. To accommodate the project, the city needs to undertake improvements to Nutmeg North to the intersection with Center City Pkwy. And Nordahl South to the 78. It is hard to ignore the poor grading and surface conditions of these roads any longer. They are major exits and entrances to the area that many people ignore because of their poor condition.

7. Economic of the Project

- a. The staff of the City of Escondido seems to have ongoing problems providing oversight and working with developers of small projects. The two unit project on Nutmeg and Gary has been left in a dangerous condition for almost a year.
 - i. How can we be sure that shifting economic conditions will not bankrupt the developer and leave the site torn up and dangerous?
 - ii. What timeline is planned for development? What happens if sales are slow. Will residents have to endure and seemingly endless ugly environment similar to Nutmeg/ Gary as the neighborhood becomes more and more congested?
 - iii. Will the developer have to post a completion bond for grading, paving and drainage?



Gary/ Nutmeg – semi-permanent dangerous condition

↑ I93-15
Cont.

I93-16

I93-17

I93-14

makers prior to a final decision on the Project.

The City acknowledges the comment and notes it expresses the concerns about intersection delays and the opinions of the commentator. The study area 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). The City has obtained the technical analysis, including modeling to verify the results presented in the traffic impact 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.

I93-15

The City acknowledges the comment and notes it expresses the opinions of the commentator regarding the accuracy of traffic delays at the El Norte/Nutmeg intersection. The Traffic Impact Analysis was performed by a third-party traffic consultant and reported in the EIR and Appendix 2.7-1. The City has determined that the traffic analysis in the EIR is accurate. 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.

8. Zone Reclassification

- a. The Zone Reclassification statement contains language that is unclear and/ or erroneous. First of all, it fails to provide any clear justification for proposing a massive project instead of a more measured approach to development. As part of the application process, the city must ask the applicant to justify the size of the project and provide benefits that it sees as justification for the significant impact on the health and well being of the community residents during construction and after. Certainly the fact that the applicant wished to "encourage a comprehensive approach to the use of land" is a poor justification for the many days of blasting, hauling in 180,000 cubic yards of fill, moving an additional 850,000 cubic yards of material, and eventually causing extreme stress if not failure of the existing infrastructure as it strains under the impacts of this project.
- b. The DEIR statement "The zone reclassification does not change the density of the Project through an adopted specific plan." is in error, and should be removed from the plan wherever it occurs. The requested reclassification changes open space to a high density housing project. Thousands of residents have lived with and made life plans that include the country club property remaining open and green. Only the applicant, one individual, considers the density as definitively set to R-1-7 or the city would not have changed it. Only the applicant would strain to find a method to measure density that is consistent with their argument; i.e, that this high level of density is less than the density the city has planned for. The city clearly had no plan to absorb 392 more housing units on the golf course.
- c. The applicant is misinterpreting and misstating the General Plan goals. The proposed density does not meet the intent of the General plan. This density and total number of units was resoundingly rejected by popular vote when the city rejected Proposition H. This density has been strongly opposed by the voters of Escondido, the community as a whole, and the residents of this area.

193-18

193-19

193-20

I93-16

The study area 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). The study area includes both El Norte Parkway and Nutmeg Street. The City is only required to analyze traffic impacts to public roads and highways. The City does not have jurisdiction over the private shopping center and its parking lot. 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.

I93-17

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 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.

I93-18

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 EIR, the Project would be consistent with the General Plan and Zoning

	<p>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 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>I93-19 Refer to response to I93-18. No further response is necessary.</p> <p>I93-20 The 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.</p>
--	---

INTENTIONALLY LEFT BLANK

Comment Letter I94

From: John Thomas [jontms1@gmail.com]
Sent: Wednesday, July 26, 2017 3:37 PM
To: Sam Abed; John Masson; Ed Gallo; Olga Diaz; Kristin Blackson
Subject: Massive Impact of ECC Development

I am working my way through the Draft EIR. However, I had to stop and express my sincere concern that this project is not worth considering. It will be a disaster for the Country Club Residents.

The developer has proposed an environmentally destructive project that would be poorly received in the middle of nowhere. It really doesn't make sense in a settled neighborhood.

NUWI wants to move and haul a Million cubic yards of dirt and rock. How can that possibly be the best starting point. It proves that the project simply can't fit without destroying the lives of thousands of residents for a number of years.

If you take this pile of dirt and stack it neatly on a football field, it would be 580 feet tall. Twice as tall as the Statue of Liberty. Think of the mayhem. Would you want to live through that?

They are adding 180,000 cubic yards of fill to the site. That means 22,000 large dump truck trips will be rumbling through this quiet neighborhood for years. Would you want to live through that?

To make all this dirt move **there will be extensive blasting.** Much of this **blasting will be within 20 to 50 yards of existing homes.** Would you want to live through that?

Most of my neighbors are senior citizens that dutifully carry their reusable bags to Vons, have adopted solar panels, and buy organic food. Please don't put us in the middle of a war zone for several years. The city should have learned a lesson from Emerald Heights. Fight for their rights of the residents and tell the developer to come back with a project that does not destroy the lives of hundreds of residents.

Regards,
 John A Thomas
jontms1@gmail.com

I94-1

Response to Comment Letter I94

John Thomas
 August 14, 2017

I94-1

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commenter and raises issues related to grading, construction traffic, and blasting. These issues are covered in the following response.

The commenter is correct that the Project proposes to import a total of 18,000 cubic yards of soil, as stated in Section 2.1, Air Quality, of the EIR. Grading activities and quantities proposed by the Project are analyzed fully in the EIR throughout Chapters 2 and 3. Regarding construction related traffic, 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 ADT, 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.

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 8.0-2). The supplemental analysis 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.

Thus, 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 CEQA Guidelines. Recirculation of the EIR is not required.

The Project does include blasting of hard rock areas. However, the only potential impact it may have on nearby residents is noise and vibration impacts. The

	<p>intensity of the noise and vibration impacts associated with rock blasting depends on location, size, material, shape of the rock, and the spacing of the charges determined to be necessary for successful fracturing (EIR page 2.6-10). 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 analysis, it was determined that the closest residential receiver will experience noise levels approaching 93 dBA L_{max} over the course of the blast, which will likely occur for only a few seconds. The Escondido General Plan and Municipal Code do not identify specific construction noise level limits for blasting activities. Therefore, the OSMRE and CFR lowest maximum <i>Air Blast Limit</i> (30 CFR 816.67(b)) of 129 dBA L_{max} at nearby sensitive uses is used in this analysis as an acceptable threshold for noise levels due to blasting activity at the Project site (refer to Section 1.4.2 of the EIR). Therefore, the 93 dBA measurement is well below the 129 dBA threshold. Additionally, blasting would be limited to no more than 3 minutes within any given hour. Although some blasting noise 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. Therefore, the basis for the significance conclusion is because the Project would</p>
--	---

not exceed the OSMRE threshold or CFR standards. It should also be noted that, in excess of caution, blasting mitigation measures (M-N-5 and M-N-6) were applied for added assurance that the impacts would remain at a level less than significant. Additionally, pursuant to this and other comment letters received during the public review period, Mitigation Measure M-N-6, which requires that, a blast signal (e.g., air horn) shall be used to notify nearby residents that blasting is about to occur per the California Code of Regulations, Title 8, Section 5291, Firing of Explosives regulations (EIR page 2.6-22) will be revised in the Final EIR to include notification of surrounding property owners within 100 feet of blasting activities through U.S. mail at least one week prior to blasting activities. These revisions and clarifications to the EIR are presented in ~~strikeout~~/underline format; refer to Section 2.6.5 of the EIR. The changes do not raise important new issues about significant effects on the environment.

Comment Letter I95

From: laura vitous
To: [Sam Abed](#); [John Masson](#); [Olga Diaz](#); [Ed Gallo](#); [Michael Morasco](#); [Mike Strong](#); [Kristin Blackson](#)
Subject: Draft EIR
Date: Wednesday, August 9, 2017 7:15:30 PM

We live on Firestone Drive and the traffic now is heavy and dangerous. Most do NOT obey the speed limit of 25 mph. I am constantly reminding my family to be alert even when simply getting the mail or crossing the street to see the neighbors. My husband and I need to know how the city plans to ensure the safety of my family with the major increase in traffic with the proposed 392 dwellings to be built on the ECC property. Another huge concern is the air quality as building commences. Not to mention the noise (construction and then the future increased traffic.) I am sure this development will take years to finish. We scouted out this neighborhood to buy a house in because of the open space and tranquility. Imagine our shock when 2 months later we were informed of the golf course being sold. We can deal with a small planned development, but 392 homes is unacceptable for the quality of our neighborhood.

Thank you in advance for considering our concerns,
 Mike and Laura

I95-1
 I95-2
 I95-3

Response to Comment Letter I95

Mike and Laura Vitous
 August 9, 2017

I95-1

The comment expresses general concern regarding traffic. As analyzed in Section 2.7, Transportation and Traffic, of the Environmental Impact Report (EIR), traffic calming measures would be implemented both at the primary intersections along Country Club Lane, as well as on the tangent street segment between intersections, to more safely accommodate pedestrian and vehicular circulation. Roundabouts would also be installed, which would be designed to reduce speeds and enhance the existing circulation system. Additionally, the Project would install adaptive signalization along El Norte Parkway to improve traffic flow and improve the southbound I-15 on-ramp. With the Project's proposed improvements and traffic calming measures, the Project would not substantially increase hazards due to a design feature or incompatible use. The comment does not raise any specific issues related to the analysis provided in the EIR. Therefore, no further response can be provided. 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.

I95-2

The comment expresses general concern regarding air quality and noise during construction and operation of

	<p>the Project. These topics are analyzed in Section 2.1, Air Quality, and Section 2.6, Noise. The comment does not raise any specific issues related to 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>I95-3 The 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.</p>
--	---

Comment Letter 196

The Villages EIR Comment Card

Name William Westlake
 Address 1445 ANOQUE GLEN
 City ESCONDIDO State CA Zip 92026
 Phone (760) 747-2580 Email westlake88@outlook.com

Comments

• ONLY PLAN SUPPORTED BY SITE OWNER
 • ALTERNATIVE PLANS ACCEPTANCE COULD LIKELY RESULT IN NO DEVELOPMENT (THIS SHOULD NOT BE AN ALTERNATIVE)
 • BIGGEST CONCERN IS TRAFFIC ON NUTMEG TOWARD EL NORTE.
 - ONE LANE BECOMING TWO AT FIRE STATION
 - ONE LANE LEFT TURN ON EL NORTE TO I-15
 (THIS IS ALREADY A PROBLEM WITHOUT DEVELOPMENT)
 • ECHO IS NOISY AND THREATENING, SHOULD NOT BE A DETERMINATION.
 • I SUPPORT THE CURRENT PLAN, I THINK THE CLUB HOUSE REDEVELOPMENT IS A REAL BOON TO NORTH WEST ESCONDIDO. (WE HAVE NOTHING NOW.)

196-1
196-2
196-3
196-4
196-5

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

Response to Comment Letter 196

William Westlake
 July 31, 2017

I96-1

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.

I96-2

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.

I96-3

The comment addresses the traffic, which was analyzed in the EIR; please refer to Section 2.7, Transportation and Traffic, specifically mitigation measures M-TR-4 and M-TR-6, which will mitigate the Project's impact to Nutmeg Street. M-TR-3 will mitigate the Project's impact to the El Norte on-ramp to Interstate 15 (I-15). The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final

	<p>decision on the Project.</p> <p>I96-4 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>I96-5 The City acknowledges the comment letter, and notes it expresses general support for the Project, but does not raise any issue concerning the adequacy of the EIR.</p>
--	---

Response to Comment Letter I97

David Whitehead
July 17, 2017

I97-1

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.

I97-2

The comment addresses general concern regarding traffic, which was analyzed in Section 2.7, Transportation and Traffic, of the EIR. As shown in Table 2.7-14 of Section 2.7, 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 implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as

Comment Letter I97

Thank you for reading, Ms. Blackson,

(I have sent email to the city council members as well.)

After reading more of the EIR, the goals for any housing project, and the city's policies for any housing project, the New Urban West (NUW) development meets those goals better than the alternatives.
 I just have issues with the goals.

The city goals and the ECC goals are at cross purposes.

The existing zoning is clear: R-1-7, minimum. However, the city's policy is for every new development to have varying lot sizes. The NUW lot sizes max out at below 5,000 sq. ft.

The city also wants low and moderate income housing. That pretty much describes the downtown area, the valley, Oak Hill, Kent Ranch, and many other neighborhoods. The city is full of them. The NUW plan and ECC plan is all about that. It is the density we are arguing about.

Another city goal is to increase the city's annual new housing percentage compared to booming San Marcos and Carlsbad. That goal requires force-feeding increased density into a peaceful neighborhood.

Here's a thought: Why not let the Deer Springs project go wild instead? Keep the ECC feel in the ECC and let the Deer Springs project go all Mira Mesa. Fatten your numbers there.

Yes, according to the EIR, the city wants a higher density. Even the 249 home plan doesn't seem to cut the muster. The EIR is ready to sacrifice the neighborhood for the numbers it can generate for the city. (That is so bureaucratic.) I'm asking that the city push through some compromising constraints on the NUW plan.

I have some suggestions:

1. All new development single-family homes shall reflect the existing ECC bordering homes. All homes shall be single story, except, allowing two-story homes at the same ratio as the ECC bordering homes. And, development can ignore this restriction for homes bordering a major

I97-1

I97-2

I97-3

I97-4

I97-5

	<p>amended or updated, or such other national standard deemed appropriate by the City. The comment does not raise any specific issue related 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> <p>I97-3 The following is stated in Chapter 3.1.5, Land Use (EIR page 3.1.5-12):</p> <p>The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City’s General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.</p> <p>Appendix 3.1.5-1, City General Plan Consistency Analysis Table, analyzes whether the Project is consistent with relevant adopted local land use policies. The policy analysis provided in the EIR</p>
--	---

	<p>concluded that the Project would not conflict with the General Plan and Zoning Ordinance. Additionally, the landscape and site planning would buffer the existing residents from the new homes and the Project’s villages would retain the character of the surrounding land (EIR pages 3.1.5-13, 3.1.5-14). The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy 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>I97-4 The following is stated in Section 3.1.1 Aesthetics (EIR page 3.1.1-12):</p> <p>The pad elevations for the new residential development have been designed to be lower than the existing development in most areas so that existing near views of the golf course are replaced by views of the landscaped Greenbelt/Open Spaces. The Greenbelt/Open Space areas would enhance the screening and buffering of views from surrounding residences and roadways (namely West Country Club Lane, La Mirada Street, La Brea Street and Portola Avenue). Additionally, the Project would be designed to maintain a relatively low profile and would be similarly scaled</p>
--	--

<p>2. All multi-family dwellings shall be single story, except in the east side of Village 2 (where there currently exist two-story, multi-family dwellings).</p> <p>Wish list:</p> <ol style="list-style-type: none"> 1. We need some 7,000 sq. ft. lots. Give a nod to the existing zoning. 2. Ask the ECC residents if they want to rename Country Club Lane to Fubar Street. <p>A new swimming pool will not mollify the residents of ECC when confronted with 1000 more cars and 2000 more daily car trips and the destruction of their peaceful community. I would imagine even the new residents would get irritated by the traffic and want to know why the city doesn't do something. Whom do you imagine the current residents will tell them to blame?</p> <p>Have you seen the ECC neighborhood? Have you driven through it? It's almost bucolic in it's peacefulness. Our city administrators have a duty, to the best of their ability, to preserve that type of environment for its citizens, current and future. It is a rare Escondido gem.</p> <p>NUW's project plan spoils this splendidly unique neighborhood. Our city administrators must step up and rein in NUW's crass project and force them to do a better job of assimilating into the existing neighborhood.</p> <p>Thank you again for reading,</p> <p>David Whitehead</p> <p>P.S. City policy is similar to zoning laws. They can be altered to fit a situation.</p>	<p>to residential development in the area... The Project would not substantially interrupt or obstruct available views from any scenic vistas. No designated scenic vistas would be impacted by the Project.</p> <p>The Project includes a Specific Plan proposal and detailed design guidelines, which provide a framework for requiring the development to be context sensitive and be appropriately sited, scaled, and designed to complement the existing environment. The design guidelines require that the Project be designed to relate to community character, design context, and site design. The Specific Plan design guidelines would ensure appropriate scale of development and an aesthetically pleasing architectural character. Therefore, the Project would not adversely affect public views. In many areas, the site is set back at an appropriate distance and shielded by vegetated slopes or context sensitive landscaping. Therefore, impacts relative to the substantial degradation of visual character and quality as a result of implementation of the Project would be less than significant (EIR page 3.1.1-19). 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>I97-5 See responses to I97-2 and I97-4 regarding traffic and aesthetics.</p>
---	---

I97-5
Cont.

I97-6

	<p>I97-6 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>
--	--

INTENTIONALLY LEFT BLANK

Comment Letter I98

From: noreply@www.escondido.org [mailto:noreply@www.escondido.org]
Sent: Monday, July 17, 2017 1:30 PM
To: Sam Abed <sabed@escondido.org>; Olga Diaz <Odiaz@escondido.org>; Ed Gallo <egallo@escondido.org>; Michael Morasco <Mmorasco@escondido.org>; John Masson <jmasson@escondido.org>
Subject: Contact Council (select recipient from drop-down list): Property formerly known as the Escondido Country C

David Whitehead
dewhitehead@hotmail.com

Subject: Property formerly known as the Escondido Country Club

Dear City Administrator,

A semi-competent judge has decided that there shall be a development on the former Escondido Country Club (ECC) site. The judge also decreed that the developer take into account the desires of the city of Escondido and the surrounding community.

Because the development is inevitable, the city of Escondido set forth a list of goals that the developer should endeavor to meet. One of the city's goals is for housing diversity. Translated, this means a goal for multi-family housing, which is an invitation for high density housing. Largely, New Urban West (NUW) has met those goals. However, the density is just too high.

Incidentally, if one of the goals is diverse housing, where the hell are some half acre estate homes? Why does diversity always mean high density?

Evidently, the General Plan states the ECC area can be developed to the tune of 5.5 dwellings per acre. At the same time, the ECC area zoning states development shall be 7,000 sq. ft. lots minimum. Since the EIR states that the zoning must change for this project to happen, then zoning is the driver, not the General Plan.

NUW has ignored the existing R-1-7 zoning and is asking for a higher density zoning. Currently, their project proposes a maximum lot size of 45'x 95' equaling a square footage of 4,275. That is nowhere near 7,000 square feet. They should be made to pay homage to the R-1-7 zoning somewhere on the development.

The proposed 392 homes increases traffic greatly. We're looking at 1000 cars. The EIR essentially says that number is no big deal. It says, put in a couple of lights and some traffic calming roundabouts and leave the rest to CalTrans. This flies against common sense. The EIR findings ignores getting on east bound El Norte Parkway from Nutmeg. Right now, half the time, it takes two light cycles when turning left onto El Norte Parkway from Nutmeg. I have personally sat through three. Some R-1-7 zoning will mitigate the traffic impact, at least, somewhat.

NUW won their suit to develop the ECC site to the tune of a R-1-7 zoning. Give them that for half their single family detached homes. It will mitigate the, roughly, 2000 daily car trips the new development will mean.

Additionally, the EIR indicated NUW should include a tennis court and a pickleball court. I

I98-1

I98-2

I98-3

I98-4

I98-5

I98-6

Response to Comment Letter I98

David Whitehead
 July 28, 2017

I98-1

The City of Escondido (City) acknowledges the comment and notes it expresses the opinions of the commentator. The Project's goals include providing a range of quality residential homes to assist the City in implementing the General Plan's housing goals and accommodating existing, planned, and future growth in North San Diego County by providing a diverse range of housing opportunities with interrelated villages for the benefit of the new community and surrounding areas. In total, the Project would provide housing ranging in the following in lot sizes: 45-foot x 95-foot sized lots, 45-foot x 75-foot lots, 35-foot x 75-foot lots, and 78 4–6-unit clusters on common lots with a combination of one-story and two-story homes. As such, the Project would meet this goal by providing a range of lot sizes and housing opportunities, including clustered lots, within three interrelated villages. The City notes the commenter's preference for larger estate homes. Pursuant to the City's General Plan Housing Element:

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to

didn't see either itemized on their latest proposed community park. Pickleball is a fast-growing recreational activity for seniors. Many seniors still live in ECC. And, NUW is proposing a significant amount of housing aimed at seniors. Let's give those seniors an activity beside sitting on a porch. Ask NUW to (at least) reinstate two pickleball courts (together, roughly half the size of a tennis court).

Thank you for your consideration,
David Whitehead

↑
198-6
Cont.

I98-2

encourage the development of a variety of housing types for all economic segments of the population. This includes single-family homes, multi-family housing, second units, mobile homes, emergency shelters, and housing for persons with disabilities.

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

The commenter is correct that the land use designation under the General Plan currently allows for 5.5 dwelling units per acre. The Project meets this density requirement. The commenter is also correct that the Project's zoning currently requires a 7,000-square-foot minimum lot size. The Project does not meet this zoning requirement. However, 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 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

	<p>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 by the decision makers prior to a final decision on the Project. No further response is required or necessary.</p> <p>I98-3 The commenter is correct in that the proposed Project would generate additional traffic over existing conditions. However, 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 jurisdiction and control of the State of California (Caltrans), and neither the applicant nor the City can ensure that Caltrans will permit the improvement to be made. Additionally, the Project will implement a Specific Alignment Plan (SAP) for CCL from El Norte Parkway to Nutmeg Street, within which the roundabouts are proposed. With this plan, the majority of CCL 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</p>
--	---

	<p>approaches, as shown on Figures 2.7-1a and 2.7-1b of the EIR Traffic section. Analyses completed for these locations with these configurations show acceptable LOS B or better operations at buildout of the community, with implementation of mitigation measures and the SAP.</p> <p>The El Norte Parkway and Nutmeg intersection is identified as Intersection #12 in the EIR. As discussed in Section 2.7.6, M-TR-6 would reduce the impact at Intersection #12 by restriping the south leg of Nutmeg Street to provide two southbound left-turn lanes, one shared through-right turn lane, a bike lane, as well as restriping the north leg. Traffic signal equipment at this intersection would also be modified to serve the revised intersection.</p> <p>I98-4 The City acknowledges the comment and notes it expresses the opinion of the commentator to develop the site with half of the homes considered. 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>I98-5 See Responses Whitehead 2 and 4 above regarding traffic and aesthetics.</p> <p>I98-6 The City acknowledges the commenter's request for tennis and pickleball courts, which are included in the Project design. The following is stated in Section</p>
--	---

	<p>3.1.8, Recreation:</p> <p>Active recreational facilities, including a gym, swimming pool, and tennis/pickle ball court(s), would be located on site in close proximity to the new Clubhouse. These private facilities would be available to the new residents that purchase homes and to nearby residents that choose to purchase membership in the Clubhouse.</p> <p>The construction of the Village Center and associated amenities, including the tennis/pickle ball courts, will be a condition of the Project.</p>
--	--

Response to Comment Letter I99

Ray Wolcott
July 24, 2017

Comment Letter I99

July 24, 2017



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

Dear Ms. Blackson:

My name is Ray Wolcott. I live at 1861 Cortez Avenue in Escondido. I am submitting this information as my comments on The Villages draft Environmental Impact Report. I must admit that I have not read the entire report. As a retired college professor with a Master of Science degree in biology, I was most interested in Section 2.2. Biological Resources.

I99-1

This portion of the report contains a substantial amount of boiler plate language stating laws, regulations, requirements and other fairly standard language along with a rather lackluster statement to the effect that participants in this section didn't think there was much to be found on the site, so they didn't look too hard. The authors state in Section 2.2.2.2.:

I94-2

Special-status plant and animal species that are known to the region were not found during surveys on the Project site due to general lack of suitable habitat. Additionally, the fact that the Project site has previously been developed and disturbed as a golf course makes it unlikely that special-status plant and wildlife species would occur. Therefore, no impacts on special-status species are anticipated.

The lack of a vigorous survey effort is borne out by a listing of species known to be present on the land that the survey team failed to identify. They are presented below:

Mammals

Mammalia is neither my academic specialty nor a field of interest to me. As a result, I will list only the common names of those observed to be on the old country club land, but not listed by the project team:

- Coyote, how they missed this is beyond me
- Rabbit, they could have guessed this one
- Mouse, they could have guessed this one, too
- Rat (including a possible sighting of a Stephens' Kangaroo Rat)

I94-3

Birds

The scientific names of birds is something I have never been interested in. However, the project team seems to have missed one of my favorites: *Egretta thula*, the Snowy Egret. We had one last weekend

I99-1

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.

I99-2

The City acknowledges the comment and notes it expresses concern with the methodology used for the biological resources assessment. Section 2.2, Biological Resources, describes the methodology used, which included a biological survey on foot with the aid of binoculars and photographs taken of the site. In addition, plant and animal species observed on site were recorded. Animal identifications were made in the field by direct visual observation or indirect detection of calls, burrows, tracks, or scat. Plant identifications were made in the field or in the lab through comparison with voucher specimens or photographs. The biologist followed protocol methods and provided documentation of all species found or known to be on the 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.

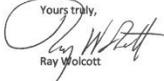
<p>that walked off the old country club property, through our yard and across Cortez Avenue without the aid of an Egret crossing sign. As this method of getting to and from the country club is also used by coyotes, it is possible that we have a wildlife corridor here that needs to be protected.</p> <p>Reptiles</p> <p>Also, not my field, but these were not noted by the project team, but also known to inhabit the old country club land:</p> <ul style="list-style-type: none"> • Gopher snake • Small lizard <p>Plants</p> <p>Here I will use the common and scientific names as they, collectively, constitute what is known as Coastal Sage Scrub, an environment deemed critical for the California Gnatcatcher, <i>Palafoxia californica</i>.</p> <p>In the spring following Mr. Schlesinger's spreading of the chicken manure, Mr. Keith Howard (a retired supervisor in the San Diego County Parks Department) and I went onto the 15th and 16th fairways of the country club to cut down some of the noxious weeds the City had failed to force Schlesinger to mow down. In the process, we identified several California sage, <i>Artemisia californica</i>, growing on the fairways and rough areas of both the 15th and 16th and both west and east of the cement runoff ditch.</p> <p>We used irrigation flags to mark 40 or so of them before running out of flags. However, a representative of Mr. Schlesinger came along and removed the flags and the entire area was mowed soon after. We re-identified many of them and they seemed to recover.</p> <p><i>Eschscholzia californica</i>, California Poppy were also seen that spring. They have continued to reseed themselves and put on quite a display this year.</p> <p>The California sage have done very well since I have been able to hold off the mowing. I continue to cut the weeds on the west end of the 15th with a whacker. They have been joined by other species that populate the Coastal Sage Scrub, including:</p> <ul style="list-style-type: none"> • <i>Eriogonum fasciculatum</i>, California Buckwheat • <i>Salvia apiana</i>, White Sage • <i>Salvia mellifera</i>, Black Sage • <i>Encelia californica</i>, California bush sunflower (several of these did very well this spring, including one that was over 5 feet tall.) 	<p>I99-3 The commenter has listed species observed on and in the area of the Project site. However, the species listed by the commenter are not special-status plant and animal species. The California Environmental Quality Act Guidelines only analyze whether or not special-status species are being impacted. Therefore, this is not required to be addressed 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>I99-4 The commenter has listed vegetation communities observed on and in the area of the Project site. As analyzed in Section 2.2 of the EIR, no special-status plant species were observed within the Project site during the 2016 surveys. No records of previous observations exist from U.S. Fish and Wildlife Service, California Natural Diversity Database, California Native Plant Society, and SanBIOS species data. Special-status animal species include those that have been afforded special status and/or recognition by the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife. No special-status animal species were observed within the Project site during HELIX's 2016 surveys. No records of previous observations exist from U.S. Fish and Wildlife Service, the California Natural Diversity Database, and SanBIOS species data. None of the special-status animal species known to the region</p>
---	---

194-3
Cont.

194-4

194-5

194-6

<p>So, that brings to 6 the number of plants the project team missed. They were all present in 2016 and are all native. Together, they make a nice Coastal Sage Scrub environment and are a wonderful contrast to the weeds growing on the property. I invite you to visit the area to see for yourself.</p> <p><u>Critical Habitat</u></p> <p>Because the project team failed to identify the 6 species listed above, they were unable to see the Critical Habitat for the gnatcatcher. Or it is possible that they decided that such habitat was unlikely to exist and they didn't look hard enough to see it.</p> <p><u>Conclusion</u></p> <p>Based on my review of the project team's work, it is easy to conclude that they may have done a better job than they did. They found 2 of the 6 mammals I am aware of. When I was a professor, 33% was a failing grade. Failure to identify either of the two reptiles, at least one prominent bird and half a dozen native plants further supports this conclusion. Failure to recognize and provide for the Coastal Sage Scrub may lead to legal difficulties with State and Federal authorities, as well as conservation groups.</p> <p>As I mentioned earlier, I have not read the entire report. However, if the flaws in this section are indicative of the rest of the work, I am not sure the citizens of Escondido received the best possible Environmental Impact Study. To me, the work seems more like a very cursory attempt to comply with the law, while writing a report favorable to the developer.</p> <p>It is my belief that any open minded person should be able to tell from the report and my findings that this work could not have been done on an impartial basis with the best interests of the people of the Country Club area and the Citizens of Escondido in mind.</p> <p style="text-align: center;">Yours truly,  Ray Wolcott</p> <p>Cc: Escondido City Council State, Local and Federal Agencies</p>	<p style="text-align: right;">↑ 194-6 Cont.</p> <p style="text-align: right;"> 194-7</p> <p style="text-align: right;"> 194-8</p> <p style="text-align: right;"> 194-9</p> <p>199-5 have a high potential to occur within the Project site due primarily to the lack of suitable habitat, isolation of the site from undeveloped habitat blocks in the region, and disturbances associated with the highly urbanized setting. The site does not support the constituent elements required by many of the special-status animals known to the region for nesting/breeding, foraging, dispersal, and other life history requirements. 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>199-5 The commenter has listed species observed on and area the Project site. However, the species listed by the commenter are not special-status plant and animal species. The California Environmental Quality Act Guidelines only analyze whether or not special-status species are being impacted. Therefore, this is not required to be addressed 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>199-6 Please see response to 199-6.</p> <p>199-7 Please see response to 199-6.</p> <p>199-8 The City acknowledges the comment and notes it expresses the opinions of the commentator, and does</p>
--	--

	<p>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>I99-9 The 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.</p>
--	---