

# Comments Received on the Draft EIR and Responses

All comments received on the Draft EIR have been coded to facilitate identification and tracking. Each of the comment letters, forms, and emails received during the public comment period was assigned an identification number (refer to Table RTC-1). These documents were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. Each numbered comment document is the submittal of a single agency or organization. The comment number consists of two parts. The first part is the number of the document and the second is the number of the comment. Thus, Comment S2-1 refers to the first comment (comment #1) of Comment Letter S2. To aid the readers and each commenter, the comment letters and responses have been reproduced together on a single sheet of paper, with the numbered comment letter on the left side of the page and the corresponding numbered response on the right side of the page.

**Table RTC-1 Comment Letters Received on the Draft EIR**

<b>No.</b>	<b>Commenter</b>	<b>Date</b>
<b>Federal Agencies</b>		
F1	Janet Stuckrath, U.S. Fish and Wildlife Service	March 5, 2012
<b>State Agencies</b>		
S1	Scott Morgan, Director, State Clearinghouse	February 28, 2012
S2	Al Shami, Project Manager, Department of Toxic Substances Control	February 21, 2012
S3	Jacob Armstrong, Chief, California Department of Transportation, District 11	February 27, 2012
S4	Stephen M. Juarez, Environmental Program Manager, California Department of Fish and Game	March 2, 2012
<b>Local Agencies</b>		
L1	Jeffery Pasek, Watershed Manager, City of San Diego	February 27, 2012
L2	Eric Gibson, Director, Department of Planning and Land Use, County of San Diego	February 24, 2012
L3	Susan Baldwin, Senior Regional Planner, San Diego Association of Governments	February 27, 2012
L4	Angela Jamison, Manager, San Diego County Regional Airport Authority	February 24, 2012
L5	Wally Grabbe, PE, District Engineer, Valley Center Municipal Water District	February 27, 2012

No.	Commenter	Date
<b>Individuals and Organizations</b>		
O1	Patricia Borchmann	February 27, 2012
O2	Escondido Chamber of Citizens	February 1, 2012
O3	Jo Ann Greenberg	February 9, 2012
O4	Janean Huston	February 27, 2012
O5	Kevin K. Johnson, Esq.	February 27, 2012
O6	Christine Nava	February 27, 2012
O7	Bill Osborn	February 26, 2012
O8	Mark Rodriguez	February 27, 2012
O9	San Diego County Archaeological Society	February 20, 2012
O10	Valley Center Community Planning Group	March 12, 2012

Any additions to the Draft EIR included in the responses to comments are indicated as underlined text, and deletions are indicated as ~~strikeout~~ text. In the revised Draft EIR, changes resulting from the comments received are also indicated as underlined and/or as ~~strikeout~~ text, with a simple vertical line in the outside margin.

In addition, the City acknowledges that during the public review period for the Draft EIR, the City received numerous comment letters that pertain only to the proposed project (General Plan Update, Downtown Specific Plan Update and Escondido Climate Action Plan) and do not contain any comments regarding the adequacy or accuracy of information presented in the Draft EIR. Section 15088(a) of the CEQA Guidelines states that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” The City is not required to respond to comments on the proposed project itself, only to comments pertaining to information contained in the Draft EIR. Therefore, no responses have been prepared for comment letters that do not address the information provided in the Draft EIR. City staff will provide responses to comments on the proposed project on a case by case basis. The letters pertaining only to the proposed project are included in the Final EIR for informational purposes only. A list of the comment letters included in this category and the date of the letter are provided below. These comment letters are provided at the end of the Response to Comments section of the Final EIR.

1. Bob Berg (February 27, 2012)
2. Christie O’Brien (February 20, 2012)
3. Elfin Forest Harmony Grove Town Council (February 02, 2012)
4. M.A. Mareck (February 16, 2012)
5. Mark Rodriguez (January 22, 2012)
6. Mark Rodriguez (February 07, 2012)
7. Bill & Marilyn Morgan (February 12, 2012)
8. Pamela Stahl and Lisa Prazeau (February 16, 2012)
9. Pamela Stahl (February 26, 2012)
10. Pala Band of Mission Indians (January 19, 2012)
11. William Stephenson (February 23, 2012)

Comments

Responses

**From:** Janet\_Stuckrath@fws.gov [mailto:Janet\_Stuckrath@fws.gov]  
**Sent:** Monday, March 05, 2012 9:05 AM  
**To:** Jay Petrek  
**Cc:** BDuke@dfg.ca.gov  
**Subject:** Escondido General Plan Update

In Reply Refer To:  
 FWS/CDFG-12B0100-12TA0212

Jay,

**F1-1.** The Service has reviewed the Draft Environmental Impact Report (EIR) for the Escondido General Plan Update, Downtown Specific Plan Update, and the Climate Action Plan Project. We offer the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

**F1-2.** In 2007, the Service revoked City's ability to process the loss of coastal sage scrub through the 4(d) rule (Habitat Loss Permit). Therefore, the EIR should indicate that impacts to coastal sage scrub occupied by the coastal California gnatcatcher (*Polioptila californica californica*) will require either a section 7 consultation with the Service if there is a Federal nexus or a section 10 (HCP) if there is no Federal nexus.

**F1-3.** The Critical Habitat paragraph on page 4.4-12 describes critical locations rather than critical habitat as defined by the Service. Please clarify whether this is intended to be a discussion of critical locations for Multiple Habitat Conservation Plan (MHCP) covered species or whether it should be a discussion of critical habitat designated by the Service for Federally listed species within the General Plan areas.

**F1-4.** Thank you for the opportunity to comment on the draft EIR. If you have any questions or concerns with these comments, please contact me at (760) 431-9440 extension 270 or Janet\_Stuckrath @fws.gov

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 Janet Stuckrath  
 Carlsbad Fish and Wildlife Office  
 (760) 431-9440 ext. 270

**Letter F1: U.S. Fish & Wildlife Service**

**F1-1** This comment introduces the comment letter and does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

**F1-2** This comment requests that the Draft EIR indicate that future impacts to coastal sage scrub occupied by the coastal California gnatcatcher would require either a Section 7 or Section 10 consultation with the U.S. Fish and Wildlife Service (USFWS). The discussion of existing regulations in Section 4.4.3.1, Issue 1: Special Status Plant and Wildlife Species, of the Draft EIR already states that the federal Endangered Species Act (ESA) requires a Section 7 or Section 10 process to be undertaken if a project would result in take of a federally listed species. However, this discussion has been revised as follows in response to this comment:

The federal ESA requires a Section 7 or Section 10 process be undertaken with the USFWS if a project would result in take of a federally listed species, while the CESA prohibits take of state-listed species without securing a Section 2081 permit. For example, Section 7 or Section 10 consultation with the USFWS would be required for potential impacts to coastal sage scrub habitat that is occupied by the coastal California Gnatcatcher. These permits may also be achieved through NCCP plans such as the MHCP or MSCP.

**F1-3** This comment requests clarification regarding the critical habitat discussion in Section 4.4.1.3, Sensitive Resources, of the Draft EIR. The subsection entitled "Critical Habitat" is intended to be a discussion of critical locations for Multiple Habitat Conservation Plan (MHCP) covered species. The discussion is of MHCP critical locations. To further clarify this, the "Critical Habitat" heading has been renamed "Critical Locations." The discussion below the heading correctly describes the critical locations for MHCP covered species and does not require any revisions.

**F1-4** This comment concludes the letter and does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.

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EDMUND G. BROWN JR.  
GOVERNOR

February 28, 2012

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

Jay Petrek  
City of Escondido  
201 North Broadway  
Escondido, CA 92025-2798

Subject: Escondido General Plan Update, Downtown Specific Plan Update & Climate Action Plan  
SCH#: 2010071064

Dear Jay Petrek:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 27, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

S1-1.

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Mergan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Letter S1: State Clearinghouse**

S1-1 This comment letter states that the City of Escondido has complied with the State Clearinghouse requirements for the review of draft environmental documents under the California Environmental Quality Act (CEQA) and that the Draft EIR was sent to and reviewed by the following state agencies: Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control (DTSC); Native American Heritage Commission (NAHC); and Public Utilities Commission.

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**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2010071064  
**Project Title** Escondido General Plan Update, Downtown Specific Plan Update & Climate Action Plan  
**Lead Agency** Escondido, City of

**Type** EIR Draft EIR  
**Description** The City of Escondido is the Lead Agency for the preparation of a Program EIR, as defined in Section 15168 of the CEQA Guidelines, addressing the Escondido General Plan Update, Downtown Specific Plan Update and Climate Action Plan. A summary of each of these project components is provided below.

**Lead Agency Contact**

**Name** Jay Petrek  
**Agency** City of Escondido  
**Phone** (760) 839-4556 **Fax**  
**email** jpetrek@escondido.org  
**Address** 201 North Broadway  
**City** Escondido **State** CA **Zip** 92025-2798

**Project Location**

**County** San Diego  
**City** San Diego  
**Region**  
**Lat / Long** 33° 7' 29" N / 117° 4' 51" W  
**Cross Streets** I-15 and SR 78

Parcel No.	Township	Range	Section	Base
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**Proximity to:**

**Highways** Hwy 78, I-15  
**Airports** Lake Wohlford Airstrip  
**Railways** NCTD Sprinter Line  
**Waterways** Escondido Creek, Reidy Creek  
**Schools** Escondido HS/Escondido ES  
**Land Use**

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 01/12/2012 **Start of Review** 01/12/2012 **End of Review** 02/27/2012

Responses

Comments



Matthew Rodriguez  
Secretary for  
Environmental Protection

February 21, 2012



Department of Toxic Substances Control

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



Edmund G. Brown Jr.  
Governor

Mr. Jay Petrek  
City of Escondido Planning Department  
201 North Broadway  
Escondido, California 92025

NOTICE OF COMPLETION & ENVIRONMENTAL IMPACT REPORT (EIR)  
DOCUMENT TRANSMITTAL FOR ESCONDIDO GENERAL PLAN UPDATE (SCH#  
2010071064)

Dear Mr. Petrek:

S2-1.

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation Report for the above-mentioned project. The following project description is stated in your document: "The General Plan will include an updated vision, with goals, objectives, and policies anticipating a 2050 buildout reflecting the current needs and preferences of the community, and ensuring compliance with state law. The EIR will also include analysis of a Climate Action Plan for developing implementing energy efficiency and conversation strategies to reduce fossil fuel emissions created as a result of transportation, building, and other appropriate sector within the General Plan. Amendments are proposed involving the following elements: Land Use, Housing, Circulation, Community Facilities and Services, Community Protection and Safety, Community Open Space/Conservation, Economic Prosperity, Growth Management, General Plan Implementation, and Specific Planning Areas".

S2-2.

DTSC sent you comments on Notice of Preparation Report for the above-mentioned project on 8/17/2010, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

S2-3.

If you have any questions regarding this letter, please contact me at [ashami@dtsc.ca.gov](mailto:ashami@dtsc.ca.gov), or by phone at (714) 484-5472.

Sincerely,

Al Shami  
Project Manager

**Letter S2: California Department of Toxic Substances Control**

- S2-1 This comment in an introduction to the comment letter and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- S2-2 This comment references the commenter's letter submitted on the Notice of Preparation (NOP) for the Draft EIR in August 2010 and states that the NOP comments should be addressed. The comments provided by DTSC on the NOP for the Draft EIR are addressed in responses to comments S2-4 through S2-12.
- S2-3 This comment states that DTSC has no further comments other than the comments provided in the NOP letter. Therefore, no further response is necessary.

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cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3452

Comments

Responses



Linda S. Adams  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

August 16, 2010

Mr. Jay Petrek  
City of Escondido Planning Department  
201 North Broadway  
Escondido, California 92025

NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT (NOP) FOR  
ESCONDIDO GENERAL PLAN UPDATE (SCH# 2010071064)

Dear Mr. Petrek:

S2-4.

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of the Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The General Plan will include an updated vision, with goals, objectives, and policies anticipating a 2050 buildout reflecting the current needs and preferences of the community, and ensuring compliance with state law. The EIR will also include analysis of a Climate Action Plan for developing implementing energy efficiency and conversation strategies to reduce fossil fuel emissions created as a result of transportation, building, and other appropriate sectors within the General Plan. Amendments are proposed involving the following elements: Land Use, Housing, Circulation, Community Facilities and Services, Community Protection and Safety, Community Open Space/Conservation, Economic Prosperity, Growth Management, General Plan Implementation, and Specific Planning Areas".

Based on the review of the submitted document DTSC has the following comments:

S2-5.

- 1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

S2-4

This comment is an introduction to the DTSC's NOP comments and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

S2-5

This comment states that the Draft EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment, and includes a list of related databases. Section 4.8, Hazards and Hazardous Materials, evaluates potentially hazardous conditions within the General Plan Update planning area boundary. The analysis includes a review of regulatory databases, including the EnviroStor database, Resource Conservation and Recovery Information System (RCRIS), and County of San Diego databases as recommended in the comment. Therefore, this NOP comment has been addressed in the Draft EIR.

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S2-5. cont.	<ul style="list-style-type: none"> <li>• Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).</li> <li>• Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.</li> <li>• Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.</li> <li>• Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.</li> <li>• GeoTracker: A List that is maintained by Regional Water Quality Control Boards.</li> <li>• Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.</li> <li>• The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).</li> </ul>	S2-6	<p>This comment states that the Draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated. As discussed in Section 2.3 of the Draft EIR, Intended Use of the EIR, the Draft EIR is program EIR that addresses the potential future development in the General Plan Update area during the planning horizon (year 2035), including the Downtown Specific Plan Update and Escondido Climate Action Plan (E-CAP). While the EIR intends to identify potential impacts that would result from project implementation, the level of analysis is not detailed to the level of site specificity, nor is it intended to be accurate to this level of specificity. The exact location of future proposed developments is not known at this time; therefore, it cannot be determined with certainty that future development would require investigation and/or remediation of a contaminated site. However, as discussed in Section 4.8.3.4, Issue 4: Existing Hazardous Materials Sites, due to the large number of hazardous materials sites located throughout the proposed project area, implementation of the proposed project would have the potential to result in a potentially significant hazard to the public or environment by locating projects on or near contaminated sites. However, compliance with applicable existing regulations and processes, and implementation of the proposed General Plan Update policies, would ensure that the proposed project would not result in a significant hazard to the public or the environment from the location of future land uses for human habitation or occupation on existing hazardous materials sites. The Draft EIR identifies the Environmental Protection Agency's Preliminary Remediation Goals, which establish tools for evaluating and cleaning up contaminated sites, as a mechanism to initiate investigation and site cleanup, if required. Therefore, this comment has been addressed in the Draft EIR.</p>
S2-6.	<p>2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.</p>	S2-7	<p>This comment states that any environmental investigations, sampling, and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. As discussed in response to comment S1-6 above, the Draft EIR is a programmatic document. The exact location of future proposed developments is not known at this time; therefore, it cannot be determined with certainty that future development would require investigation, sampling, or remediation. However, as discussed in Section 4.8.3.4, Issue 4: Existing Hazardous Materials Sites, due to the large number of hazardous materials sites located throughout the proposed project area, implementation of the General Plan Update would have the potential to result in a potentially significant hazard to the public or environment by locating projects on or near contaminated sites. While it would be premature at this time to conduct environmental investigations without knowing the location of future developments, compliance with applicable existing regulations and processes and implementation of the proposed General Plan Update policies would ensure that future development consistent with the proposed project would not result in a significant hazard to</p>
S2-7.	<p>3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.</p>		

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the public or the environment from the location of future land uses for human habitation or occupation on contaminated sites. Applicable regulations include the California Health and Safety Code (H&SC), which includes requirements for cleanup and oversight of contaminated sites. The County of San Diego Department of Environmental Health (DEH) provides oversight of assessments and cleanups in accordance with the California H&SC. Required compliance with the H&SC through oversight by the County of San Diego DEH would ensure proper investigations, sampling, and/or remediation. Additionally, future development projects in the City would also be subject to CEQA, and if it is determined that the proposed development would have environmental effects not examined in the Program EIR, a new Initial Study would need to be prepared leading to the preparation of either a subsequent EIR, Mitigated Negative Declaration (MND) or Negative Declaration (ND). Future development projects near contaminated sites would be required as part of the CEQA process to determine the potential hazards associated with the contaminated site and identify the mitigation necessary to reduce potential risks to a less than significant level, including compliance with applicable regulations. Therefore, this comment has been addressed in the Draft EIR.

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S2-8.	<p>4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.</p>	S2-8	<p>This comment states that investigations should be conducted for the presence of hazardous chemicals, mercury, asbestos containing materials, and lead-based paint in buildings, other structures, asphalt, or paved areas that would be demolished. As discussed in response to comment S1-6 above, the Draft EIR is a programmatic document. The exact location of future proposed developments is not known at this time; therefore, it cannot be determined with certainty what demolition would be required. Accidental release of hazardous materials is addressed in Section 4.8.3.2 of the Draft EIR, including accidental exposure to hazardous materials as a result of demolition. As discussed in the Draft EIR, numerous federal, state, and local regulations exist that would reduce the potential for humans or the environment to be affected by an accidental release of hazardous materials to a less than significant level. Regulations pertaining to exposure to hazardous materials during demolition include the California Accidental Release Prevention (CalARP) Program, which governs the accidental airborne release of chemicals; and the EPA's Renovation, Repair and Remodeling Rule (40 CFR 745, Subpart E), which requires contractors or firms performing renovation, repair, and painting projects that disturb lead-based paint in buildings built before 1978 to be certified and to follow specific work practices to prevent lead contamination. The EPA has also developed asbestos demolition and renovation requirements in the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 CFR, Part 61, Subpart M). NESHAP includes notification, inspection, and emission control requirements. Additionally, future development projects in the City would also be subject to CEQA, and if it is determined that the proposed development would have environmental effects not examined in the Program EIR, a new Initial Study would need to be prepared leading to preparation of a subsequent EIR, MND or ND. Future development projects that would require demolition would be required as part of the CEQA process to determine the potential for health hazards to occur as a result of demolition and identify the mitigation necessary to reduce potential risks to a less than significant level, including compliance with applicable regulations. Therefore, this comment has been addressed in the Draft EIR.</p>
S2-9.	<p>5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.</p>		
S2-10.	<p>6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.</p>		
S2-11.	<p>7) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.</p>		
S2-12.	<p>8) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see <a href="http://www.dtsc.ca.gov/SiteCleanup/Brownfields">www.dtsc.ca.gov/SiteCleanup/Brownfields</a>, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.</p>	S2-9	<p>This comment states that if contaminated soil is excavated, it must be disposed of properly, and suggests that imported soil should be sampled for contamination. As discussed in response to comment S1-6 above, the Draft EIR is a programmatic document. The exact location of future proposed developments is not known at this time; therefore, it cannot be determined with certainty where excavation would be required, and if the contaminated soils would be contaminated. Accidental release of hazardous materials, including improper handling of contaminated soil during construction, is addressed in Section 4.8.3.2 of the Draft EIR. Implementation of the proposed General Plan Update would have the potential to result in adverse impacts to the public and environment during construction on properties with contaminated soil. Compliance with applicable</p>

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existing regulations and processes and implementation of the proposed General Plan Update policies would ensure that future developments consistent with the proposed project would engage in proper sampling and disposal methods. Applicable regulations include the California Health and Safety Code, which includes requirements for cleanup and oversight of contaminated sites. Therefore, this comment has been addressed in the Draft EIR.

- S2-10 This comment states that human health and the environment of sensitive receptors should be protected during construction and demolition by preparing a health risk assessment, as necessary. As discussed in response to comment S1-6 above, the Draft EIR is a programmatic document. The exact location of future proposed developments is not known at this time; therefore, it cannot be determined with certainty if a health risk assessment would be necessary. Refer to responses to comments S2-8 and S2-9. Compliance with existing regulations would ensure that construction and demolition activities associated with future development under the proposed project would not result in significant impacts to human health or the environment of sensitive receptors, as discussed in Section 4.8.3.2 of the Draft EIR, Accidental Release of Hazardous Materials. Additionally, future development projects in the City would also be subject to CEQA, and if it is determined that the proposed development would have environmental effects not examined in the Program EIR, a new Initial Study would need to be prepared leading to preparation of a subsequent EIR, MND or ND. Future development projects that would involve construction and demolition near sensitive receptors would be required as part of the CEQA process to determine if these activities would potentially impact sensitive receptors and if a health risk assessment is necessary. Therefore, this comment has been addressed in the Draft EIR.
- S2-11 This comment states that if hazardous wastes would be generated by operation of the proposed project, wastes must be managed in accordance with the regulations listed in the comment. In this case, the proposed project is the General Plan Update, Downtown Specific Plan Update, and Escondido Climate Action Plan, which are planning documents that do not propose any specific development project or operation. Therefore, the approval of the proposed project would not generate hazardous wastes. Future development consistent with the plans that would potentially generate hazardous waste would be required to comply with all applicable laws and regulations as identified in Section 4.8.3.1 of the Draft EIR, Transport, Use, and Disposal of Hazardous Materials. Therefore, this comment has been addressed in the Draft EIR.
- S2-12 This comment states that DTSC can provide cleanup oversight. As discussed in response to comment S2-11, the proposed project does not propose any specific development that would require cleanup oversight. The City has noted that this DTSC service is available for future development projects.

Comments

Responses

S2-12. If you have any questions regarding this letter, please contact me at [ashami@dtsc.ca.gov](mailto:ashami@dtsc.ca.gov),  
cont. or by phone at (714) 484-5472.

Sincerely,



Al Shami  
Project Manager  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
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CEQA # 2988

Comments

Responses

DEPARTMENT OF TRANSPORTATION

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February 27, 2012

11-SD-15  
 Various  
 Escondido General Plan and Specific Plan Update and  
 Climate Action Plan  
 DEIR  
 SCH 2010071064

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

Dear Mr. Petrek:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Escondido General and Specific Plan update and Climate Action Plan. Caltrans would like to submit the following comments:

- The California Governor’s Office of Planning and Research states the following regarding general law and policy concerning the relationship between Regional Transportation Plans (RTP) and General Plans (GP):
  - *When preparing or revising a General Plan, cities and counties should carefully analyze the implications of regional plans for their planning area. General Plans are required to include an analysis of the extent to which the General Plan's policies, standards, and proposals are consistent with regional plans.*
  - *The policies and plan proposals contained in the land use and circulation elements should reflect the RTP and Regional Transportation Improvement Program (RTIP). Clearly, transit standards, congestion management measures, proposed facilities, and transportation related funding may directly affect land use patterns and capital improvements. Although there is no explicit requirement that the RTP and RTIP be consistent with local general plans, good practice dictates that cities and counties should address these regional goals, policies, and programs to the extent they are relevant.*
- The city should cooperate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on/off ramps is adequate.

S3-1.

S3-2.

**Letter S3: California Department of Transportation**

- S3-1 This comment provides guidelines from the California Governor’s Office of Planning and Research concerning the relationship between regional transportation plans and general plan preparation. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- S3-2 This comment is a request for the City to cooperate with Caltrans to implement circulation improvements where the City and Caltrans have joint jurisdiction. The City appreciates the comment and will coordinate with Caltrans as needed regarding future development that is consistent with the proposed project. However, this comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

Comments

Responses

S3-3.	<ul style="list-style-type: none"> <li>Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled (VMT) and the number of trips per household. Therefore, Caltrans encourages local agencies as part of their General Plan updates to work towards a safe, functional, interconnected, multi-modal system integrated with land use planning that supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. Transit accommodations can be accomplished through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements which can improve mobility and alleviate traffic impacts to State facilities serving the City: Interstate 15 (I-15) and State Route 78 (SR-78). Such proposed accommodations in Caltrans R/W should be coordinated early with Caltrans staff; contact Chris Schmidt, Caltrans Transportation Planning, Public Transit Branch (619-220-7360).</li> </ul>	S3-3	<p>This comment includes Caltrans recommendations for general plans to support multi-modal transportation networks and recommendation to implement transit accommodations. As discussed in Section 4.16, Transportation and Traffic, a Complete Streets Assessment was completed for the proposed project and is included in the Draft EIR as Appendix I3. The Complete Streets Assessment provides the basis for the proposed Land Use and Community Form Element and Mobility and Infrastructure Element and ensures that the proposed circulation network would be consistently designed and planned for all transportation and land use projects in Escondido with all modes of transportation and users of all ages and abilities in mind. The proposed Mobility and Infrastructure Element specifically implements the Complete Streets Assessment policies. Section 4.16.3.5, Issue 5: Alternative Transportation, of the Draft EIR addresses potential impacts of the proposed project on multi-modal transportation, including a discussion of the Complete Streets Analysis. Therefore, this comment has been adequately addressed in the Draft EIR.</p>
S3-4.	<ul style="list-style-type: none"> <li><b>SR-78 Corridor Study:</b> The San Diego Association of Governments (SANDAG) and Caltrans are currently working on the SR-78 Corridor Study for improving transportation and land use along the SR-78 corridor. The SANDAG project manager for the SR-78 Corridor Study is Rachel Kennedy (619-699-5638), and the Caltrans project manager is Robin Owen (619-688-2507).</li> </ul>	S3-4	<p>This comment provides a status update on the SR-78 Corridor Study and contact information for the project. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.</p>
S3-5.	<ul style="list-style-type: none"> <li><b>SANDAG 2050 RTP:</b> With SANDAG's Sustainable Communities Strategy efforts in the 2050 RTP Update, per Senate Bill 375 (SB 375), Caltrans encourages the City to coordinate with SANDAG to address regional strategies to reduce greenhouse gases (GHG) and VMT as part of the City's General Plan update.</li> </ul>	S3-5	<p>This comment summarizes the Caltrans efforts to reduce greenhouse gas emissions and vehicle miles traveled that are found in the SANDAG 2050 RTP. The proposed project includes the Escondido Climate Action Plan (E-CAP). The E-CAP includes measure R3-T1, Regional Land Use and Transportation Coordination, which encourages coordination between the City, SANDAG, Caltrans, and neighboring jurisdictions. As stated in this measure, regional coordination aids in the State's implementation of Senate Bill (SB) 375 and helps SANDAG to achieve the GHG emission reduction targets for passenger vehicles. Section 4.7 of the Draft EIR, Greenhouse Gas Emissions, incorporates the E-CAP GHG Reduction Measures, including R3-T1. Therefore, this comment has been adequately addressed in the Draft EIR.</p>
S3-6.	<ul style="list-style-type: none"> <li><b>The California Complete Streets Act of 2008:</b> Beginning January 1, 2011, Assembly Bill 1358 requires that any substantive revision of the circulation element of the general plan includes planning for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways in a manner that is suitable to the context of the general plan. The Act defines all users as motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. Caltrans supports Complete Streets policies and continues to implement our own Complete Streets directive, DD-64-R1.</li> </ul>		
S3-7.	<ul style="list-style-type: none"> <li><b>Traffic Impact Study:</b> A significant impact is identified in the Traffic Impact Study (TIS) of the EIR for the General Plan update on I-15 at Valley Parkway. The TIS as part of the EIR documented that this significant impact was unmitigatable. Caltrans has provided the City as part of previous development reviews, potential improvements at this freeway ramp location. It is recommended the attached improvements be considered as mitigation for future land developments that may have impacts at the location.</li> </ul>	S3-6	<p>This comment summarizes the California Complete Streets Act of 2008, which includes requirements for general plan updates. As discussed in Response to Comment S3-3, a Complete Streets Assessment was prepared for the proposed project and included in the Draft EIR as Appendix I3. The Complete Streets Assessment was prepared in compliance with the Complete Streets Act of 2008 and was incorporated into the General Plan Update Mobility and Infrastructure Element, as discussed in Section 4.16.3.5 of the Draft EIR, Issue 5: Alternative Transportation. Therefore, this comment has been adequately addressed in the Draft EIR.</p>

## Comments

If you have any questions or require further information, please contact Marisa Hampton at (619) 688-6954 or email at [marisa.hampton@dot.ca.gov](mailto:marisa.hampton@dot.ca.gov)

Sincerely,



JACOB ARMSTRONG, Chief  
Development Review Branch

## Responses

S3-7

In response to this comment, Section 13.3.3 of the Traffic Impact Analysis prepared by LLG Engineers (2011) has been revised to include the following language regarding mitigation for the I-15 Southbound Ramps/Valley Parkway intersection impact:

It is recommended that the provision of a second right turn lane at the I-15 NB ramps be planned to partially mitigate the impact at this location. Future land developments could contribute a fair share towards this improvement as well as any other improvements needed to mitigate this impact to below a level of significance.

Further, Section 4.16.6, Mitigation, of the EIR has been revised as follows to identify this specific mitigation for the impact to the intersection.

**Tra-12 Interstate 15 Southbound Ramps/Valley Parkway Intersection.** The City of Escondido shall provide a second right turn lane at the I-15 Northbound ramps to partially mitigate the impacts at this intersection. Future land developments would be required to contribute a fair share towards this improvement as well as any other improvements that may be needed in the future to mitigate this impact to below a level of significance.

Comments

Responses



State of California -The Natural Resources Agency  
 DEPARTMENT OF FISH AND GAME  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
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*EDMUND G. BROWN JR., Governor*  
*CHARLTON H. BONHAM, Director*



March 2, 2012

Mr. Jay Petrek  
 City of Escondido  
 Planning Department  
 201 North Broadway  
 Escondido, California 92025

**Subject: Comments on the Draft Environmental Impact Report for the Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Project, City of Escondido, San Diego County, California (SCH # 2010071064)**

Dear Mr. Petrek:

The California Department of Fish and Game (Department) has reviewed the above-referenced draft Environmental Impact Report (EIR) dated January 12, 2012. The comments provided herein are based upon information provided in the draft EIR, our knowledge of sensitive and declining vegetation communities in the County of San Diego, the City of Escondido's (City) draft Multiple Habitat Conservation Program (MHCP) Subarea Plan (SAP) goals, and the North County Multiple Species Conservation Plan (NC MSCP). The Department acknowledges and appreciates the willingness of the City to accept comments for this draft EIR until March 2, 2012.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code §2050 et seq.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City is participating in the Department's NCCP program through the preparation of its draft SAP. The Department also is responsible for the administration of the Streambed Alteration Agreement Program, which oversees potential threats to the State's wetlands resources.

The proposed project is located in northwestern San Diego County in the City. The City is located approximately 30 miles north of San Diego and approximately 18 miles east of the Pacific Ocean. Located approximately 615 feet above mean sea level (AMSL), the City is situated in a natural valley and is surrounded by rolling hills and rugged terrain ranging up to 4,200 feet AMSL. The unincorporated communities of Valley Center and Hidden Meadows bound the City on the north, and the City of San Marcos bounds the City on the west. The City is bounded on the south by Lake Hodges and the City of San Diego and on the east by unincorporated San Diego County. Interstate 15 (I-15) bisects Escondido in a north-south direction and State Route (SR) 78 transitions from freeway to surface streets in an east-west direction through the City.

S4-1.

**Letter S4: California Department of Fish and Game (CDFG)**

S4-1 This comment summarizes information about the proposed project and provides background information about CDFG. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

Comments

Responses

<p>S4-1. cont.</p>	<p>The project has three components: an update to the existing City General Plan (General Plan Update) including the Housing Element (General Plan Update), implementation of an update to the existing City's Downtown Specific Plan (Downtown Specific Plan Update), and creation and implementation of an Escondido Climate Action Plan.</p> <p>The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.</p>	<p>S4-2 This comment recommends consultation with the U.S. Fish and Wildlife Service (USFWS) to initiate a Habitat Loss Permit for future developments that would impact coastal sage scrub while the City's Multiple Habitat Conservation Program Subarea Plan is in progress. As discussed in Section 4.4, Biological Resources, of the Draft EIR, future development would be required to obtain all required take permits from the USFWS, Army Corps of Engineers, Regional Water Quality Control Board, and/or CDFG until the City's Subarea Plan is adopted. Therefore, this comment has been addressed in the Draft EIR.</p>
<p>S4-2.</p>	<p>1. The draft EIR (Section 4.4) provides a good summary of the MHCP and City's SAP, which is still in progress. Currently the U.S. Fish and Wildlife Service (Service) 4 (d) interim Habitat Loss Permit is not available to the City. Therefore the draft EIR should recommend consulting with the Service to determine the appropriate steps to initiate the process for acquiring a 4 (d) interim Habitat Loss Permit (HLP) from the Wildlife Agencies (Service and Department) for any impacts to coastal sage scrub while the plan is in-progress. Projects under the General Plan Update that result in impacts to sensitive habitat should also provide adequate mitigation following the City's draft SAP and ensure adequate funding for long-term management of the mitigation site.</p>	<p>This comment also recommends that future projects under the General Plan Update resulting in impacts to sensitive habitat provide adequate mitigation following the City's Draft Subarea Plan. As discussed in Section 4.4 of the Draft EIR, Biological Resources, future development within the project planning area would result in potential significant impacts to sensitive plant and animal species. However, as stated in the same Draft EIR section, existing federal and state regulations prohibit the take of sensitive species without permitting from the wildlife agencies. Existing City regulations limit the amount of habitat that can be impacted by new development. Additionally, the goals and policies in the General Plan Update require projects with the potential to impact sensitive species to prepare a biological survey and mitigate any impacts that would occur. For example, Biological and Open Space Resources Policy 1.8 in the Resource Conservation Element requires consultation with state and federal agencies and mitigation of resources either onsite or offsite at ratios consistent with state and federal regulations. Appropriate mitigation would be determined through consultation with the wildlife agencies. While the City's Draft Subarea Plan would be a source of information upon which to base consultation with the City and wildlife agencies to develop appropriate mitigation for future project impacts to biological resources, the City cannot require future applicants to comply with an unadopted plan (County of Amador v. El Dorado County Water Agency and Pacific Gas &amp; Electric Company, 1999). Therefore, the suggestion for the Draft EIR to identify mitigation that requires future project applicant's to comply with the City's Draft Subarea Plan is not appropriate or consistent with CEQA case law.</p>
<p>S4-3.</p>	<p>2. The draft EIR identifies (Section 4.4.3.1) that impacts to sensitive species could be potentially significant because some study areas currently include open space (e.g., Nutmeg Street Study Area and the Imperial Oakes Specific Planning Area while other study areas are located adjacent to open space areas (e.g., Escondido Research and Technology Center North and South SPA, the I-15/Felicita Road Corporate Office Target Area, the Westfield Shopping Town Target Area and Kit Carson Park). Additionally, development that would occur outside of the study areas and growth that will be accommodated in the City's sphere-of-influence could impact sensitive species and habitat. Although development within the urban core would generally not result in the removal of natural habitat, development (including nurseries) would have the potential to remove stands of trees or other vegetation that provides nursery sites to wildlife, particularly birds. The proposed General Plan Update circulation network also proposes new roadways in undeveloped areas that would have the potential to impede wildlife movement. Roads that may impact wildlife movement include the proposed extension of Mountain Meadow Road (crosses through the northern habitat area, slightly north of Daley Ranch) and the extensions of Citracado Parkway and Lariat Drive (would cross a small portion of the southwestern habitat area). Until the City's SAP is completed, the City does not have incidental take authorization for impacts to listed species. Accordingly, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Additionally, a 10 (a) permit from the Service may be required for take of federally-listed species. For Impacts to coastal sage scrub, an interim 4 (d) permit would be required (see comment 1).</p>	<p>S4-3 This comment summarizes potential environmental impacts that are presented in Section 4.4, Biological Resources, of the Draft EIR and states that until the City's Draft Subarea Plan is adopted, future development would be required to obtain permits from CDFG and the USFWS. Refer to response to comment S4-2. The Draft EIR includes the requirements for future development projects consistent with the proposed project to consult with the wildlife agencies and obtain all applicable biological resource permits, including a 10(a) or 4(d) permit from the USFWS. Therefore, this comment has been addressed in the Draft EIR.</p>
<p>S4-4.</p>	<p>3. The draft EIR states on page 4.4-22 that "protection and replacement standards include making every feasible effort to preserve sensitive biological habitat and species and onsite or offsite mitigation at a ratio of 1:1 or higher." While 1:1 may be an acceptable mitigation ratio for impacts to some habitats (e.g., unoccupied non-native grassland), it would not be acceptable, for example, for impacts to CSS while the City's SAP is still in-progress.</p>	<p>S4-4 This comment summarizes potential environmental impacts that are presented in Section 4.4, Biological Resources, of the Draft EIR and states that until the City's Draft Subarea Plan is adopted, future development would be required to obtain permits from CDFG and the USFWS. Refer to response to comment S4-2. The Draft EIR includes the requirements for future development projects consistent with the proposed project to consult with the wildlife agencies and obtain all applicable biological resource permits, including a 10(a) or 4(d) permit from the USFWS. Therefore, this comment has been addressed in the Draft EIR.</p>

Comments

Responses

S4-5.

4. The draft EIR (Section 4.4, page 4.4-21) concludes that golden eagles (*Aquila chrysaetos*) potentially occur in the General Plan Update planning area and that impacts to the eagle may be significant. If impacts to golden eagle nesting or foraging habitat may occur from the General Plan Update, the Wildlife Agencies recommend that the City consult with the Service on the need to obtain a Golden Eagle permit pursuant to the Bald and Golden Eagle Protection Act and related new regulations (74 FR 46835-4687, "Eagle Act Regulations) that went into effect on November 10, 2009.

5. The General Plan provides many policies to provide interim resource protection until the City's SAP is completed and approved. Some of these include, but are not limited to, the following:

a. Quality of life standard 8 (Open Space System) which requires a system of open space corridors, easements, acquisition programs and trails to be established in the Resource Conservation and Community Health and Services Elements. Further, quality of life standard 8 states that significant wetlands, riparian or woodland habitat, and habitat for rare or endangered species shall be protected in coordination with state and/or federal agencies having jurisdiction over such areas.

b. Biological and Open Space Resources Policies 1.2, 1.6 through 1.9, 1.11, and 1.13 require the City to maintain open space and rural residential uses around the perimeter of the City; preserve and protect significant wetlands, riparian, and woodland habitats and rare, threatened or endangered plants and animals and their habitats; require mitigation of resources either onsite or offsite at ratios consistent with state and federal regulations; require surveys be prepared for proposed development projects located in areas potentially containing significant biological resources; prohibit the removal of significant stands of trees unless needed to protect public safety; require appropriate barriers to be constructed to restrict access to areas containing sensitive biological resources; and promote the use of native plants for public and private landscaping purposes within the City.

S4-6.

c. Open Space Land Use Policy 12.1, which establishes the Open Space/Park land use designation to identify properties reserved for active and passive parks, habitat preservation, and public safety purposes.

d. Residential Clustering Policies 5.2 and 5.6, which encourage utilization of clustering as tool to preserve slopes, ridgelines and sensitive habitats, and require the City to limit density transfers from areas containing sensitive biological resources.

e. Planned Development Policy 6.3, which identifies requirements for planned development proposals such as minimization of grading and removal of native vegetation; preservation of the creeks and their adjoining vegetation; and the protection and management of areas supporting rare and endangered plant and animal species.

f. Open Space Land Use Policies 12.3 and 12.4, which encourage the preservation of land within the planning area and require the City to explore options to purchase land for recreation or open space purposes that is owned by other public agencies and available for acquisition, as appropriate.

S4-4

This comment summarizes text provided in Section 4.4, Biological Resources, of the Draft EIR and focuses specifically on the identification of a minimum mitigation ratio of 1:1 for impacts to sensitive biological habitat. The 1:1 mitigation ratio is the minimum ratio found in the City's Zoning Ordinance, which states that some sensitive habitats and species require higher mitigation ratios, in accordance with state and federal regulations. No maximum mitigation ratio is specified in the Draft EIR. Accordingly, future developments would not be precluded from mitigating impacts to coastal sage scrub (CSS) or other sensitive habitats at a ratio higher than 1:1. Therefore, this comment has been addressed in the Draft EIR.

S4-5

This comment states that consultation with the USFWS is recommended for potential impacts to golden eagle nesting or foraging habitat, and a permit may be required. Refer to response to comment S4-2. The Draft EIR includes the requirements for future development projects consistent with the proposed project to consult with the wildlife agencies and obtain all applicable biological resource permits, including a Golden Eagle permit from the USFWS. Therefore, this comment has been addressed in the Draft EIR.

S4-6

This comment summarizes policies that are included in the General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

Comments

Responses

S4-6.  
cont.

- g. Biological and Open Space Resources Policies 1.7 and 1.8, which require the preparation of a biological survey for development projects that would potentially impact significant biological resources. In the event that significant biological resources are adversely affected, appropriate state and federal agencies must be consulted to determine adequate mitigation for replacement of the resource.

The Department recommends that the General Plan Update include the following policies to minimize impacts to sensitive species and habitats and to ensure it would not significantly impact the City's ability to complete its SAP:

- h. A policy to complete the City's SAP should be identified as a high priority in the General Plan Update and the associated Implementation Plan/Action Plan. The Department recommends that 3-5 years be identified as a reasonable time period to substantially or entirely complete the SAP. Moreover, the draft EIR concludes in Section 4.4 and on page 4.4-39 (Issue 4) that many impacts to sensitive species and to habitat conservation planning from the General Plan Update would be less than significant when the City's SAP is completed and approved. Until that time, the federal and state permitting processes would be the method to ensure that any impacts to listed species are less than significant. This underscores the importance of completing the City's SAP and of including such a policy in the General Plan Update and Implementation Plan/Action Plan.

S4-7.

- i. A fire protection policy that minimizes the removal of native cacti in areas located within or adjacent to areas identified for conservation in the City's SAP, especially where populations of coastal cactus wren (*Campylorhynchus brunneicapillus*, "cactus wren") occur. The City contains one of the core populations of cactus wren in the MHCP Planning area. Retaining native cacti (a low-combustive plant) can contribute to preserving habitat for the cactus wren and help to ensure that additional development authorized under the General Plan Update would not result in a significant impact to cactus wren.
- j. Policies that direct locating public use trails along the edges and perimeter of proposed core lands and linkages included in the City's draft SAP and to avoid encroachment into sensitive habitats or defined (or subsequently identified) wildlife movement areas. The Department recommends that, for any trails designated in the City's SAP preserve, that a Public Access Plan (PAP) to be developed for the trail. The PAP should include a trail compatibility analysis to ensure that impacts to species (e.g., golden eagle, cactus wren, etc.) are avoided, impacts to habitat are minimized and, where appropriate, performing additional monitoring of public trail usage where problems exist.
- k. A policy that the City will actively consult and work with the California Department of Forestry and Fire Protection and the Wildlife Agencies to incorporate appropriate review and mitigation (e.g., CEQA) for impacts to habitat and species into vegetation management projects.
- l. A policy that actions to meet the requirements of AB 375 for sustainable community planning should not be at the expense of multi-species preservation or implementation of the City's draft SAP. For instance, green infrastructure should be viewed as less sustainable in the backcountry versus in existing urban area (viewed as more sustainable). In this case, the latter would be more sustainable because there is no trade-off between green infrastructure and natural habitat. In other words, the push for

S4-7

This comment provides recommendations for new and revised policies in the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

## Comments

## Responses

green infrastructure should not conflict with the City's draft SAP or other regulations that promote species and habitat protection. As an example, although a "wind farm" may be a "green project," it may not be consistent with the goals and objectives of MHCP.

- m. A policy to integrate the City's draft SAP with watershed planning, greenhouse gas reductions (global climate change) and other regional planning involving natural resources. This would potentially allow the City to maximize access to multiple sources of grant funding for conservation-related purposes.
- n. A policy that all existing and planned SAP conserved lands that contribute to biological preservation will be redesignated to open space-conservation as part of the General Plan Update and Implementation Plan/Action Plan. The underlying zoning could remain unchanged under the General Plan Update, but then be rezoned as an action item in the Implementation Plan/Action Plan (e.g., as part of Community Plan updates). This would shift the land use development in the SAP preserve areas from a land development first focus to a biological minimization focus that is more sensitive to the natural environment.
- o. A policy for fire protection that emphasizes that for optimal protection against wildfires, "hardening of the structure" should occur first, and then defensible space can supplement structural design requirements. A policy called "Building and Site Design" (or equivalent) should be added that requires UBC/structural "hardening" measures (e.g., boxed eaves, fire rated windows/walls, fire retardant native vegetation, etc.) in project design as part of, and preceding, defensible space measures, especially where located within or adjacent to City SAP preserve and/or Wildlife Agency (Department and Service) lands. All defensible space should be included within the project footprint and property boundary of project applicants. The General Plan Update should establish a policy that the City will not allow variances or other project approvals where it would necessitate impacts to Wildlife Agency and/or SAP-preserve lands (e.g., brush management).
- p. A policy that monitoring and enforcement is a critical part of natural resource planning and implementation (e.g., encroachment, trail management). Without enforcement (e.g., adequate number of rangers, ensuring that new, unauthorized trails are not being cut/maintained, etc.), realization of conservation goals set forth in the Resource and Conservation Element and other goals in the General Plan Update may be problematic.
- q. A policy (e.g., Resource Conservation Element) that provides adequate interim protection of biological resources from the period between the discretionary approval and issuance of grading permits. This time period should also be tracked in City records. Often, there is a considerable lag time between the hearing approval and ministerial permits, which leaves "protected" resources at risk. In most cases, the applicant needs to be clearly held responsible for protecting these resources until the transfer of management responsibility has been transferred (along with any endowment or funding mechanism) to another entity approved by the City and the Wildlife Agencies. Failure to account for this interim protection potentially results in management organizations refusing to assume unanticipated clean-up or restoration obligations and could affect the City from achieving conservation goals for MHCP covered species and habitats.

S4-7.  
cont.

Comments

Responses

<p>S4-7. cont.</p>	<p>r. The General Plan Update should take into account all proposed fuel modification zones and maintenance activities (including a buffer area) when planning conservation goals and habitat preserves, and acknowledge that these zones/activities should be undertaken outside the preserve boundaries, consistent with the obligations of the City's draft SAP. If such zones/activities have to occur in the preserve boundaries due to new fire regulations, then the General Plan Update should identify a policy of no net habitat loss from fuel modification within the preserves.</p> <p>s. To address potential impacts from wildlife movement corridors, a policy to limit brush management in wildlife movement and corridor areas as well as provide bridge and crossing to facilitate movement.</p>	<p>S4-8 This comment recommends that the EIR be updated to provide a status of Daley Ranch and the conservation credits available. The City provides an annual report to the wildlife agencies regarding the status of the credit sales at the Daley Ranch Conservation Bank, as required by the conservation agreement. The discussion of Daley Ranch on page 4.4-5 of the Draft EIR has been revised as follows in response to this comment:</p> <p>Daley Ranch is located in the northeastern portion of the City, north of Dixon Lake and west of Valley Center Road. The Daley Ranch Conservation Bank is an approved mitigation bank to satisfy the environmental mitigation requirements of development projects throughout all of western San Diego County. This 3,058-acre property is heavily covered with a variety of threatened and endangered species. There are thousands of acres of chaparral and coastal sage scrub, several large stands of coast live oak and Engelmann oak woodland, wetlands and non-native grasslands. <u>Within the Conservation Bank there are 2,842 Conservation Credits approved for use as mitigation for five categories of species and habitat: Chaparral and Unoccupied Coastal Sage Scrub, Coast Live Oak Woodland, Engelmann Oak Woodland, and Non-Native Grassland.</u></p>
<p>S4-8.</p>	<p>6. The Department recommends that the draft EIR for the General Plan Update provide an updated status of Daley Ranch and credits available (e.g. page 4.4-5/Focused Planning Areas).</p>	
<p>S4-9.</p>	<p>7. The General Plan should clearly distinguish between "active" and "passive" recreational uses (i.e., provide an inclusive list of both) and describe which uses would be allowed on and adjacent to various types of open space (e.g., City's SAP preserve lands, active parks, urban amenity, etc.). Moreover, the General Plan Update and Implementation/Action Plan should describe how much annual funding goes into administrative versus stewardship and monitoring, management and enforcement.</p>	<p>S4-9 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no response is necessary.</p>
<p>S4-10.</p>	<p>8. The General Plan combines several important areas commonly associated with open space, including recreation, trails, biological conservation, water-resource issues, global climate change, etc. The Department recommends including language in the General Plan Update that would establish biological conservation as the primary objective within the SAP preserve system wherever potential recreation or other resource conflicts may become an issue.</p>	<p>S4-10 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no response is necessary.</p>
<p>S4-11.</p>	<p>9. The General Plan Update should acknowledge the City's open space network (including MHCP preserve lands) as "green capital or infrastructure." This infrastructure is essential to the City's responsibility to balance the preservation of environmental resources with its obligation to meet the region's growth needs. The General Plan Update should include policy language that clearly defines and demonstrates that adequate funding (aside from speculative regional funding sources) is available to carry-out the Plan's "green infrastructure," including implementing the conservation actions, management activities, and necessary enforcement in the SAP.</p>	<p>S4-11 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no response is necessary.</p> <p>S4-12 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no response is necessary.</p>
<p>S4-12.</p>	<p>10. The General Plan and/or Implementation/Action Plan should identify the target number of rangers and preserve managers per 1,000 acres of open space (categorized into biological, active, passive, etc.) and identify an overall goal to have at least one preserve manager in each region or SAP plan area of the City.</p>	<p>S4-13 This comment states that annexation of any lands within the County of San Diego's North County MSCP or South County MSCP into the City would require the approval of the wildlife agencies, and provides contact information for CDFG. The planning area does include lands within the County of San Diego's Draft North County MSCP and South County MSCP. If any of these lands are proposed to be annexed in the future, the annexation process would include obtaining all required approvals, including approval from the wildlife agencies.</p>
<p>S4-13.</p>	<p>11. The planning boundaries for the County's North County (in-progress) and South County (approved) MSCP are located adjacent to the City in various locations. Any annexation of these lands by the City would require approval from the Wildlife Agencies to ensure it would not significantly impact the NC MSCP, including, but not limited to, wildlife movements, covered species, conservation goals and biological core and linkage areas.</p>	

## Comments

## Responses

S4-13.  
cont.

The Department appreciates the opportunity to comment on this draft EIR. We are hopeful that further coordination with us will ensure the protection we find necessary for the biological resources that would be affected by this project. If you have questions or comments regarding this letter, please contact Bryand Duke (858) 637-5511, [Bduke@dfg.ca.gov](mailto:Bduke@dfg.ca.gov) or Randy Rodriguez of the Department (858) 467-4201, [RFRodriguez@dfg.ca.gov](mailto:RFRodriguez@dfg.ca.gov).

Sincerely,



Stephen M. Juarez  
Environmental Program Manager  
California Department of Fish and Game

cc: State Clearinghouse (fax only)  
Janet Stuckrath, U.S. Fish and Wildlife Service  
Diane Sandman, Atkins Global (Emailed copy)  
Kim Howlett, Atkins Global (Emailed copy)

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February 27, 2012



THE CITY OF SAN DIEGO

Mr. Jay Petrek, AICP  
 Project Manager  
 Escondido Planning Division  
 201 N. Broadway  
 Escondido, CA 92078

Dear Mr. Petrek:

Subject: Draft EIR for the Escondido General Plan Update, Downtown Specific Plan, and Climate Action Plan (Case Nos. PHG 09-0020 and 10-0016); SCH No. 2010071064

The City of San Diego Public Utilities Department has reviewed the Draft Environmental Impact Report (DEIR) dated January 12, 2012. In a letter responding to the Notice of Preparation dated August 30, 2010 Public Utilities explained potential issues needing environmental assessment. While the DEIR generally addresses these, there remain several key issues of concern for Public Utilities.

**Summary**

**L1-1.** The City of San Diego shares municipal boundaries with the City of Escondido. The Public Utilities Department (Public Utilities) owns and manages 9,800 acres of land at Hodges Reservoir and the San Pasqual Valley (Map 1). Hodges Reservoir is a drinking source water reservoir connected to the regional aqueduct system. Water from the reservoir is supplied directly to the Santa Fe Irrigation District and San Dieguito Water District, and indirectly to the City of San Diego and to water agencies across the southern half of San Diego county. Groundwater in San Pasqual Valley is a potential source of regional water supply.

City owned land at Hodges Reservoir and in San Pasqual Valley are designated Cornerstone Land preserves in the City's Multiple Species Conservation Program (Map 2).

**L1-2.** We disagree with the conclusion of the DEIR that impacts to water quality will be less than significant. The General Plan Update covers land areas in the catchment of Hodges Reservoir and the San Pasqual Groundwater Basin. Land uses within the catchment directly affect water quality. Regional stormwater regulations do not address salt and nutrient loading at the level

**L1-3.** needed to fully protect drinking water impounded in reservoirs or captured in groundwater

**L1-4.** basins. The DEIR should evaluate the effects of land use changes on the drinking source waters

**Letter L1 - City of San Diego**

**L1-1** This comment is an introduction to the comment letter and provides background information regarding some of the facilities managed by the City of San Diego Public Utilities Department. This comment does not pertain to the accuracy or adequacy of information presented in the Draft EIR. No further response is necessary.

**L1-2** This comment states that the City of San Diego disagrees with the Draft EIR conclusion that impacts to water quality would be less than significant because the project area includes land in the catchment of Hodges Reservoir and the San Pasqual Groundwater Basin. This comment introduces the commenter's specific concerns, which are addressed in responses to comments L1-4 through L1-7. Please refer to the responses to these comments.

**L1-3** This comment states that regional stormwater regulations do not address salt and nutrient loading at the level needed to fully protect drinking water in reservoirs or groundwater basins. The comment does not refer to a specific stormwater regulation. The National Discharge Elimination System (NPDES) permit system, which is enforced by the State Water Resources Control Board and Regional Water Quality Control Boards, protects waters of the U.S. from stormwater discharges, including nutrients and total dissolved solids (TDS) (salts), which would hurt water quality or public health, but are not intended to maintain water quality to potable water standards. The City's NPDES permit, commonly called the MS4 Permit, is Order NO. R9-2007-0001, NPDES NO. CAS0108758. Additionally, the City currently monitors nutrients and TDS as part of its annual dry weather sampling process. As a potable water supplier, the City of San Diego is required to treat reservoir water and groundwater to meet potable water quality standards prior to discharge of the water into the City's potable water system<sup>1</sup>.

**L1-4** This comment requests that the Draft EIR evaluate the effects of land use changes on drinking source waters. The water quality impacts of the development that would be accommodated by the proposed project are addressed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. This section outlines the surface and groundwater resources within and downstream of the General Plan Update planning area, including Hodges Reservoir and the San Pasqual Groundwater Basin, lists applicable regulations that are in place to protect surface and groundwater resources, and discusses the potential for development to adversely affect surface and groundwater resources. No regulations or water quality standards have been adopted that

<sup>1</sup> City of San Diego Public Utilities, Water & Wastewater. 2010. 2010 Watershed Sanitary Survey (CDPH SYSTEM NUMBER 37-10020). March 1.

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establish thresholds for non-point source pollutants to meet drinking water quality standards. However, stormwater regulations protect water quality in surface water by preventing pollutants and runoff from leaving project sites according to the requirements established through the City's MS4 Permit, which includes the City's Standard Urban Stormwater Mitigation Plan (SUSMP) and Hydromodification Management Plan (HMP). Preventing pollutant runoff indirectly protects surface and groundwater sources of drinking water by preventing pollutants from reaching these sources. As discussed in Section 4.9.3.1, Issue 1: Water Quality Standards and Requirements, the General Plan Update would allow land uses and development that would contribute additional point and non-point source pollutants within watersheds that are in violation of water quality requirements. If unregulated, this would result in the increase of a pollutant for which waterbodies in the project area are already impaired, including nutrients and TDS, and would result in the exceedance of applicable surface or groundwater receiving water quality objectives, which would be considered a significant impact. However, existing federal, state, and local regulations are in place to ensure that future non-point source pollutants from land use modification and human activities would not result in significant impacts to water quality, including potential discharges to the San Dieguito River Watershed, which includes Lake Hodges, and the San Pasqual Groundwater Basin. These regulations include, but are not limited to: 1) Clean Water Act (CWA), which establishes water quality standards for all waters of the U.S.; 2) Porter-Cologne Water Quality Control Act, which requires region-specific basin plans; 3) NPDES MS4 Permit (Order No. R9-2007-001), which regulates point source and non-point source discharges to surface waters of the U.S.; 4) San Diego Basin Plan, which sets water quality objectives for the San Diego Basin; 5) City of Escondido Stormwater Management and Discharge Control Ordinance, which controls non-stormwater discharges to the stormwater conveyance system; 6) City of Escondido Grading and Erosion Control Ordinance, which establishes regulations to control erosion from excavation, grading and other construction activities; and 7) City of Escondido Jurisdictional Urban Runoff Management Plan, which establishes strategies to improve the quality of urban runoff. Any point-source discharger of industrial wastes into the City's sewer or stormwater system is required to obtain a permit from the Industrial Waste Program. Additionally, the proposed General Plan Update includes policies that would reduce the potential for surface and groundwater quality requirements to be violated. Water Resources Policy 5.3 requires the implementation of appropriate measures to protect water quality. Water Resources Policies 5.4 and 5.5 restrict development that would impact Lake Wohlford, Dixon Lake, Lake Hodges and Escondido's natural creek system. Water Resources Policies 5.6 through 5.9 identifies measures that would preserve and restore creeks and groundwater basins within the proposed project area. Specifically, Water Resources Policy 5.8 strives to protect Escondido's shallow groundwater basin from contamination by prohibiting post-development runoff from containing pollutant loads that violate water quality objectives, or which have

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L1-5.	downstream. Hodges Reservoir and the San Pasqual Groundwater Basin should be thoroughly discussed, and they should be shown on the project maps.	
L1-6.	Managing pollutant loading in the catchment is key to protecting water quality in the reservoir and the groundwater basin. Land use modification and human activities can significantly alter stream function, disturb critical habitat, and contribute to non point source pollution. It is important that the DEIR discuss and disclose how implementation of the General Plan, including future annexations in Citrus Valley and Lake Hodges neighborhoods, will affect water quality in the catchments of Hodges Reservoir and the San Pasqual Groundwater Basin.	L1-5 This comment requests that Hodges Reservoir and the San Pasqual Groundwater Basin be thoroughly discussed in the Draft EIR. Lake Hodges is discussed in Draft EIR Section 4.9.1.2, Surface Water Hydrology, and impacts to surface water quality, including Lake Hodges, are addressed in Draft EIR Section 4.9.3.1, Issue 1: Water Quality Standards and Requirements. The San Pasqual Groundwater Basin is described in Draft EIR Section 4.9.1.1, Groundwater Hydrology, and potential impacts to the basin are addressed in Draft EIR Section 4.9.3.1, mentioned above, and in Section 4.9.3.2, Issue 2: Groundwater Supplies and Recharge. Therefore, these resources are thoroughly discussed in the Draft EIR.
L1-7.		
<p><b>Specific Comments</b></p>		
<p><b>Chapter 4 Environmental Analysis</b></p>		
L1-8.	<p><i>Table 4.0-2: Regional Plans that Provide the Foundation for Cumulative Analysis</i></p> <p>COMMENT: Please include the City of San Diego’s Multiple Species Conservation Program and associated MSCP Subarea Plan.</p>	<p>The comment also requests that Hodges Reservoir and the San Pasqual Groundwater Basin be included on project maps. Figure 4.9-1, Watersheds, is the figure relevant to this comment. This figure identifies the three watersheds within the General Plan Update boundary. It does not identify the individual surface water bodies within these watersheds, groundwater basins or water resources outside of the General Plan Update boundary. The identification of Hodges Reservoir and the San Pasqual Groundwater Basin would be inconsistent with the format of this figure; consequently, no revisions have been made to it. No other Draft EIR figures are intended to identify water resources. Therefore, Hodges Reservoir and the San Pasqual Groundwater Basin were not added to any Draft EIR figures.</p>
<p><b>4.4 Biological Resources</b></p>		
L1-9.	<p><b>Section 4.4.1, Existing Conditions</b> <b>Page 4.4-1:</b> Please add the following to the first sentence: “...adopted in 2003 (SANDAG 2003), and adjacent to the City of San Diego’s MSCP Cornerstone Land at Hodges Reservoir and San Pasqual Valley.”</p>	
L1-10.	<p><b>Figure 4.4-1, Page 4.4-3:</b> Please show the City of San Diego’s Hodges Reservoir and San Pasqual Valley Cornerstone Lands.</p>	L1-6 This comment states that management of pollutant loading in the catchment is key to protecting water quality and that land modification and human activities can alter stream function, disturb habitat, and contribute to non-point source pollution. The general statements identified in this comment do not specifically address the adequacy or accuracy of information presented in the Draft EIR. However, the topics of drainage alteration and non-point source pollution are addressed in Section 4.9 of the Draft EIR, while the potential for water quality to result in indirect impacts to biological resources is addressed in Draft EIR Section 4.4, Biological Resources. Therefore, the topics identified in the comment have been addressed in the Draft EIR.
L1-11.	<p><b>4.4.1.1, Page 4.4-5:</b> Second paragraph: Add to the sentence, “The portion of San Pasqual Valley in the planning area is located north of the San Dieguito River Valley Regional Open Space Park, also known as the San Dieguito River Park, in the City of San Diego, and occurs on land owned and managed by the Public Utilities Department.”</p>	
L1-12.	<p><b>4.4.1.1, Page 4.4-6:</b> Second paragraph: Change the sentence, “The areas surrounding Lake Hodges Reservoir and along the southern boundary ...are identified as <i>Cornerstone Lands</i>, a core biological area protected in perpetuity (City of San Diego, 1997).”</p>	
L1-13.	<p><b>4.4.2.3, Page 4.4-18:</b> Include a discussion about the City of San Diego’s MSCP Cornerstone Lands, similar to the discussion about the County’s MSCP.</p>	L1-7 This comment recommends that the Draft EIR discuss and disclose how General Plan implementation would affect water quality in the catchments of Hodges Reservoir and the San Pasqual Groundwater Basin. The Draft EIR already provides this information. Potential surface and ground water quality impacts of General Plan implementation are addressed in Section 4.9.3.1, Issue 1: Water Quality Standards. As discussed in this section, existing federal, state, and local regulations are in place to ensure that future non-point source pollutants from land use

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modification and human activities would not result in significant impacts to water quality, including potential discharges to the San Dieguito River Watershed, which includes Lake Hodges, and the San Pasqual Groundwater Basin. These regulations include, but are not limited to, the regulations listed in response to comment L1-4. Additionally, as discussed in response to comment L1-4, the proposed General Plan Update includes policies that would reduce the potential for surface and groundwater quality requirements to be violated. Any land that is annexed into the City of Escondido would be required to comply with all City requirements and the City's General Plan. Therefore, this comment has been adequately addressed in the Draft EIR.

L1-8 This comment requests the Multiple Species Conservation Program (MSCP) and the City of San Diego Subarea Plan be added to Table 4.0-2 in the Draft EIR. The MSCP is already listed in Table 4.0-2. A reference to the City's MSCP Subarea Plan has been added to the MSCP description in response to this comment.

L1-9 This comment requests that the Draft EIR include a reference to City of San Diego Cornerstone Land adjacent to the General Plan Update boundary. Section 4.4.1 of the Draft EIR, Existing Conditions, has been revised as follows:

The City of Escondido is located within the boundary of the MHCP for the Cities of Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista, adopted in 2003 (SANDAG 2003). The General Plan Update planning area outside of the City's boundaries is located within the boundary of County of San Diego's South County and North County MSCP areas, and adjacent to the City of San Diego's MSCP Cornerstone Land at Hodges Reservoir and San Pasqual Valley.

L1-10 This comment requests that Figure 4.4-1 of the Draft EIR, MHCP and MSCP Areas, be revised to include the Cornerstone Lands surrounding Lake Hodges and in San Pasqual Valley. These resources are located entirely outside of the General Plan Update planning area and would not be appropriate to include in this figure. Therefore, no revisions have been made to Figure 4.4-1.

L1-11 The discussion of San Pasqual Valley on page 4.4-5 of the Draft EIR has been revised as follows in response to this comment:

The portion of San Pasqual Valley in the planning area is located just north of San Dieguito River Valley Regional Open Space Park, also known as the San Dieguito River Park, in the City of San Diego, which occurs on land owned and managed by the City of San Diego Public Utilities Department.

L1-12 The discussion of Focused Planning Areas in Section 4.4.1.1 of the Draft EIR has been revised as follows as requested by the commenter. Additionally, references to Lake Hodges throughout the Draft EIR have been revised to Hodges Reservoir.

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The areas surrounding ~~Lake~~ Hodges Reservoir and along the southern boundary of the General Plan Update planning area within the City of San Diego's MSCP Subarea Plan are identified as Cornerstone Lands, a core biological area ~~targeted for conservation~~ protected in perpetuity (City of San Diego 1997).

- L1-13 This comment requests that the City of San Diego's MSCP Cornerstone Lands be added to the list of regional/local regulatory plans that apply to the General Plan Update. The basis for this request is the inclusion of County of San Diego documents in the Draft EIR. The County of San Diego's MSCP plans are included in the Draft EIR because the General Plan Update boundary includes land within the unincorporated County that is subject to the County's MSCP plans. The General Plan Update boundary is adjacent to the City of San Diego's MSCP area, but does not include any areas that are within the boundary of the City that are subject to the San Diego MSCP. Therefore, this plan was not included in the list of regulations that directly pertain to implementation of the General Plan Update. The revision requested in the comment has not been implemented.

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L1-14.	<p><b>4.4.3 Analysis of Project Impacts and Determination of Significance</b>                  The land surrounding Hodges Reservoir and much of the land in the San Pasqual Valley is part of the City of San Diego MSCP Cornerstone Lands<sup>1</sup>. As the foundation of the MSCP these lands support extremely valuable habitat and species dependent on those habitats. The DEIR should address the potential impacts to Cornerstone Lands adjacent to the City of Escondido's boundary.</p>	<p>L1-14 This comment requests that the Draft EIR address potential biological resources impacts to the City of San Diego MSCP Cornerstone Lands adjacent to the General Plan Update boundary. As discussed in response to comment L1-13, no City of San Diego MSCP land is located within the General Plan Update boundary; therefore, no direct impacts to City of San Diego MSCP Cornerstone Lands would occur. Indirect impacts to habitat supporting sensitive species are addressed in Draft EIR Section 4.4.3.1, Issue 1: Special Status Plant and Wildlife Species. As stated in this section, development that would occur outside of the study areas and the City's developed downtown core, which would include areas within the General Plan Update boundary adjacent to the City of San Diego's Cornerstone Lands, would have the potential to result in significant indirect impacts to adjacent habitat supporting sensitive species. However, existing regulations and proposed General Plan Update policies would reduce potential impacts to a less than significant level. For example, Biological and Open Space Resources Policies 1.6, 1.7, 1.8, 1.11, and 1.13 require the following: 1) preservation and protection of significant wetlands, riparian, and woodland habitats and rare, threatened or endangered plants and animals and their habitats; 2) mitigation of resources either onsite or offsite at ratios consistent with state and federal regulations; 3) preparation of surveys for proposed development projects located in areas potentially containing significant biological resources; 4) implementation of appropriate measures to minimize potential adverse impacts on sensitive habitat areas, such as buffering and setbacks; 5) construction of appropriate barriers to restrict access to areas containing sensitive biological resources; and 6) use of native plants for public and private landscaping purposes within the City. Therefore, potential impacts to City of San Diego MSCP Cornerstone Lands have been adequately addressed at a programmatic level in the Draft EIR.</p>
L1-15.	<p><b>4.9 Hydrology and Water Quality</b>                  Overall, this section provides a general description and analysis of water quality issues and regulations, but falls short in addressing the potential effects on the adjacent Hodges Reservoir and San Pasqual Groundwater Basin from implementation of the project. This section needs to fully describe the regional importance of the reservoir and groundwater basin.</p>	<p>L1-15 This comment states that Section 4.9 of the Draft EIR, Hydrology and Water Quality, falls short in addressing potential effect on Hodges Reservoir and the San Pasqual Groundwater Basin. This comment summarizes comments L1-4 through L1-7. Please refer to the responses to these comments.</p>
L1-16.	<p>The City of San Diego has an approved Groundwater Management Plan (GMP) for the San Pasqual Groundwater Basin. This should also be discussed in the DEIR. The General Plan Update should embrace the intent of the GMP and coordinate with the City on protection and enhancement of the basin. The GMP can be viewed at: <a href="http://www.sandiego.gov/water/gen-info/watersupply.shtml">http://www.sandiego.gov/water/gen-info/watersupply.shtml</a>.</p>	<p>L1-16 This comment requests that the City of San Diego's Groundwater Management Plan for the San Pasqual Groundwater Basin be discussed in the Draft EIR. The following discussion has been added to the list of local regulations in Section 4.9, Hydrology and Water Quality, for informational purposes because the San Pasqual Groundwater Basin is partially within the General Plan Update planning area boundary. However, the Groundwater Management Plan only applies to the land within the jurisdiction of the City of San Diego; therefore, future development consistent with the Escondido General Plan Update and within the jurisdiction of the City of Escondido is not subject to this plan.</p>
L1-17.	<p>The City of San Diego is presently assessing all potential local sources of water, including the development of groundwater. While the City has no immediate plans to develop or extract groundwater from the San Pasqual Groundwater Basin, it does figure prominently as a future source of water supply. Therefore, activities within Escondido's jurisdiction that would jeopardize these water resources, including activities that would degrade water quality, should be carefully assessed.</p>	<p><b><u>City of San Diego Groundwater Management Plan for the San Pasqual Valley</u></b>  <b><u>The Groundwater Management Plan (GMP) for the San Pasqual Valley</u></b></p>
L1-18.	<p>The State Water Resources Control Board adopted a Recycled Water Policy (Resolution No. 2009-0011) to increase sustainable local water supplies by increasing the acceptance and use of recycled water to recharge local groundwater basins. This Policy requires the development of salt and nutrient management plans for groundwater basins. The San Pasqual Basin is the first area the City of San Diego will be evaluating to comply with this Policy. We will be collaborating with surrounding jurisdictions, including the City of Escondido, and request this Recycled Water Policy be disclosed in the DEIR.</p>	
L1-19.	<p><b>Section 4.9.1.1 Groundwater Hydrology</b>                  COMMENT:                  Please show the San Pasqual Valley Groundwater Basin on Figure 4.9-1. <i>Section 4.10 Land Use</i></p>	

<sup>1</sup> City of San Diego, March 1997. [Multiple Species Conservation Program](#), City of San Diego MSCP Subarea Plan; City of San Diego, California Department of Fish and Game, US Fish and Wildlife Service, July 15, 1997. [Cornerstone Lands Conservation Bank Agreement](#); US Fish and Wildlife Service, California Department of Fish & Game, City of San Diego, July 16, 1997. [Implementing Agreement to Establish a Multiple Species Conservation Program \("MSCP"\) for the Conservation of Threatened, Endangered, and Other Species in the Vicinity of San Diego, California](#)

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groundwater basin is an adaptive management plan for the basin. The purpose of the GMP is to serve as the initial framework for coordinating the management activities into a cohesive set of Basin Management Objectives (BMOs) and related actions to improve management of the groundwater resource in San Pasqual Valley. The goal of the GMP is to understand and enhance the long-term sustainability and quality of groundwater within the basin, and protect this groundwater resource for beneficial uses including water supply, agriculture, and the environment. This goal is anticipated to be accomplished through five management objectives and five accompanying plan components. The management objectives are: 1) protect and enhance water quality; 2) sustain a safe, reliable, local groundwater supply; 3) reduce dependence on imported water; 4) improve understanding of groundwater elevation, basin yield and hydrogeology; and 5) partner with the agricultural and residential communities to continue to improve implementation of best management practices. The five plan components that are outlined in detail in Chapter 3 of the GMP are stakeholder involvement, a monitoring program, groundwater resources protection, groundwater sustainability, and planning integration. The GMP only applies to the land within the jurisdiction of the City of San Diego; therefore, future development consistent with the Escondido General Plan Update and within the jurisdiction of the City of Escondido is not subject to this plan.

- L1-17 This comment requests that the Draft EIR address potential water quality effects on the San Pasqual Groundwater Basin. This comment reiterates comments L1-4 through L1-7. Please refer to the responses to these comments.
- L1-18 This comment requests that the State Water Resources Control Board Recycled Water Policy (Resolution No. 2009-0011) be included in the list of regulations that are applicable to the analysis of the hydrology and water quality impacts of the proposed project. The Recycled Water Policy is intended to increase the use of recycled water from municipal wastewater sources by providing direction regarding the appropriate criteria to be used in issuing permits for recycled water projects, prescribing criteria that apply to the majority of recycled water projects to maximize consistency, and streamline the process for permitting recycled water facilities. This policy applies specifically to recycled water projects and does not include policies related to the impacts of land development on hydrology and water quality. The policy requires salt and nutrient management plans; however, no plans have been adopted for General Plan Update area, or adjacent areas. Therefore, this policy is not relevant to the Draft EIR analysis and was not included in the Draft EIR.
- L1-19 This comment requests that Figure 4.9-1 of the Draft EIR be revised to identify the San Pasqual Valley Groundwater Basin. As discussed in response to comment L1-5, this revision would be inconsistent with the format and content of the figure. Refer to response to comment L1-5 for a more detailed response.

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L1-20.	<p><b>4.9.3 Analysis of Project Impacts and Determination of Significance</b> We disagree that impacts to water quality will be less than significant. The land uses in the project area that are within the catchments will directly affect water quality. Nonpoint source pollution and sedimentation are of particular concern for water quality.</p>	L1-20	<p>This comment states that the City of San Diego disagrees with the conclusion that impacts to water quality will be less than significant because the proposed land uses will directly affect water quality, specifically as a result on non-point source pollution. Potential water quality impacts resulting from implementation of the proposed project have been thoroughly addressed in the Draft EIR, including impacts from non-point sources. Project compliance with existing regulations would ensure that a significant impact would not occur. Therefore, the City of Escondido maintains the Draft EIR conclusion that impacts to water quality would be less than significant. Refer to response to comment L1-7 for a more detailed response.</p>
L1-21.	<p>The Environmental Protection Agency identifies non point source pollution as the nation’s largest water quality problem<sup>2</sup>. Nonpoint source pollution is more difficult to regulate since the sources spread out over large areas and discharge rates and quantities are unpredictable. Pollutants of particular concern for Hodges Reservoir and the San Pasqual Groundwater Basin are nutrients [nitrogen and phosphorus in their various forms], salts [aka TDS], and total organic carbon. All these can be expected to be present in runoff from residential and commercial development in the area of the General Plan Update.</p>	L1-21	<p>This comment states that non-point sources of nutrients, total dissolved solids, and organic carbon are of particular concern for Hodges Reservoir and the San Pasqual Groundwater Basin. These pollutants are recognized as water quality issues in Section 4.9.1.5, Surface Water and Groundwater Quality, of the Draft EIR and are listed as pollutants that would potentially result from land development under the proposed project in Section 4.9.3.1, Issue 1: Water Quality Standards and Requirements. The potential water quality impacts resulting from implementation of the proposed project have been thoroughly addressed in the Draft EIR, including impacts from non-point sources. Project compliance with existing regulations would ensure that a significant impact would not occur. Refer to response to comment L1-7 for a more detailed response.</p>
L1-22.	<p>Three streams tributary to Hodges Reservoir are in areas identified for potential annexation by the City of Escondido. Water quality in Hodges Reservoir has been degraded by non point source pollution. Additional pollutant and nutrient loading would further degraded water quality.</p>	L1-22	<p>This comment states that three tributaries to Hodges Reservoir are located within the General Plan Update boundary and would have the potential to be degraded by additional non-point source pollution. The Draft EIR recognizes that the San Dieguito River Watershed, which includes Hodges Reservoir and its tributaries, is partially within the General Plan Update boundary in Section 4.9.1.2, Surface Water Hydrology. Impacts to this watershed are addressed in Section 4.9.3.1, Issue 1: Water Quality Standards and Requirements. The potential water quality impacts resulting from implementation of the proposed project have been thoroughly addressed in the Draft EIR, including impacts from non-point sources. Project compliance with existing regulations would ensure that a significant impact would not occur. Refer to response to comment L1-7 for a more detailed response.</p>
L1-23.	<p>Development of land under one acre will not require a NPDES permit and regional stormwater regulations do not address salt and nutrient loading at the level needed to fully protect drinking water source reservoirs. The DERI should clarify how land use changes in the catchment could affect water quality. It should analyze the salt and nutrient loading potential to Hodges Reservoirs and the San Pasqual Groundwater Basin resulting from the proposed project.</p>	L1-23	<p>The first part of this comment states that projects less than one acre in size do not require an NPDES permit. The commenter does not specify what type of NPDES permit they are referring to, such as the MS4, General Industrial or General Construction Permits. As discussed in EIR Section 4.9, Hydrology and Water Quality, although NPDES permits may not be required for construction or operation of all projects, the City’s Standard Urban Stormwater Mitigation Plan (SUSMP), which is required as part of its MS4 permit, establishes</p>
L1-24.	<p><b>4.10 Land Use</b> <b>4.10.2.2, Page 4.10-17:</b> To fully understand the surrounding land uses and provide a comprehensive disclosure of potential impacts, it is recommended that a few paragraphs be added discussing pertinent City of San Diego’s plans, programs, policies, and regulations that will be affected (or not) by the General Plan Update. The City of San Diego’s jurisdiction is adjacent to the City of Escondido. Potential issues affecting natural resources and water resources in this bordering area should be discussed.</p>		
L1-25.	<p><b>4.15 Recreation</b> This section should include an expanded discussion about the San Dieguito River Park Joint Powers Authority and potential impacts to San Diego’s MSCP land because of increased recreation. Trails of the River Park traverse Public Utilities land at Hodges Reservoir and in San Pasqual Valley. Growth in Escondido will lead to a greater pressure for recreation on River Park trails. Growth in Escondido will also lead, inexorably, to more unauthorized access to Public Utilities lands. The Public Utilities Department has a long history of managing public recreation and unauthorized access, especially at Hodges Reservoir and in San Pasqual Valley. Our experience has made it clear that development close to undeveloped rural reservoir properties greatly increases the scope and severity of problems such as trespass, off road vehicles use, degradation of vegetation and soil, trash and hazardous material dumping, and a general increase in pollutants. At Hodges Reservoir and in San Pasqual Valley there are already dozens of</p>		

<sup>2</sup> EPA website, February 27, 2012  
<http://water.epa.gov/polwaste/nps/outreach/point1.cfm>

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stormwater requirements for development projects in the City. The SUSMP includes Priority Development Projects that would disturb less than one acre but would still potentially impact water quality, such as projects that would create 2,500 square feet or more of impervious surface on a site that discharges to receiving waters in an Environmentally Sensitive Area. Draft EIR Section 4.9 has also been updated to include the City of Escondido Hydromodification Management Plan which establishes hydromodification requirements for new development projects to reduce stormwater runoff, including requirements for Priority Development Projects less than one acre in size. Project sites less than one acre in size are required to achieve hydromodification through low impact development (LID) facilities, or small detention facilities in combination with LID facilities. Therefore, certain future development projects that would disturb less than one acre, but have the potential to adversely impact stormwater quality, would still be subject to stormwater regulations.

The second part of this comment states that stormwater regulations do not address salt and nutrient loading to the level needed to fully protect drinking water. Refer to response to comment L1-3. The NPDES permit program protects surface waters of the U.S. from discharges that would hurt water quality or public health, but are not intended to maintain water quality to potable water standards. No regulations or water quality standards have been adopted that establish thresholds for non-point source pollutants to meet drinking water quality standards. However, stormwater regulations protect drinking water resources by limiting or preventing polluted stormwater from leaving individual project sites. Future development under the General Plan Update would be required to comply with all applicable federal, state, and local regulations that are intended to ensure water quality meets adopted water quality standards such as the Clean Water Act (CWA). The Draft EIR includes a thorough analysis of the proposed project's impacts related to applicable water quality standards. Although these standards do not specifically address drinking water standards, the CWA standards are intended in part to protect public health, and include requirements for nutrients and TDS. As a result, these regulations also protect water quality in drinking water resources by minimizing new non-point discharges of nutrients and TDS. As discussed in Section 4.9.3.1, Issue 1: Water Quality Standards and Requirements, compliance with applicable non-point source pollutant requirements would reduce pollutant discharges from development under the General Plan Update, including nutrients and TDS, to a less than significant level.

- L1-24 This comment states that the Draft EIR should clarify how land use changes would affect water quality in catchments for drinking water sources, and salt and nutrient loading to Hodges Reservoir and the San Pasqual Groundwater Basin. Refer to responses to comments L1-7, L1-21, and L1-23. Potential surface and ground water quality impacts associated with implementation of the proposed project, including TDS and nutrient discharges, are addressed in Section 4.9.3.1, Issue 1: Water Quality Standards. As discussed in this section, existing federal, state, and local regulations

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are in place to ensure that future non-point source pollutants from land use modification and human activities would not result in significant impacts to surface water quality. These regulations would indirectly protect drinking water sources, including Lake Hodges and the San Pasqual Groundwater Basin, because the existing standards ensure that non-point source discharges from development under the General Plan Update would meet applicable water quality standards to protect public health and water quality. Stormwater regulations may not protect water quality to potable water quality standards; however, these regulations are not intended to protect water quality to this level and are the water quality standards applicable to land development. Potential water quality impacts resulting from land use changes under the General Plan Update have been thoroughly addressed in the Draft EIR, and no revisions are necessary as a result of this comment.

- L1-25 This comment requests that Section 4.10, Land Use, of the Draft EIR include a discussion of the General Plan Update's impacts on City of San Diego plans, programs, policies and regulations. The General Plan Update boundary does not include any City of San Diego land; therefore, the City's of San Diego's plans and policies do not apply to the proposed project area. The County of San Diego's plans, programs, policies, and regulations are only included in the Draft EIR analysis as they apply to unincorporated County land within the General Plan Update boundary. No other neighboring jurisdictions' plans, such as those adopted by the City of San Marcos, are included in the Draft EIR. The proposed project's potential regional impacts, including impacts to biological resources and water resources, are addressed in their respective environmental topic sections of the Draft EIR. Indirect impacts to adjacent biological resources are addressed in Section 4.4, Biological Resources, and potential impacts to regional watersheds are addressed in Section 4.9, Hydrology and Water Quality. Therefore, no revisions to the Draft EIR are warranted as a result of this comment.
- L1-26 This comment requests that Section 4.15, Recreation, of the Draft EIR include an expanded discussion of the San Dieguito River Park Joint Powers Authority (SDRPJPA) and potential recreational impacts to the City of San Diego's MSCP land. The San Dieguito River Park is discussed in this section because existing Escondido recreational facilities connect to this park. However, the Park itself is outside of the General Plan Update boundary and the SDRPJPA's jurisdiction does not apply to the proposed project area. Therefore, an expanded discussion of the SDRPJPA is not warranted. Draft EIR Section 4.15.3.1, Issue 1: Deterioration of Parks and Recreational Facilities, addresses the potential impacts of the proposed project on existing recreational facilities. As discussed in this section, an increase in population in Escondido would increase the demand for and use of recreational facilities, which could lead to deterioration. However, the proposed General Plan Update, Escondido Climate Action Plan (E-CAP), and Downtown Specific Plan Update policies would ensure that adequate recreational facilities are provided to serve the growing population in Escondido without overburdening existing recreational facilities.

## Comments

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Therefore, the proposed project's potential impacts related to increased recreational use is adequately addressed in the Draft EIR and additional discussion of City of San Diego's recreational resources outside of the proposed project area is not warranted.

- L1-27 This comment states that growth in Escondido will lead to a greater pressure for recreation on River Park trails. Refer to response to comment L1-26. The proposed General Plan Update, E-CAP, and Downtown Specific Plan Update include policies that would ensure that adequate recreational facilities, including trails, are available to serve the growing Escondido population and that growth would not overburden existing facilities. Therefore, the proposed project would not result in a significant impact to trails within the San Dieguito River Park.
- L1-28 This comment states that growth in Escondido near undeveloped areas will lead to unauthorized use of City of San Diego Public Utilities land, specifically Hodges Reservoir and San Pasqual Valley. This comment is speculative and based on the City's notion that development close to undeveloped rural reservoir properties leads to increased unauthorized access. However, the General Plan Update does not propose substantial changes to future growth along the planning area's southern border with land the City of San Diego's public utilities lands, specifically Hodges Reservoir and San Pasqual Valley. Under the General Plan Update, land adjacent to the City of San Diego would generally be designated for open space or low-density residential development. These designations are consistent with existing conditions and would not substantially change as a result of the proposed project. Several Specific Plan Areas are located adjacent to the City of San Diego; however, the plans for these areas have already been adopted and would not be affected or changed by implementation of the General Plan Update. The only land use intensification that would occur adjacent to City of San Diego land is at one existing commercial area (Westfield Shoppingtown Target Area) and one proposed new commercial designation along San Pasqual Valley Road. Because intensified growth would be limited in the areas adjacent to the City of San Diego, the potential for new development as a result of the General Plan Update to result in increased unauthorized access to City of San Diego Public Utilities land would be minimal.

Comments

**L1-28. cont.** unauthorized access points, miles of “volunteer” trails, and continuing problems with vandalism, poaching, homeless encampments, and serious crime.

**L1-29.** The DEIR should explain how the Trail Network Policies will be implemented by the General Plan to reduce impacts to less than significant.

**Chapter 5 Other CEQA Considerations**

**L1-30.** Section 5.1.2, Page 5-3: Fourth paragraph: Add to this sentence, “Additionally, intensified non-residential land uses proposed ...and the Westfield Shoppingtown Target Area would be located in close proximity to the adjacent jurisdictions (City of San Marcos, *City of San Diego*, and unincorporated San Diego County).”

If you have any questions, please contact me at [jpasek@sandiego.gov](mailto:jpasek@sandiego.gov) or at (619) 533-7599.

Sincerely,



Jeffery Pasek  
Watershed Manager

JP/tm

- Enclosures:
1. Map 1, Public Utilities Land: Hodges Reservoir and San Pasqual Valley
  2. Map 2, Cornerstone Lands: Hodges Reservoir and San Pasqual Valley

RMU 2.0

Responses

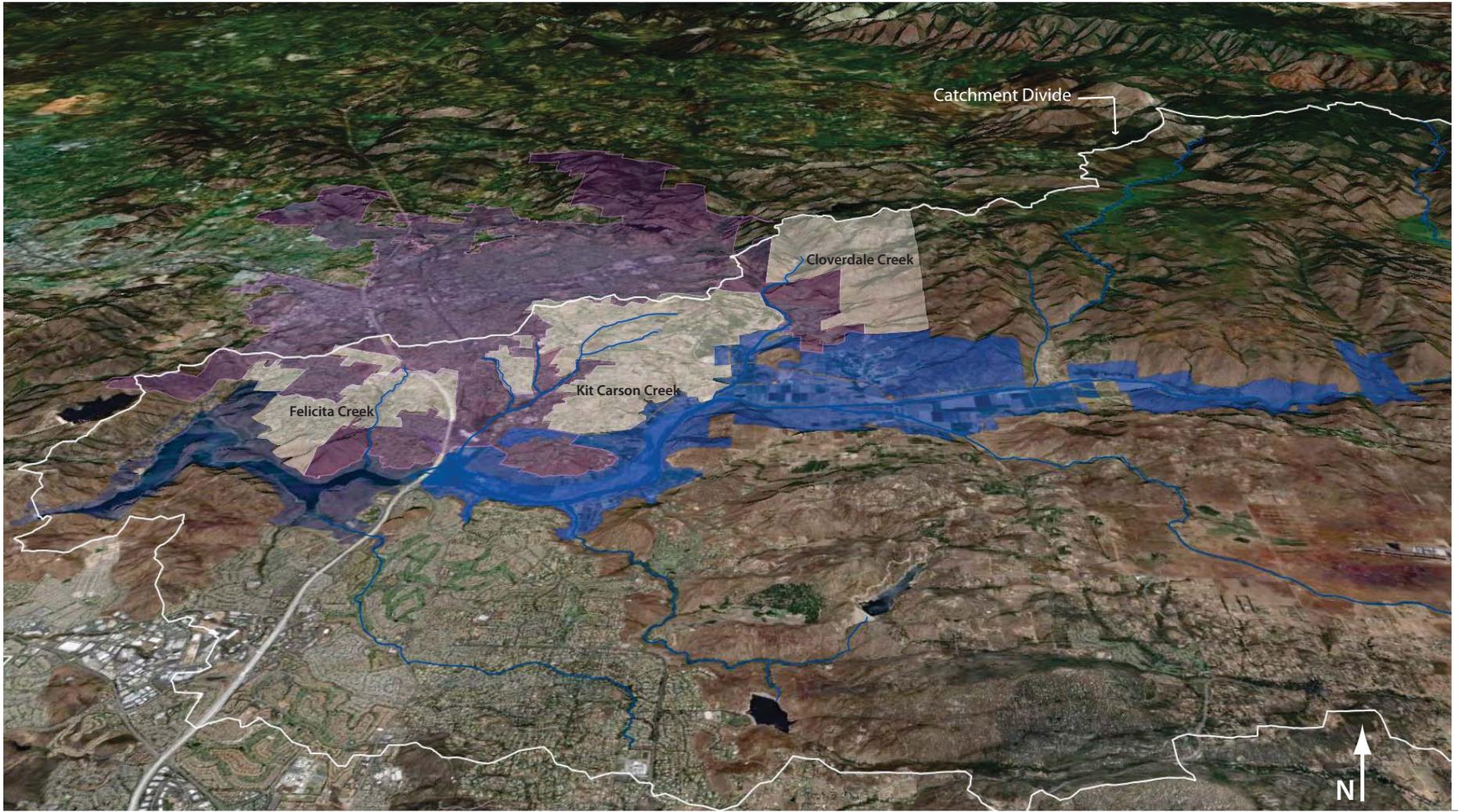
**L1-29** This comment requests an explanation of how the Trail Network Policies will be implemented by the General Plan Update to reduce potential recreational impacts. Similar to implementation of the City of San Diego’s General Plan policies, the City of Escondido would review future development proposals for consistency with the General Plan Update. Additionally, the General Plan Update includes an Implementation Program to ensure that the overall direction set forth in the General Plan is translated from policy to action with timeframes for implementation. The purpose of the Implementation Program is to describe the specific actions Escondido will require of new developments, or will undertake itself, to achieve the General Plan Update policies, including the Trail Network Policies.

**L1-30** This comment requests Draft EIR Section 5.1.2, Employment Growth, to be revised to include the City of San Diego in the list of jurisdictions located adjacent to commercial areas proposed for intensification under the General Plan Update. The EIR discussion has been revised as follows:

The General Plan Update would accommodate new commercial, office, industrial, and other development that would create new sources of employment and therefore result in growth inducement in the proposed project planning area. Additionally, intensified non-residential land uses proposed in the Escondido Research Technology Park (ERTC) North and South SPAs, Nutmeg Street Study Area, Centre City Parkway/Brotherton Road Target Area, and the Westfield Shoppingtown Target Area would be located in close proximity to adjacent jurisdictions (City of San Marcos, City of San Diego, and unincorporated San Diego County).

Comments

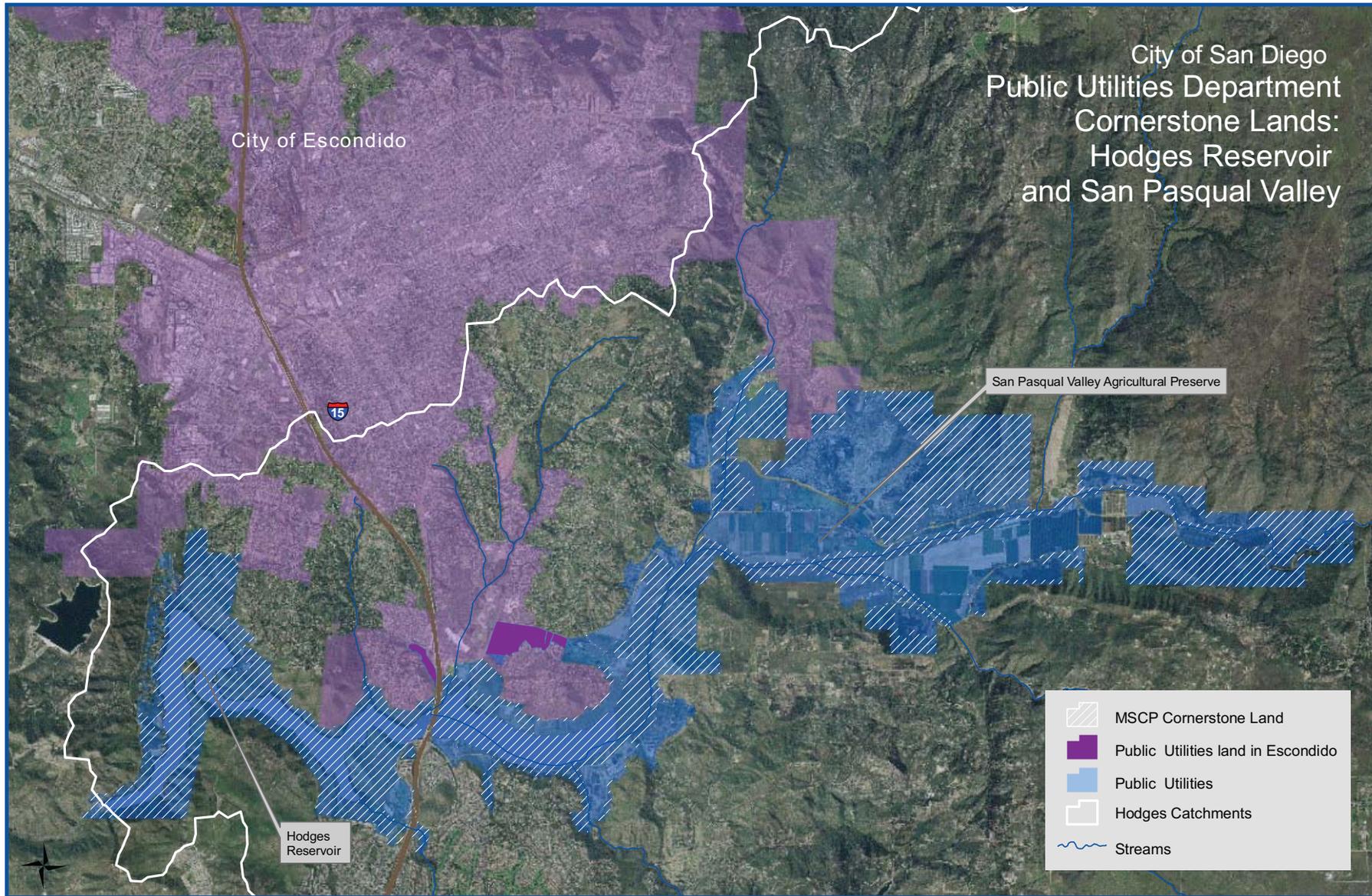
### Public Utilities Land: Hodges Reservoir and San Pasqual Valley



Watershed and Resource Protection  
Image: Google Earth 2012

Map 1

Comments



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Prepared by:  
City of San Diego Public Utilities  
Watershed and Resource Protection Team

Map 2

Comments

Responses



County of San Diego

ERIC GIBSON  
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

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February 24, 2012

Jay Petrek, AICP, Principal Planner  
City of Escondido Planning Division  
201 North Broadway  
Escondido, California 92025

Transmitted via email to: [jpetrek@escondido.org](mailto:jpetrek@escondido.org)

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT, GENERAL PLAN UPDATE, DOWNTOWN SPECIFIC PLAN UPDATE, AND CLIMATE ACTION PLAN**

Dear Mr. Petrek:

The County of San Diego (County) has received and reviewed the City of Escondido's (City) Draft Environmental Impact Report (DEIR), General Plan Update, Downtown Specific Plan Update, and Climate Action Plan dated January 13, 2012 and appreciates this opportunity to comment. In response to the documents, the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an effect on the unincorporated lands of San Diego County. In addition, the comments may identify reasonable alternatives and mitigation measures that the County will need to have explored in the environmental document.

County Department of Planning and Land Use (DPLU), Department of Parks and Recreation (DPR), and Department of Public Works (DPW) have completed their review and have the following comments regarding the content of the above documents:

**GENERAL COMMENTS**

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing

**Letter L2: County of San Diego**

- L2-1 This comment is an introduction to the comments that are addressed in responses to comments L2-1 through L2-32. Therefore, no further response is necessary.
- L2-2 This comment requests that the County of San Diego's Guidelines for determining significance be used for potential impacts to land within the County's jurisdiction. The proposed project study area includes areas currently within the unincorporated county; however, the only way that the City could approve future development in these areas is if the area is annexed into the City. Upon annexation, the City's significance thresholds would apply; therefore, the City's thresholds are the correct thresholds to be used for analysis of the proposed project.

Comments

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L2-2. cont.	<p>potentially significant impacts in the unincorporated portions of the County of San Diego. Project impacts that could have potentially significant adverse effects to the unincorporated County or County facilities should evaluate and mitigate environmental impacts using these guidelines, available online at: <a href="http://www.sdcounty.ca.gov/dplu/procguid.html#guide">http://www.sdcounty.ca.gov/dplu/procguid.html#guide</a>.</p>	L2-3 This comment concurs with information regarding flood control facilities presented in the Draft EIR. Therefore, no further response is necessary.
<b>FLOOD CONTROL</b>		L2-4 This comment pertains only to policies within the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
L2-3.	<p>2. Potential future developments in accordance with the proposed changes to the General Plan may have impacts to existing County flood control facilities, which is acknowledged in the DEIR in Section 4.9.3.5.</p>	L2-5 This comment is an introduction to the comments that are addressed in responses to comments L2-5 through L2-14. Please refer to the responses to these comments.
L2-4.	<p>As previously noted in the County's NOP comment letter dated August 30, 2010, policies related to coordination of flood control facilities managed by other jurisdictions and policies that recognize the potential need for additional hydraulic studies are not included in the draft General Plan Update and should be added.</p> <p>If you have questions on these comments from DPW Flood Control Engineering, please contact Sara Agahi at (858) 694-2665 or by email at <a href="mailto:Sara.Agahi@sdcounty.ca.gov">Sara.Agahi@sdcounty.ca.gov</a>.</p>	L2-6 This comment provides the context for the plan area discussed in comments L2-7 and L2-8. Please refer to the responses to these comments.
<b>LAND USE</b>		
L2-5.	<p>3. As previously noted in the County's NOP comment letter dated August 30, 2010, the City's General Plan Update boundaries extend beyond both the City's boundaries as well as the Sphere of Influence (SOI) boundaries. Per the 2003 State General Plan Guidelines, the planning area boundary encompasses areas "bearing a relation to the city's planning." The Guidelines also state that cities and counties should work together to delineate planning areas. County staff has identified three areas where the draft Escondido General Plan extends beyond the Escondido SOI (see areas A, B and C on attached Figure-1). As such, the County's land use comments below refer only to those areas within the proposed Escondido General Plan Area, but outside of the SOI.</p>	
L2-6.	<p>a. Plan Area A - Located along the eastern boundary of the City, this area is designated Rural Lands 40 under the County General Plan (see Areas A-1 and A-2 on attached Figure-1). These areas are sparsely populated, located outside of the County Water Authority boundary, and contain steep slopes greater than 25 percent. The County General Plan's Guiding Principle 5 emphasizes that development must account for the physical constraints and natural hazards of the land. A discussion of how the existing land use plan for this area compares to the draft Escondido General Plan is provided below.</p>	

Comments

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- L2-7.
  - **Area A-1:** Based on the draft Escondido General Plan, Area A-1 contains most of Valley View Specific Plan Area (SPA) #4, excepting the part of the SPA that is within City limits (see Figure 1). The draft Plan indicates that although the portion of the SPA within the City limits has been developed with 80 units on 133 acres of the 1,590-acre SPA, the City intends for the remainder of the SPA to yield 720 additional units in the portion located within the unincorporated area. This correlates to a density of approximately one dwelling unit per two acres.

It should be noted that although the property owner requested a corresponding density increase as part of the County's General Plan Update (request NC13), the request included in the approved General Plan and the density remains at one dwelling unit per 40 acres. Moreover, previous attempts to annex into the City of Escondido were not successful.
- L2-8.
  - **Area A-2:** The draft Escondido General Plan assigns a Rural I designation to Area A-2. While this is the City's least intensive land use designation, it will still potentially result in a tenfold increase in permitted density when compared to the adopted County General Plan. While the Escondido Rural I designation would allow a density as high as one dwelling unit per four acres, the adopted County Plan's RL-40 designation only allows a maximum of one dwelling unit per 40 acres. Therefore, the Rural I designation is not consistent with the County's General Plan.
- L2-9.
  - b. **Plan Area B -** This area, located north of Lake Wohlford and along the northern boundary of the Escondido SOI, is assigned a Rural I designation in the draft Escondido General Plan (see Figure-1). In some cases that designation matches the County's General Plan for Semi-Rural 4 (one dwelling unit per four acres). However, in other areas (B-2 and B-3) the Rural I designation is inconsistent with the County's designation of RL-40 or RL-20 (one dwelling unit per 40 or 20 acres, respectively). Since the draft Escondido General Plan contains no designation that is consistent with the County's Rural Lands category, the County is opposed to the inclusion of these areas within the draft Escondido General Plan unless a new category of land use designations is created to address the planning goals of these sparsely populated areas. A more detailed discussion of how the existing land use plan for this area compares to the draft Escondido General Plan is provided below.
- L2-10.
  - **Area B-1:** The draft Escondido General Plan assigns a Rural I designation; however, the adopted County General Plan assigns the Open

- L2-7 This comment notes that the Valley View SPA is designated for a development density of one dwelling unit per 40 acres in the County's General Plan and previous attempts to annex this area into the City of Escondido have been unsuccessful. The Draft EIR acknowledges that the existing County designation for this area is one dwelling unit per 40 acres in Section 4.10.1.5, Sphere of Influence and Remaining Planning Area, and Table 4.10-2, Comparison of Planning Area Land Use Designations. Section 4.10.3.2, Issue 2: Conflicts with Land Use Plans, Policies and Regulations, identifies that the City's General Plan Update proposes residential densities for the Valley View SPA that are higher than those identified in the County's General Plan. The Draft EIR acknowledges that the proposed project would conflict with the land use designations identified in the County's General Plan; however, the City does not currently have land use jurisdiction in these areas. The portions of the unincorporated area within the City's General Plan Update boundary are included for planning purposes only, should these areas be annexed in the future. Therefore, the City's land use designation would not apply to these areas unless the unincorporated area was annexed into the City. In the event of annexation, the City's General Plan would be the applicable land use plan for the area. It should be noted that the existing General Plan Update (1990) also included these unincorporated areas within the General Plan Update boundary for planning purposes only. Further, the previous attempts to annex this area do not preclude the area from being annexed in the future. Therefore, the applicable portions of this comment have already been addressed in the Draft EIR.
- L2-8 This comment states that the Escondido General Plan Update proposed land use designation of Rural I in the unincorporated area referred to as Area A-2 in the comment is inconsistent with the adopted County General Plan land use designation of RL-40 for this area. The Draft EIR acknowledges that the existing County and General Plan Update designations for this area are different in Table 4.10-2, Comparison of Planning Area Land Use Designations. Section 4.10.3.2, Issue 2: Conflicts with Land Use Plans, Policies and Regulations, acknowledges that the proposed project would conflict with the land use designations identified in the County's General Plan and the community plan for North County Metro; however, the City does not currently have land use jurisdiction in these areas. The portions of the unincorporated area within the City's General Plan Update boundary are included for planning purposes only, should these areas be annexed in the future. Therefore, the City's land use designation would not apply to these areas unless the unincorporated area was annexed into the City. In the event of annexation, the City's General Plan would be the applicable land use plan for the area. It should be noted that the existing General Plan Update (1990) also included these unincorporated areas within the General Plan Update boundary for planning purposes only. Therefore, the applicable portions of this comment have already been addressed in the Draft EIR.

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As discussed in Section 2.9 of the San Diego County General Plan Update EIR, Land Use, the County's General Plan proposes land use designations in unincorporated areas within the Spheres of Influence (SOI) of adjacent jurisdictions that are substantially different than those adopted in the general plans prepared by the cities that may annex those SOI areas. However, these areas are not yet under the jurisdiction of the adjacent cities. Therefore, the County's Draft EIR determined that the proposed differences would not result in any conflicts with applicable land use plans<sup>2</sup>. Similarly, the Escondido General Plan Update and County General Plan land use designations do not conflict with each other because only one land use designation would be applicable to future proposed development.

- L2-9 This comment provides the context for comments L2-10 through L2-12. Please refer to the responses to these comments.
- L2-10 This comment states that the Escondido General Plan Update proposed land use designation of Rural I in the unincorporated area referred to as Area B-1 in the comment is inconsistent with the adopted County General Plan land use designation of Open Space Conservation in this area. The Draft EIR acknowledges that the adopted County General Plan and proposed Escondido General Plan Update designations for this area are different in Table 4.10-2, Comparison of Planning Area Land Use Designations. However, as discussed in detail in response to comment L2-8, the Escondido General Plan Update and County General Plan land use designations do not conflict with each other because only one land use designation would be applicable to future projects proposed in this area. The City's proposed land use designation would not apply to this area unless it was annexed into the City. Additionally, the Escondido General Plan Update does designate a portion of Area B-1 as Public Land/Open Space.

<sup>2</sup> County of San Diego Department of Planning and Land Use. 2011. San Diego County General Plan Update, Final Environmental Impact Report (SCH #2002111067). August.

Comments

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L2-10. cont.	Space Conservation designation since these areas are part of an existing open space preserve.	
L2-11.	<ul style="list-style-type: none"> <li>• <b>Area B-2:</b> The draft Escondido General Plan assigns a Rural I designation, which would result in a tenfold density increase over the adopted County General Plan (one dwelling unit per four acres vs. one dwelling unit per 40 acres). Most of Area B-2 is characterized by steep slopes and sensitive natural resources. Moreover, this area provides a buffer between Escondido and Valley Center.</li> </ul>	L2-11 This comment states that the Escondido General Plan Update proposed land use designation of Rural I in the unincorporated area referred to as Area B-2 in the comment is inconsistent with the adopted County General Plan land use designation of RL-40. The Draft EIR acknowledges that the adopted County General Plan and proposed Escondido General Plan Update land use designations for this area are different in Table 4.10-2, Comparison of Planning Area Land Use Designations. However, as discussed in detail in response to comment L2-8, the Escondido General Plan Update and County General Plan land use designations do not conflict with each other because only one land use designation would be applicable to future projects proposed in this area. The City’s proposed land use designation would not apply to this area unless it was annexed into the City. With regard to the portion of the comment that states the area contains steep slopes and sensitive natural resources, it should be noted that Escondido’s Rural I designation is slope dependent. Maximum densities are allowed on the following slope categories: 0-25 percent = 1 dwelling unit (du)/4 acres; 25-35 percent = 1 du/8 acres; 35+ percent = 1 du/20 acres. Additionally, Draft EIR Section 4.1.3.1, Issue 1: Scenic Vistas, identifies that future development would be required to comply with the City’s Grading and Erosion Ordinance, which includes requirements for development on steep slopes, and Draft EIR Section 4.4.3.1, Issue 1: Special Status Plant and Wildlife Species, future development would be required to comply with applicable federal, state and local regulations in place to protect special status species. Regarding the portion of the comment that states that the area provides a buffer between Escondido and Valley Center, the proposed low-density Rural I designation would accommodate low-density residential development and would maintain the buffer between high-intensity development in the City and the rural areas of the Valley Center community. Therefore, no revisions to the Draft EIR are necessary in response to this comment.
L2-12.	<ul style="list-style-type: none"> <li>• <b>Area B-3:</b> The draft Escondido General Plan assigns a Rural I designation, while the County Plan’s designation for this area is RL-20. The area is located along Lake Wohlford Road, which gives it greater accessibility than the neighboring lands designated RL-40 and RL-80. The RL-20 designation is consistent with the County’s Community Development Model to assign Rural Lands designations on the periphery of communities (Valley Center) and create a buffer with adjacent communities (Escondido).</li> </ul>	
L2-13.	c. Plan Area C - This area is located near the unincorporated communities of Harmony Grove and Elfin Forest. The County Plan identifies an approved Specific Plan in the area and has designated many of the surrounding parcels (between the SPA and the City of Escondido) as one dwelling unit per 10 or 20 acres, or as open space. The draft Escondido General Plan assigns a range of higher density designations between Rural I and Estate II. The County’s General Plan emphasizes the importance of maintaining the individual character of a community through appropriate buffers between communities; an objective that is supported by the County’s lower semi-rural and rural designations. Consequently, there are numerous individual differences between the County’s and City’s general plans in this area.	
L2-14.	4. Due to the significant differences between the two plans, County staff is interested in better understanding the City of Escondido’s intentions to annex these regions in the future. Past discussions with City staff seem to indicate that the City may have no intention of annexing some areas shown within the proposed Planning Area Boundary of the draft General Plan. If there is no foreseeable expectation that such lands will be annexed, then it would be appropriate to remove them from the Escondido General Plan planning area, since in many instances there is no comparable designation to the designation assigned by the County Plan. Alternatively, the County recommends that Escondido create a land use designation that matches the County’s definition of	L2-12 This comment states that the proposed Escondido General Plan Update land use designation of Rural I in the unincorporated area referred to as Area B-3 in the comment is inconsistent with the adopted County General Plan Designation of RL-20. The Draft EIR acknowledges that the existing County General Plan and proposed Escondido General Plan Update land use designations for this area are different in Table 4.10-2, Comparison of Planning Area Land Use Designations. However, as discussed in detail in response to comment L2-8, the Escondido General Plan Update and County General Plan land use designations do not conflict with each other because only one land use designation would be applicable to future projects proposed in this area. The City’s proposed land use designation would not apply to this area unless it was annexed into the City. Regarding the portion of the comment that states that the area provides a buffer between Escondido and Valley Center, as discussed in response to comment L2-11, the proposed low-density Rural 1 designation would accommodate low-density

## Comments

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residential development and would maintain the buffer between high-intensity development in the City and the more rural Valley Center community. Therefore, no revisions to the Draft EIR are necessary in response to this comment.

- L2-13 This comment states that the proposed Escondido General Plan Update land use designations of Rural I and Estate II in the unincorporated area referred to as Area C in the comment is inconsistent with the adopted County General Plan designations of one dwelling unit per 10 or 20 acres, or open space. The Draft EIR acknowledges that the existing County General Plan and proposed Escondido General Plan Update land use designations for this area are different in Table 4.10-2, Comparison of Planning Area Land Use Designations. However, as discussed in detail in response to comment L2-8, the Escondido General Plan Update and County General Plan land use designations do not conflict with each other because only one land use designation would be applicable to future projects proposed in this area. The City's proposed land use designation would not apply to this area unless it was annexed into the City. Regarding the portion of the comment that states that the area provides a buffer between Escondido and adjacent unincorporated communities, the proposed low-density Rural I, Estate I, and Estate II designations would accommodate low-density residential development and would maintain the buffer between high-intensity development in the City and adjacent unincorporated communities. Therefore, no revisions to the Draft EIR are warranted in response to this comment.
- L2-14 This comment requests information regarding the City's plans for annexation and requests that unincorporated areas for which there are no foreseeable plans for annexation be removed from the Escondido General Plan Update boundary. This comment does not address the accuracy or adequacy of information contained in the Draft EIR. The proposed project is a planning document and does not propose any specific future development projects for which annexation would be required. The unincorporated areas within the General Plan Update boundary are included for planning and informational purposes only, and are considered areas that could be annexed into the City in the future. Much of the area within the Escondido General Plan Update is within the City's Sphere of Influence (SOI) which provides parameters for the City's ultimate corporate boundaries. Establishing the City's vision for these areas in the event of potential annexation is an appropriate component of the General Plan process. Further, the portion of the City's General Plan Update boundary that lies outside the City's SOI orients toward the City and has a bearing on the City's planning efforts. Therefore, it is appropriate to designate this portion of Escondido's General Plan Update in concert with the community's vision for planning purposes.

This comment also requests that the City create a land use designation that matches the County's definition of Rural Lands. This comment pertains only to the proposed General Plan Update and does not address the adequacy or accuracy of information presented in the Draft EIR. However, as discussed in Section 4.1.3.3,

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L2-14. cont. Rural Lands to more appropriately characterize the existing land uses and preserve the rural character of outlying lands in these areas.  
If you have questions on these comments from DPLU General Plan staff, please contact Bob Citrano at (858) 694-3229 or [Robert.Citrano@sdcounty.ca.gov](mailto:Robert.Citrano@sdcounty.ca.gov).

Issue 3: Visual Character or Quality, of the Draft EIR, the proposed Rural and Estate General Plan Update land use designations are similar to existing conditions in the unincorporated areas and would accommodate only limited new residential development (a total of 500 homes throughout the City’s entire SOI). Therefore, the City does not feel it is necessary to create a new land use designation that matches the County’s definition of Rural Lands. No revisions to the Draft EIR have been made in response to this comment.

**MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP)**  
L2-15. 5. Planning Areas A and B as identified on the Attached Figure-1 and discussed under the Land Use section above have the potential to impact existing Pre-Approved Mitigation Area (PAMA) in the County’s MSCP South County Subarea as well as potential future PAMA in the County’s proposed North County MSCP. While the DEIR discusses the need to comply with habitat conservation plans, it does not adequately analyze or disclose how the proposed land uses and densities could be accomplished without substantially affecting PAMA. Therefore, and for reasons noted above, the County requests that these areas within the unincorporated lands but outside of the SOI be removed from the City’s planning documents.

L2-15 This comment requests that the unincorporated lands within the General Plan Update boundary, but outside of the City’s Sphere of Influence (SOI) be removed from City planning documents because the Draft EIR does not disclose how the proposed land uses could be accommodated without affecting the County’s Pre-Approved Mitigation Area (PAMA). As discussed in Draft EIR Section 4.4.1.1, General Biological Setting, the southeastern area of the General Plan Update planning boundary near San Pasqual Valley includes an adopted PAMA under the County’s MSCP South County Subarea Plan. Additionally, this section states that the portion of the North County MSCP within the General Plan Update planning boundary includes areas within the proposed PAMA within the Escondido Creek Watershed including areas to the east of the City boundary and most of the land surrounding Daley Ranch and along I-15. The PAMA in the North County MSCP subarea is part of the draft subarea plan and has not yet been adopted. Additionally, as discussed in Draft EIR Section 4.4.3.1, Issue 1: Special Status Plant and Wildlife Species, future development under the General Plan Update would be required to comply with adopted MHCPs. The proposed project is a programmatic planning document and does not propose any specific development projects; therefore, the programmatic analysis provided in the Draft EIR is adequate to address the issue and does not require a more detailed response. It should be noted that the County of San Diego’s General Plan also designates the southeastern area of the Escondido General Plan Update planning area near San Pasqual Valley and the area surrounding Daley Ranch for low-density residential development, similar to the Escondido General Plan Update<sup>3</sup>. As discussed in response to comment L2-8, the unincorporated areas are included in the General Plan Update boundary for planning purposes only. The proposed land uses designations would only apply if this land were someday annexed into the City. No change to the County’s land use designations or jurisdiction would occur as a result of the proposed project. Therefore, no revisions have been made to the General Plan Update boundary or Draft EIR in response to this comment.

L2-16. 6. Please note that throughout the DEIR the County of San Diego Draft North County MSCP is incorrectly referred to as a Subarea. It is proposed as a stand-alone habitat conservation plan.  
If you have questions on these comments from DPLU Multiple Species Conservation Program staff, please contact Bobbie Stephenson at (858) 694-3680 or [Bobbie.Stephenson@sdcounty.ca.gov](mailto:Bobbie.Stephenson@sdcounty.ca.gov).

**PARKS AND RECREATION**

L2-17. 7. All Land Use maps incorrectly designate Assessor’s Parcel Numbers (APNs) 238-021-07 and 238-010-57 as “Residential”. These parcels were acquired by the County for inclusion in the Del Dios Highlands Preserve and Escondido Creek Preserve, respectively, and should be designated “Public Land/Open Space”.

L2-18. 8. **Page 4.15-1, Existing Parks** – The last sentence of this paragraph indicates that, with the exception of Felicita Park, all parks within the project area (as identified in Figure 4.15-1) are operated by the City. However, this section should be revised to clarify that the City also does not operate the San Diego County Open Space areas identified in Figure 4.15-1 (#28).

L2-19. 9. **Figure 4.15-1 Park and Recreational Facilities** –  
a. This figure should be revised to include APNs 238-021-07, and 238-010-57 as San Diego County Open Space.

L2-20. b. The San Diego County Open Space Areas should be called out by name (i.e., Escondido Creek Preserve and Del Dios Highlands Preserve).

<sup>3</sup> County of San Diego Department of Planning and Land Use. 2011. San Diego County General Plan, Land Use Map Appendix. August.

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- L2-16 This comment states that the North County MSCP is incorrectly referred to as a subarea plan in the Draft EIR. Section 4.5, Biological Resources, and Section 4.10, Land Use, of the Draft EIR have been revised to remove any references to the North County MSCP as a subarea.
- L2-17 This comment states that two open space parcels within the Escondido General Plan Update boundary should be designated as Public Lands/Open Space rather than Rural I (residential) in the General Plan Update. These parcels are located within the unincorporated area and are currently under the jurisdiction of the County. As discussed in response to comment L2-8, the unincorporated areas are included in the General Plan Update boundary for planning purposes only. The Escondido General Plan Update Open Space areas reflect large areas of designated open space. Smaller, parcel-sized open space areas may be included in areas within another land use designation. Regarding the open space parcels identified in the comment, the General Plan Update proposes land use densities of one dwelling unit per four to 20 acres surrounding the parcels. The proposed land use designations would only apply if the areas surrounding these parcels were annexed into the City in the future. In the event of annexation, the open space parcels would remain undeveloped but the areas surrounding the open space parcels would be allowed to develop consistent with the City's land use designation. As existing, dedicated, open space land owned by the County, it is unlikely that the two open space parcels would be annexed, or proposed for annexation, into the City. Therefore, these parcels would remain open space land under the jurisdiction of the County, regardless of surrounding development. No revisions to the Draft EIR are necessary in response to this comment.
- L2-18 This comment states that the Section 4.15, Recreation, of Draft EIR should be revised to clarify that the City does not operate the San Diego County Open Space Area. The discussion of Existing Parks in Section 4.15.1.1, Parks, has been revised as follows.
- All parks within the proposed project area are operated by the City, with the exception of Felicita County Park and the San Diego County Open Space Area, which is are owned and operated by the County of San Diego Department of Parks and Recreation.
- L2-19 This comment states that Figure 4.15-1, Parks and Recreational Facilities, should be revised to include two parcels as open space areas. These are the same two parcels that are addressed in comment L2-17. Figure 4.15-1 depicts parks and recreational facilities within the General Plan Update boundary. The recreational area of the Del Dios Highlands Preserve within the City's jurisdictional boundary is included in this map as the San Diego County Open Space Area (#28). Therefore, this recreational resource has been included in Figure 4.15-1. APN 238-021-07 was acquired as part of the Del Dios Highlands Preserve; however, the General Plan Update is not intended to be parcel specific. This parcel is located within the City's SOI within a

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larger area designated for rural residential development. APN 238-10-57 was acquired as part of the Escondido Creek Preserve, which is not open to the public<sup>4</sup>; therefore, it is not considered an existing public recreational resource and is not included in Figure 4.15-1. Additionally, APN 238-10-57 is located within a larger area designated for rural residential development. As discussed in response to comment L2-17, as dedicated open space land owned by the County of San Diego, it is unlikely that the two open space parcels would be annexed, or proposed for annexation, into the City. These parcels would remain open space land under the jurisdiction of the County, regardless of the land use designation identified in the City's General Plan. No revisions to the Draft EIR have been implemented as a result of this comment.

- L2-20 This comment states that County of San Diego open space areas should be called out by name in Figure 4.15-1, Parks and Recreational Facilities. Figure 4.15-1 has been revised to identify the Del Dios Highlands Preserve as a County open space area. As discussed in response to comment L2-19, the Escondido Creek Preserve is not included on this figure because it is not open to the public; therefore, no revision to Figure 4.15-1 has been made with respect to this resource.

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<sup>4</sup> County of San Diego Parks and Recreation. 2011. Resource Management Plan for Escondido Creek Preserve San Diego County. June.

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- L2-21. 10. **Table 4.15-1 Escondido Park Facilities** – This table should be revised to include Escondido Creek Preserve and Del Dios Highlands Preserve under Regional Open Space Parks.
- L2-22. 11. **Page 4.15-8, Trails** – The last sentence inaccurately states that all trails within the proposed project area (as identified in Figure 4.15-2) are owned and operated by the City. However, the spur trail depicted in the figure from Del Dios Highway to Harmony Grove Road crosses through the County’s Del Dios Highlands Preserve. There is an existing rural trail within the Preserve that connects to the Elfin Forest Recreational Reserve property trail system and Harmony Grove Road to the west; however, these trails are not owned or operated by the City. Therefore, it is recommended that the last sentence be deleted to avoid confusion.  
  
If you have questions on these comments from DPR staff, please contact Trish Boaz at (858) 966-1370 or [Trish.Boaz@sdcounty.ca.gov](mailto:Trish.Boaz@sdcounty.ca.gov).

- L2-21 This comment states that Table 4.15-1, Escondido Park Facilities, should be revised to include the Escondido Creek Preserve and Del Dios Highlands Preserve. Table 4.15-1 has been revised to include the Del Dios Highlands Preserve. The Escondido Creek Preserve is not open to the public; it is not considered an existing recreational resource and was not included in the table.
- L2-22 This comment states that the discussion of trails in Section 4.15.1.2, Trails, of the Draft EIR should be revised to clarify that the City does not operate spur trails in unincorporated areas. The referenced sentence has been revised as follows in response to this comment:  
  
All trails within the proposed project area are owned and operated by the City, with the exception of the spur trail that traverses the County of San Diego’s Del Dios Highlands Preserve.
- L2-23 This comment requests three roadways to be added to the Traffic Impact Analysis prepared for the proposed project by LLG Engineers (2011). It does not specify what segments of these roadways should be included. Deer Springs Road, west of I-15 in the unincorporated County was included in the Traffic Impact Analysis, as well as Harmony Grove Road from Kuana Loa Drive to Country Club Lane. The analysis determined that implementation of the proposed project would not result in a significant impact to these segments of Deer Springs Road and Harmony Grove Road. Lake Wohlford Road is designated as a Collector Road in Escondido’s Mobility and Infrastructure Element for the segment between Valley Center Road and Foxley Drive, and as a Local Collector for portions east of Foxley Drive. In response to this comment, impacts to Lake Wohlford Road were analyzed and the results are provided in Table L2-23. As shown in Table L2-23, Lake Wohlford Road would operate at an acceptable level of service with implementation of the proposed project.

**TRAFFIC / TRANSPORTATION**

- L2-23. 12. **Roadways Not Assessed** - There are various roadways within Escondido’s General Plan Boundary/Sphere of Influence that are within the current unincorporated area of San Diego County. These roadways, which are on the County of San Diego’s General Plan Mobility Element Network, are adjacent to and/or affected by traffic from the City of Escondido. The DEIR and Traffic Impact Analysis (TIA) should assess any direct and cumulative impacts and identify appropriate mitigation for these roadways which were not assessed in the DEIR:
  - Deer Springs Road
  - Lake Wohlford Road
  - Harmony Grove Road
- L2-24. 13. **Mobility Element / Circulation Inconsistencies** – There are several major inconsistencies for roadway classifications within the unincorporated area between the City of Escondido’s Draft General Plan Update Mobility and Infrastructure Element-Circulation System and the County’s General Plan Mobility Element Network. The DEIR should identify the discrepancies in

**Table L2-23. Lake Wohlford Road Traffic Impact Analysis**

Street Segment	Existing Capacity (LOS E) <sup>a</sup>	Existing			Existing + Project			Proposed Project (Year 2035)		
		ADT	LOS	V/C	ADT	LOS	V/C	ADT	LOS	V/C
<b>Lake Wohlford Road</b>										
Valley Center to Foxley Road	15,000	6,300	B	0.42	10,800	C	0.72	10,800	A	0.32
Foxley Road to within the City of Escondido Sphere of Influence	15,000	6,300	B	0.42	10,800	C	0.72	10,800	C	0.72

a. Capacities based on City of Escondido Roadway Classification & LOS table (See *Table 3-1* of the TIA [Draft EIR Appendix I1]).  
ADT = Average Daily Traffic; LOS = Level of Service; V/C = Volume to Capacity ratio.  
Source: LLG 2012. Memorandum Re: Escondido General Plan Update Response to Traffic Comments on DEIR dated January 12, 2012 (TIA 12/5/11). March 8.

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proposed roadway classifications or update the classifications in the City's Draft General Plan Update to reflect the County's adopted General Plan Mobility Element. The roadway classification inconsistencies are identified below:

Roadway	Escondido GP Update	County of San Diego GP
<b>Broadway</b> (DEIR-Pg.4.16-30) • Mtn Meadow Rd to North Av	4-lane: Collector	2-lane: 2.1D Community Collector
<b>Valley Center Road</b> (Pg.4.16-31) • North of Lake Wohlford Rd	8-lane: Prime Arterial	4-lane: 4.1A Major Road
<b>Del Dios Highway</b> (Pg.4.16-32) • Via Rancho Pkwy to Mt Israel Rd	6-lane: Super Major	2-lane: 2.1D Community Collector
<b>Bear Valley Parkway</b> (Pg.4.16-34) • Mary Ln to Sunset Dr • Sunset Dr to San Pasqual Vly Rd	8-lane Prime Arterial 6-lane: Super Major	4-lane: 4.1A Major Road
<b>Lake Wohlford Road</b> (DEIR-Fig.3-6) • North of Guejito Rd	4-lane: Collector	2-lane: 2.2F Light Collector

*Link to the County's General Plan and Mobility Element Network maps:  
<http://www.sdcounty.ca.gov/dplu/generaplan.html>*

L2-24.  
cont.

L2-25.

L2-26.

L2-27.

14. **County Guidelines** - The DEIR/TIA should reference and use the County's Guidelines for Determining Significance (modified February 19, 2010) for any traffic analysis of direct and cumulative impacts on roadway segments and intersections within the County's jurisdiction.

*Link to the County's Traffic Guidelines:  
[http://www.sdcounty.ca.gov/dplu/docs/Traffic\\_Guidelines.pdf](http://www.sdcounty.ca.gov/dplu/docs/Traffic_Guidelines.pdf)*

15. **Level of Service** - Page 4.16-2 notes that Level of Service (LOS) is based upon the City's Roadway Classification, Level of Service, and Average Daily Trip (ADT) Table (Table 4.16-1). The County requests that any LOS assessment for roadways within the County's jurisdiction utilize the County's LOS thresholds and road classifications per the County's Public Road Standards (Table 1).

*Link to the County's Public Road Standards:  
<http://www.sdcounty.ca.gov/dpw/docs/pbrdstds.pdf>*

16. **Traffic Impacts to Unincorporated Area** - The General Plan and DEIR should note that future development projects within the City of Escondido should also propose mitigation for significant traffic impacts to roadway facilities within the unincorporated area. Potential mitigation measures for significant traffic impacts can include traffic signal improvements, physical road improvements, street re-

L2-24 This comment requests that the roadway classifications in the proposed Mobility and Circulation Element be revised to be consistent with the County of San Diego's Mobility Element Network. The comment falsely identifies Lake Wohlford Road north of Guejito Road as a 4-lane Collector in the Escondido General Plan Update, when it is actually a 2-lane Local Collector. This is consistent with the County's identification of this roadway segment as a 2-lane Light Collector. Figure 3-6 in the EIR has been updated to identify this segment as a Local Collector. Table 4.16-2, Existing and Proposed Roadway Operations, has been revised to disclose the differences between the existing County of San Diego roadway classifications and the proposed Mobility and Circulation Element classifications. However, as discussed in response to comment L2-8, the unincorporated areas are included in the Escondido General Plan Update boundary for planning purposes only. The roadway classifications identified in the Escondido General Plan Update would only apply if the area containing these roadways were annexed into the City; otherwise they would remain under the jurisdiction of the County. Therefore, the proposed roadway classifications and the County's classifications do not conflict because only one designation would be applicable to future proposed development.

L2-25 This comment states that the Draft EIR should reference and use the County's Guidelines for Determining Significance for traffic impacts to roadways currently within the County's jurisdiction. The proposed project study area includes areas of the unincorporated County for planning purposes only; in order for the City's proposed land use designations and roadway classifications to be implemented, these areas would require annexation. Once annexed, the City's significance thresholds would apply; therefore, the City's thresholds are the correct thresholds to use for the analysis of environmental impacts associated with implementation of the proposed project.

L2-26 This comment requests that the County's level of service thresholds be used in the Traffic Impact Analysis prepared for the proposed project. Refer to response to comment L2-25 for the response to this comment.

L2-27 This comment states that the Draft EIR should note that future development projects should propose mitigation for significant traffic impacts to roadways within the unincorporated areas. As discussed in Section 2.3, Intended Use of the EIR, the Draft EIR is program EIR that addresses the potential future development in the General Plan Update area during the planning horizon (year 2035), including the Downtown Specific Plan Update and E-CAP. While the EIR intends to identify potential impacts that would result from project implementation, the level of analysis is not detailed to the level of site specificity, nor is it intended to be accurate to this level of specificity. However, as noted in the Draft EIR in Section 2.3, future development projects would also be subject to CEQA. If is determined

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**L2-27. cont.** striping and parking prohibitions, fair share contributions toward identified, funded and scheduled projects, and transportation demand management programs. Fairshare contributions to the County's Transportation Impact Fee (TIF) program should be considered to mitigate cumulative traffic impacts. The fairshare contributions should be based upon the amount of project trips that will be distributed onto County roadways.

**L2-28.** 17. **County Roadways** - Tables in the DEIR and TIA (e.g., DEIR-4.16-2) should note which roadways are within the County's jurisdiction.

18. **Figure 3-6 / Circulation System Inconsistencies** – Figure 3-6 is missing the Super Major classification. In addition, there are various discrepancies between Figure 3-6 and tables within the DEIR. Examples of discrepancies include:

- Via Rancho Parkway is shown as a Major Road in Figure 3-6 while in Table 3-6 it is proposed as a Collector
- Bear Valley Parkway is shown as a Major Road in Figure 3:6, while in Table 3-6 it is proposed as a Prime
- Del Dios Highway appears to be Major Road in Figure 3-6, but is designated as a 6-lane Super Major in Table 4.16-2

**L2-29.** 19. **"Circulation Element"** – All incidental references to the "Circulation Element" should be corrected to "Mobility and Infrastructure Element" in the text, table, and figures. (e.g., Pg.3-29, Section 3.4.1.4, first paragraph; Table 3-6, title; Figure 3-6, legend; etc.)

**L2-30.** If you have questions on these comments from DPW Traffic/Transportation Planning staff, please contact Richard Chin at (858) 874-4203 or [Richard.Chin@sdcounty.ca.gov](mailto:Richard.Chin@sdcounty.ca.gov).

**WASTEWATER**

**L2-31.** 20. As identified in the NOP comments provided by the County and in comments from DPLU above, the City of Escondido's General Plan boundary includes areas within the unincorporated County. Within the southwestern portion of the boundary is the Harmony Grove Sewer Maintenance District operated by the County of San Diego. The DEIR should acknowledge the existence of a County sanitation/sewer district within the City's proposed general plan boundaries that will be providing service by means of an on-site sewer treatment plant.

that the proposed development would have effects not examined in the EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. Future development projects with the potential to result in significant traffic impacts, including impacts to County roadways, would be required as part of the CEQA process to determine the potential impacts and identify the appropriate mitigation necessary to reduce traffic impacts to a less than significant level. The mitigation measures suggested in this comment would be considered for incorporation into project-specific mitigation measures, if the City determines that these measures would mitigate the project's potential impacts.

**L2-28** This comment requests that the tables in the Draft EIR and Traffic Impact Analysis (LLG 2011) be revised to identify which roadway segments are within the County's jurisdiction. Table 4.16-2 of the Draft EIR, Existing and Proposed Roadway Operations, has been revised to add a footnote to identify the roadway segments within the County's jurisdiction. No changes have been made to the Traffic Impact Analysis; however, Table L2-28 below provides a list of the roadway segments currently within the County's jurisdiction. It also identifies the section of the Traffic Impact Analysis where each segment is discussed and the study area of the General Plan Update that each segment is located within.

**Table L2-28. County of San Diego Roadways within the City of Escondido General Plan Sphere of Influence**

Roadway Segment	Traffic Impact Analysis Section	General Plan Update Area
<b>Citracado Parkway</b> - Kauana Loa Drive to Lariat Drive	11.0	ERTC South SPA #8
<b>Harmony Grove Road</b> - Kauana Loa Drive to Lariat Drive	11.0	ERTC South SPA #8
<b>Harmony Grove Road</b> - Lariat Drive to Country Club Lane	11.0	ERTC South SPA #8
<b>Kauana Loa Drive</b> - Country Club Lane to Harmony Grove Road <sup>a</sup>	11.0	ERTC South SPA #8
<b>Lariat Drive</b> - Country Club Lane to Harmony Grove Road	11.0	ERTC South SPA #8
<b>Lariat Drive</b> - Harmony Grove Road to Citracado Parkway <sup>a</sup>	11.0	ERTC South SPA #8
<b>Citracado Parkway</b> - Bernardo Avenue to I-15 Southbound Off-Ramp	12.0	I-15/Felicita Rd Corporate Office Target Area
<b>Centre City Parkway</b> - Ivy Dell Lane to Nutmeg Street	14.0	Nutmeg Street
<b>Nutmeg Street</b> - I-15 to Country Club <sup>a</sup>	14.0	Nutmeg Street
<b>Via Rancho Parkway</b> - Quiet Hills Rd to I-15 SB Ramps <sup>a</sup>	20.0	Westfield Shopping Town Target Area

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Table L2-28 continued

Roadway Segment	Traffic Impact Analysis Section	General Plan Update Area
Nutmeg Street - El Norte Pkwy to Rock Springs Road <sup>a</sup>	21.0	Northwest Quadrant
Deer Springs Road - West of I-15 Ramps	21.0	Northwest Quadrant
El Norte Parkway - Bennett Avenue to Nutmeg St <sup>a</sup>	21.0	Northwest Quadrant
Rock Springs Road - Nordahl Road to Deodar Road <sup>a</sup>	21.0	Northwest Quadrant
Ash Street - Rincon Avenue to Stanley Avenue <sup>a</sup>	22.0	Northeast Quadrant
Ash Street - Stanley Avenue to Vista Avenue	22.0	Northeast Quadrant
Ash Street - Vista Avenue to Sheridan Avenue <sup>a</sup>	22.0	Northeast Quadrant
Broadway - Mountain Meadow Road to North Avenue	22.0	Northeast Quadrant
Centre City Parkway - Mountain Meadow Road to Jesmond Dene Road	22.0	Northeast Quadrant
Centre City Parkway - Jesmond Dene Road to Mesa Rock Road	22.0	Northeast Quadrant
Centre City Parkway - Mesa Rock Road to Ivy Dell Lane	22.0	Northeast Quadrant
Jesmond Dene Road - Centre City Parkway to Ivy Dell Lane	22.0	Northeast Quadrant
Jesmond Dene Road - Ivy Dell Lane to Broadway <sup>a</sup>	22.0	Northeast Quadrant
Ivy Dell Lane - Centre City Parkway to Jesmond Dene Road	22.0	Northeast Quadrant
Mountain Meadow Road - Champagne Road to Broadway	22.0	Northeast Quadrant
Mountain Meadow Road - Broadway to Valley Center Road	22.0	Northeast Quadrant
North Avenue - Broadway to Vista Verde Way <sup>a</sup>	22.0	Northeast Quadrant
Bernardo Avenue - 11 <sup>th</sup> Ave to Citracado Parkway	23.0	Southwest Quadrant
Del Dios Highway - Via Rancho Parkway to Mount Israel Road <sup>a</sup>	23.0	Southwest Quadrant
Felicita Road - Hamilton Lane to Via Rancho Parkway	23.0	Southwest Quadrant
Citracado Parkway - Valley Parkway to Eucalyptus Avenue <sup>a</sup>	23.0	Southwest Quadrant
Clarence Lane - Felicita Road to Alexander Drive	23.0	Southwest Quadrant
Via Rancho Parkway - Valley Parkway to Eucalyptus Avenue	23.0	Southwest Quadrant
Via Rancho Parkway - Eucalyptus Avenue to Bernardo Avenue	23.0	Southwest Quadrant
Via Rancho Parkway - Bernardo Avenue to Felicita Road	23.0	Southwest Quadrant
Via Rancho Parkway - Felicita Road to Quiet Hills Road <sup>a</sup>	23.0	Southwest Quadrant
Bear Valley Parkway - Sunset Drive to San Pasqual Valley Road <sup>a</sup>	24.0	Southeast Quadrant
Bear Valley Parkway - San Pasqual Valley Road to Idaho Avenue	24.0	Southeast Quadrant
Bear Valley Parkway - Idaho Ave to Birch Avenue	24.0	Southeast Quadrant

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Table L2-28 continued

Roadway Segment	Traffic Impact Analysis Section	General Plan Update Area
<b>Bear Valley Parkway</b> - Birch Avenue to Rose Street <sup>a</sup>	24.0	Southeast Quadrant
<b>Citrus Avenue</b> - Mountain View Road to Birch Avenue <sup>a</sup>	24.0	Southeast Quadrant
<b>Citrus Avenue</b> - Birch Avenue to Idaho Avenue	24.0	Southeast Quadrant
<b>Citrus Avenue</b> - Idaho Avenue to San Pasqual Valley Road	24.0	Southeast Quadrant
<b>Cloverdale Road</b> - Rockwood Road to San Pasqual Valley Road (SR-78)	24.0	Southeast Quadrant
<b>San Pasqual Road</b> - San Pasqual Valley Road (SR-78) to Ryan Drive <sup>a</sup>	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Birch Avenue to Idaho Avenue	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Idaho Avenue to 17 <sup>th</sup> Avenue	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - 17 <sup>th</sup> Avenue to Bear Valley Parkway	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Bear Valley Parkway to Citrus Avenue	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Citrus Avenue to Summit Drive	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Summit Drive to Old San Pasqual Road	24.0	Southeast Quadrant
<b>San Pasqual Valley Road</b> - Old San Pasqual Road to Cloverdale Road	24.0	Southeast Quadrant
<b>Sunset Drive</b> - Juniper Street to Bear Valley Parkway	24.0	Southeast Quadrant
<b>Sunset Drive</b> - Escondido Boulevard to Juniper Street <sup>a</sup>	24.0	Southeast Quadrant
<b>Sunset Drive</b> - Juniper Street to Bear Valley Parkway	24.0	Southeast Quadrant
<b>17<sup>th</sup> Avenue</b> - Encino Dr to San Pasqual Valley Rd <sup>a</sup>	24.0	Southeast Quadrant
<b>Idaho Avenue</b> - Encino Drive to San Pasqual Valley Road	24.0	Southeast Quadrant
<b>Idaho Avenue</b> - San Pasqual Valley Road to Bear Valley Parkway	24.0	Southeast Quadrant
<b>Idaho Avenue</b> - Bear Valley Parkway to Citrus Avenue	24.0	Southeast Quadrant
<b>Idaho Avenue</b> - East of Citrus Avenue	24.0	Southeast Quadrant

a. Roadways located in both County of San Diego and City of Escondido jurisdictions.  
 Source: LLG 2012. Memorandum Re: Escondido General Plan Update Response to Traffic Comments on DEIR dated January 12, 2012 (TIA 12/5/11). March 8.

## Comments

## Responses

L2-31.  
cont.

If you have any questions on these comments from the DPW Wastewater Management Section, please contact Jeff Bosvay at (858) 694-2711, or by email at [Jeff.Bosvay@sdcounty.ca.gov](mailto:Jeff.Bosvay@sdcounty.ca.gov).

L2-32.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any general questions regarding these comments, please contact Mindy Fogg, Land Use Environmental Planner at (858) 694-3831 or email [mindy.fogg@sdcounty.ca.gov](mailto:mindy.fogg@sdcounty.ca.gov).

Sincerely,



ERIC GIBSON, Director  
Department of Planning and Land Use

## Attachments:

Figure 1: Escondido Proposed General Plan Outside SOI  
County of San Diego NOP Comment Letter dated August 30, 2010

## e-mail cc:

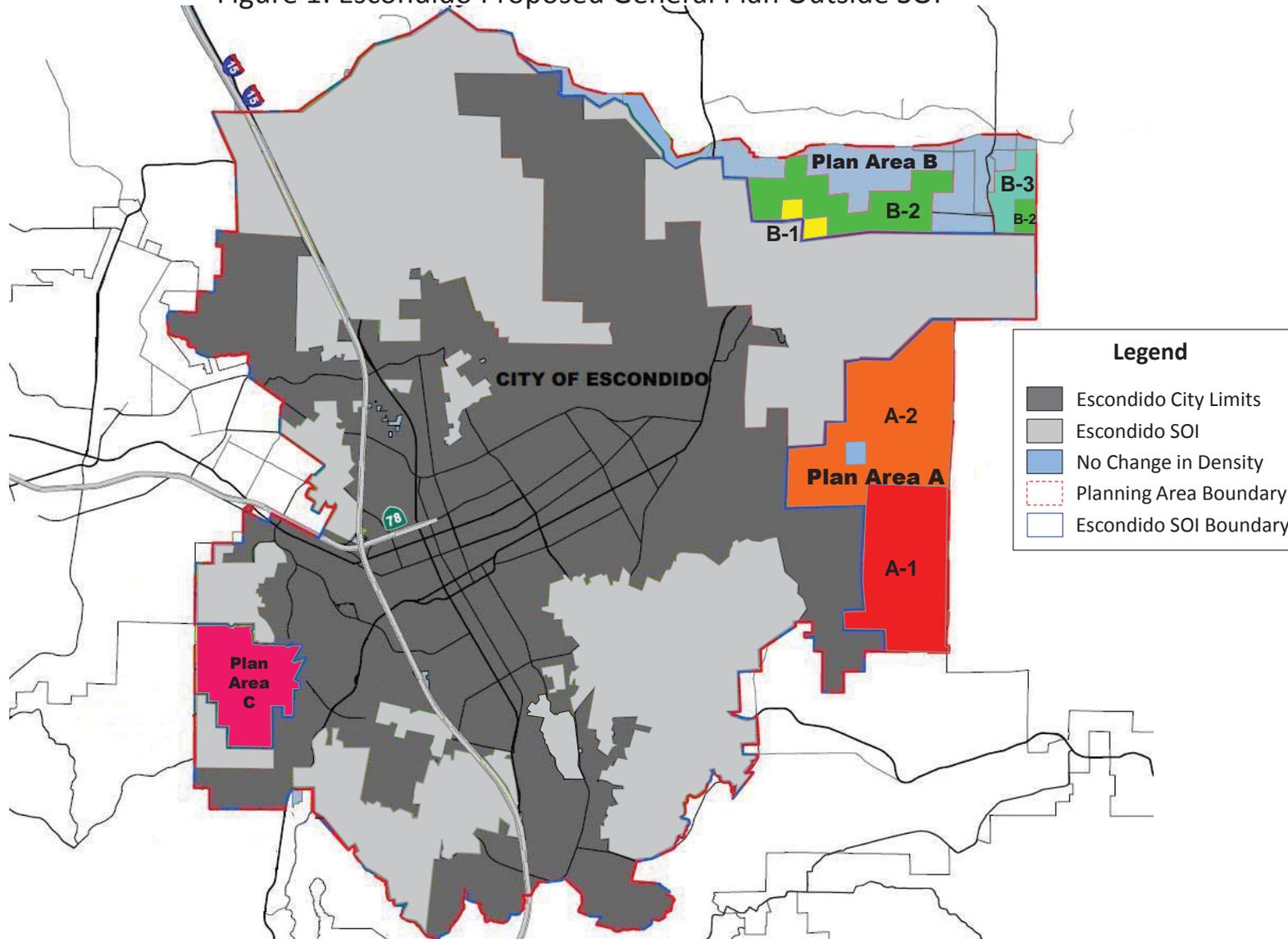
Sachiko Kohatsu, Policy Advisor, Board of Supervisors, District 3  
Dustin Steiner, Deputy Chief of Staff, District 5  
Megan Jones, Land Use Environment Group Program Manager, DCAO  
Trish Boaz, Chief, County Department of Parks and Recreation  
Richard Chin, Associate Transportation Specialist, Department of Public Works  
Jeff Bosvay, Unit Manager, Department of Public Works  
Sara Agahi, Senior Civil Engineer, Department of Public Works  
Robert Citrano, Planning Manager, Department of Planning and Land Use  
Bobbie Stephenson, Land Use Environmental Planner, Department of Planning and Land Use  
Hidden Meadows Community Sponsor Group  
San Dieguito Community Planning Group  
Valley Center Community Planning Group  
Twin Oaks Community Sponsor Group  
Mindy Fogg, Land Use Environmental Planner, Department of Planning and Land Use  
Priscilla Jaszkwiaak, Administrative Secretary, Department of Planning and Land Use

- L2-29 This comment identifies several inconsistencies between Figure 3-6, Proposed Circulation System; Table 3-6, Mobility and Infrastructure Element Roadway Segment Classification Changes; and Table 4.16-2, Existing and Proposed Roadway Operations, within the Draft EIR. Figure 3-6 has been revised to include the Super Major classification and correctly label the segment of Via Rancho Parkway from Quiet Hills Drive to Del Dios Highway as a Collector Road. This revision also addresses the inconsistency in the Del Dios Highway classification. Bear Valley Parkway from Beethoven Drive to Sunset Drive is correctly identified as a Prime Arterial in Figure 3-6, consistent with the classification identified for this segment in Table 3-6, Circulation Element Roadway Segment Classification Changes. Therefore, no revisions were made to the Bear Valley Parkway roadway classification identified in Figure 3-6.
- L2-30 This comment states that references to the Circulation Element in the Draft EIR should be corrected to Mobility and Infrastructure Element. Chapter 1.0, Executive Summary; Chapter 3.0, Project Description; Section 4.12, Noise; Section 4.13, Population and Housing; Section 4.16, Transportation and Traffic; and Chapter 6.0, Alternatives, of the Draft EIR have been revised to correct references to the Mobility and Infrastructure Element.
- L2-31 This comment states that the Harmony Grove Sewer Maintenance District should be included in the Draft EIR. Section 4.17.1.3 of the Draft EIR, Wastewater Collection, Transmission and Disposal, has been updated to include the following discussion of the Harmony Grove Sewer Maintenance District. Although this district was established in 2007, it currently does not have any constructed facilities and does not provide wastewater service<sup>5</sup>.
- Harmony Grove Sewer Maintenance District**  
The Harmony Grove Sewer Maintenance District was established in 2007 in response to the proposed development of the approved 468-acre Harmony Grove Village project, partially located within the General Plan Update boundary near the intersection of Harmony Grove Road and Country Club Drive. The Harmony Grove Sewer Maintenance District is coterminous with the development project. However, Harmony Grove Village has not been developed and there are currently no wastewater facilities within the district. It is anticipated that sewage flows from the future development will be conveyed to an on-site wastewater treatment facility; however, the facility has not been built (County of San Diego 2010, 2011).
- L2-32 This comment concludes the letter and provides contact information. It does not address the accuracy or adequacy of information presented in the Draft EIR. Therefore, no further response is necessary.

<sup>5</sup> County of San Diego. 2010. County of San Diego Sewer System Management Plan. June.

Comments

Figure 1: Escondido Proposed General Plan Outside SOI



## Comments

## Responses



## County of San Diego

ERIC GIBSON  
DIRECTOR

### DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1656  
INFORMATION (858) 694-2960  
TOLL FREE (800) 411-0017  
[www.sdcounty.ca.gov/dplu](http://www.sdcounty.ca.gov/dplu)

August 30, 2010

Jay Petrek, Principal Planner  
City of Escondido Planning Division  
201 N. Broadway  
Escondido, California 92025

Transmitted via email to: [jpetrek@escondido.org](mailto:jpetrek@escondido.org)

#### COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE ESCONDIDO GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN

The County of San Diego has received and reviewed the Notice of preparation of a program environmental impact report (PEIR) for a general plan update and climate action plan and appreciates this opportunity to comment. In response to the document the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County that the County will need to have explored in the environmental document.

Department of Planning and Land Use (DPLU), Department of Public Works (DPW), and Department of Parks and Recreation (DPR) staff have completed their review and have the following comments regarding the content of the above documents:

#### GENERAL COMMENTS

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used as guidance for determining the significance of environmental impacts in the unincorporated portions of the County of San Diego. Projects that could have potentially significant adverse effects to the unincorporated County should evaluate impacts using the guidance described in these guidelines, available online at: <http://www.sdcounty.ca.gov/dplu/procguid.html#guide>.

## Comments

2. The NOP and attached maps all refer to General Plan Designations and zones using acronyms. Descriptions of the land use designations, both density and intensity, and the proposed zones are needed in order for the reader to understand what the project is proposing.

**FLOOD CONTROL**

3. Flood Control Engineering has reviewed the City of Escondido's General Plan Update NOP. Potential future developments in accordance with the proposed changes to the General Plan may have impacts to existing County flood control facilities that may be located downstream. Please include a policy in the General Plan that requires coordination of flood control facilities managed by other jurisdictions and recognizes that additional hydraulic studies may be needed when the proposed developments are further refined.

**LAND USE**

4. The City of Escondido's General Plan Update boundaries extend beyond both the City's boundaries and its Sphere of Influence (SOI) boundaries. Per the 2003 State General Plan Guidelines, the planning area boundary encompasses areas "bearing a relation to the city's planning". The Guidelines also state that cities and counties should work together to delineate planning areas. There are areas where the draft Escondido Land Use Map is different from the County General Plan Update Land Use Map, which is the result of a twelve-year public planning process. The County General Plan is tentatively scheduled to be considered for adoption by the Board of Supervisors on October 20, 2010, which, if adopted, will result in significant land use changes when compared to the existing General Plan. Outside its SOI, the Escondido General Plan Update is proposing significantly different land use and residential densities than those proposed by the County's General Plan Update. The Escondido General Plan appears that it would return the densities to these areas between the two communities that the County General Plan is seeking to avoid. A copy of this Land Use Map that the County staff will present to the County Board of Supervisors for adoption on October 20th is available on the County General Plan Update web site at: <http://www.sdcounty.ca.gov/dplu/gpupdate/docs/prec/ncmetro.pdf>
5. The County is interested in the City of Escondido's intentions to annex these areas in the future. Past discussions with city staff seem to indicate that the City may have no intention of ever annexing some areas shown within the General Plan planning area or SOI. If there is no intention of annexing these areas, then it would seem the land use designations for those areas should either reflect the County General Plan Update Land Use Map or more preferably be removed from the Escondido General Plan planning area. County Department of Planning and Land Use staff would like to meet with City of Escondido staff to discuss further. Please contact Bob Citrano at 858-694-3229 or [Robert.Citrano@sdcounty.ca.gov](mailto:Robert.Citrano@sdcounty.ca.gov) if you would like to schedule a meeting.

## Responses

## Comments

## Responses

6. Several specific plan areas are shown on the Escondido draft General Plan Land Use Map outside the SOI; however, a description of planned uses is not included in Attachment 3 of the NOP. A breakdown of uses should be provided, along with an analysis for whether these areas are different from the County General Plan Update Land Use Map and Community Development Model (see Guiding Principle 2 in the draft County General Plan at the following link: [http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/ch2\\_vision\\_2010.pdf](http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/ch2_vision_2010.pdf))

**MOBILITY**

7. Similar to the Escondido General Plan Update, the County General Plan Update Mobility Element is recommending reduced classifications on many roadways through physically constrained areas. The PEIR should identify any discrepancies in proposed roadway classifications between the Escondido General Plan Update and the County General Plan Update Mobility Element. The County draft Mobility Element road network is available at: [http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/m-appendix\\_2010.pdf](http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/m-appendix_2010.pdf)

**MULTIPLE SPECIES CONSERVATION PROGRAM**

8. The EIR must analyze how the Escondido General Plan Update and Climate Action Plan will impact the County of San Diego Multiple Species Conservation Program (MSCP), Draft North County Plan which can be found at the following link: <http://www.sdcounty.ca.gov/dplu/mscp/nc.html>
9. Many of the areas within the sphere of influence and within planning area (which extends beyond both the sphere of influence and the city boundaries) are considered to be focal areas for conservation under the North County Plan. These areas are identified in the North County Plan as Pre-Approved Mitigation Areas (PAMA). According to the North County Plan, 75% of these PAMA lands will ultimately be conserved as biological open space.
10. Of particular concern are SPA's 2, 3, and 4 (shown on the Land Use Map; NOP Attachment 3) in the unincorporated areas of the county. These SPAs are either wholly or mostly within PAMA areas. No explanation is provided as to what uses are expected within these SPAs. The North County Plan requires that annexations of land by jurisdictions adjacent to the within the plan area be in a manner consistent with the goals and requirements of the plan. These requirements includes specific project review standards and approval processes. If development is proposed within the annexed areas, the conservation goals for the North County Plan must not be compromised. The EIR should analyze how these SPAs and other areas of PAMA with the scope of the update will be maintained in a manner consistent with the North County Plan.

## Comments

## Responses

**PARKS AND RECREATION**

11. The General Plan boundary includes lands owned and managed by DPR including the Del Dios Highlands Preserve and Felicita County Park. The location of these parks can be viewed at [www.sdparks.org](http://www.sdparks.org). These lands appear to be designated R1 or R2 in Attachment 2. County DPR owned lands should be included in the "Corrective/Clean-Up Amendment Areas" and/or Public Land Classifications and be designated as open space and/or public lands.
12. When planning for growth management, the General Plan Update and Climate Action Plan should avoid impacting existing DPR parks and preserves or existing or planned trails to the maximum extent feasible. Additionally, adjacent land use designations should complement existing open space/preserve land use designations (such as DPR parks and preserves). If impacts are unavoidable, coordination with DPR to determine appropriate mitigation measures is requested.

DPR appreciates the opportunity to participate in the review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions or comments please contact Megan Hamilton, Group Program Manager at (858) 966-1377 or e-mail [Megan.Hamilton@sdcounty.ca.gov](mailto:Megan.Hamilton@sdcounty.ca.gov)

**TRAFFIC/TRANSPORATION**

13. There are numerous roadways within Escondido's General Plan Boundary that are within the current unincorporated area of San Diego County. The PEIR should assess direct and cumulative impacts and identify appropriate mitigation for all roadways located on the County of San Diego's Circulation Element network, in particular:
  - Deer Springs Road
  - North Centre City Parkway
  - Mountain Meadow Road
  - Valley Center Road
  - Lake Wohlford Road
  - Country Club Drive
  - Harmony Grove Road
  - Citricado Parkway/Gamble Lane
  - Del Dios Highway
  - Via Rancho Parkway
  - Bear Valley Parkway
  - San Pasqual Valley Road
  - Mary Lane/Summit Drive
  - San Pasqual Road

## Comments

14. For all potential cumulative impacts to facilities located within the unincorporated area of San Diego County, fairshare contributions to the County's Transportation Impact Fee (TIF) program should be considered to mitigate the cumulative traffic impacts. The fairshare contributions should be based upon the amount of project trips that will be distributed onto the County roadways.
15. The PEIR should reference and use the County's Guidelines for Determining Significance (modified February 19, 2010) for any traffic analysis of direct and cumulative impacts on roadway segments and intersections within the County's jurisdiction.
16. The PEIR should coordinate with County staff on the list of near-term / cumulative proposed / pending projects for the analysis of cumulative traffic conditions.
17. The PEIR should identify any discrepancies in proposed roadway classifications between Escondido's GP Update and the County's GP Update Mobility Element.

If you have any questions on the comments from DPW Traffic/Transportation Planning section, please contact Bob Goralka, DPW Program Manager, at (858) 874-4202, or by email at [Robert.Goralka@sdcounty.ca.gov](mailto:Robert.Goralka@sdcounty.ca.gov).

**WASTEWATER**

18. Escondido's general plan boundary includes areas of unincorporated County. Within the southwestern portion of the boundary is the Harmony Grove Sewer Maintenance District. We would request that the EIR show the boundaries of the Harmony Grove SMD and acknowledge the recorded map, and future on-site sewage treatment facility and agreement with Rincon Water to received reclaimed water from the development. Attached are maps that might be useful.

If you have any questions on the comments from the DPW Wastewater Management Section, please contact Jeff Bosvay, Unit Manager, at (858) 694-2711, or by email at [Jeff.Bosvay@sdcounty.ca.gov](mailto:Jeff.Bosvay@sdcounty.ca.gov).

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact LeAnn Carmichael at (858) 694-3739 or email at [leann.carmichael@sdcounty.ca.gov](mailto:leann.carmichael@sdcounty.ca.gov).

Sincerely,



ERIC GIBSON, Director  
Department of Planning and Land Use



**ATKINS**

## Responses

Comments

Responses

Attachments

cc: Sachiko Kohatsu, Policy Advisor, Board of Supervisors, District 3 (via email)  
Dustin Steiner, Policy Advisor, Board of Supervisors, District 5, (via email)  
Megan Jones, CAO Staff Officer, DCAO, (via email)  
Michael Ott, Executive Officer, LAFCO, (via email)  
Trish Boaz, Chief, County Department of Parks and Recreation, (via email)  
Nael Areigat, Project Manager, Department of Public Works, (via email)  
Kenneth Brazell, Project Manager, Department of Public Works, (via email)  
Bob Goralka, Department of Public Works, Transportation Division, (via email)  
Hidden Meadows Community Sponsor Group  
Valley Center Community Planning Group  
Twin Oaks Community Sponsor Group  
Elfin Forest Town Council  
LeAnn Carmichael, Land Use/Environmental Planning Manager, Department of  
Planning and Land Use (via email)  
Priscilla Jaskowiak, Administrative Secretary, Department of Planning and  
Land Use, (via email)

Comments

Responses



401 B Street, Suite 800  
 San Diego, CA 92101-4231  
 (619) 699-1900  
 Fax (619) 699-1905  
 www.sandag.org

February 27, 2012

File Number 3330300

Mr. Jay Petrek  
 Principal Planner  
 City of Escondido  
 201 North Broadway  
 Escondido, CA 92025

Dear Mr. Petrek:

SUBJECT: Comments on the City of Escondido's Draft Environmental Impact Report for a General Plan Update, Downtown Specific Plan Update and Climate Action Plan

L3-1.

Thank you for the opportunity to comment on the City of Escondido's Draft Environmental Impact Report (DEIR) for a General Plan Update, Downtown Specific Plan Update, and Climate Action Plan. Our comments, which are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan (2050 RTP), are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth principles.

SANDAG staff has several specific and general comments for your consideration. SANDAG recommends the following comments be addressed and analyzed in the Draft EIR. These comments are outlined below.

**Specific Comments**

**General Plan**

Chapter I – Vision and Purpose:

L3-2.

- Page I-6: SANDAG and Regional Planning Efforts - No mention of the Regional Transportation Plan (RTP). Please refer to the recently adopted (2050 RTP), adopted in October 2011.
- Page I-10: Transportation and Mobility - Use all caps for "SPRINTER" throughout the entire plan.
- Page I-13: Quality of Life Standard 1: Traffic and Transportation - Please refer to the 2050 RTP, Chapter 8, Transportation Demand Management (TDM) for inclusion in this section. Also, consider including Complete Streets policies.

**Letter L3: San Diego Association of Governments**

L3-1 This comment is an introduction to comment letter and does not address the accuracy or adequacy of information presented in the Draft EIR. Therefore, no further response is necessary.

L3-2 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. However, the following editorial revisions have been made to the Draft EIR in response to this comment:

The Draft EIR has been revised to use all caps for references to the SPRINTER.

Section 4.16 of the Draft EIR, Transportation and Traffic, and Figure 4.16-3, Rapid Bus and Rail Transit, have been revised to correct the reference to the Escondido Rapid bus service as a rapid bus service to be consistent with Appendix A of the 2050 RTP.

## Responses

## Comments

## Chapter II – Land Use and Community Form

- Page II-68 – SANDAG supportive of Target Area 4 Guiding Principles to support investments made for the Escondido BREEZE Rapid bus.

## Chapter III – Mobility and Infrastructure

- Page III-2: Figure III-1 - see comment referring to Chapter I, page I-13.
- Page III-3: B. Regional Transportation Planning - second paragraph, edit first sentence to read as "The RTP is meant to be action-oriented, practical, and flexible and to consider both short-term and long-term issues....." Add sentence referring to the RTP being updated every 4 years immediately following. Edit second sentence to read as "Federal guidelines also recommend identifying both the unconstrained and revenue constrained financial resources necessary to accelerate programming....."
- Page III-10: Transit System - Escondido Rapid is a Rapid Bus service not Bus Rapid Transit (BRT) service.
- Page III-11: Transit System, Figure III-4 - Please refer to Appendix A of the 2050 RTP. This figure is missing BRT service routes including routes 608 and 610, Escondido-downtown express and Temecula, Escondido to downtown. Also, it seems that there may be possible confusion between rapid arterial bus routes versus BRT service. Is the intent of the map to only show extensions of the SPRINTER and arterial rapid service or all BRT, SPRINTER, and arterial rapid planned improvements? If so, consider listing other improvements for SPRINTER and BRT as stated in Appendix A of the 2050 RTP.
- Pages III-15-16: Street Network - Consider widening pedestrian path within the pedestrian zone.
- Page III-19 – Typo – "NCTD"
- Page III-33: Complete Streets Policies - Consider aligning and integrating a comprehensive policy with 2050 RTP policies.
- Page III-34: Pedestrian Network - Consider adding to Pedestrian Network Policy 3.1, data collection/walkability analysis as keys efforts for monitoring performance of pedestrian facilities.
- Page III-35: Bicycle Network - Consider adding to Bicycle Network Policy 3.1, data collection as a key effort for monitoring performance of bicycle facilities.
- Page III-37: TDM – Please refer to Chapter 8 from the 2050 RTP for additional TDM programs.
- Page III-37 – SANDAG supports Transit System Policies 5.5 and 5.6.

L3-2.  
cont.

Comments

Responses

<p>L3-2. cont.</p> <ul style="list-style-type: none"> <li>• Pages III-38-39: Street Network – Consider including/integrating/referencing within Street Network policies complete street, pedestrian network, bicycle network, transit system, TDM policies. Also, consider incorporating into street network policies, Technical Appendix 20 within the 2050 RTP, which requires all local agency roadway projects seeking federal funds to perform a non-single occupancy vehicle analysis prior to projects being incorporated within the RTIP.</li> <li>• Page III-40: Traffic Calming - Consider within Traffic Calming Policy 9.1 incorporating safe routes to schools, safe routes to transit, TDM (schoolpools), and other programs.</li> <li>• Throughout Document – Escondido BREEZE Rapid is not a BRT, it should be classified as a Rapid Bus. See page 6-12 of the 2050 RTP for definitions of transit services.</li> </ul>	<p>L3-3</p> <p>This comment requests Table ES-1, Summary of Project Impacts, to include an explanation of proposed project’s significant and unavoidable impacts to two intersections: I-15 Southbound (SB) Ramps/Valley Parkway and I-15 SB Ramps/ Via Rancho Parkway. The Executive Summary of the Draft EIR is meant to provide a brief overview of the conclusions of the impact analyses provided in Chapter 4.0, Environmental Analysis. It is not the appropriate place in the Draft EIR to detail how the conclusions in Table ES-1 were reached. Refer to Section 4.16, Transportation and Traffic, for a detailed analysis of the proposed project’s impacts to the I-15 SB ramps/Valley Parkway and I-15 SB Ramps/Via Rancho Parkway intersections. This section of the Draft EIR has been revised in response to this comment and comments L3-15 and L3-17. Mitigation measures Tra-1 through Tra-9 identified in Draft EIR Section 4.16.6, Mitigation, Issue 1: Traffic and LOS Standards, have been renumbered as mitigation measures Tra-3 through Tra-11. In addition, the information provided in this Draft EIR section has been clarified in response to this comment. A summary of text changes to Draft EIR Section 4.16.6, Mitigation, Issue 1: Traffic and LOS Standards, is provided below.</p>
<p>Chapter X – Implementation Program</p> <ul style="list-style-type: none"> <li>• Page X-12: Regional Agencies-See comment above to Chapter I, page I-6.</li> </ul>	
<p><b>City of Escondido Draft General Plan EIR</b></p>	
<p>Draft EIR Chapter I – Executive Summary</p> <p>L3-3.</p> <ul style="list-style-type: none"> <li>• Page 1-13: Summary of Project Impacts – Provide explanations for significant and unavoidable project impacts for the following intersections: <ul style="list-style-type: none"> <li>• I-15 SB ramps/Valley Parkway (LOS F, PM peak hour).</li> <li>• I-15 SB ramps/Via Rancho Parkway (LOS E/F, AM/PM peak hours, respectively).</li> </ul> </li> </ul>	<p><b>Partially Mitigated Impacts</b>  <u>Implementation of mitigation measure Tra-1 would partially mitigate impacts to the four roadway segments and six intersections listed in the measure. However, even after implementing treatment and technology improvements, impacts to these street segments and intersections would remain significant because even after mitigation the facilities would not operate at an acceptable LOS. Implementation of mitigation measure Tra-2 would fully mitigate the impact to Montiel Road between Nordahl Road and Deodar Road. However, the mitigation for the proposed project’s impact to the segment of Montiel Road is considered to be infeasible because the timing and implementation of the mitigation measure is within the jurisdiction of the City of San Marcos and cannot be guaranteed by the City of Escondido.</u> If and when the City of San Marcos desires to mitigate the impact to this segment, the City of Escondido would coordinate with San Marcos when significant traffic impacts to this segment are attributed to specific projects being processed in the City of Escondido. These projects would be required to undertake mitigation, such as a fair share contribution, pursuant to city direction. <del>However, because the City of Escondido cannot guarantee the timing of implementation of the mitigation measure for this segment impact, the impact is considered to be</del> Therefore, until the City of San Marcos decides to implement the improvements, impacts to the segment of Montiel Road between Nordahl Road and Deodar Road would remain significant and unavoidable.</p>
<p>Draft EIR Chapter 3 – Project Description, Location, and Environmental Setting</p> <p>L3-4.</p> <ul style="list-style-type: none"> <li>• Pages 3-40-41: Quality of Life Standard 1 Traffic and Transportation - Please refer to comment above for the Draft General Plan, Chapter I, Page I-13.</li> </ul>	
<p>Draft EIR Chapter 4 – Transportation and Traffic</p> <p>L3-5.</p> <ul style="list-style-type: none"> <li>• Figure 4.16-3 – Please refer to comments above for Draft General Plan Chapter III - Mobility and Infrastructure, Figure III-4.</li> </ul>	
<p>L3-6.</p> <ul style="list-style-type: none"> <li>• Figure 4.16-3 – Add layer showing Future Metropolitan Transit System (MTS) I-15 BRT Route.</li> </ul>	
<p>L3-7.</p> <ul style="list-style-type: none"> <li>• Page 4.16-9 – Suggest adding that a Transit Queue Jump lane exists on Valley Parkway east of Centre City Parkway.</li> </ul>	
<p>L3-8.</p> <ul style="list-style-type: none"> <li>• Page 4.16-45 (first paragraph) – Both NCTD and MTS provide service to the project area. MTS provides local bus service from Del Lago Transit Station to San Diego. MTS provides Express Bus service from Escondido to San Diego.</li> </ul>	<p><b>Tra-1</b> The City of Escondido shall implement intersection improvement treatment and adaptive traffic signal control technology along the following roadway segments and at the following intersections. Adaptive signal control technologies shall use real-time traffic data to adjust signals to events that cannot</p>

## Comments

## Responses

~~be anticipated by traditional time-of-day plans, such as accidents and road construction. Implementation of the General Plan Update would result in certain roadway segments and intersections experiencing significant and unavoidable traffic impacts. To offset the impacts, these segments and intersections would undergo intersection improvement treatment and adaptive traffic signal control technology to improve traffic flow. However, even after implementing such treatment/technology improvements, impacts to the following street segments and intersections would remain significant and unavoidable:~~

## Roadway Segments

- Mission Road between Barham Drive and Auto Park Way (LOS E)
- Valley Parkway between Hickory Street and Fig Street (LOS F)
- Valley Parkway between Fig Street and Date Street (LOS F)
- Valley Parkway between Date Street and Ash Street (LOS F)

## Intersections

- Nordahl Road/Auto Park Way/Mission Road (LOS E, PM peak hour)
- ~~I-15 SB Ramps/Valley Parkway (LOS F, PM peak hour)~~
- Centre City Parkway/Felicita Avenue (LOS F, PM peak hour)
- Escondido Boulevard/Felicita Avenue (LOS E/F, AM/PM peak hours, respectively)
- Ash Street/Valley Parkway (LOS E, both AM/PM peak hours)
- I-15 SB Ramps/Via Rancho Parkway (LOS E/F, AM/PM peak hours, respectively)
- El Norte Parkway/Centre City Parkway (LOS E/F, AM/PM peak hours, respectively)

~~In addition, the proposed project would result in a roadway segment impact to Montiel Road between Nordahl Road and Deodar Road, which is located within the City of San Marcos. The mitigation for the proposed project's impact to this segment is considered to be infeasible because the timing and implementation of the mitigation measure is within the jurisdiction of another city and cannot be guaranteed by the City of Escondido. The following mitigation measure would reduce this impact to a less than significant level:~~

**Tra-2 Montiel Road between Nordahl Road and Deodar Road.** The City of Escondido shall implement adaptive traffic signal control technology along Montiel Road between Nordahl Road and Deodar Road prior to the segment reaching an LOS of E or F. Adaptive traffic signal control technologies shall use real-time traffic data to adjust signals to events that cannot be anticipated by traditional time-of-day plans, such as accidents and road construction.

As discussed in Section 4.16.6, Mitigation, Issue 1: Traffic and LOS Standards, implementation of the General Plan Update would result in the I-15 Southbound (SB) Ramps/Valley Parkway and I-15 SB Ramps/Via Rancho Parkway intersections experiencing significant traffic impacts. To offset the proposed project's impact to the I-15 SB Ramps/Via Rancho Parkway intersection, this intersection would

## Comments

## Responses

undergo improvement treatment and adaptive traffic signal control technology to improve traffic flow (see mitigation measure Tra-1 above). However, even after implementation of mitigation measure Tra-1, the impact to the I-15 SB Ramps/Via Rancho Parkway intersection would remain significant and unavoidable because the intersection would continue to operate at an unacceptable LOS at this intersection. Based on Caltrans comment letter on the Draft EIR dated February 27, 2012, a more specific mitigation measure has been identified for the I-15 SB Ramps/Valley Parkway intersection that would fully mitigate the impact to below a level of significance. The measure reads as follows:

**Tra-12 Interstate 15 Southbound Ramps/Valley Parkway Intersection.** The City of Escondido shall provide a second right turn lane at the I-15 Northbound ramps to partially mitigate the impacts at this intersection. Future land developments would be required to contribute a fair share towards this improvement as well as any other improvements that may needed in the future to mitigate this impact to below a level of significance.

Table ES-1 in the Executive Summary and Section 4.16.6, Mitigation, Issue 1: Traffic and LOS Standards, in Section 4.16, Transportation and Traffic, have been updated to reflect that the proposed project's impact to the I-15 SB Ramps/Valley Parkway intersection would be reduced to a less than significant level with implementation of mitigation measure Tra-12. This mitigation measure merely clarifies and amplifies the mitigation previously identified for this intersection in the Draft EIR. Therefore, pursuant to CEQA Guidelines Section 15088.5, it does not represent new information that would require recirculation of the Draft EIR.

- L3-4 This comment requests that the 2050 RTP and Complete Streets policies be included in the Draft EIR discussion of Quality of Life Standard 1: Traffic and Transportation, in Chapter 3.0, Project Description. This comment is based on the commenter's requested revisions to the proposed General Plan Update in comment L3-2. The Draft EIR Project Description summarizes key information about the proposed project from the proposed General Plan Update. The Draft EIR is not the appropriate place to make changes to the proposed project. No changes were made to Quality of Life Standard 1 as a result of comment L3-2; therefore, no changes were made to the Draft EIR Project Description in response to this comment.
- L3-5 This comment states that Figure 4.16-3, Rapid Bus and Rail Transit, should be revised based on response to comment L3-2. Refer to response to comment L3-2. The requested revisions have been incorporated into the Draft EIR.
- L3-6 This comment states that Figure 4.16-3, Rapid Bus and Rail Transit, should be revised to show the future Metropolitan Transit System (MTS) Bus Rapid Transit (BRT) route. Figure 4.16-3, Rapid Bus and Rail Transit, has been updated to add the future MTS Interstate (I) 15 BRT route.

## Comments

## Responses

L3-7 This comment states that the description of Valley Parkway under the Existing Roadway and Intersection Conditions discussion in Section 4.16.1.1, Roadways and Traffic, of the Draft EIR, should be revised to add that an existing Transit Queue Jump lane is located along Valley Parkway. The discussion of Valley Parkway on page 4.16-9 of the Draft EIR has been revised as follows.

**Valley Parkway.** Valley Parkway is currently built as a three-lane, one-way roadway between Grand Avenue and Centre City Parkway, and as a five-lane, one-way roadway between Centre City Parkway and Broadway within the Downtown SPA. Bike lanes are not provided and parking is permitted intermittently along both sides of the roadway. Sidewalks, curbs and gutters are provided and the posted speed limit is 35 mph. A Transit Queue Jump lane exists on Valley Parkway, east of Centre City Parkway, which allows buses to bypass traffic congestion at the Valley Parkway/ Centre City Parkway intersection.

L3-8 This comment requests MTS be included in the discussion of bus service in Section 4.16.1.2, Alternative Transportation Facilities, of the Draft EIR. Page 4.16-45 of the Draft EIR has been revised as follows in response to this comment:

North County Transit District (NCTD) and Metropolitan Transit System (MTS) provides bus service to the proposed project area. Service is generally provided along major circulation corridors with a heavier concentration of bus routes in the downtown area. NCTD provides three types of bus services in the proposed project area, including local bus service, County transit service, and express bus service. Local bus service is generally provided at 30 to 60 minute intervals and provides local access within the City and surrounding communities. County transit service provides bus service along rural routes connecting Escondido to the unincorporated Valley Center community. MTS provides eExpress bus service is provided from the City's downtown area to the City of San Diego, and local bus service from the Del Lago Transit Station to the City of San Diego.

Comments

Responses

- L3-9.
    - Page 4.16-45 (second paragraph) – NCTD operates “Rapid Bus” service not BRT service. SANDAG constructed but does not operate the Escondido BREEZE Rapid (Route 350). See page 6-12 of the 2050 RTP for definitions of transit services. The Escondido BREEZE Rapid does not connect to MTS trolley.
  - L3-10.
    - Page 4.16-45 (3rd paragraph) – Capitalize SPRINTER.
  - L3-11.
    - Page 4.16-45 (3rd paragraph) – The 2 major bus transfer points within the project area include Escondido Transit Center and Del Lago Transit Station. Del Lago BRT station is located near the intersection of I-15, Del Lago Blvd, and Avenida Magoria. There are timed transfers between NCTD Route 350 and MTS Route 20 bus routes. There are no major bus transfer points at Westfield or Second Ave.
  - L3-12.
    - Page 4.16-47 – Capitalize SPRINTER, COASTER, and BREEZE.
  - L3-13.
    - Page 4.16-50: Regional/Local – Please update the Congestion Management Program to the Congestion Management Process SANDAG and the local jurisdictions opted out of the state Congestion Management Program. Refer to Technical Appendix 20 in the 2050 RTP and the Congestion Management Process Web site<sup>1</sup> for additional information.
  - L3-14.
    - Consider including the Pedestrian Master Plan in this section.
  - L3-15.
    - Page 4.16-82: Infeasible Mitigation Measures – Please refer to comment above, Draft EIR Chapter I, Executive Summary, page 1-13.
- Draft EIR Appendix I – Traffic Impact Analysis
- L3-16.
    - Page 14: Future Volumes Traffic Model – Four managed lanes are included to on I-15 from SR 163 to SR 78 only. Improvements on I-15 north of SR 78 to the Riverside county line include four toll lanes, not managed lanes. General comment- There is no mitigation proposed or explanation for significant and unavoidable project impacts for the intersections mentioned in Draft EIR Chapter 1, Executive Summary. Please work with Caltrans to develop proposed mitigation for these intersections.
  - L3-17.
    - Draft EIR Appendix I-3 Complete Streets Assessment provides a well-established multimodal existing conditions framework. Per the Regional Multimodal Transportation Analysis Report, consider incorporating into Draft EIR Appendix I-1 Traffic Impact Analysis, existing and planned transit service impacts.
  - L3-18.
    - Draft EIR Appendix I-3 Complete Streets Assessment provides a well-established multimodal existing conditions framework. Per the Regional Multimodal Transportation Analysis Report, consider incorporating into Draft EIR Appendix I-1 Traffic Impact Analysis, existing and planned transit service impacts.
- Climate Change Plan**
- L3-19. Chapter 4: Greenhouse Gas (GHG) Reduction Programs and Regulations
    - Pages 4-6 and 4-7 regarding “SANDAG ENERGY ROADMAP PROGRAM.” Please update the description of Escondido’s Roadmap and bulleted section from the second half of paragraph onward. Replace all language beginning with, “Currently, Escondido is in Phase 2 of the Roadmap Program; energy assessments....” Suggested language is:

- L3-9 This comment requests revisions to the Draft EIR discussion of bus service in Section 4.16.1.2 of the Draft EIR, Alternative Transportation Facilities. Page 4.16-45 of the Draft EIR has been revised as follows in response to this comment:  
  
SANDAG, in cooperation with the City and NCTD; also operate a Bus Rapid Transit ~~the Escondido Rapid bus~~ service: ~~that~~ BRT provides a “rapid bus” connection along Escondido Boulevard between the Escondido Transit Center and Westfield Shoppingtown TA. This service also connects to the SPRINTER passenger rail line at the Escondido Transit Center, existing Metropolitan Transit System (MTS) ~~trolley~~ and bus services, and to future I-15 BRT rapid bus services. Figure 4.16-3, Rapid Bus and Rail Transit, identifies existing NCTD ~~BRT~~ rapid bus routes within the proposed project area.
- L3-10 This comment requests that SPRINTER be capitalized. As stated in response to comment L3-2, this revision has been made throughout the EIR.
- L3-11 This comment clarifies bus transfers in the project area. The discussion of bus service in Section 4.16.1.2 of the Draft EIR, Alternative Transportation Facilities, has been revised as follows in response to this comment:  
  
There are two major bus transfer points located within the proposed project area: Escondido Transit Center and Del Lago Transit Station Second Avenue. The Escondido Transit Center, located on Valley Parkway at Quince Street, provides bus transfers between 10 separate bus routes, the existing SPRINTER passenger rail line and taxi service. A park-and-ride lot is provided at the Escondido Transit Center. The Del Lago Transit Station Second Avenue bus transfer point is located at Westfield Shoppingtown (North County Fair) on Via Rancho Parkway Del Lago Parkway at I-15. ~~This transit station connects Timed transfers between three different bus routes, a park-and-ride lot, and transfers between NCTD Route 350 and MTS Route 20 take place at Westfield Shoppingtown (North County Fair).~~
- L3-12 This comment states that SPRINTER, COASTER, and BREEZE should be capitalized. The Draft EIR has been revised to use all caps for references to the SPRINTER, COASTER, and BREEZE in response to this comment.
- L3-13 This comment requests revisions to the discussion of regulations in Section 4.16 of the Draft EIR, Transportation and Traffic, to clarify that SANDAG has opted out of the state Congestion Management Program. In response to this comment, the Congestion Management Program discussion has been removed from the Draft EIR and the discussion of Title 23, Code of Federal Regulations, in Section 4.16, Transportation and Traffic, has been revised as follows:  
  
Revised in April 1, 2005, Section 450.220 of Title 23 of the Code of Federal Regulations (CFR), Highways in the Code of Federal Regulations, requires each state to carry out a continuing, comprehensive, and intermodal statewide

<sup>1</sup> <http://www.sandag.org/index.asp?projectid=13&fuseaction=projects.detail>

Comments

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L3-19.  
cont.

- o Escondido began its Energy Roadmap with SANDAG in April 2011. As of February 2012, baseline electricity and natural gas use for 29 municipal sites was established through this program. The 29 preliminary energy assessments indicated that almost all Escondido municipal sites were performing significantly more efficient than the comparable facilities in California and the nation. Either in response to a specific issue discovered through the site assessment process, or as instructed by city staff, eight sites and two technologies citywide were identified to be further evaluated in the form of comprehensive energy audits. The energy assessments were performed at no cost to the City. Escondido is finalizing its Energy Roadmap with SANDAG, which is scheduled for completion in March 2012. The government operations component of the Roadmap includes the following elements:
  - Saving Energy in City Buildings and Facilities
  - Demonstrating Emerging Energy Technologies
  - Greening the City Vehicle Fleet
  - Developing Employee Knowledge of Energy Efficiency
  - Promoting Commuter Benefits to City Employees
- The communitywide component of the Roadmap will provide the following elements:
  - Leveraging Planning and Development Authority, including smart growth development policies, energy efficient building upgrades, and clean and efficient transportation options
  - Marketing Energy Programs to Local Residents, Schools, and Businesses
  - Supporting Green Jobs and Workforce Training

Page 4-18. In the bulleted measures for R2-E1: NEW RESIDENTIAL ENERGY EFFICIENCY REQUIREMENTS, the following edits are suggested:

- Install ENERGY STAR-qualified or equivalent appliances, including air conditioning and heating units, dishwashers, clothes washers, etc.;
- Install solar water heaters;
- Install ENERGY STAR-qualified or equivalent windows and appropriate insulation per climate zone;
- Install ENERGY STAR-qualified or equivalent lighting;

Page 4-18, INSET Table "GHG Reduction Potential." Suggest the following edits:

- These emissions reductions assume all new residential units will increase energy efficiency an average of 10% beyond currently adopted California Title 24 standards. Based on the 2008 Title 24 standards, this results in a 25% decrease in electricity and natural gas use from new residential developments.
- Private Costs: \$4.06 million (one time cost). 100% units going 10% beyond 2008 Title 24 is approximately equivalent to 83% of units increasing efficiency to 15% beyond Title 24.
- Potential Funding Sources: Rebates and incentives from San Diego Gas & Electric (SDG&E) and/or California Center for Sustainable Energy (CCSE).

Page 4-19: R2-E2: NEW COMMERCIAL ENERGY EFFICIENCY REQUIREMENTS, suggested edits to following bulleted measures:

- Install ENERGY STAR-qualified or equivalent appliances, including air conditioning and heating units, dishwashers, etc.;

transportation planning process. This planning process must include the development of a statewide transportation plan and transportation improvement program that facilitates the efficient, economic movement of people and goods in all areas of the state. Section 450.320 of Title 23 requires that each transportation management area (TMA) address congestion management through a process (Congestion Management Process) involving an analysis of multimodal metropolitan-wide strategies that are cooperatively developed to foster safety and integrated management of new and existing transportation facilities eligible for federal funding.

SANDAG has been designated as the TMA for the San Diego region. The 2050 Regional Transportation Plan (RTP) meets the requirements of the Congestion Management Process by incorporating the following federal congestion management process: performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-single occupant vehicle analysis, land use impact analysis, the provision of congestion management tools, and integration with the regional transportation improvement program process (SANDAG 2012).

L3-14

This comment states that the Pedestrian Master Plan should be addressed in the Draft EIR. It is unclear what Pedestrian Master Plan the commenter is referring to. Pedestrian Network Policy 3.1 in the proposed Mobility and Infrastructure Element requires the preparation of a Pedestrian Master Plan; however, the City has not prepared the plan yet. Section 4.16 of the Draft EIR, Transportation and Traffic, references this policy in the list of proposed policies related to potential alternative transportation impacts (Section 4.16.3.5, Issue 5: Alternative Transportation). The plan has not yet been prepared; therefore, it has already been included in the Draft EIR in Section 4.16, Transportation and Traffic, to the extent it is applicable at this time.

L3-15

This comment requests an explanation of the proposed project's significant and unavoidable impacts to two intersections: I-15 Southbound (SB) Ramps/Valley Parkway and I-15 SB Ramps/Via Rancho Parkway. Refer to response to comment L3-3 for a response to comment L3-15. Revisions have been made to the Draft EIR regarding the project's impacts and mitigation measures associated with these intersections.

L3-16

This comment states that the improvements on I-15 north of State Route (SR) 78 to the Riverside County line include four toll lanes, not managed lanes. The Methodology for Traffic Impact Analysis discussion in Section 4.16.3.1, Issue 1: Traffic and LOS Standards, has been revised as follows. This change does not affect the findings or conclusions of the Traffic Impact Analysis, which are summarized in the Draft EIR. This revision was also made to Section 5.0, Future Volumes Traffic Mode, of the Traffic Impact Analysis (LLG 2011).

## Comments

- Install ENERGY STAR-qualified or equivalent windows and appropriate insulation for climate zone;
- Install ENERGY STAR-qualified or equivalent lighting; and
- Install ENERGY STAR-qualified or equivalent computer systems and electronics to reduce electricity need from plug load.

Page 4-19: INSET BOX on GHG Reduction Potential.

- These emissions reductions assume all new residential units will increase energy efficiency an average of 10% beyond currently adopted California Title 24 standards. Based on the 2008 Title 24 standards, these emissions reductions assume a 25% decrease in electricity and natural gas use from new commercial developments.
- Private Costs: \$4.6 million (one time cost). The cost is based on an estimated \$1.00 per square foot to achieve 10% beyond 2008 Title 24 standards (Anders 2009).
- Potential Funding Sources: SDG&E and CCSE.

Page 4-20: R2-E3: NEW RESIDENTIAL RENEWABLE ENERGY REQUIREMENTS. Delete the following bulleted statement as this topic is new construction:

- Energy retrofits of existing buildings in order to offset energy use.

Page 4-21: R2-E4: NEW COMMERCIAL RENEWABLE ENERGY REQUIREMENTS. Delete the following bulleted statement as this topic is new construction:

- Energy retrofits of existing buildings in order to offset energy use.

Page 4-22: R2-E5: EXISTING RESIDENTIAL ENERGY RETROFITS

- Replace inefficient air conditioning and heating units with ENERGY Star-qualified or equivalent models;
- Replace older, inefficient appliances and electronic equipment with ENERGY STAR-qualified or equivalent models;
- Seal and insulate homes to stop drafts, block heat loss in winter, and block heat gain in summer;
- Replace old windows with ENERGY STAR-qualified or equivalent windows; and
- Replace inefficient and incandescent lighting with energy efficient lighting.

Page 4-23: R2-E6: EXISTING COMMERCIAL ENERGY RETROFITS. Suggest making identical edits to bulleted measures as proposed for R2-E5 on page 4-22.

Chapter 7: Implementation

Page 7-5: 7.2 Step 2, Financing and Budgeting.

- Energy Upgrade California. Replace SDG&E Web site for Energy Upgrade California with State of California's Web site. Energy Upgrade California is larger than just the SDG&E rebate. The California-wide Web site provides homeowners and contractors with all programs and funding available. See <https://energyupgradeca.org/overview>.

Page 7-5: 7.2 Step 2, Financing and Budgeting.

- California Solar Initiative (CSI). The information is out of date. The following revision to the paragraph and Web site is proposed:

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Additionally, the following regional transportation improvements were assumed in the future forecast modeling: 1) SPRINTER light rail extension to Westfield Shoppingtown (North County Fair); and I-15 north of SR-78 as an eight-lane freeway with four toll managed lanes to the Riverside County border.

This change does not affect the findings or conclusions of the Traffic Impact Analysis, which are summarized in the Draft EIR. This revision was also made to Section 5.0, Future Volumes Traffic Mode, of the Traffic Impact Analysis (LLG 2011).

L3-17 This comment requests an explanation and mitigation for impacts to the I-15 SB Ramps/Valley Parkway and I-15 SB Ramps/Via Rancho Parkway intersections listed in the Executive Summary as having significant and unavoidable impacts. Please refer to response to comment L3-3 for a response to comment L3-17. Revisions have been made to the Draft EIR regarding the project's impacts and mitigation measures associated with these intersections.

L3-18 This comment requests that the existing and planned transit service impact information from the Complete Streets Assessment (Appendix I3) be incorporated into Appendix I1, the Traffic Impact Analysis (LLG 2011). The Complete Streets Assessment (LLG 2011) was completed to ensure that complete streets were incorporated into the proposed General Plan Update transportation network to provide a multi-modal transportation network in compliance with the Complete Streets Act. The purpose of the Traffic Impact Analysis was to determine the potential impacts to vehicular traffic that would occur as a result of proposed project implementation. The Traffic Impact Analysis assumed buildout of the proposed transportation network; therefore, complete streets were incorporated into the analysis to the extent necessary to assess potential vehicular traffic impacts. Both the Traffic Impact Analysis and the Complete Streets Assessment are incorporated into the Draft EIR analysis in Section 4.16, Transportation and Traffic. No revision to the Traffic Impact Analysis is necessary as a result of this comment.

L3-19 This comment pertains only to the proposed Escondido Climate Action Plan (E-CAP). It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

L3-19.  
cont.

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L3-19. cont. In January 2006, the California Public Utilities Commission (CPUC) adopted the CSI to provide more than \$3 billion in incentives for solar-energy projects with the objective of providing 3,000 megawatts (MW) of solar capacity by 2016. In December 2011, the CPUC increased the CSI budget by \$200 million in order to cover a budget shortfall. The action implements Senate Bill (SB) 585 signed by Governor Jerry Brown on Sept. 22, 2011. The CSI program is administered by PG&E, SCE, and CCSE for the SDG&E territory. CSI is comprised of five rebate programs: the general CSI Program of solar rebates for existing homes, new/existing commercial, agricultural, and public agencies; the CSI-Thermal Program for solar hot water rebates for homes and businesses; the Single-family Affordable Solar Homes program for low-income residents that own their own single-family home and meet a variety of income and housing eligibility criteria; the Multifamily Affordable Solar Housing program for multifamily affordable housing; and the CSI RD&D (research, development, demonstration, and deployment) Program. See <http://energycenter.org/csi>.

**General Comments**

**Smart Growth Opportunity Areas**

L3-20. A key goal of the RCP is to focus growth in Smart Growth Opportunity Areas. There are a total of eight Smart Growth Planning Area place types located within the City of Escondido, and as you know, SANDAG has recently updated the Smart Growth Concept Map. We appreciate the help we received from your staff on these updates, and the incorporation of Smart Growth principles in Escondido's planning documents.

**Multimodal Transportation Analysis**

L3-21. The 2050 RTP sets forth a multimodal approach to meeting the region's transportation needs. As such, we recommend that the traffic analysis for the Draft EIR strive to balance the needs of motorists, transit riders, pedestrians, and bicyclists. The Regional Multimodal Transportation Analysis, adopted by the SANDAG Board on October 14, 2011, is another tool that may be used to enhance traffic impact analysis of development projects where use by transit, bicycle, and/or pedestrians is anticipated. This new tool is available online at [www.sandag.org/igr](http://www.sandag.org/igr).

L3-22. We request that you coordinate the Draft EIR's development with the 2050 RTP and its Sustainable Communities Strategies as well as the recently approved Regional Housing Needs Assessment.

**Transit and Highways**

L3-23. Please evaluate the consistency of the Draft EIR and the City of Escondido's General Plan Update, Downtown Specific Plan Update, and Climate Action Plan with the 2050 RTP goals as they relate to specific transit projects.

**Transportation Demand Management**

L3-24. Please consider developing a TDM plan that outlines your strategy(ies) for providing and promoting transportation alternatives to driving alone during peak periods such as carpooling, vanpooling, bicycling, telecommuting, and flexible work hours for employees, to help mitigate regional transportation impacts. Carpooling and vanpooling could be promoted by providing priority reserved and/or free parking for high-occupancy vehicles. We recommend contacting the SANDAG iCommute team to explore TDM options.

L3-20 This comment expresses appreciation for the help SANDAG received from City staff on the eight Smart Growth Planning Areas in the City and the incorporation of Smart Growth principles into Escondido's planning documents. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

L3-21 This comment recommends that the Traffic Impact Analysis (LLG 2011) for the Draft EIR strive to balance the needs of motorists, transit riders, pedestrians, and bicyclists. However, it is the opinion of the City that the Draft EIR is not the appropriate document to address circulation network planning. The Mobility and Circulation Element of the proposed General Plan Update includes a multi-modal transportation network for the General Plan Update planning area. Section 4.16.3.5, Alternative Transportation, of the Draft EIR includes an analysis of the proposed project's impacts on alternative transportation. As discussed in this section, implementation of the proposed project would create provisions for alternative modes of transportation and promote alternative transportation within the proposed project area. Many policies proposed in the General Plan Update would require coordination between the City and the agencies responsible for public transportation planning, including SANDAG. Compliance with existing regulations, in addition to implementation of the proposed General Plan Update and Downtown Specific Plan Update policies and Escondido Climate Action Plan reduction measures would ensure impacts related to alternative transportation would be less than significant. This comment also suggests use of the Regional Multimodal Transportation Analysis for development projects where transit, bicycle, and/or pedestrian use is anticipated. As a programmatic analysis, this model is not appropriate for the proposed project's analysis of traffic and transit impacts because this model is intended for use in determining the potential impacts of a specific development project. The City notes that this resource is available for the analysis of traffic and transit impacts associated with future proposed development projects.

L3-22 This comment suggests that development of the Draft EIR be coordinated with the 2050 RTP and its Sustainable Communities Strategies, as well as the recently approved Regional Housing Needs Assessment (RHNA). The Draft EIR addressed the proposed project's compliance with the RTP and the RHNA. The proposed project's consistency with the 2050 RTP is addressed in Section 4.10.3.2, Issue 2: Conflicts with Land Use Plans, Policies, and Regulations, of the Draft EIR. As discussed in this section, the General Plan Update implements the RTP guidelines and is consistent with the 2050 RTP, including coordination for regional transportation planning and encouraging multi-modal transportation through complete streets, pedestrian network, bicycle network, transit system, street network, and traffic calming policies that ensure safe and efficient circulation. The proposed project would not result in a conflict with the 2050 RTP. The

## Comments

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proposed project's consistency with the RHNA is addressed in Section 4.13.3.2, Issue 2: Displacement of Housing. As discussed in this section, the City's RHNA allocation, as established by SANDAG, is a total of 4,175 new units for the January 1, 2010 to December 31, 2020 period. Consistent with state law, the General Plan Update's land use plan provides adequate capacity to exceed its RHNA allocation by accommodating an additional 9,924 dwelling units by 2035; or an additional 4,367 dwelling units by December 31, 2020. Therefore, the issues raised in the comment are adequately addressed in the Draft EIR. No revisions to the Draft EIR are necessary.

- L3-23 This comment suggests that the Draft EIR be evaluated for consistency with the 2050 RTP. The proposed project's consistency with the 2050 RTP is addressed in Section 4.10.3.2, Issue 2: Conflicts with Land Use Plans, Policies, and Regulations, of the Draft EIR. As a programmatic document, the appropriate level of analysis for the proposed project is a comparison of the project's goals with the goals of the 2050 RTP. As discussed in response to comment L3-22, the proposed project is consistent with the 2050 RTP. Therefore, no changes to the Draft EIR have been made in response to this comment.
- L3-24 This comment suggests that the City develop a Transportation Demand Management (TDM) plan to help mitigate regional transportation impacts. As discussed in Section 4.16.3.1, Issue 1: Traffic and LOS Standards, the proposed Mobility and Infrastructure Element of the General Plan Update includes Transportation Demand Management (TDM) policies for future development. TDM Policies 6.1, 6.2 and 6.3 require implementation of a TDM and complete streets program; employers to promote alternative transportation methods; and a TDM program for City employees. The TDM for City employees would promote carpooling, transit use, and use of other alternative modes. Therefore, this suggestion has already been incorporated into the General Plan Update and Draft EIR.

Comments

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**Consult with North County Transit District and Caltrans**

L3-25. SANDAG advises the project applicant to consult with NCTD, the transit service providers within the project area, and with Caltrans to coordinate planned transit and/or highway improvements.

**Natural Environment**

L3-26. A key RCP objective is to preserve and maintain natural areas in urban neighborhoods, such as canyons and creeks, and provide access for the enjoyment of the region's residents. Please consider this criteria, if applicable, to your project.

**Other Considerations**

L3-27. Please consider the following State of California laws and Executive Order when developing the DEIR: Assembly Bill 32 (Nunez, 2006) (AB 32); Senate Bill 375 (Steinberg, 2008) (SB 375); SB 97 (Dutton, 2007); and Executive Order S-13-08, which call for analysis of GHG emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy that promote the reduction of energy demand and water consumption.

L3-28. We appreciate the opportunity to comment on the Draft EIR for the City of Escondido's General Plan Update, Downtown Specific Plan Update and Climate Action Plan. We encourage the City of Escondido, where appropriate, to evaluate these plans based on the following SANDAG publications: (1) Designing for Smart Growth, Creating Great Places in the San Diego Region; (2) Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region; (3) Trip Generation for Smart Growth; and (4) Parking Strategies for Smart Growth. These publications can be found on our Web site at [www.sandag.org/igr](http://www.sandag.org/igr).

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or [sba@sandag.org](mailto:sba@sandag.org).

Sincerely,



SUSAN BALDWIN  
Senior Regional Planner

SBA/RSA/dsn

L3-25 This comment suggests that the City consult with NCTD, transit service providers within the project area, and Caltrans to coordinate planned transit and/or highway improvements. The City will consider this suggestion; however, the comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

L3-26 This comment summarizes a Regional Comprehensive Plan (RCP) objective pertaining to the preservation of natural areas in urban neighborhoods and requests the criteria be considered for the proposed projects, if applicable. An analysis of the proposed project's consistency with the goals of the RCP is included in Draft EIR Section 4.10.3.2, Issue 2: Conflicts with Land Use Plans, Policies, and Regulations. This section addressed the RCP goal to achieve a land use pattern that channels much of the region's future growth into existing urban communities, preserving and protecting the lifestyle and sensitive environment of the rural unincorporated area. The General Plan Update would be consistent with the land use pattern identified in this goal by concentrating new development within study areas near and within the City's urban core and along existing transportation corridors. Therefore, no revisions to the Draft EIR are warranted in response to this comment.

L3-27 This comment requests that the following regulations be considered when developing the Draft EIR: Assembly Bill (AB) 32, Senate Bill (SB) 375, SB 97, and Executive Order S-13-08. All four of these regulations are addressed in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR which provides an analysis of the greenhouse gas (GHG) emissions associated with the proposed project. The proposed project was compared for consistency with AB 32 reduction targets to determine significance in Section 4.7.3.1, Issue 1: Compliance with AB 32, of the Draft EIR. As discussed in this section, the purpose of the Escondido Climate Action Plan (E-CAP) is to reduce the City's GHG emissions to a level that is in compliance with the AB 32 reduction target for 2020. The E-CAP demonstrates that implementation of the GHG-reduction policies identified in the proposed General Plan Update and the E-CAP GHG reduction measures, the City would reduce emissions to a level that is below the AB 32 2020 reduction target. The proposed project's impact to GHG emissions would be reduced to a less than significant level. This comment has already been addressed in the Draft EIR.

L3-28 This comment lists several SANDAG publications and encourages the City to evaluate the proposed project based on these plans. These publications are guidance documents; not regional plans or regulations. Therefore, a consistency evaluation is not required in the Draft EIR. The General Plan Update has incorporated Smart Growth principles into the planning document and the Designing for Smart Growth, Creating Great Places in the San Diego Region document is referenced in the Land Use and Community Form Element. The City will consider implementation of the guidelines identified in the referenced publications as future development projects are proposed. However, no revisions to the Draft EIR are necessary as a result of this comment.

Comments

Responses

SAN DIEGO COUNTY  
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776  
619.400.2400 WWW.SAN.ORG

February 24, 2012

Mr Jay Petrek, AICP  
City of Escondido  
Planning Division  
201 North Broadway  
Escondido, California 92025-2798

Re: **City of Escondido General Plan Update Draft Environmental Impact Report**

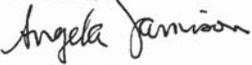
Dear Mr Petrek:

**Letter L4: San Diego County Regional Airport Authority**

- L4-1. The San Diego County Regional Airport Authority (SDCRAA) appreciates notice of availability of a draft environmental impact report (EIR) for the project referenced above and offers the following comments.
- L4-2. On pages III-21 and VI-23, it is recommended that "the County of San Diego", as the official name of the government entity, be cited as the owner and operator (rather than sponsor) of McClellan-Palomar Airport. San Diego County is a generic term referring to the geographic location (as used in our own agency name) apart from the specific agency of government. Similarly, it would be preferable to say that the airport is located in the "city" (rather than "City") of Carlsbad as a geographic location apart from the specific municipal corporation, particularly given that the airport is not owned or operated by that City government.
- L4-3. While the description of the Airport Influence Area (AIA) on page III-21 is accurate, that discussion might be augmented to note that no overflight notification areas from the McClellan-Palomar Airport - Airport Land Use Compatibility Plan (ALUCP) apply to land within Escondido, nor does Escondido contain any terrain penetrations to McClellan-Palomar Airport airspace surfaces.
- L4-4. Aviation Policy 11.2 (pages III-41 & X-33) should indicate that all applicable development should be in conformance with the McClellan-Palomar ALUCP. As worded, the policy states that all development in the AIA is required to be in conformance with the General Plan. A general plan must be made consistent with an adopted ALUCP, not the other way round, or the affected local agency must override the ALUCP through a State statutory procedure.
- L4-5. The statement on page VI-23 that the ALUCP requires new residential development to be conditioned with a real estate disclosure statement mixes ALUCP terminology. The ALUCP requires a permitting local agency to condition new residential uses proposed within the overflight notification area to record that notification on affected properties, but none of the overflight notification area extends into Escondido. By contrast, State law requires that professionals in real estate transactions disclose to prospective property owners that a property is located within an AIA if that circumstance applies, but this does not place any conditioning or recordation requirement upon the City of Escondido or property owners. A portion of the AIA does extend into Escondido, as accurately mapped in Figure III-10, and real estate

- L4-1 This comment is an introduction to the comments addressed in response to comments L4-2 through L4-6. Therefore, no further response is necessary.
- L4-2 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- L4-3 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. The information presented in the Draft EIR related to the McClelland Palomar Airport is accurate; however, Section 4.8.3.5, Issue 5: Airports, of the Draft EIR has been revised as follows to clarify that the project area is outside of the airport's overflight notification area.  
  
The McClellan-Palomar Airport is located approximately 10 miles to the west of the proposed project area. Portions of the proposed project area, west of I-15, are within the McClellan-Palomar Airport's AIA Review Area 2, which has the same height restrictions as identified above for the Ramona AIA Review Area 2; however, the General Plan Update area is located entirely outside of the airport's overflight notification area. The General Plan Update proposes low density residential land uses (Estate I, Estate II, Rural I, and Rural II) or public land/open space within the AIA for the McClellan-Palomar Airport.
- L4-4 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- L4-5 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

## Comments

- L4-5. cont.** professionals are thus obligated to make such disclosure for affected properties in the practice of their profession.
- Similarly, Noise Policy 5.15 (pages VI-35 and X-49) would involve only real estate professionals in disclosure, rather than McClellan-Palomar Airport itself or the County of San Diego as its owner/operator.
- L4-6.** Thank you for the opportunity to offer comment on the General Plan Update draft EIR. Please contact Ed Gowens at (619) 400-2244 or egowens@san.org if you have any questions regarding this letter.
- Yours truly,
- 
- Angela Jamison  
Manager  
Airport Planning
- cc: Amy Gonzalez, SDCRAA – Director, Counsel Services  
Sandy Hesnard, Caltrans – Division of Aeronautics  
Chris Schmidt, Caltrans, District 11  
Peter Drinkwater, Director, County of San Diego Airports

## Responses

- L4-6** This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

Comments

Responses



# VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

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Director

February 27, 2012

Jay Petrek, AICP Principal Planner  
City of Escondido Planning Division  
201 North Broadway  
Escondido, CA 92025

Subject: Notice of Availability of a Draft Environmental Impact Report (EIR)

Project: Escondido General Plan Update, Downtown Specific Plan Update, and  
Climate Action Plan, SCH Number 2010071064, City Project Number  
PHG 09-0020 and PHG 10-0016

Dear Mr. Petrek:

I have reviewed the referenced documents and the planning information as it relates to the, Sphere of Influence, area that overlaps with Valley Center Municipal Water District. The land use planning information provided would appear to be fairly consistent with densities indicated by the County General Plan documents on which our facility planning is based.

Sincerely,

Wally Grabbe, PE  
District Engineer

**Letter L5: Valley Center Municipal Water District**

L5-1 This comment states that the Valley Center Municipal Water District has reviewed the Draft EIR and concurs with the land use planning information provided in the document. No further response is necessary.

**Comments**

**Responses**

February 27, 2012

Patricia Borchmann  
1141 Carrotwood Glen  
Escondido, Ca 92026  
760 580-7046

**Letter O1: Patricia Borchmann**

Jay Petrek, Principal Planner  
City of Escondido  
Planning Division  
201 N. Broadway  
Escondido, Ca 92025

**RE: Public Comments on General Plan/Downtown Specific Plan Update – Draft EIR – (SCH 201 007 1064)**

Dear Jay,

**O1-1.** Thank you for opportunity to participate in process with public comments on the draft EIR prepared for the General Plan, and Downtown Specific Plan update.

**1. Visual Resources, Community Character, Historic Resources**

**O1-2.** The impact analysis of the Downtown SPA indicates development under the proposed Downtown SPA **would not** have potentially significant impacts to existing **visual resources, community character, and historic resources**. As an observant concerned citizen, I disagree with that conclusion because it appears to **understate**, or underestimate the actual extent of visual impact which proposed changes will likely cause, based on the proposed drastic increase in building height (up to 85’), producing a high-rise urban profile, and extreme density increases in the retail core area of Downtown’s Specific Plan Area..

**O1-3.** **In Section 4.1.3.3., Issue : Visual Character or Quality, Community Character:** The draft General Plan update reflects: “the implementation of the proposed General Plan update would have the potential to change **but would not substantially degrade the existing visual character or quality in the General Plan update area**. The City has existing regulations in place, and the General Plan update and Downtown Specific Plan update propose new policies to ensure future projects would be cohesive, high quality development that would not degrade existing visual character or quality.”

**O1-4.** The analysis seems to fail to fully recognize the actual extent of disparity and contrast which will result between the size, scale and mass of an existing 1-2 story building profile currently predominant in the Downtown Retail Core/Historical Downtown District, with the dramatically more massive size, scale and mass of a more high-rise urban profile, resulting from the proposed land use, building height changes and density increases proposed under the General Plan/Downtown SPA update. The analysis fails to fully recognize that the existing 1-2 story buildings (many of which

**O1-1** This comment is an introduction to the comment letter and does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

**O1-2** This comment states that the commenter disagrees with the conclusion that visual resources, community character, and historic resources impacts would be less than significant because an increase in allowable building height to 85 feet would produce a high-rise urban profile and because of extreme density increases in the Downtown Specific Plan Area (SPA) retail core area. Building heights of 85 feet are currently allowable throughout the Downtown SPA, including adjacent to the retail core area; therefore, the Downtown Specific Plan Update does not propose a drastic height increase compared to the existing plan. In areas where the Downtown SPA boundaries are proposed for expansion (north of Washington Avenue, east of Palomar Hospital, south of Fifth Avenue, and west of Pine Street) the current zoning standards include either no height restrictions, or limits of 75 feet. However, the Draft EIR acknowledges in Section 4.1.3.2, Issue 2: Scenic Resources, that the proposed General Plan Update would accommodate increased building heights in the Historic Downtown District. Therefore, it was concluded that growth accommodated by the proposed land use designations would have the potential to adversely affect the historic exterior appearance of the existing historic buildings and the district as a whole. However, the development standards proposed in the Downtown Specific Plan Update would protect scenic historic buildings from adverse impacts associated with building height increases through increased front setback requirements proposed in the Specific Plan and other means that encourage compatibility between buildings. Therefore, the proposed project’s impact related to adverse changes to a historic district would be less than significant. Increased building heights surrounding Grape Day Park are addressed in Section 4.1.3.3, Issue 3: Community Character or Quality. The proposed development pattern and park extension in this area would provide additional focus on Grape Day Park as a visual resource, which would enhance the existing character of the area. Additionally, the building height limit of 85 feet would only be allowable outside of the historic Grand Avenue retail core area. The maximum height in the retail core area of the Downtown SPA would remain 45 feet along Grand Avenue and 55 feet along the south side of Valley Parkway and north side of 2<sup>nd</sup> Avenue between Centre City Parkway and Palomar Hospital, as shown in Figure III-6, Building Height Limits, of the Downtown Specific Plan Update. Multi-story buildings are currently located in this area and comprise the existing condition of the area. Additionally, the historic retail core is currently built-

**Comments****Responses**

out, which means that some of the existing, low-intensity commercial developments may be redeveloped as more intensified commercial uses; however, extreme density increases would not be accommodated in this area. As discussed in Section 4.1.3.1 of the Draft EIR, a Certificate of Appropriateness (COA) would continue to be required for any physical changes to buildings in the Historic Downtown District. The purpose of the COA is to ensure that the historical character of the area is not adversely affected by new development. Therefore, the increases in building height and density that would be allowable in the historic retail core area with implementation of the proposed project would be appropriate for the area.

- O1-3 This comment provides several quotes from Draft EIR Section 4.1, Aesthetics. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- O1-4 This comment states that the Draft EIR does not fully recognize the extent to which proposed increases in allowable building heights in the Downtown Specific Plan Update would affect the visual character of the existing 1-2 story building profile in the retail core area and historical downtown district. This comment is based on the statements that 85 foot building heights would be allowable in areas with existing 1-2 story buildings, little transition would be provided, and building heights up to 75 feet are proposed in the Historic Downtown District. Building heights of up to 85 feet are currently allowable north of Valley Parkway, adjacent to the retail core area. Buildings up to 60 and 75 feet are also currently allowable in the Historic Downtown District and adjacent area, including an area within the retail core with a 60-foot allowable building height. The proposed Downtown Specific Plan Update would provide additional transition between building heights by limiting building heights along Grand Avenue to 45 feet, surrounded by a 55-foot height limit along Valley Parkway and 2<sup>nd</sup> Avenue before transitioning to taller building heights. Therefore, the historic core retail area, located along Grand Avenue, would be located adjacent to mid rise, not high rise, structures. The commenter incorrectly states that the Downtown Specific Plan Update would increase the currently allowable building height limit up to 75 feet in the historic downtown district. As previously stated in this response, buildings heights up to 75 feet are currently allowable in the Historic Downtown District, although no buildings this tall have been built. Under the proposed General Plan Update, building heights would be limited to 45 feet in the historic retail core, and 55 feet on surrounding Downtown Historic District streets as currently stipulated in the adopted Specific Plan text. Building heights up to 85 feet would only be allowable in the Historic Downtown District outside of the historic retail core, to the east of the existing nine-story, high—rise hospital tower. These buildings would be separated from the rest of the downtown area by the existing nine-story hospital tower.

As discussed in response to comment O1-2, the Draft EIR acknowledges that increases in building height would occur in the Historic Downtown District, although building

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- are historically significant), will become dwarfed, diminished, overpowered, and sometimes shadowed in darkness, in contrast to new oversized high rise structures in close proximity .
- O1-4. cont.** As understood, high-rise residential buildings up to 85’ high, (w/100 du/acre density) may be located in a peripheral area surrounding the existing 1-2 story buildings in the retail core, with little transitional, or intermediate treatment. In the Downtown Retail Core Area/Historic Downtown District, high rise buildings up to 75’, (w/75.du/ acre density ) are proposed.
- O1-5.** The analysis seems to overly minimize the extent of actual change in the character of this area ,and falsely leads one to believe the proposed building height increase is relatively minor. In the Downtown Specific Plan’s retail core, there are only two existing high rise buildings (AT&T/Pac Bell facility, and Palomar Hospital). Otherwise, the typical existing building profile is low-rise (1-2 story building streetscape) in Escondido’s Downtown Retail Core/Historic District.
- O1-6.** Based on the extent of change from an existing predominantly low-rise urban profile to a high-rise urban profile, I strongly feel the Visual Character or Quality **will be significantly changed**, and that the changes could degrade the existing visual character or historic quality in the Historic Downtown District. That is why I think a reasonable person might **disagree with consultant’s conclusions that changes are not expected to “substantially degrade the existing visual character or quality in the General Plan update area”**. I also feel the consultant’s analysis of the area’s **existing community character fails to reflect the extremely high intrinsic value which surveyed residents and downtown merchants place on the City’s existing historic resources.**
- O1-7.** **In a quantitative analysis prepared in 2011 for “Escondido’s Future”, the value of Escondido’s historic resources in Downtown and Old Escondido Neighborhood were identified by residents who were surveyed, as one of the top three (3) existing amenities in the City, which are considered ‘Escondido’s treasures’.** <sup>(1)</sup>
- O1-8.** **In 2011, streets in a segment of the Historic Downtown District were closed, so the area could be used for film production purposes, because Escondido was specifically chosen by film-makers because of the existing unique ambience and historic charm. In 2011, another area in Old Escondido Neighborhood was specifically chosen in a nation-wide search, to be photographed for an automobile commercial, because of the unique charm and historical authenticity unfound elsewhere for winter photos on a residential street shaded by large trees. The visual value of historic resources are an irreplaceable existing amenity, which draws the film industry, and advertisers marketing products with commercial photography in prime locations with desirable backgrounds. This is an asset which deserves more emphasis and importance.**

- heights up to 45 feet would not result in a drastic height increase compared to the existing multi-story buildings in the area. Additionally, the Downtown Specific Plan Update includes design guidelines for the Historic Downtown District and a Certificate of Appropriateness would continue to be required for any physical changes to buildings in the historic downtown district. These guidelines and regulations would ensure that the historical character of the area is not adversely affected by new development. Additionally, future development projects would be subject to design review by City staff and/or Planning Commission, as required by Section 33-1357 of the Zoning Ordinance, Design Review Standards. Section 33-344 of the Zoning Ordinance also requires design approval and establishes development standards to ensure that new development does not have a negative impact on the physical or visual character of the area in which it is located. If a future proposed project in the Downtown SPA would adversely impact the visual character or quality of an area surrounding the project site, modifications would be required prior to project approval. Therefore, with implementation of existing City policies and regulations, and the Downtown Specific Plan Update, the proposed project would result in a less than significant impact to visual character or quality. Therefore, the Draft EIR does not fail to fully recognize the extent of visual contrast that would occur in the downtown area.
- O1-5** This comment states that the Draft EIR minimizes the actual change in character that would occur in the downtown retail core as a result of building height increases because there are only two existing high rise buildings in the retail core. Refer to response to comment O1-4. The allowable heights proposed in the Downtown Specific Plan Update in the Historic Downtown District and surrounding area are not substantially different than the existing plan and more accurately reflect existing conditions. Under the proposed General Plan Update, building heights would be limited to 45 in the historic retail core, and 55 feet on surrounding Downtown Historic District streets as currently adopted. The proposed Downtown Specific Plan Update would provide a height transition between the historic Grand Avenue retail core and allowable taller buildings outside the district that is not identified in the existing plan but is envisioned in the adopted Downtown Specific Plan purpose statement which calls for taller structures, and buildings constructed along the street edge. The provision of a height transition would allow for gradual height increases along this corridor and minimize the visual change to the area. Therefore, the Draft EIR does not misrepresent information regarding building heights.
- O1-6** This comment reiterates the commenter’s opinion that visual character and quality in the Historic Downtown District would be significantly impacted by future development allowed under the proposed Downtown Specific Plan Update, based on the reasons given in comments O1-2 through O1-5. Refer to the responses to these comments. Impacts would not occur as outlined in these comments and the

<sup>(1)</sup> Escondido’s Future – Survey 2011 Results Summary – source – Mel Takahara

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Draft EIR analysis does not fail to disclose any information that would change the less than significant conclusion related to visual character and quality impacts.

- O1-7 This comment states that the Draft EIR fails to reflect the value that Escondido residents and merchants place on the City's existing historic resources. The City disagrees with this conclusion. The Old Escondido Historic District and historic downtown are recognized as significant visual resources in Draft EIR Section 4.1, Aesthetics, and as significant historic resources in Section 4.5, Cultural Resources. In addition, building heights are limited to 35 feet in the southeastern portion of the Downtown Specific Plan adjacent to the Old Escondido Neighborhood to provide an appropriate transition for this historic single-family area. Therefore, the Draft EIR recognizes the value of the City's historic resources as appropriate in the context of the environmental impact analysis.
- O1-8 This comment provides additional information supporting the Historic Downtown District and states that it is an asset which deserves more emphasis. Refer to response to comment O1-7. The Draft EIR recognizes the value of the City's historic resources as appropriate in the context of the environmental impact analysis. No further response is necessary.

**Comments**

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- O1-9.** It is an understood, and supported premise that the basis of the General Plan update follows strategies promoting “smart growth” and higher densities in the urban core, and discourages urban sprawl into rural peripheral areas.
- O1-10.** It is an unfair assessment however, to conclude the proposed General Plan update’s impacts on visual resources and community character will not be degraded. I think it might be appropriate to more fully reassess the General Plan updates’ actual impacts on Visual Resources and Community Character (and Historic Resources). If necessary, potentially significant impacts could be overridden by Findings of Overriding Considerations, but that process would provide a more authentic impact analysis, and a more authentic effort to determine if additional mitigation measures are feasible. Possible mitigation measures might **include additional** design standards to provide transitional treatments, graduated roof height levels, variation in wall planes and materials to avoid a monotonous wall plane or surfaces. Encouragement of roof terraces, large balconies, and opportunities for open community garden spaces on roof surfaces, and specific design standards to promote solar energy in urban high rise buildings are also suggested.

**2. Population**

During Council’s discussion on Population, Jay you indicated how the City’s most recent data on unit occupancy increased from the former rate of 2.44 persons per unit to over 3 persons per unit. Your discussion indicated how the forecast changes population, and will affect targets for affordable housing and other components most linked to Housing Element. It was noted that any negative impacts resulting from increased unit occupancy rates could be overridden by Findings by Council, that Overriding Considerations would Outweigh certain negative impacts. I suggest that the applicable draft EIR sections be reevaluated and possibly revised to reflect these findings.
- O1-11.** Although it may be true that Findings of Overriding Considerations may allow Council to approve the EIR despite negative impacts, this issue made me wonder about how this specific increased occupancy rate was evaluated in the assessment of other important sections of the EIR analyses. This would likely be relevant in assessment of impacts on traffic generation rates, demand for all public services and infrastructure (public services from schools, to increased service demand for police, fire and emergency service, to other major infrastructure systems). Unless the same increased unit occupancy rate (over 3.0 persons per unit) were applied in the impact analysis in other sections of the EIR, such analysis would result in an underestimated project impact from development under the General Plan. How was this increased unit occupancy treated by consultants in the various impact analyses prepared for this General Plan update? If not already fully assessed, a reassessment is recommended for purposes of accuracy in various technical studies, by reflecting the current occupancy rates.

- O1-9** This comment states that the General Plan Update follows strategies supporting smart growth. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- O1-10** This comment states that it is unfair to conclude that the General Plan Update will not degrade visual resources or community character with the inclusion of smart growth strategies and suggests that impacts be reassessed. This comment does not include a specific reason or example of inadequacy in the Draft EIR. However, this comment lists several measures that the commenter feels would reduce the potential for impacts to visual character and quality including design standards to provide transitional treatments, graduated roof height levels, variations in wall planes and materials to avoid monotonous surfaces; and encouragement of roof terraces, balconies, community gardens on roofs, and solar panels. These measures have already been incorporated into the Downtown Specific Plan Update, General Plan Update, and existing regulations, as identified in Table O1-10, below. Therefore, consistent with the conclusion implied in this comment, the Draft EIR determined that visual resource and community character impacts would be less than significant with implementation of the General Plan Update and Downtown Specific Plan policies, and existing regulations.

**Table O1-10. Suggested Measures and Corresponding Proposed Policies**

<b>Measures Suggested in Comment O1-10</b>	<b>Corresponding Location in General Plan Update, Downtown Specific Plan Update, Escondido Climate Action Plan, or Existing Regulations</b>
<i>Design regulations</i>	<ol style="list-style-type: none"> <li>1. General Plan Update Land Use and Community Form Element – Recommended Urban Form Characteristics</li> <li>2. Downtown Specific Plan Update Chapter III, Design Principals, Guidelines, and Standards; and Chapter IV, Historic Preservation Standards and Guidelines</li> <li>3. Design Guidelines for Homeowners of Historic Resources</li> </ol>
<i>Transitional treatments</i>	<ol style="list-style-type: none"> <li>1. General Plan Update Land Use and Community Form Element – Recommended Urban Form Characteristics, Target Area Guiding Principles, Community Character Policy 1.2, Residential Development Policy 3.9, and Office Land Use Policy 9.4</li> <li>2. Downtown Specific Plan Update Chapter III, Design Principals, Guidelines, and Standards</li> <li>3. Design Guidelines for Homeowners of Historic Resources: Section II-E, Infill Development; Section III, Industrial/Packing House Design Guidelines</li> <li>4. Zoning Ordinance Section 33-1357, Design Review Standards</li> </ol>
<i>Graduated roof height levels</i>	<ol style="list-style-type: none"> <li>1. General Plan Update Land Use and Community Form Element – Target Area Guiding Principles</li> <li>2. Downtown Specific Plan Update Chapter III, Design Principals, Guidelines, and Standards</li> <li>3. Design Guidelines for Homeowners of Historic Resources: Section II, Residential Design Guidelines</li> </ol>

Comments

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Table O1-10 continued

Measures Suggested in Comment O1-10	Corresponding Location in General Plan Update, Downtown Specific Plan Update, Escondido Climate Action Plan, or Existing Regulations
<i>Variations in wall planes and materials to avoid monotonous surfaces</i>	<ol style="list-style-type: none"> <li>1. General Plan Update Land Use and Community Form Element –Residential Development Policy 3.10 and Planned Development Policy 6.3</li> <li>2. Downtown Specific Plan Update Chapter III, Design Principals, Guidelines, and Standards</li> <li>3. Zoning Ordinance Section 33-1357, Design Review Standards</li> </ol>
<i>Encourage terraces and balconies</i>	<ol style="list-style-type: none"> <li>1. Downtown Specific Plan Update Chapter III, Design Principals, Guidelines, and Standards</li> <li>2. Design Guidelines for Homeowners of Historic Resources: Section II, Residential Design Guidelines</li> </ol>
<i>Encourage community gardens on roofs</i>	<ol style="list-style-type: none"> <li>1. General Plan Update Resource Conservation Element - Agricultural Resources Policy 4.6</li> <li>2. General Plan Update Community Health and Services Element – Health and Wellness Policy 1.7</li> </ol>
<i>Promote Solar Energy</i>	Escondido Climate Action Plan Measures R2-E1 (New Residential Energy Efficiency Requirements), R2-E2 (New Commercial Energy Efficiency Requirements), R2-E3 ( New Residential Renewable Energy Requirements), R2-E4 (New Commercial Renewable Energy Requirements), R2-E5 (Existing Residential Energy Retrofits), and R2-E6 (Existing Commercial Energy Retrofits)

O1-11 This comment states that the Draft EIR should be revised using a unit occupancy rate of over three persons per unit to forecast population changes. The Draft EIR impact analyses related to aesthetics, agriculture, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, recreation, and traffic are based on the amount of physical development that would occur under the buildout of the proposed General Plan Update rather than the increase in population that the Plan would accommodate. Any changes in unit occupancy would not affect these analyses because they would not affect the buildout of the General Plan Update. The population-based analyses in Section 4.13, Population and Housing; Section 4.14, Public Services; and Section 4.17, Utilities and Service Systems, are based on an increase of 9,924 dwelling units within the project area by year 2035, and an additional 40,000 to 50,000 persons, which is a unit occupancy rate between 4 and 5 persons per unit. Therefore, these Draft EIR analyses are conservative and do not need to be revised.

O1-12 Refer to response to comment O1-11. The Draft EIR fully assessed the potential impacts of population growth that would occur under the proposed General Plan Update.

Comments

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	Comments	Responses
O1-13.	<p><b>3. Traffic</b></p> <p>Although the draft General Plan EIR recognizes that during peak hours, projected service levels will be reduced to Levels C, D, and E in the Urban Core, the extent of negative impacts on traffic patterns caused by the increased densities and an urban high-rise profile seems to have been overly minimized in the analysis. <b>By emphasizing these degraded service levels are only projected during peak hours, the limited occurrences supposedly indicates that negative impacts are otherwise acceptable? I assert that that the anticipated reduction in service levels during peak hours is an unacceptable significant negative impact, and should be treated as such.</b></p>	<p>O1-13 This comment misinterprets use of the peak hour traffic levels in the Traffic Impact Analysis prepared by LLG Engineers (2011) as an indication that unacceptable LOS levels outside of peak hours are acceptable. Peak hour traffic levels are used in the traffic analysis because they represent the worst-case traffic volume scenario. If projected service levels are acceptable during peak traffic hours, it is reasonable to assume traffic levels would be acceptable during off-peak hours, which typically have lower traffic volumes than peak hours. Likewise, if a project would result in a significant impact during the peak hour, mitigation of peak hour conditions to a less than significant level would also reduce off-peak hour impacts to a level less than significant. Use of peak hour conditions represents a conservative analysis. Therefore, the Draft EIR does not understate potential traffic impacts and no revisions to the Traffic Impact Analysis or Draft EIR are warranted.</p>
O1-14.	<p>One could reasonably expect that degraded service levels during peak hour in the urban core would likely also cause other offsite impacts, and cause increased congestion and traffic impacts on other peripheral transportation routes. Drivers will likely seek alternative ways to travel more quickly across town, or to-from freeway interchanges on I-15 and SR 78. Therefore, I believe actual development under the General Plan update may cause a greater traffic impact than the extent specifically evaluated in this draft EIR traffic analysis. If not already fully addressed, the full traffic impact analysis in the General Plan update should be undertaken, including offsite impacts.</p>	<p>O1-14 This comment suggests that the Draft EIR may not fully address traffic impacts because drivers will seek alternative travel routes due to congestion in the urban core. The methodology used in the Traffic Impact Analysis (LLG Engineers, 2011) is described in detail in Appendix L1. The traffic impact study area encompasses the entire City of Escondido as well as adjacent areas in the City's Sphere of Influence, and includes the analysis of over 300 street segments and 40 intersections. The discussion of traffic impacts is separated into areas to best present the results of the analysis; however, the circulation system was analyzed as a whole. Therefore, impacts in the urban core were not isolated from surrounding roadways. The Traffic Impact Analysis fully evaluates the potential impacts of the proposed project using the SANDAG Series 11 Regional Traffic Model, which has been fully approved by the SANDAG Board of Directors. Analysis of alternative traffic distributions based on this comment would be speculative. Additionally, a Downtown Core Analysis was prepared for the proposed project by LLG Engineers (2011), and was included in the Draft EIR as Appendix L2. The Downtown Core Analysis specifically addresses potential traffic impacts within the historic downtown core. As discussed in this analysis, the City is proposing through the General Plan Update to accept LOS E as the minimum threshold of acceptance for vehicular operations in the downtown retail core, which constitutes Valley Parkway, Grand Avenue, and 2<sup>nd</sup> Avenue and intervening side streets between Palomar Hospital and the North County Transit District Transit Station. This is one letter-grade lower than would be acceptable elsewhere throughout the City, because of the anticipated enhanced economic vitality in this area and is consistent with LOS provisions applied to similar downtown urban environments. This would result in increases in traffic volumes and density; however, the City would at the same time be investing in infrastructure improvements that enhance the transit, pedestrian, and bicycle operations within the downtown core area. When viewed from a "Complete Streets" perspective addressing all users, a reduction in vehicular-only LOS would be off-set by a corresponding increase in non-vehicular activity. Nevertheless, for the purposes of the Draft EIR traffic level</p>
O1-15.	<p>Additionally, the issue of increased traffic congestion and reduced service levels Downtown are likely to create a more negative impression of the City. This is critical especially for visitors, or potential customers trying to travel to the City using various freeway interchanges, to destinations, or for businesses with anyone touring the City as a potential employer. Actual Service levels during peak hour conditions often play an important, and major role in the image projected by the City, and may have an adverse effect on any type of an improved future employment base the City tries to form.</p>	
O1-16.	<p><b>5. Grading, Landform Alteration</b></p> <p>The draft General Plan EIR reflects a series of policies which, with adherence, appear to form the basis of mitigation measures to assure potentially significant impacts would be averted.</p>	
O1-17.	<p>While the collective intent of conformance with these policies 'sounds good' on a macro-level, at a micro-level, this alone is an ineffective method. As explained subsequently in further detail, some of the policies are internally inconsistent, which often makes policy implementation overly confusing, difficult, and overly complex.</p> <p>For instance, policies in the General Plan's new Prosperity Element promote processes which are business-, and user-friendly, simple to apply without 'hidden requirements' or surprises. This observation is not presented as a criticism of</p>	

**Comments****Responses**

of service (LOS) analysis in Section 4.16.3.1, Issue 1: Traffic and LOS Standards, LOS D or better operations were considered acceptable for intersection and street segment operations, while LOS E and F operations were considered unacceptable, regardless of location. No revisions to the Draft EIR are necessary as a result of this comment.

- O1-15 This comment states that reduced traffic levels of service may have a negative effect on the City's future employment base. This comment is speculative and does not pertain to an environmental issue under CEQA. Refer to the response to comment O1-14. The Draft EIR adequately determines potential future traffic levels of service in the project area in accordance with adopted traffic models. No further response is necessary.
- O1-16 This comment states that the General Plan Update policies form the basis of mitigation measures in the Draft EIR. This is not accurate. The Draft EIR analyzes the potential environmental impacts of the General Plan Update, including implementation of the General Plan Update policies, which are part of the proposed project. Therefore, as part of the proposed project, the General Plan Update policies are considered to be project features that would reduce the potential for environmental impacts to occur from future development projects consistent with the proposed General Plan Update.
- O1-17 The first part of this comment states that conformance with the proposed General Plan Update policies would be ineffective at the micro-level. As a programmatic document, the Draft EIR cannot determine the precise impacts that would occur from future development projects, because they are currently unknown and such analysis would be speculative (Section 15064 of the CEQA Guidelines). Therefore, it is not appropriate for the Draft Program EIR to propose mitigation at project-specific level. The Draft EIR addresses the proposed General Plan Update land use designations as a whole and identifies proposed policies that, at the programmatic level, would reduce potential impacts, in some cases to a less than significant level. As discussed in Section 2.3, Intended Use of the EIR, any proposal for future development within the City's jurisdiction must be reviewed pursuant to the terms of the General Plan Update, E-CAP, implementing entitlements, and, if applicable, the Downtown Specific Plan. As addressed in CEQA Guidelines Section 15168(c), if a later activity would have effects not examined in the EIR, a new Initial Study would need to be prepared leading to the preparation of a future CEQA document. Therefore, mitigation for "micro-level" impacts would be addressed in the environmental analyses completed for future development projects.

The second part of this comment suggests that the General Plan Update policies are internally inconsistent; however, the commenter does not provide an example of two policies within the proposed General Plan Update that would conflict with each other. The proposed General Plan is a separate document from the Zoning Ordinance,

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the draft EIR prepared for the General Plan Update. Instead, this observation is presented to indicate the current complexity which exists, because development standards, guidelines and policies controlling property development are currently not cohesively described in a single, stand-alone document, or in a single handout for use by the public, or use by consultants.

Instead, for instance, the requirements for property development are described in **multiple** sections of the underlying zone in the Zoning Ordinance, or grading standards which are described in the Grading Ordinance. Beyond those, the General Plan’s policies for Resource Conservation (Chapter 6) , are treated separately, as are Guidelines for Hillside Development, ridgeline protection, scenic vistas, view corridors (I-15), or sensitive habitats (such as wetlands, streamcourses, sensitive habitat, steep slopes).

O1-17.  
cont.

Because these extremely important supplemental policies and guidelines seem to be treated almost as if they are ‘afterthoughts’, separate, or subordinate to explicit standards defined in the Zoning Ordinance or Grading Ordinance, they are often overlooked, often misunderstood, or are unclear as to whether standards are absolute, mandatory, optional, required, or recommended. As often as this Council directs staff to ‘simplify’ processes, a more thorough method to develop a stand-alone comprehensive hand-out document is highly recommended. This effort would provide a major benefit by avoiding instances where user’s don’t inadvertently overlook important development constraints which otherwise often become surprise obstacles at later stages in the development process. I would expect this type of effort would hopefully occur in the not-so-distant future, perhaps concurrently with the City’s subsequent comprehensive update of the Zoning Ordinance. Until a more comprehensive method to implement General Plan policies with a subsequent, more comprehensive single- source handout to fully describe development standards is prepared, the need for, the intent, and commitment for follow-up actions would at least be appropriate to explain in this Draft EIR for the General Plan Update.

**6. Environmental Review**

O1-18.

The General Plan Update’s Section 18 identifies a series of Goals pertaining to Environmental Review Policies 18.1 – 18.4. Under Policy 18.1, the draft EIR indicates the requirement to maintain Environmental Quality Regulations (EQR) in accordance with the California Environmental Quality Act (CEQA).

O1-19.

Since the City routinely utilizes federal funds under Community Development Block Grants on an annual basis, (sometimes for City-projects, or to subsidize valuable services performed by local non-profit organizations), or possibly other federal grant sources, it is suggested this section of the General Plan Update EIR be expanded, to also include requirements to maintain EQR in conformance with National Environmental Policy Act (NEPA), when necessary.

Grading Ordinance, and other City regulations. The General Plan is a planning document that guides future City-wide development, while other City regulations, such as the Zoning and Grading Ordinances, direct specific development actions. It would be inappropriate to combine planning guidelines and regulations into one comprehensive document. Future development would be subject to both the General Plan Update policies and other applicable City regulations. The General Plan ensures that future development is consistent with the overall vision for the City, and the City’s ordinances would ensure that specific adverse effects would not occur as a result of a development action, such as impacts to hillsides as a result of a proposed grading plan. Chapter X of the General Plan Update is the Implementation Program for the policies identified within the General Plan. The Implementation Program ensures that the overall direction set forth in the General Plan is translated from policy to action with timeframes for implementation. The purpose of the Implementation Program is to describe the specific actions the City will require of new developments, and will undertake itself, to achieve the community’s vision for its future as expressed in the General Plan goals, objectives, and policies. Therefore, a comprehensive program to implement the General Plan Update policies has been prepared and is available to the public. The inclusion of both General Plan Update policies and City regulations in the Draft EIR environmental impact analyses is not contradictory because both would apply to future development under the proposed project. Therefore, no revisions to the Draft EIR or General Plan Update are necessary as result of this comment.

O1-18

This comment correctly summarizes Environmental Review Policy 18.1 in the Land Use and Community Form Element of the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

O1-19

This comment requests a change to Environmental Review Policy 18.1 in the General Plan Update. This comment suggests a change to the Draft EIR; however, it pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Future development projects proposed under the General Plan Update would be required to undergo environmental review as part of the project approval process, and would continue to be required to comply with NEPA requirements, if applicable. Therefore, no further response is necessary.

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**O1-20.** It seems the section 18 pertaining to Environmental Review would be an ideal location to reflect the intent of CEQA's mandate, to promote development which reflects efforts to first avoid, or minimize project-related impacts to the maximum extent feasible, and provide full mitigation to offset negative impacts to valuable natural resources and amenities, when impacts cannot be avoided.

**O1-20** This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

**O1-21.** In separate sections of the General Plan Update EIR, there are numerous examples where the text describes processes, with language which would probably be appropriate in a summary under the Environmental Review section 18. For instance, under the Mobility and Infrastructure Element's policies require use of best practices to maintain the highest possible energy efficiencies in water treatment system and infrastructure system to reduce costs and greenhouse emissions (Policy 12.9). Or, for example, Policy 14.6 requires new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion while encouraging implementation of low impact development measures, and maximum use of natural drainage ways consistent w/sound engineering and best management practices.

**O1-21** This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

**O1-22** This comment requests that the Draft EIR repeat details about the City's Environmental Quality Regulations (EQR) in the discussion of proposed General Plan Update policies. The EQRs are not a General Plan policy; therefore this is not the appropriate location for this information. No revision to the Draft EIR is necessary in response to this comment.

**O1-22.** On page 4.4-30, under Federal, State, and Local Requirements, the draft EIR refers to the City's Environmental Quality Regulations (EQR), as follows:

**O1-23** The discussion in Section 3.3 Environmental Setting, of the Draft EIR has been updated as follows in response to this comment:

The City of Escondido's geographic setting is characterized by hills and mountains surrounding an open valley bisected by Escondido Creek. Reidy Creek traverses the planning area from north to south and combines with Escondido Creek west of the Transit Station Target Area. The City includes a historic downtown and urban core area. Escondido's prominent public facilities are located downtown, providing convenient access for the community. City Hall, the performing arts and conference center, a central library, the multi-modal transit center, museums, theaters, Palomar Hospital's downtown campus, and an office, financial, and commercial employment base combine to establish the downtown area.

**O1-22.** "Additionally, the City's EQR require reporting programs to ensure that all required mitigation measures for development projects are properly and fully implemented with regards to impacts to biological resources, including habitat fragmentation and habitat that supports sensitive species."

This level of detail, and type of description also belongs in the draft EIR Section pertaining to Environmental Review in Section 18.

**7. Description of Environmental Setting**

Under Section 3.3, the general description for Environmental Setting describes:

"The City's geographic setting is characterized by hills, and mountains surrounding an open valley bisected by Escondido Creek.....".

**O1-23.** I feel this general description should be expanded to **also specifically identify the existence of Reidy Creek under the Description of Environmental Setting.** Reidy Creek is another important drainage feature which is recognized in other sections of the Draft EIR prepared for the General Plan Update, and was identified in the Notice of Preparation, and Notice of Completion. Reidy Creek is partially a natural drainage channel in it's upper reaches (approximately 3 miles in length?) adjacent to Broadway flowing from a north to south direction, until the creek reaches the channelized segment (approximately 2 miles? In length). From there, the

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<p>O1-23. cont.</p>	<p>channelized portion of Reidy Creek combines with Escondido Creek channel at Mission Avenue between Centre City Parkway and Quince Street.?</p> <p>An expanded description for “Environmental Setting” to include Reidy Creek would be consistent with the description of Riparian Vegetation (page 4.4-9) under Biological Resources, and the Riparian Forest category displayed on the Vegetation Classes (Figure 4.4.2). Due to the relative rareness, sensitivity, and high level of biological habitat value usually associated with rural segments of natural drainage channels supporting riparian vegetation, the current superficial description under the draft EIR’s summary of the Existing Setting on page 3.3 seems incomplete, and overlooks an important element.</p>	<p>O1-24 This comment expresses the commenter’s hope that someday a park or open space system may be developed adjacent to Reidy Creek Golf Course. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary. This comment also requests a reference to Reidy Creek be added to the description of the Setting for the proposed project. Refer to response to comment O1-23. This revision to the Draft EIR has been made.</p>
<p>O1-24.</p>	<p>It is hoped that at some future point in time, it may become possible to perhaps assemble a series of parcel acquisitions for purposes of forming a linear park, or a contiguous open space system adjacent to Reidy Creek Golf Course, when undeveloped portions of Reidy Creek are developed. Or a preserve system could be assembled to function as a mitigation bank area. In order to protect that option to possibly preserve and protect portions of Reidy Creek’s unchannelized section in the future, it is important to identify this natural streamcourse as a feature under the description of the City’s Environmental Setting.</p>	<p>O1-25 This comment states that it may be suitable to add additional information about the components of the Escondido Creek Master Plan to the Draft EIR. The comment does not specify what information should be included, or the appropriate place in the Draft EIR to include this information. The Escondido Creek Master Plan was adopted during the public review period for the Draft EIR; therefore, it is not appropriate to include this plan in the baseline conditions for the Draft EIR. It is acknowledged in this response that the Escondido Creek Master Plan has been adopted by the City. The purpose of the Master Plan is to provide guidelines for the future development of a trail along a seven mile stretch of Escondido Creek from Beven Drive to the transit center and Quince Street. However, no revisions to the information provided in the Draft EIR are necessary in response to this comment.</p>
<p>O1-25.</p>	<p><b>8. Escondido Creek Master Plan</b></p> <p>Since the City Council recently adopted the final Escondido Creek Master Plan (January 25, 2012), it may be suitable to more extensively reflect components of this adopted Master Plan in the draft EIR and General Plan, than is currently described in the document(s).</p>	<p>O1-26 This comment expresses approval for text in the General Plan Update and Downtown Specific Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.</p>
<p>O1-26.</p>	<p>I was extremely glad to see that the draft General Plan/Downtown Specific Plan Update <b>generally</b> reflects the City’s “vision” for Escondido Creek. On page 1-11, the Draft General Plan Update (Section 5) for Parks, Trails and Open Space, (paragraph 2), states:</p> <p>“Escondido Creek is enhanced as a shaded rail system that connects to other regional trails and open space systems, and includes recreational improvements with exercise stations, seating areas, and mini-playgrounds.”</p>	<p>O1-27 This comment requests that the Draft EIR be expanded based on the recently adopted Escondido Creek Master Plan to reflect a future zoning overlay, specify design standards, and identify theme and features to be constructed in future phases. The Draft EIR addresses the potential environmental impacts of the proposed General Plan Update, Downtown Specific Plan Update, and Escondido Climate Action Plan. The Draft EIR is not an appropriate document in which to outline the planning goals or specify design guidelines for Escondido Creek as requested in this comment, which would be more appropriately directed toward specific implementation measures and City Council Action Plans. As stated in response to comment O1-25, the Escondido Creek Master Plan was adopted during the public review period for the Draft EIR; therefore, it is not appropriate to include in the baseline conditions discussion for the Draft EIR. No revision to the Draft EIR is necessary in response to this comment.</p>
<p>O1-27.</p>	<p>It seems that the discussion about the Escondido Creek Master Plan should be expanded, to more comprehensively describe specific elements of the adopted Master Plan. For instance, it should more fully reflect excerpts from the actual Master Plan recently adopted for Escondido Creek, to function as a Class II bikepath/ pedestrian path. The current document could easily be expanded to further reflect a future Zoning Overlay district for Escondido Creek, and specify design standards for shade structures, furniture features, fencing design guidelines, identify themes, various design elements and signage, street crossings, security and safety features which will be constructed in future phases.</p>	

## Comments

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O1-27.  
cont.

Since the draft General Plan Update EIR and Downtown Specific Plan are still at a point where minor revisions are still possible, it seems this might prove to be a worthwhile and valuable undertaking. If the General Plan Update and EIR were expanded at this point to more consistently and comprehensively reflect subsequent plans for phased construction for the Escondido Creek Master Plan, **the undertaking would greatly simplify subsequent efforts to obtain grant funding from various sources if the General Plan were structured in such a way.**

At the recent Strategy Session meeting (February 21, 2012), there was discussion among members of The Escondido Creek Conservancy (TECC) and Reveal the Creek (REC) groups to explore the possibility that future portions for phased improvements in the Escondido Creek Master Plan area might be suitable for use as an off-site mitigation bank area for other important projects proposed in other areas of the City, (such as off-site mitigation for extension of Citracado Parkway for instance). **These options would be easier to implement in the future, if such possibilities were specifically anticipated and generally described in the draft EIR prepared for the General Plan Update.**

O1-28.

As an interested citizen/unaffiliated member of Reveal Escondido Creek, I think there would be distinct advantages for the City to reflect possible opportunities to focus on future construction phases for segments of the Escondido Creek Master Plan. The draft General Plan EIR could also reflect the **possibility to utilize portions of the Escondido Creek Master Plan as an Overlay area, as a potential off-site mitigation bank area, to offset future impacts of City projects, or street extensions pursuant to the Circulation Element, or street widening**. Use of this method for future mitigation banking opportunities would simultaneously accelerate, simplify, and speed-up the ultimate construction of Escondido Creek Master Plan's features, so the City's residents, citizens, students, bicycling enthusiasts, recreational users, members of the public and visitors could more immediately begin to enjoy the multiple benefits resulting from the implementation of the Escondido Creek Master Plan.

O1-29.

Thank you for your patience, and that of your consultants, in evaluating public comments on the Draft EIR prepared for the General Plan and Downtown Specific Plan Update. It is an exciting process, to play a small but active part as a member of the public, in the development of the City's future, and master plans for future development in Escondido until 2035.

I was impressed the Climate Action Plan was made part of the General Plan update, and that the Plan reflects some of the previous public comments generated during earlier public outreach efforts.

Respectfully,

Patricia Borchmann

O1-28

This comment requests that the Draft EIR explore the option of using portions of the Escondido Creek Master Plan area as a mitigation bank. The Draft EIR is not a planning document that outlines future options for development or improvements in the City. The Draft EIR is an informational document that addresses the potential environmental impacts of the proposed General Plan Update, Downtown Specific Plan Update, and Escondido Climate Action Plan. The Escondido Creek Master Plan is not part of the proposed project. Therefore, the Draft EIR is not an appropriate place to explore options for implementation of the Escondido Creek Master Plan. No revision to the Draft EIR is necessary in response to this comment.

Please note that future development projects proposed under the General Plan Update would be responsible for mitigating environmental impacts associated with their development. Mitigation for biological resources impacts may include the use of mitigation banks to offset impacts to sensitive habitat or species. If appropriate, and approved by the City and the resource agencies, use of the area covered in the Escondido Creek Master Plan may be reviewed for use as a potential mitigation bank to mitigate for the loss of biological resources associated with future development projects.

O1-29

This comment concludes the letter and does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

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Questions re the Escondido General Plan Update, 2012

- Prepared by the Escondido Chamber of Citizens (ECOC) -

1.	A build-out figure is not mentioned in the body of the General Plan Update. However, at the staff presentation to the Planning Commission on January 24, 2012, Jay Petrik stated that it would be about 205,000.	Letter O2: Escondido Chamber of Citizens	
O2-1.	<p>The General Plan Update Matrix – a “side-by-side” comparison of the current and the proposed General Plan Goals and Policies – states that “Updated policies are based on attaining a vision for the future prescribed in the General Plan rather than by population.”(p. 158, Population Policy F1.1 comment) That statement is completely contrary to the intent and letter of the Growth Management and Neighborhood Protection Act (“Prop.S”).</p> <p>2. If the City moves from a General Law city to a Charter city, how will that affect the proposed General Plan Update?</p> <p>3. The Minority Report written by two members of the G.P. Issues Committee – Pam Stahl and Lisa Prazeau – relates to certain Quality of Life standards, to annexation and to clustering. This report is very helpful in analyzing the proposed changes to our city’s General Plan. Have you received your copies of that Minority Report?</p> <p>4. It appears that there is an effort to overturn the Growth Management and Neighborhood Protection Act, passed overwhelmingly by Escondido voters in 1998. Are we mis-reading any of the policy statements? We have been unable to find any of the protections which the people of Escondido wrote into their General Plan.</p> <p>5. Issues Committee member Stahl asked for policies included in the General Plan Update relating to standards for smart growth areas (open space, recreational amenities, playgrounds for children, desirable landscaping, setbacks, et cetera). However, the committee turned down this request. We do see that there are some guidelines for the downtown area, but nothing for other smart growth areas. If not in General Plan policies, where will there be clear and <i>required</i> standards?</p>	O2-1	These comments pertain only to the proposed General Plan Update. They do not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
		O2-2	This comment asks if the General Plan ensures that buildout of the land uses identified in the plan will not impede the fire department doing its job. The potential environmental impacts of the proposed General Plan Update related to fire protection are addressed in Section 4.14.3.1, Issue 1: Fire Protection Services, of the Draft EIR. The Draft EIR concluded that the increase in development within the proposed project planning boundary would increase demand for fire protection services. To maintain or achieve acceptable travel time standards for fire protection, the provision of new or physically altered fire facilities would be required. The purpose the Draft EIR is to determine whether or not the provision of new facilities to maintain acceptable service ratios and response times would cause significant environmental impacts. The General Plan Update includes Fire Protection Policies 2.1 to 2.13 that are intended to ensure adequate fire service is available for future development. Therefore, the Draft EIR adequately addresses the proposed project’s potential impacts related to fire protection.
		O2-3	These comments pertain only to the proposed General Plan Update. They do not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
O2-2.	6. Does this General Plan assure that no new construction is permitted that will impede our fire department doing its job? (Remember the 2009 fire in the newly constructed condominiums at Escondido Blvd. and Woodward?)		
O2-3.	7. Why were the Planning Commissioners not made aware of the Side-by-Side Comparison of Existing (adopted) and Draft (proposed) General Plan Goals and Policies – known as the Matrix?		
	8. The ECOC (Escondido Chamber of Citizens) will comment on the make-up of the General Plan Issues Committee.		

Comments

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<p>O2-3. cont.</p>	<p>9. The entire General Plan Update is not readily available to the general public: several computer-savvy residents have reported great difficulty in downloading the documents; when the hard copies were requested at the Main Library yesterday, the Librarian could not find them. (She located them later that day.) Of course, with the closure of the East Valley Library, neither computers nor hard copies of those documents are available there to that large part of our population. Also, although the General Plan Update documents are available to the in hard copy at the Planning Department at City Hall, a very large number of our working residents do not get off work until after 5 or 6p.m and so cannot consult those documents if the on-line option is inaccessible. (They could be purchased, we are told; however the cost of those weighty volumes could have been shared by neighborhoods if such a people-friendly plan had been co-ordinated through our neighborhoods. )</p>	
<p>O2-4.</p>	<p>Secondly, on January 12<sup>th</sup>, our city Planning Department announced that the Draft Environmental Impact Report – which assesses the General Plan Update, the Downtown Specific Plan Update and the Climate Action Plan - was starting a 45-day public review period, to end on February 27<sup>th</sup>. In light of the accessibility realities, the public needs formal assurances <i>today</i> that public input will continue to be received and considered for changes in the Draft Update well after that February 27<sup>th</sup> date.</p>	<p>O2-4 This comment correctly states the end date of the public review period for the Draft EIR (February 27, 2012). Pursuant to CEQA Guidelines Section 15105, the Draft EIR public review period establishes a formal 45-day period for review and comment on the Draft EIR, which is required when a Draft EIR is submitted to the State Clearinghouse for review by State Agencies. The City will continue to receive and consider public input regarding the General Plan Update beyond the Draft EIR review period, including at any public meetings or hearings. However, the dates of the Draft EIR public review period have not been formally extended. No further response is necessary.</p>
<p>O2-5.</p>	<p>Finally, as we all know, if a community’s General Plan is to actually and effectively guide its future, then, its council, staff, and residents must be committed to the thorough study, review, discussion and commentary which alone can result in a plan that protects and improves the quality of its residents lives – that is to say “the best interest of its public.” Right now, this General Plan is slated to go on the November ballot. Perhaps, if future public workshops over the next six months are held at times and places accessible to the working public ; if the documents are readily available to them; and if the staff continues to receive, respond to and consider the public input toward possible changes to the Draft, perhaps our city’s Plan could be ready for the November ballot. Sliding through or rushing or avoiding the give-and-take of genuine and thorough community-wide discussion and decision- making will only degrade the liveability of our city for decades to come.</p>	<p>O2-5 This comment pertains only to the proposed General Plan Update. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.</p>

## Comments

## Responses

**From:** Jo Ann Greenberg  
**Sent:** Thursday, February 09, 2012 12:23 PM  
**To:** Jay Petrek  
**Subject:** EIR report

Hi, Jay

O3-1.

I was going through the EIR draft, **4.14.1.4**, and read the following: “The East Valley Branch Library is located in the East Valley Community Center on East Valley Parkway and is a source for: up-to-date books, videos, books on tape, and CDs; state-of-the-art technology and resources; free programs for children and adults; and literacy tutoring for adults.” We should take that out since we no longer have a branch.

Jo Ann

Jo Ann Greenberg  
 City Librarian  
 Escondido Public Library  
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 Escondido, Ca 92025  
[jgreenberg@escondido.org](mailto:jgreenberg@escondido.org)  
 760.839.4834

## Letter O3: Jo Ann Greenberg

O3-1 This comment requests that references to the East Valley Branch Library be removed from the Draft EIR because this branch is no longer in operation. Section 4.14, Public Services, of the Draft EIR has been revised as follows to remove references to the East Valley Branch Library from the description of existing conditions.

Founded in 1898, the Escondido Public Library Department serves residents with a Main Library, ~~an East Valley Library Branch,~~ and the Escondido Pioneer Room. The Main Library is located at 239 South Kalmia Street, Escondido, CA 92025 and offers library services, microfilm, movies, video tapes, community programs, and meeting rooms. The Main Library provides residents with a source for over 300,000 books, videos, books on tape and CDs (including electronic books and electronic audiobooks); technology and resources; free programs for adults and children; literacy tutoring; and low cost meeting places (EGP 1990).~~The East Valley Branch Library is located in the East Valley Community Center on East Valley Parkway and is a source for: up-to-date books, videos, books on tape, and CDs; state-of-the-art technology and resources; free programs for children and adults; and literacy tutoring for adults.~~The Escondido Pioneer Room is located at 247 South Kalmia Street and provides the community with a research room for non-circulating reference material (EPL 2010).

**Comments**

February 27, 2012

**Responses**

Jay Petrek AICP, Principal Planner  
 City of Escondido Planning Division  
 201 N. Broadway, Escondido, CA 92025

RE: GENERAL PLAN UPDATE AND C.A.P. DRAFT EIR PHG 090020, PHG 100016, SCH #2010071064

O4-1.

Thank you for the opportunity to comment on this Draft EIR for the City's General Plan Update and Climate Action Plan. Eden Valley has recently been granted the opportunity to be represented by the San Dieguito Planning Boards, due to the actions of a core group of active community members who have worked hard with the County of San Diego to develop a vision for our community as part of the Sand Diego County General Plan Update.

O4-2.

In particular we have comments on General Plan Area EL5 (Eden Valley) and the proposal to replan and rezone a portion of this area to Industrial Office (IO) with GP Policy to establish a Medical Overlay Area Plan in the proposed Escondido General Plan Update. Specifically the portion of EL5, which does NOT lie within the City Limits, and is currently zoned Rural and Agricultural in nature.

O4-3.

Eden Valley Community Character: Located in unincorporated Escondido, Eden Valley is rural in nature, extremely quiet, peaceful, and generally remains in its natural state. The area is singlefamily rural residential and agricultural in usage, with large lots, residential livestock keeping; equestrian trails, and the dark night sky is an important aesthetic resource. There is one main roadway in Eden Valley: Country Club Drive, which is a 2lane, treelined residential street with commercial weight limits and is designated as a traffic calming area. The roadside is often used as a multiuse equestrian trail by the residents. There is no commercial development; no sewer, no street lights, no traffic lights, no lighted signs, no traffic signals, no curbs, no sidewalks, no extractive land uses, and no commercial or nonagricultural industry in Eden Valley. Residents here value open space, quiet, dark nighttime skies, low traffic volume, equestrian trails and access to the abundant wildlife that flourishes in this beautiful rural environment.

O4-4.

We ask that the Escondido General Plan Update and EIR remove any County land within the area of EL5 from the planning area. Should the City of Escondido choose to move forward with including current County land within

**Letter O4: Janean Huston**

- O4-1 This comment is an introduction to the comment letter and does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- O4-2 This comment introduces and provides a context for comments O4-3 through O4-8. No further response is necessary.
- O4-3 This comment describes the existing community character of the Eden Valley neighborhood through the eyes of the commenter, who is also a resident of Eden Valley. It does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.
- O4-4 This comment requests that the General Plan Update remove any unincorporated areas within the Escondido Research Technology Center (ERTC) North Specific Planning Area (SPA) #8 from the General Plan Update planning area, or that the Draft EIR detail how increasing residential densities in areas such as the ERTC North SPA #8 would affect the community character of rural neighborhoods such as Eden Valley. Section 4.1.3.3, Issue 3: Visual Character or Quality, of the Draft EIR addresses the potential environmental impacts of the proposed General Plan Update land use designations on community character, including the land uses proposed for ERTC North SPA #8. As discussed in this section under the ERTC North SPA heading, the SPA is currently developed with industrial and commercial uses, an SDG&E power plant, the new Palomar Medical Center West hospital campus, and a SPRINTER station. New high-intensity development in this SPA would be focused along Citracado Parkway, Auto Park Way, and in areas more distanced from residences west of the SPA, which would include Eden Valley, to ensure compatibility. Specific attention would be given to achieving compatibility with semi-rural residential areas to the west, such as Eden Valley, by incorporating lower intensity land uses, building materials, heights, orientation, colors, screening, lighting and signage along the edge of the SPA to create a buffer between the two land use types. The General Plan Update envisions high-quality architecture and landscaping and transit-focused pedestrian-friendly development in this area. Therefore, implementation of the General Plan Update would not significantly impact Eden Valley's community character. Similar analyses are included in this section for the other General Plan Target Areas and remaining area with the planning area boundary. Therefore, the Draft EIR adequately details the potential for implementation of the General Plan Update to impact community character. No revisions to the Draft EIR in response to this comment are necessary.

Comments

Responses

O4-4. cont.	<p>the area of EL5, we ask that the General Plan EIR’s detail how increasing residential densities and intensities in “Smart Growth” areas such as EL5 which are in close proximity to transit, will not compromise the character of adjacent single family neighborhoods such as Eden Valley.</p>	O4-5	<p>This comment suggests that land within Eden Valley may be purchased for permanent open space to offset losses and enhance recreational and open space opportunities. It is unclear as to what specific losses the commenter is referring. Based on the previous comment (O4-4), it is assumed the commenter is referring to impacts to community character. The analysis of impacts to community character in Section 4.1.3.3, Issue 3: Visual Character or Quality, of the Draft EIR concluded that with implementation of existing City policies and regulations, the proposed General Plan Update would result in a less than significant impact to visual character or quality. Therefore, no mitigation measures are required. The suggestion to purchase land within Eden Valley for a permanent open space reserve is not necessary to address the proposed project’s impact to visual character or quality. Therefore, this suggestion was not incorporated into the Draft EIR. Additionally, the proposed project would result in less than significant impacts to Biological Resources (Section 4.4 of the Draft EIR) and Recreation, including open space resources (Section 4.15 of the Draft EIR); therefore, no mitigation was identified for these issues. If future environmental review of a proposed project determines that potential environmental impacts require mitigation for open space or sensitive species, and if those impacts can be mitigated off site, the wildlife agencies may require that such mitigation occur in a pre-approved mitigation bank and that the type(s) of habitat be comparable. If areas within Eden Valley are part of a pre-approved mitigation bank with similar habitat types as the impacted area, it may be an appropriate location for off-site mitigation in the future. As discussed in Section 2.3, Intended Use of the EIR, while the EIR intends to identify potential impacts that would result from project implementation, the level of analysis is not detailed to the level of site specificity, nor is it intended to be accurate to this level of specificity. As a programmatic EIR, the Draft EIR cannot determine the precise impacts that would occur from individual actions that would occur under the General Plan Update because future projects are unknown and such analysis would be speculative. Therefore, the commenter’s suggestion was not incorporated into the Draft EIR.</p>
O4-5.	<p>An alternative may be to purchase mitigation lands <u>within Eden Valley</u> as a permanent OpenSpace Reserve to offset the losses. This may also be in keeping with the General Plan’s goal of establishing “Smart Growth” and “Healthy Community Concepts” which enhance accessibility to recreational and open space opportunities.</p>		
O4-6.	<p>Furthermore, since most of the EL5 area is within the City limits, we ask the City of Escondido to create a buffer zone and graduate the FAR with lower intensities adjacent to the existing County areas, while increasing the FAR intensities to the North and East areas of EL5.</p>		
O4-7.	<p>This project does NOT blend with our existing community character and will have an adverse visual and environment impact on all of Eden Valley by sitting buildings that may project above the ridge line and resulting in a scale of development that is incompatible with the existing setting.</p>		
O4-8.	<p>We ask that the Escondido General Plan Update and EIR recognize and support the proposed planning for all of Eden Valley, which is currently with the County of San Diego’s General Plan Update. The City of Escondido new General Plan should accept and adopt all of the provisions which exist in the Eden Valley Community Plan. This should include an agricultural/equestrian district overlay that would allow durable special animal and livestock keeping and breeding, a trail system suitable for equestrian use, and low density zoning to encourage small familyowned organic farms.</p>		
	<p>As neighbors, we hope that the City of Escondido will continue to help keep our rural community true to it’s name sake of Eden Valley</p>	O4-6	<p>This comment requests that the City create a buffer zone where higher intensity uses in the ERTC North SPA #8 are located closer to the northern and eastern areas of the SPA, and lower intensity uses are located near the unincorporated areas of this SPA. Refer to response to comment O4-4. This suggestion has already been incorporated into the General Plan Update, and is reflected in the Draft EIR analysis in Section 4.1.3.3, Issue 3: Visual Character or Quality.</p>
	<p>Janean Huston (and neighbors) Escondido, CA 92029</p> <p>cc: San Dieguito Planning Group Elfin Forest/Harmony Grove Town Council Residents of the Eden Valley Bugle Devon Muto, County of San Diego DPLU</p>	O4-7	<p>This comment states that the land uses proposed in the ERTC North SPA #8 would be incompatible with the existing visual environment of Eden Valley. Refer to responses to comments O4-4 and O4-6. The commenter’s suggestions of a buffer zone and graduated FAR to provide compatibility between the ERTC North SPA #8 and the Eden Valley community has already been incorporated into the General Plan Update and is addressed in Draft EIR Section 4.1.3.3, Issue 3: Visual Character</p>

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or Quality. Additionally, specific attention would be given to achieving compatibility with semi-rural residential areas outside of ERTC North SPA #8 to the west by incorporating lower intensity land uses, building materials, heights, orientation, colors, screening, lighting and signage along the edge of the SPA to create a buffer between the two land use types. Therefore, the Draft EIR concluded that the proposed project would result in a less than significant impact to the unincorporated neighborhoods surrounding ERTC North SPA #8, including Eden Valley.

- O4-8 This comment requests that the City of Escondido adopt into the General Plan Update all of the provisions of the Eden Valley Community Plan, including an agricultural/equestrian district overlay for animal and livestock breeding, equestrian trails, and small farms. A portion of the Eden Valley area within the unincorporated County is included in the General Plan Update boundary for planning purposes only. The land use designations proposed in the General Plan Update provide information for property owners in areas that may be annexed into the City. Unless annexation is approved, proposed development in the unincorporated area would be subject to the County's land use plans, such as the Eden Valley Community Plan and County General Plan. If an area has been annexed, proposed development would be subject to the City's land use plans, such as ERTC North SPA #8 and the City's General Plan Update. General Plan Community Character Policy 1.15 calls for the City to "Recognize Community Plans approved by the Board of Supervisors within Escondido's General Planning Area and coordinate land use and design guidelines to minimize impacts in areas where city/county lands transition. Collaborate with annexing property owners to retain desired components of their Community Plans by considering appropriate zoning overlay designations in the event of annexation." The General Plan Update does not include the requested agricultural/equestrian district overlay for the Eden Valley area; however, this area is proposed for Estate I and Estate II land uses under the General Plan Update, which could include agricultural properties. The low residential densities allowed by the Estate I and II land use designations could also accommodate animal and livestock facilities and small farms. Additionally, the General Plan Update encourages trails throughout the planning area and would not preclude the establishment of new equestrian trails in the Eden Valley area. No revisions to the Draft EIR are necessary as a result of this comment.

**Comments**

**From:** Kevin Johnson [mailto:kevin@johnsonlawaplc.com]  
**Sent:** Monday, February 27, 2012 10:26 AM  
**To:** Jay Petrek  
**Subject:** General Plan Update EIR--Comments  
**Importance:** High

Hi Jay:

- O5-1.
 I have been asked by the Escondido Chamber of Citizens to review and comment upon the General Plan Update Draft Environmental Impact Report. Following are a number of comments addressing issues related to Proposition "S".
- O5-2.
 1) The DEIR fails to fully and clearly inform the public as to what specific zoning amendments and GP policy text amendments will need to be voted upon under Proposition "S".
- O5-3.
 2) The criteria for deciding what amendments will require a public vote should be specifically explained and expressly applied to each amendment. Are there for example any "close cases" where a vote may or may not be required? If so, why?
- O5-4.
 3) A map of the properties to be rezoned should be provided and a standard figure/chart listing the properties in one place with a brief explanation about why or why not a public vote will be needed should be provided.
- O5-5.
 4) There should be clear explanation of how the vote on the properties will be handled. Proposition "S" requires separate votes on each property, not a vote on a block of several properties. The City has stated it has not decided whether there will be individual property votes or a block vote. The decision should however be made now and not sometime in the future otherwise the DEIR fails as an informational document. The decision factors in this regard need to be detailed in the FEIR.
- O5-6.
 5) The issue of GP inconsistency should be addressed in the context of potential "no" votes on the subject properties. What amendments to the rest of the GP update will be required if certain zoning changes are not approved by the voters? What will be the ripple effect on the balance of the GP of various combinations of no votes?
- O5-7.
 6) There needs to be a clear statement that the proposed update will not change or alter any part of Proposition "S"--other than specifically identified GP policy provisions to be amended-- and how it has been applied since 1998.

**Responses**

**Letter O5: Kevin Johnson**

- O5-1
 This comment is an introduction to the comment letter. It does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.
- O5-2
 This comment states that the Draft EIR fails to inform that public as to what specific zoning amendments and General Plan text amendments would need to be voted upon under Proposition S. As discussed in Draft EIR Section 2.1, Purpose of the EIR and Legal Authority, the Draft EIR was prepared for the following purposes:
  - To satisfy the requirements of CEQA, pursuant to Public Resource Code Section 21080;
  - To inform the general public, local community, responsible trustee and federal public agencies, and others of the nature of the proposed project, its potential significant environmental effects, potentially feasible measures to mitigate those impacts and reasonable potentially feasible alternatives to the proposed project;
  - To enable the City Council to consider the environmental consequences of approving the proposed project;
  - For consideration by responsible agencies in issuing permits and approvals for the proposed project that would occur as part of proposed project implementation;
  - To provide a basis for tiering subsequent environmental documents pursuant to CEQA Guidelines Sections 15152 and 15168(c).

As noted in Section 3.5 of the Draft EIR, Discretionary Actions, Decisions and Approvals, a City-wide public vote pursuant to Proposition S is required for approval of portions of the General Plan Update and is scheduled for the November 6, 2012 election. However, the Draft EIR is an informational document related to the physical environmental impacts that would occur as a result of the General Plan Update, Downtown Specific Plan Update, and Escondido Climate Action Plan (E-CAP). It is not intended to be a voter information document related to Proposition S. The San Diego County Registrar of Voters will issue voter information guides to all City residents prior to the November 2012 election, which will include information related to approval of the General Plan Update. Whether or not portions of the proposed General Plan Update would require voter approval does not affect the analysis of the project's environmental impacts identified in the Draft EIR. Therefore, including additional voter information related to Proposition S is not necessary to include in the EIR.
- O5-3
 Refer to response to comment O5-2. As noted in Section 3.5 of the Draft EIR, Discretionary Actions, Decisions and Approvals, a City-wide public vote pursuant to Proposition S is required for approval of portions of the General Plan Update and

**Comments**

Thank you for your attention to these matters and please confirm receipt of this e-mail.

Very Truly Yours,

Kevin

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is scheduled for the November 6, 2012 election. The purpose of the Draft EIR is to disclose the potential environmental impacts of the General Plan Update, Downtown Specific Plan Update, and E-CAP as proposed. Including additional voter information related to Proposition S is not necessary to include in the EIR.

- O5-4 Refer to response to comment O5-2. As noted in Section 3.5 of the Draft EIR, Discretionary Actions, Decisions and Approvals, a City-wide public vote pursuant to Proposition S is required for approval of portions of the General Plan Update and is scheduled for the November 6, 2012 election. The purpose of the Draft EIR is to disclose the potential environmental impacts of the General Plan Update, Downtown Specific Plan Update, and E-CAP as proposed. Including additional voter information related to Proposition S is not necessary to include in the EIR.
- O5-5 This comment states that the Draft EIR should include an explanation of how the Proposition S vote will be handled or the Draft EIR fails as an information document. Refer to response to comment O5-2. Section 3.5 of the Draft EIR, Discretionary Actions, Decisions and Approvals, identifies that a City-wide public vote pursuant to Proposition S is required for approval of portions of the General Plan Update and is scheduled for the November 6, 2012 election. The purpose of the Draft EIR is to disclose the potential environmental impacts of the General Plan Update, Downtown Specific Plan Update, and E-CAP as proposed. Including additional voter information related to Proposition S is not necessary to include in the EIR.
- O5-6 This comment states that the Draft EIR should address impacts that would potentially occur as a result of combinations of voter disapproval of the General Plan Update. Section 15126 of the CEQA Guidelines, Consideration and Discussion of Environmental Impacts, requires that the Draft EIR discuss the potential environmental impacts of a proposed project that would occur if the project is implemented. It does not require the Draft EIR to address potential impacts that would occur if portions of the project would not be implemented because such scenarios are not options under the proposed project and to anticipate voter outcome would be speculative. However, Chapter 6.0 of the Draft EIR, Alternatives, does discuss potential impacts of alternatives to the proposed project compared to the potential impacts of the proposed project, as required by CEQA Guidelines Section 15126.6. CEQA requires that the alternative analysis cover a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the proposed project. It does not require an exhaustive list of alternatives, such as all possible election outcomes. The Draft EIR analyzes the potential impacts of several alternatives that propose lower residential density compared to the Draft EIR. These include the No Project Alternative, which assumes the proposed project would not be adopted or implemented and the currently adopted City of Escondido General Plan (1990) would be the applicable planning document for the proposed project area; the Reduced Residential Alternative

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and Blended Reduce Downtown/Focuses Smart Growth and Employment Alternative, under which multiple areas identified for smart growth residential and employment land uses would be reduced or eliminated entirely; and the Nutmeg Street Alternative, under which the proposed residential land use designation for the Nutmeg Street Study Area would be eliminated and replaced with employment land uses. Therefore, the intent of this comment has already been incorporated into the Draft EIR to the extent appropriate for an EIR and consistent with CEQA.

- O5-7 Two General Plan policies related to Proposition S are subject to voter approval. They are: 1) the establishment of a residential Urban V designation (multi-family; up to 45 units per acre), and 2) the deletion of one residential clustering policy that eliminates the requirement of 50 percent of a project's residences to back up to open space. No other changes to policies associated with Proposition S will require a public vote. The policies pertaining to the Urban V designation and the elimination of the single clustering policy are reflected in the draft General Plan as described above. The draft General Plan constitutes the "project" for which the Draft EIR analyzes and identifies environmental impacts, along with the Downtown Specific Plan Update and E-CAP. As noted in Section 3.5 of the Draft EIR, Discretionary Actions, Decisions and Approvals, a City-wide public vote pursuant to Proposition S is required for approval of portions of the General Plan Update and is scheduled for the November 6, 2012 election.

**Comments**

From: Christine Nava <christinenava@hotmail.com>  
 Sent: Monday, February 27, 2012 4:03 PM  
 To: Jay Petrek  
 Subject: DEIR comments

Dear Mr. Petrek-

- O6-1. I am just under the deadline for DEIR comments (I went out-of-town right after the workshop) and this is my first opportunity to follow up on a couple of issues I raised at the workshop. First let me thank you, your staff and all who worked on this plan. It shows a tremendous amount of work and your efforts to draw the public into the discussion is greatly appreciated.
- O6-2. Regarding the DEIR section entitled “significant and unavoidable impacts”, I notice that a number of factors are not included:
- O6-3. 1. Ground wind effect when tall buildings are clustered.
- O6-4. 2. Shading effects especially for other buildings.
- O6-5. 3. “Canyon effects” -trapping pollutants, thus reducing air quality at the street level
- O6-6. 4. Effects on light from obstruction of sun
- O6-7. Other comments that refer in a general way to the downtown clustering:
  - 1. I am very concerned that apartments/condos planned in the higher density targeted areas will, in the long run, result in the creation of ghettos. I do not believe that these planned structures will draw the “high tech” or higher income level workers/families to residency to these apartments.
- O6-8. 2. I am concerned about the social impact for both pedestrians and nearby residents.

Thank you for the opportunity to comment. I may have others as I continue to study the documents.

Sincerely,

Chris Nava

**Responses**

**Letter O6: Chris Nava**

- O6-1 This comment is an introduction to the comment letter and does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.
- O6-2 This comment is an introduction to a list of potential impacts the commenter feels should be included in Section 5.4, Significant and Unavoidable Impacts, of the Draft EIR. Section 5.4 summarizes the significant and unavoidable impacts identified in analysis Sections 4.1 through 4.17 of the Draft EIR. It does not provide analysis of issues that were not addressed in Sections 4.1 through 4.17. Therefore, the list of environmental issues addressed in responses to comments O6-3 through O6-6 is based on the analysis provided in Sections 4.1 through 4.17 of the Draft EIR, not Section 5.4, Significant and Unavoidable Impacts.
- O6-3 This comment states that the Draft EIR is missing a discussion of ground wind effect when tall buildings are clustered. Impacts to visual character and quality are addressed in Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality. As discussed in this section, implementation of the General Plan Update and Downtown Specific Plan Update would have the potential to increase building heights and densities throughout the General Plan Update planning area. However, compliance with existing regulations and the proposed General Plan Update policies would ensure that quality development is constructed which implements the City’s vision for a vibrant, walkable community with revitalized residential neighborhoods and attractive, sustainable, economically viable industrial and commercial areas. In response to this comment, the discussion of visual character and quality impacts in areas that may experience substantial building height increases was revised to specifically state that ground winds are a potential adverse impact of clustered tall buildings. Additionally, the discussion was revised to clarify that the City would minimize adverse impacts such as ground winds. The revisions add clarification to the impact analysis, but do not change the Draft EIR conclusion that impacts to visual character and quality would be less than significant with compliance with the General Plan Update policies and existing regulations. Additionally, most high-rise future development projects would be subject to additional CEQA review. If a future development project would have the potential to result in an adverse visual character and quality impact such as ground wind, mitigation would be required to reduce the impact, as applicable. An example of the revised Draft EIR discussion from Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality, is provided below for the South Escondido Boulevard/Felicita Road Target Area. This revision was made for all areas that would experience substantial building height increases.

## Comments

## Responses

The South Escondido Boulevard/Felicita Road Target Area currently has a residential character and is developed with mid-range density multi-family residential development, low intensity suburban shopping, general retail, office, restaurant, and small scale services. A portion of the Old Escondido Historic District is located adjacent to this study area. The General Plan Update proposes similar retail, multi-family residential, commercial, and office development in this area, but would also accommodate intensified commercial and residential development. Therefore, the General Plan Update proposes land uses that would be compatible with the existing character of the area. New urban development in this area would have the potential to substantially increase building heights in this target area and impact visual quality. Clusters of tall buildings have the potential to create ground winds, obscure access to sunlight, and create shading on adjacent buildings. However, future development would be required to comply with the General Plan Update development policies which would ensure construction of high quality development, as discussed below in the discussion of Proposed General Plan Update Goals and Policies. The General Plan Update envisions high quality architecture and landscaping, pedestrian friendly streets, and access to transit and urban trails for the area. Projects would be subject to design review by the City, which would ensure that adverse impacts such as ground winds, shading, and sunlight obstruction, would be minimized in order to maintain consistency with existing development and support the General Plan vision for this area. Therefore, implementation of the General Plan Update would enhance the existing visual character of this study area and impacts would be less than significant.

- O6-4 This comment states that shading effects are not considered in the Draft EIR. Refer to response to comment O6-3. Similar to impacts related to ground wind, the various discussions in Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality, have been revised to specifically state that shading is a potential adverse impact of tall buildings. Additionally, the discussions were revised to clarify that the City would require projects to minimize impacts such as adverse shading. These revisions add clarification to the impact analysis, but do not change the Draft EIR conclusion that impacts to visual character and quality would be less than significant with compliance with the General Plan Update policies and existing regulations. Additionally, most high-rise future development projects would be subject to additional CEQA review. If a future development project would have the potential to result in an adverse visual character and quality impact such as shading, mitigation would be required to reduce the impact, as applicable. An example of the revised discussion in Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality, is provided in response to comment O6-3.
- O6-5 This comment states that air quality at the street level as a result of trapped pollutants is not addressed in the Draft EIR. Section 4.3.3.3, Issue 3: Sensitive Receptors, includes an analysis of the potential for carbon monoxide hot spots,

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which are areas of trapped carbon monoxide (CO) pollution as a result of traffic congestion. The analysis determined that no CO hot spots would occur as a result of implementation of the proposed project. Therefore, this issue was adequately addressed in the Draft EIR.

- O6-6 This comment states that effects of light from the obstruction of the sun are not addressed in the Draft EIR. Refer to response to comment O6-3. Similar to impacts related to ground wind and shading, the various discussions in Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality, have been revised to specifically state that sunlight obstruction is a potential adverse impact of tall buildings. Additionally, the discussions were revised to clarify that the City would require projects to minimize impacts such as sunlight obstruction. These revisions add clarification to the impact analysis, but do not change the Draft EIR conclusion that impacts to visual character and quality would be less than significant with compliance with the General Plan Update policies and existing regulations. Additionally, most high-rise future development projects would be subject to additional CEQA review. If a future development project would have the potential to result in an adverse visual character and quality impact such as sunlight obstruction, mitigation would be required to reduce the impact, as applicable. An example of the revised discussion in Draft EIR Section 4.1.3.3, Issue 3: Visual Character or Quality, is provided in response to comment O6-3.
- O6-7 This comment expresses the commenter's concern that higher density areas will result in the creation of ghettos [low income areas] and will not attract higher income level workers or families to the area. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. The comment speculates as to the economic and social effects of future development. As stated in Section 15131 of the CEQA Guidelines, potential economic or social effects of a project shall not be treated as significant effects on the environment. Blight resulting from the creation of a ghetto would be considered an adverse impact to community character. However, impacts to community character and quality are addressed in the Draft EIR in Section 4.1.3.3, Issue 3: Visual Character or Quality. As discussed in this section, existing City policies and regulations such as the Zoning and Grading and Erosion Control Ordinances, proposed General Plan Update design principles and policies, and proposed Downtown Specific Plan Update goals and policies are intended to protect visual character and quality. These policies establish guidelines for high-quality development consistent with existing visual character, and require design review of new development. The General Plan Update includes development guidelines which would ensure that quality development is constructed. For example, the Land Use and Community Form Element includes Neighborhood Maintenance and Preservation Policy 4.3, which encourages working with residents to enhance existing neighborhood character and aesthetics, and Cluster Policies D1.4 and D1.5, which require the City to ensure that the portion of the site to be

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developed for clustered residential lots maintains the character of the surrounding area and does not block scenic views. Mixed Use Overlay Policy 7.4 requires the review of proposed projects in mixed use overlay districts to ensure the project incorporates architectural elements or themes from the surrounding neighborhood; provides appropriate transitions between land use designations to minimize compatibility conflicts; and ensures quality architecture, landscaping and onsite open space. Impacts to visual character and quality would be less than significant. Therefore, the issue has been adequately addressed in the Draft EIR.

- O6-8 This comment expresses concern about social impacts for pedestrians and nearby residents; however, it does not state a specific social concern. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. As stated in Section 15131 of the CEQA Guidelines, potential economic or social effects of a project shall not be treated as significant effects on the environment. The purpose of the Draft EIR is to disclose potential physical environmental changes. No potential physical environmental impacts are identified in this comment; therefore, no further response is necessary.

## Comments

**From:** noreply-www@escondido.org [mailto:noreply-www@escondido.org]  
**Sent:** Sunday, February 26, 2012 4:36 PM  
**To:** Jay Petrek  
**Subject:** [Comment on General Plan Update]: North East portion of Eden Valley

Bill Osborn [bill-osborn@sbcglobal.net](mailto:bill-osborn@sbcglobal.net)

- 07-1.** My understanding is that a portion in the North East corner of Eden Valley is to be annexed into Escondido as part of the GP update. The land is to be used for potential hospital infrastructure such as Dr. Offices or retirement communities.
- 07-2.** Our rural valley has already had an 11 story hospital forced upon us in an area that was promised to be maximum two story buildings hidden by an earthen berm. I fear that adding additional infrastructure on the fringes of our valley will be detrimental to our rural lifestyle and we do not want to see increased density here. Why is it that more density is not being placed on the freeway corridors and near the Malls where it makes more sense?
- 07-3.** I also fear that the any new office space on that property will increase the traffic. The Eden Valley residents are already feeling the effects of new development which is making it more and more difficult to exit our driveways. I would like to ask that the annexation of the land be mitigated with the purchase and protection of the 30+ acres that is found at the end of Surrey Lane. This property has already been determined to be of ecological importance. In addition, I would like to ask that the speed limit on Country Club drive be reduced from its current 45MPH down to 35MPH or less.
- 07-4.** Lastly, I respectfully request that any buildings built on that property (North East corner of Eden Valley North of the hospital) should not be visible from our valley and that all lighting be kept to a minimum to protect our dark skies.

Regards,  
 Bill Osborn

## Responses

**Letter O7: Bill Osborn**

- 07-1** This comment indicates the commenter's view that the proposed project would include annexation of the northeast portion of Eden Valley to be used for medical offices or retirement communities. This statement is incorrect. No portion of the Eden Valley community is proposed for annexation at this time. The Eden Valley community in unincorporated San Diego County is included within the General Plan Update boundary for planning purposes only as an area that could be annexed in the future. The proposed General Plan Update proposes a land use designation for the northeast corner of Eden Valley that would allow employment land uses to be developed in this location, including medical offices; however, this land uses designation would only apply if the area is annexed in the future. Otherwise, the area would continue to be part of the unincorporated area under the jurisdiction of the County and the County's land use designations for the area would apply. The reason that the proposed General Plan Update identifies employment land in this area is due to its proximity to the new hospital, the Nordahl Transit Station, existing employment land, and State Route 78.
- 07-2** This comment expresses concern that additional medical facilities in the ERTC North SPA #8 on the edge of the Eden Valley community will be detrimental to the rural lifestyle of Eden Valley residents. The comment requests that such development be placed closer to the freeway corridors and existing shopping areas. This comment has already been incorporated into the General Plan Update. As shown in Draft EIR Figure 3-3, Study Areas, the Highway 78/Broadway Target Area, Transit Station Target Area, I-15/Felicita Road Corporate Office Target Area, Promenade Retail Center and Vicinity Target Area, Nutmeg Street Target Area, Downtown SPA #9, East Valley Parkway Target Area, South Escondido Boulevard/Felicita Road Target Area, Centre City Parkway/Brotherton Road Target Area, and Westfield Shoppingtown Target Area are located adjacent to freeway corridors and existing shopping areas. The majority of growth that would be accommodated under the General Plan Update would occur in these areas. Additionally, the potential community character impacts of the proposed land use designations identified for the ERTC North SPA #8, and other areas within the General Plan Update planning boundary, are discussed in Section 4.1.3.3, Issue 3: Visual Character or Quality. As identified in this section under the heading "Escondido Research Technology Center North SPA", new high-intensity development in this SPA would be focused along Citracado Parkway, Auto Park Way, and in areas more distanced from residences west of the SPA to ensure compatibility. Specific attention would be given to achieving compatibility with semi-rural residential areas outside of the SPA to the west by incorporating lower intensity land uses, building materials, heights, orientation, colors, heights, screening, lighting and signage along the edge of the SPA to create a buffer between the two land use types. Therefore, implementation of the General Plan Update would not

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significantly impact community character. New higher intensity development would be focused along major roadways and existing developed areas, similar to the commenter's suggestion.

- O7-3 This comment expresses concern that office development in ERTC North SPA #8 would increase traffic. The potential for the proposed General Plan Update land uses to increase traffic is addressed in Section 4.16.3.1, Issue 1: Traffic and LOS Standards. The information in this EIR section is based on the Traffic Impact Analysis (LLG 2011) prepared for the project, which is included as Appendix I1 to the EIR. Table 4.16-2, Existing and Proposed Roadway Operations, in the Draft EIR specifically shows the potential roadway segment impacts that would occur in the ERTC North SPA #8 area. As shown in this table, buildout of the General Plan Update land uses would result in a significant impact to the segment of Mission Road from Barham Drive to Auto Park Way. Table 4.16-3, Existing and Proposed Intersection Operations, lists the potential intersection impacts that would occur in the ERTC North SPA #8. As identified in this table, the Nordahl Road/Auto Park Way/Mission Road intersection would be significantly impacted by implementation of the proposed General Plan Update. As discussed in Section 4.16.6, Mitigation, mitigation measure Tra-1 would partially mitigate the impacts of the proposed project by requiring intersection improvement treatment and adaptive traffic signal control technology to improve traffic flow on the roadway segment of Mission Road from Barham Drive to Auto Park Way and the Nordahl Road/Auto Park Way/Mission Road intersection. However, even after implementation of mitigation, this roadway segment and intersection would operate at an unacceptable LOS. Therefore, the potential traffic impacts of the proposed project, including development of land uses in ERTC North SPA #8, are thoroughly analyzed and disclosed in the Draft EIR.

This comment also requests that annexation of Eden Valley be mitigated with the purchase and protection of land found at the end of Surrey Lane. As discussed in response to comment O7-1, the proposed project does not propose any portions of Eden Valley for annexation at this time. Further, annexation on its own would not result in an automatic significant impact requiring mitigation. If future environmental review of a development project in this area determines that potential environmental impacts require mitigation for sensitive species, and if those impacts can be mitigated off site, the City and wildlife agencies may require that such mitigation occur in a pre-approved mitigation bank and that the type(s) of habitat be comparable. If the area at the end of Surrey Lane is part of a pre-approved mitigation bank with similar habitat types as the impacted area, it may be an appropriate location for off-site mitigation. As discussed in Section 2.3, Intended Use of the EIR, while the EIR intends to identify potential impacts that would result from project implementation, the level of analysis is not detailed to the level of site specificity, nor is it intended to be accurate to this level of specificity. As a programmatic EIR, the Draft EIR cannot determine the precise impacts that would occur from individual actions that would occur under the

**Comments****Responses**

General Plan Update because future projects are unknown and such analysis would be speculative. Therefore, the commenter's suggestion was not incorporated into the Draft EIR.

This comment also requests that the speed limit on Country Club drive be reduced from its current speed limit of 45 miles per hour (MPH) to 35 MPH or less. The speed limits for County Club Road are determined by the County of San Diego. For information regarding speed limits on County designated roads, the commenter should contact the Traffic Advisory Committee at (858) 874-4030.

- O7-4 This comment requests that any buildings built in the northeastern area of the Eden Valley community not be visible from Eden Valley and that all lighting be kept to a minimum. As discussed in response to comment O7-2, specific attention would be given to proposed development in this area in order to achieve compatibility with semi-rural residential areas outside of the SPA to the west. This would be accomplished by incorporating lower intensity land uses, building materials, heights, orientation, colors, screening, lighting and signage along the edge of the SPA to create a buffer between the two land use types. Additionally, potential impacts to dark skies are addressed in Section 4.1.3.4 of the Draft EIR, Issue 4: Light or Glare. The Draft EIR acknowledges that the unincorporated communities have identified dark skies are part of their community character. Future development would be required to comply with the Escondido Outdoor Lighting Ordinance and proposed General Plan Update policies that would minimize unnecessary nighttime lighting. Compliance with all applicable regulations and policies would reduce proposed project impacts related to light and glare to below a level of significance.

**Comments**

**Responses**

**From:** Mark Rodriguez <marknrodriguez@cox.net>  
**Sent:** Monday, February 27, 2012 5:05 PM  
**To:** Jay Petrek; Sam Abed; Marie Waldron; Olga Diaz; Ed Gallo  
**Subject:** Re: City Council General Plan Update Workshop

Jay,

O8-1.

I hope that the General Plan Update addresses issues with fire protection/services especially when dealing with the Palomar Energy Center. The transformer fire identified that there was lack of proper fire suppression services not only on the facility but with the fire department. The fact is that we were very lucky and if it had spread there would have been nothing that we could have done leaving many questions unanswered. Documentation I have obtained indicates that without the proper equipment that the temperature of the fire became too critical and prevented anyone from extinguishing the fire quickly if it had become critical.

O8-2.

Also of notice is the very poor level of circulation that will still be in place even with the Nordahl expansion and 78 widening. At some point some will die as a result and city continues to use excuses rather than addressing the problems. With Palomar West becoming a critical factor in the development of Escondido the continued failure to address existing infrastructure problems will only put another black eye in this cities attempt to change their image.

Mark

**Letter O8: Mark Rodriguez**

O8-1 This comment requests that the Draft EIR address issues related to fire protection, specifically related to Palomar Energy Center. As discussed in Section 2.1, Purpose of the EIR and Legal Authority, the purpose of the General Plan Update is to identify the potential environmental impacts that would occur as a result of implementation of the General Plan Update, Downtown Specific Plan Update, and Escondido Climate Action Plan. No changes to the operation of the existing Palomar Energy Center facility are proposed as a result of the proposed project. Therefore, potential fire risks associated with the Palomar Energy Center are not addressed in the Draft EIR, except to the extent that they contribute to existing conditions. The potential environmental impacts of the proposed General Plan Update related to fire protection are addressed in Section 4.14.3.1, Issue 1: Fire Protection Services, of the Draft EIR. The Draft EIR concluded that the increase in development within the planning area would increase demand for fire protection services. To maintain or achieve acceptable travel time standards for fire protection, the provision of new or physically altered fire facilities would be required. The purpose of the Draft EIR is to determine whether or not the provision of new fire facilities to maintain acceptable service ratios and response times would cause significant environmental impacts. The General Plan Update includes Fire Protection Policies 2.1 to 2.13 that are intended to ensure adequate fire service is available for future development. Therefore, fire protection is adequately addressed in the Draft EIR.

O8-2 This comment expresses the commenter’s concern that poor levels of circulation would occur in the ERTC North SPA #8 even with the implementation of proposed circulation improvements. Refer to response to comment O6-3. Potential traffic impacts as a result of implementation of the proposed project are addressed in Draft EIR Section 4.16.3.1, Issue 1: Traffic and LOS Standards. This EIR section is based upon the Traffic Impact Analysis (LLG 2011) prepared for the project, which is included as Appendix I1 to the EIR. Buildout of the General Plan Update land uses would result in a significant impact to the segment of Mission Road from Barham Drive to Auto Park Way and the Nordahl Road/Auto Park Way/Mission Road intersection in ERTC North SPA #8. As discussed in Section 4.16.6, Mitigation, mitigation measure Tra-1 would partially mitigate the impacts of the proposed project by requiring intersection improvement treatment and adaptive traffic signal control technology to improve traffic flow on the segment of Mission Road from Barham Drive to Auto Park Way and the Nordahl Road/Auto Park Way/Mission Road intersection. However, even after implementing such improvements, this roadway segment and intersection would continue to operate at an unacceptable LOS. Therefore, the potential traffic impacts of the proposed project in the Nordahl Road/ SR-78 area are properly addressed and disclosed in the Draft EIR, and mitigation is proposed to reduce potential impacts to the extent feasible. The City Council will consider this impact in its decision of whether or not to approve the proposed project.

Comments



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

20 February 2012

To: Mr. Jay Petrek, AICP, Principal Planner  
 Planning Division  
 City of Escondido  
 201 North Broadway  
 Escondido, California 92025-2798

Subject: Draft Environmental Impact Report  
 Escondido General Plan Update, Downtown Specific Plan Update, and  
 Climate Action Plan  
 City Project Number PHG 09-0020 and PHG 10-0016

Dear Mr. Petrek:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

O9-1.

Based on the information contained in the DEIR, we have the following comments:

1. The treatment of cultural resources in the DEIR is very good. Our only addition to the mitigation measures would be to include in Cul-3 the requirement of curation of the collections and associated records, other than cultural material subject to repatriation under state and federal law.
2. We suggest adding to the list of historic properties in or adjacent to the City two properties in the unincorporated area which have been landmarked by the County's Historic Site Board:
  - a. King Ranch House, 1445 Navel Place, Escondido 92027
  - b. Jessie C. Holmes Lemon Ranch Residence, 1106 Birch Avenue, Escondido 92027
 Both have also been granted Mills Act participation.
3. As an editorial comment, we note that San Pasqual Road is mislabeled San Pasqual Valley Road on the maps in the DEIR, such as Figures 4.5-1 and 4.5-2.

O9-2.

O9-3.

We appreciate being included in the public review of this DEIR.

Sincerely,

James W. Royle, Jr., Chairperson  
 Environmental Review Committee

Responses

**Letter O9: San Diego County Archaeological Society, Inc.**

O9-1 This comment suggests that mitigation measure Cul-3 be revised to include requirements for curation. Mitigation measure Cul-3 in Section 4.5, Cultural Resources, of the Draft EIR has been revised as follows in response to this comment:

**Cul-3** Require that significant archaeological resources be preserve in-situ, as feasible. The incorporation of resources into historical parks and multiple use recreation parks shall be encouraged. When avoidance of impacts is not possible, data recovery mitigation shall be required for all significant resources. Any significant artifacts recovered during excavation, other than cultural material subject to repatriation, shall be curated with its associated records at a curation facility approved by the City. Excavation of deposits of Native American origin shall be coordinated with and monitored by local Native American representatives.

O9-2 This comment suggests two properties to be added to the list of historic properties in Section 4.5 of the Draft EIR, Cultural Resources, because these properties have been landmarks by the County's Historic Site Board. The list of properties in Table 4.5-2, Significant Historical Sites, is not intended to be a list of all historic properties in the General Plan Update area. It is a list of historical sites that have been determined to be significant and placed on the National Register of Historic Places or California Register of Historical Resources, or that have been designated a California Historic Landmark or California Point of Historical Interest. Locally designated historic properties are not listed in this table. However, a reference to the County's Historic Sites Board and the properties listed in the comment has been added to the discussion of historic properties in Section 4.5.1.1, Cultural Resources, of the Draft EIR under the heading "Historic Buildings and Significant Historical Sites," as follows.

Numerous buildings identified by the City of Escondido Historic Preservation Surveys (Escondido 1984, 1990 and 2001), as well as through the environmental review process have been found eligible for inclusion in the NRHP, CRHR, and local registers. The project area additionally includes resources formally listed in the NRHP, CRHR and local registers, such as the Thomas House, Wohlford Ranch, A.H. Beach House, Bandy House, Hotel Charlotta, Howell House and the Mace House. These significant resources are outlined below in Table 4.5-2, Significant Historical Sites, along with additional resources found within the project area listed as California Historic Landmarks (CHLs) and California Points of Historical Interest. As noted in the table's footnote, the Escondido History Center indicates that there are a total of 270 properties on the Local Register and nine properties with Landmark status (EHC

## Comments

## Responses

2011). These resources are not all included in Table 4.5-2, Significant Historical Sites; however, the entire historic property list is identified in the Local Register Landmark Historic Properties Table provided in Appendix D, Cultural Resources, of this EIR. It is also available from the City planning division, as outlined in Article 40, Section 33-792 of the City of Escondido Municipal Code. These resources are also shown with reference to the Old Escondido Historic District, and the 15 General Plan Update Study Areas in Figure 4.5-1, Significant Historical Sites. The County of San Diego's Historic Sites Board is an advisory body that reviews historic resources for landmarking, participation in the Mills Act, and conformance with the Secretary of the Interior's Standards. The Historic Sites Board has identified two historic properties located in the General Plan Update area: King Ranch House, located at 1445 Navel Place, and Jessie C. Holmes Lemon Ranch Residence, located at 1106 Birch Avenue (County of San Diego Historic Site Board 2009, DPLU 2011).

O9-3

This comment states that San Pasqual Road is mislabeled on several Draft EIR figures. The following figures have been revised in response to this comment to correct the labeling of San Pasqual Road:

- Figure 3-2, Land Use Change Area
- Figure 3-3, Study Areas
- Figure 3-4, Proposed Land Uses
- Figure 3-5, Unincorporated Neighborhoods
- Figure 3-6, Proposed Circulation System
- Figure 4.2-1, FMMP Resources
- Figure 4.2-2, Prime Agricultural Soils
- Figure 4.2-3, Williamson Act Contract Lands
- Figure 4.2-4, Potential Forest Resources
- Figure 4.2-5, Agricultural Resources
- Figure 4.2-6, Sensitive Agricultural and Biological Resources
- Figure 4.4-1, MHCP and MSCP Areas
- Figure 4.4-2, Vegetation Classes
- Figure 4.5-1, Significant Historical Sites
- Figure 4.5-2, Geological Formations
- Figure 4.6-2, Soil Types
- Figure 4.6-3, Liquefaction Hazard Areas
- Figure 4.6-4, Landslide Hazard Areas
- Figure 4.6-5, Expansive Soils
- Figure 4.6-6, Unreinforced Masonry Buildings
- Figure 4.8-1, Existing Hazardous Materials Sites
- Figure 4.8-2, Wildfire Risk
- Figure 4.8-4, Emergency Evacuation Routes
- Figure 4.8-5, Land Uses within ¼ Mile of Schools
- Figure 4.8-6, Land Uses Near Airports

**Comments****Responses**

- Figure 4.9-1, Watersheds
- Figure 4.9-2, Dam Inundation Areas
- Figure 4.9-3, Development in Flood Zones
- Figure 4.11-1, Existing and Past Extraction Facilities
- Figure 4.12-1, Existing Noise Contours
- Figure 4.12-2, Future (2035) Noise Contours
- Figure 4.12-3, Significantly Impacted Roadway Segments
- Figure 4.14-1, Fire Service Boundaries
- Figure 4.14-2, Police Service Boundaries
- Figure 4.14-3, School Service Boundaries
- Figure 4.15-1, Parks and Recreational Facilities
- Figure 4.15-2, Master Plan for Parks, Trails, and Open Space Trails
- Figure 4.16-2, Bicycle Paths
- Figure 4.16-3, Rapid Bus and Rail Transit
- Figure 4.17-1, Water Service Boundaries
- Figure 4.17-2, Wastewater Service Area
- Figure 4.17-3, Future Septic System Areas

Comments

**Valley Center Community Planning Group**

Preliminary Minutes of the March 12, 2012 Meeting

Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison

7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082

Responses

**Letter O10: Valley Center Community Planning Group**

**5.d. Discussion and possible vote on the Escondido General Plan Update, EIR, Downtown Specific Plan Update, and Climate Action Plan as those plans impact Valley Center. Comments have been submitted in advance of the meeting by the VCCPG Chair and will be subject to a ratification vote. (Smith)**

- O10-1. **Discussion:** Smith addresses development along Valley Center Rd. [Valley Pkwy in Escondido] that will likely impact traffic on Valley Center grade. Another area along I-15 was designated for commercial development that seemed misplaced. Smith sent an email to the City of Escondido objecting to plans for those two areas.
  - O10-2. Rudolf clarifies some technicalities in the plan, and notes the fuzziness of the boundaries of areas in question. He describes an annexation proposal that may lead to further development of land along the Valley Center grade in what is now designated open space. Glavinic addresses Sager Ranch development and suggests it should be subjected to much higher traffic impact fees [TIF] than what are now required. Rudolf says TIF only applies in County. Glavinic says an equivalent fee should be applied by City of Escondido. Smith says Mirar de Valle would have to be improved to provide second exit. Rudolf says there is no proposal to annex north of Daley Ranch.
  - O10-3.
  - O10-4.
- Motion: Move to Ratify comments sent previously by the chair to County and include VCCPG's strenuous opposition to any proposed annexation by the City of Escondido east of Daley Ranch including anything east of Valley Center Road.**
- Maker/Second:** Rudolf/Hofler      **Carries/Fails 12-0-0 (Y-N-A):** Voice

- O10-1 This comment implies that development along Valley Center Road/Valley Parkway would result in increased traffic on this roadway. The traffic analysis in Section 4.16, Transportation and Traffic, of the Draft EIR addressed the segments of Valley Center Road from El Norte Parkway to Lake Wohlford Road, and north of Lake Wohlford Road within General Plan Update planning boundary. As discussed in Draft EIR Section 4.16.3.1, Issue 1: Traffic and LOS Standards, implementation of the proposed project would not result in a significant traffic impact on Valley Center Road or Valley Parkway outside of the downtown Escondido area. Therefore, the impacts of future development associated with the proposed project on Valley Center Road/Valley Parkway in the vicinity of the Valley Center community are adequately addressed in the Draft EIR.
- O10-2 This comment states that an area along I-15 which is designated for commercial development seems to be misplaced. It is unclear what area this comment is referring to or why the development seems misplaced. This comment does not address the adequacy or accuracy of information provided in the Draft EIR. No further response is necessary.
- O10-3 This comment notes fuzziness in the boundaries of the project area and suggests that an annexation proposal may lead to further development along Valley Center Road in an area that is now designated for open space. It is unclear what is meant by the comment, since the commenter does not clarify their concerns about the project area boundary or provide specific information regarding the annexation proposal. No annexations are proposed as part of the proposed project. Any future annexation would comply with the Local Agency Formation Commission processing procedures, and be subject to separate environmental analysis. Therefore, no further response is necessary.
- O10-4 This comment states that the Sager Ranch development should be subject to a higher traffic impact fee (TIF), or an equivalent fee should be applied in the City of Escondido because Mirar de Valle Road would have to be improved to provide a second exit. A portion of the Sager Ranch Specific Plan Area (Sager Ranch #2) is located within the General Plan Update planning area and the impacts of potential development in this area were addressed in the Draft EIR, including the traffic analysis. As discussed in Draft EIR Section 4.16.3.1, Issue 1: Traffic and LOS Standards, implementation of the proposed project would not result in a significant traffic impact in the Valley Center area. Adoption of the specific plan detailing the project design for Sager Ranch would be required prior to future development in this area. This plan would be required to undergo additional CEQA analysis, including an analysis of project-specific traffic impacts. If, at this time, it is determined that implementation of the Sager Ranch SPA would result in significant impacts to Mirar de Valle Road, improvements to this road may be

**Comments**

**Responses**

proposed as mitigation or as part of the specific plan. If necessary, payment of fees for mitigation of traffic impacts would be reviewed at that time. No revisions to the Draft EIR were made in response to this comment.

**Comments Received on the General  
Plan Update, Downtown Specific Plan  
Update and Escondido Climate Action  
Plan**





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**From:** Jay Petrek <Jpetrek@ci.escondido.ca.us>  
**To:** Barbara Redlitz <Bredlitz@ci.escondido.ca.us>; Charles Grimm <Cgrimm@ci.escondido.ca.us>  
**Cc:** Clay Phillips <CPhillips@ci.escondido.ca.us>  
**Sent:** Thursday, February 2, 2012 5:57 PM  
**Subject:** General Plan Community Meetings

## COMMUNITY MEETINGS FOR THE ESCONDIDO GENERAL PLAN, DOWNTOWN SPECIFIC PLAN, AND CLIMATE ACTION PLAN

Escondido is updating its General Plan and Downtown Specific Plan, as well as developing a Climate Action Plan. These documents will establish goals and policies regarding the city's future. Public input continues to be a very important part of the process. Please join City staff at one of the following workshops and share with us your thoughts about the planning efforts to date.

*Dates:*

**February 16, 2012 (Thursday)**

**March 6, 2012 (Tuesday)**

*Time:*

**6:30 PM – 8:30 PM**

*Place:*

**City Hall Mitchell Room**

*Address:*

**201 N. Broadway  
Escondido, CA 92025**

If you can't attend one of the workshops but would like to provide input, and/or to view the Draft General Plan, Draft Downtown Specific Plan, Draft Climate Action Plan, and Draft Environmental Impact Report, log on to the following website, or call Jay Petrek at (760) 839-4556.

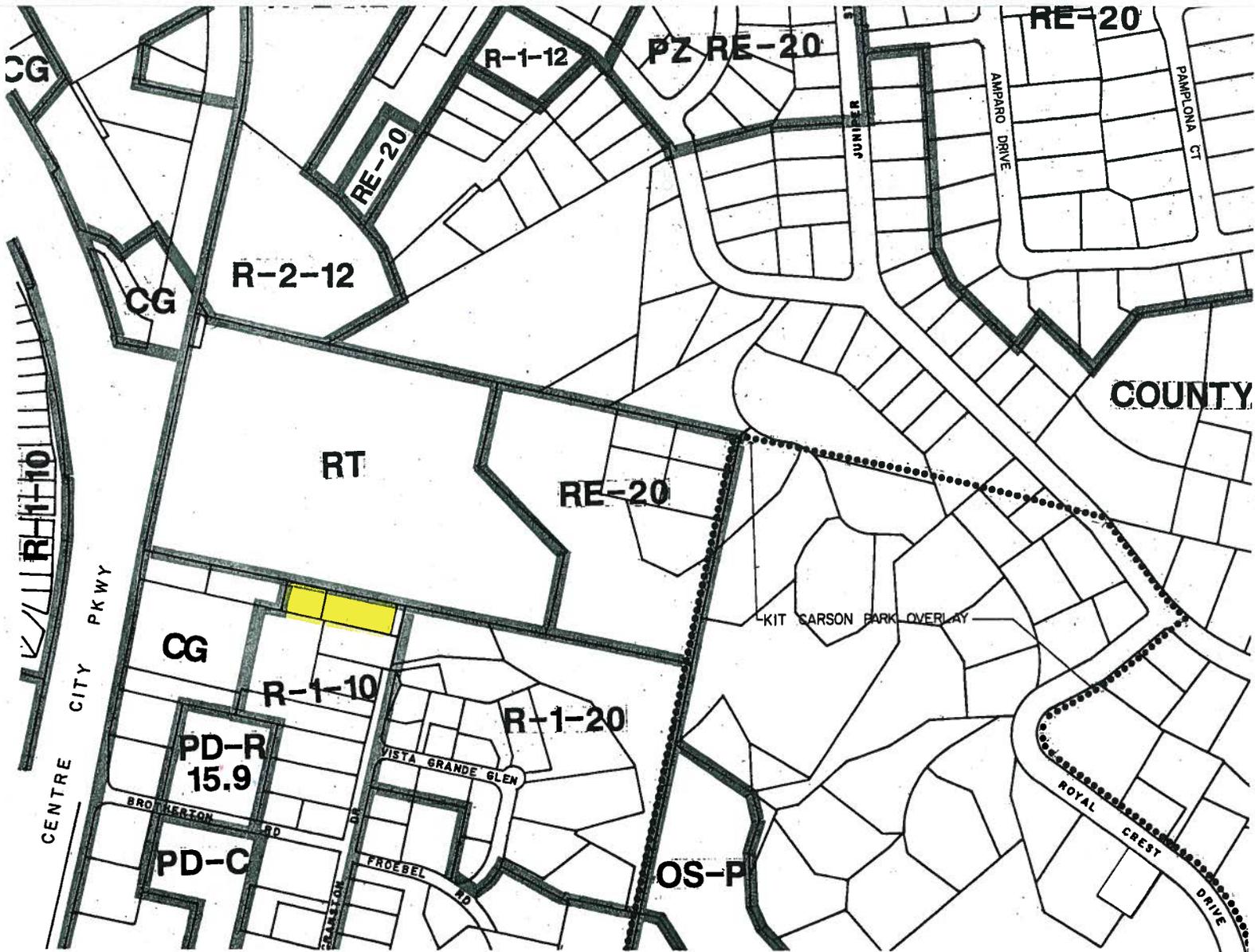
<http://www.escondido.org/general-plan-update.aspx>

Copies of these documents are also available at City Hall in the Planning Division and at the Escondido Public Library Reference Desk, 239 S. Kalmia Street, Escondido.

If you need special assistance to participate in these meetings, please contact our ADA Coordinator at (760) 839-4869. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility.

Si tiene alguna pregunta llame al (760) 839-4306.





## Jay Petrek

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**From:** noreply\_www@escondido.org  
**Sent:** Monday, February 20, 2012 9:25 AM  
**To:** Jay Petrek  
**Subject:** [Comment on General Plan Update]: Thoughts on Escondido

Christie  
[christie.obrien@gmail.com](mailto:christie.obrien@gmail.com)

Hello, these are just a few thoughts I've had. I'm sorry I don't have the time to compose this in a professional or very organized letter, but I want to get this out in time for your review.

1. San Diego County is missing a "Craft Beer City." Think about what wine has done for Temecula, pies for Julian, Mexican food for Old Town. Lets capitalize on having Stone here and encourage other small brewers to set up camp, or at least tasting rooms. All kinds of businesses could flourish along with this, restaurants that offer pairings, limi services that do beer tasting tours, hotels offering a beer tasting package.
2. Let corporate in. When you look at pictures of bustling downtown streets, they have corporate stores. I know, we would all LOVE to have all small, family owned businesses flourish here, but it's not happening and we have to get real. Fill those empty storefronts.
3. I live in Old E and I never get any deals that bring me downtown. I should have fliers in my mailbox and emails in my inbox giving me incentive to come downtown to shop, eat, drink, and play. I get nothing. This is a coupon economy, give us residents a deal!
4. So many new families are moving to North County because it's affordable. I myself am a first time Mom to a little 11 month old. Esco currently does not offer a lot of places for me to take her other than the library, parks, museum, and rec center. Take notes from Playwerx and Kidsville. A place for Moms and Playgroups to take kids, have a coffee, and relax would be very welcomed. Family friendly venues in general are needed.
5. I love the "Old California" feel of Esco. Lets capitalize on it. Why don't we have our own "Old Town" historic trolley tours, or area specifically dedicated to Mexican or Native American heritage, filled with aromas of delicious food and sounds of authentic music?

So many more possibilities are out there. We need to look at what makes other cities so successful. A chocolate festival doesn't cut it. Especially when it's \$20! Let's make Esco KNOWN for something. Put us on the "must do/see" map for tourists and make us a frequent day trip for SD locals.





20223 Elfin Forest Road  
Elfin Forest, CA 92029

2011 Board Members:  
Jacqueline Arsivaud-Benjamin, Chair  
Bonnie Baumgartner, Vice-Chair  
May Meintjes, Treasurer  
Amy Molenaar, Secretary  
Melanie Fallon  
Nancy Goodrich  
Minoos Sohaey  
Gordon Taggart  
Sandra Bartsch, At-Large Member  
Mid Hoppenrath, At-Large Member

Jay Petrek, Principal Planner

February 2, 2012

Escondido City Hall Planning Division  
201 N. Broadway  
Escondido, CA 92025

**SUBJECT:** City Case Numbers : PHG 09-0020, PHG 10-0016

Dear Mr. Petrek,

The Elfin Forest Harmony Grove Town Council appreciates the opportunity to comment on the GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN, City Case Numbers : PHG 09-0020, PHG 10-0016, in particular, regarding policies concerning unincorporated Harmony Grove (underlining added for emphasis):

**Page II-53**

SPA 8 - "Increased building heights and intensities shall be focused along Citracado Parkway and in areas more distanced from residential uses to ensure compatibility. Primary access to non-residential areas within the Specific Plan Area south of Andreason Street shall be from Citracado Parkway and Lariat Drive. Vehicular access to nonresidential land uses from Harmony Grove Road west of Citracado Parkway shall be prohibited. Attention shall be given to buffer the semi-rural residential areas along "edges" near Harmony Grove Road (west of Citracado Parkway), Kauana Loa Drive and in the Eden Valley area by incorporating land uses, building heights, architectural materials, building orientations, setbacks, colors, screening, lighting and signage that are harmonious with adjacent lower intensity land uses."

"The drainage areas running north and south through the center of this Specific Planning Area, as well as Escondido Creek, represent a desirable visual amenity. The Specific Plan shall include provisions for the enhancement of riparian areas and for the incorporation of the Escondido Creek Trail into the ultimate development plans while minimizing impacts to these resources."

**Page II-81 to 84**

1. Eden Valley and Harmony Grove Neighborhoods

Location / General Description: The Eden Valley and Harmony Grove neighborhoods are located in a rural valley along the western portion of Escondido, generally bounded by Hill Valley Road to the north, Escondido's General Plan boundary to the west, Escondido Creek Conservancy natural open space to the south, and Country Club Road, Kauana Loa Drive and portions of Harmony Grove Road to the east. The area generally north of Mount Whitney Road forms the boundary between the Eden Valley and Harmony Grove neighborhoods. The area includes single family residential on one-acre

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ON 2/2/12

and larger lots, a concrete pipe manufacturing company, agricultural uses, a historic spiritualist retreat center, and vacant property.

The Harmony Grove neighborhood is included in the County's adopted Elfin Forest and Harmony Grove San Dieguito Community Plan; a policy document created to address the issues, characteristics and vision of the two communities. Future development within Harmony Grove includes a 468-acre Specific Plan approved by the County that will involve a mixed-use rural residential village consisting of commercial uses, a fire station, open space, equestrian facilities and up to 742 units.

**Page II-95**

***Community Character Policy 1.15***

Recognize Community Plans approved by the Board of Supervisors within Escondido's General Planning Area and coordinate land use and design guidelines to minimize impacts in areas where city/county lands transition. Collaborate with annexing property owners to retain desired components of their Community Plans by considering appropriate zoning overlay designations in the event of annexation.

***Community Character Policy 1.16***

Notify and coordinate with surrounding property owners and resident groups when conducting land use studies affecting residents of unincorporated communities to include property owners, resident groups, homeowner's associations, and / or planning advisory groups that make their presence known to the City. Utilize Neighborhood meetings to notify interested parties to gather information and solicit input for recommendation to various decision-makers.

We approve of these additions to Escondido's General Plan, and in particular the underlined portions, which recognize the concerns of the local resident groups and planning advisory groups and also the County-approved Community Plan for this rural residential valley. We hope that Escondido would realize the benefit of having an attractive neighboring rural equestrian area and will act upon these policies in a manner that will safeguard the continued existence of these historic and environmentally sensitive communities.

Toward that end, we ask that Escondido institute a durable agricultural/equestrian overlay zoning plan based on the approved Elfin Forest Harmony Grove Community Plan as part of this General Plan Update, and not wait until an individual property is proposed for annexation to "consider" this, as is stated in the draft ***Community Character Policy 1.15.***

We look forward to collaboration with the City of Escondido towards limiting urban sprawl and "industrial creep" by creating effective buffer zones between future industrial/commercial uses and rural residential areas in the Harmony Grove Community.

Sincerely,



Jacqueline Arsivaud-Benjamin  
Chair, Elfin Forest/Harmony Grove Town Council Board

Cc: San Diego Board of Supervisors  
San Dieguito Planning Group

Question and Concern to City Council & Staff re the Proposed General Plan Update  
(Please enter into the Record of this 2/16/2012 GPU Workshop)  
Submitted by M. A. Mareck, 1439 Leland Way, Escondido, Ca. 92026

*The first part of my question:* Where is the list of the land-use changes which are made in the General Plan Update?

*Secondly:* my concern: At the Planning Commission General Plan Update workshop on January 24<sup>th</sup>, the Planning Commissioners had not been given the Side-by-Side Comparison of the Proposed Update and the Current General Plan, a document which could have greatly helped their preparation for the workshop. The lack of information on the part of the Commissioners was very evident, and raised much concern in those attending the workshop. Following that workshop, the concluding recommendations in the staff overview for the February 1<sup>st</sup> workshop listed: "Forward documents to Planning Commission for their final recommendation." My understanding is that this "final recommendation" by the Planning Commissioners will be to our City Council in regard to the Council's deciding vote on the content of our General Plan Update, which is slated to be on the November ballot.

Many of Escondido's current voters are also those who voted for the Growth Management and Neighborhood Protection Act. That Act was the result of a grassroots response to repeated abuses of the city's voter-approved General Plan by its city councils. The Act requires a vote of the people for changes to residential densities, changes to land use categories, and changes from residential designations to commercial or industrial designations. It also re-adopted specific related policies from the General Plan and stated that changes to those policies in future could only be authorized by a vote of the people at an election.

*Those voters – and all of Escondido's voters – need to be sure that our commissioners have all the information they need about how the proposed General Plan does or does not honor the voters' intent when they passed the Growth Management and Neighborhood Protection Act. And the voters themselves need that information – in a clear, accurate, and concise form, widely available, and in time to permit study and discussion.*

TRANSMITTED TO CONSULTANT  
ON 2/27/12



## Jay Petrek

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**From:** Mark Rodriguez <marknrodriguez@cox.net>  
**Sent:** Sunday, January 22, 2012 10:35 PM  
**To:** Dgarrick@Nctimes. Com; Jay Petrek  
**Cc:** Darol Caster  
**Subject:** Escondido Research Technology Center (SPA #8) - Planning Commission Workshop  
**Attachments:** PastedGraphic-4.tiff; ATT00001.txt

Although the January 2012 DRAFT Escondido General Plan Land Use and Community Form indicates (Harmony Grove) the northern part of SPA #8 has a drastic impact on Country Club and the Escondido Residents living west of the ERTC. The SPA 8 Guiding Principles are the same stated in the original ERTC Specific Plan yet those principles have not always been implemented.

"Specific Plan(s) shall include attractive design standards, landscape features, integrated recreation, and compatible land uses. General guidance for these development standards may be similar to and derived from the ERTC and Harmony Grove Specific Plans."

"Attention shall be given to buffer the semi-rural residential areas along "edges" near Harmony Grove Road (west of Citracado Parkway), Kauna Loa Drive and the Eden Valley area by incorporating land uses, building heights, architectural materials, building orientations, setbacks, colors, screening, lighting and signage that are harmonious with adjacent lower intensity land uses."

Attention to those standards have since been changed heavily impacting building heights, noise and lighting that are not harmonious with adjacent lower intensity land uses and were unanimously rejected by the Planning Commission, but were adopted anyway to allow the Palomar West facility to proceed due to political pressure. Other standards such as architectural materials, colors and screening were not followed with the development of the Stone Brewery with attempts to get them addressed on expansions made after the fact. One of those was the color and architectural materials used on the rear of the building with the expansion of the garden area. The owner agreed to stain the rear of the building, but it did not take and only lasted a few months while large outside equipment areas had gone unscreened for noise. No further attempt has been made by the city or owner to address this issue. The future expansion of the Stone Brewery production area to double production needs to take into account these impacts and must be addressed not only for the expansion but what has been done in the past.

While I know there is very little that can be done to address the hospital, I hope that any consideration used for expansion of the ERTC area are deeply considered and held to those standards. I also hope that the same developer is not involved with the northern expansion because of his known lack of cooperation even with the city staff and the violations that have cost millions.

Regards,  
Mark Rodriguez  
(8580312-2696

TRANSMITTED TO CONSULTANT  
ON 1/31/12



**From:** Mark Rodriguez [mailto:marknrodriguez@cox.net]  
**Sent:** Tuesday, February 07, 2012 2:56 PM  
**To:** Jay Petrek  
**Subject:** Re: General Plan Community Meetings

Jay,

First I'd like to thank you for any effort you put in communicating the bright lighting issue on the top of PPH West. It appears that they have turned off the conference room lighting during the night these past couple of evenings.

I would also like you to confirm our discussion we had on the phone about the county property on the northern part of the ERTC as not being part of the new General Plan and that it would require its own specific plan to be brought forward on its own in the future. Can you also confirm that is also not part of the current ERTC Specific Plan?

Thanks,  
Mark Rodriguez



**From:** Bill [mailto:billmar1999-bill@yahoo.com]  
**Sent:** Sunday, February 12, 2012 11:25 AM  
**To:** Jay Petrek  
**Subject:** Draft General Plan Update

Hi Jay,

We have been monitoring the discussions on the Escondido GP Update recently and would like to make our voice heard. Unfortunately, my wife and I work and have other evening commitments that preclude us from attending any of the public meetings to air our opinions. So, we would like to do so here.

We do not support the notion that a higher ratio of industrial/commercial acreage to residential acreage necessarily translates into better prosperity for the city. Carlsbad has a high ratio and is a very prosperous community, but is prosperous because it is a desirable place to live. Yes, they have a higher median income and a higher ratio of commercial vs. residential acreage, but then Rancho Santa Fe has an even higher median income and lower commercial vs. residential acreage ratio. The point is that both these places are prosperous because they are great places to live.

The City of Escondido should concentrate their efforts on making the City of Escondido a desirable place to live as the sole method of meeting their goal. Adding more industry and non-integrated commercial only adds more pollution, traffic and inevitably industrial blight. Just look at some of the industrial areas in Escondido now that are dilapidated. This is a short-sighted solution and actually lowers the desirability of the area as a livable community, especially in the long run. Besides, the workers that garner the higher incomes presumably created by this strategy won't necessarily live and spend in the Escondido community. How many Carlsbad residents actually work in Carlsbad. Not many. I have worked at three companies in Carlsbad and only knew a few people that didn't commute from other areas.

We support the idea of adding residential density to the City of Escondido to avoid sprawl and stimulate spending in the city and community. We saw firsthand how this works when we lived in the City of Long Beach. It was for years a transient city of office and industrial workers that commuted to the city for work by day and were gone by evening. They spent very little of their wages in the city. Once the City embarked on re-developing a friendly living environment downtown the city flourished. When we left it had a lively, prosperous downtown area with desirable living areas being constructed around it. We think Escondido should look to this as their model, not just mimicking commercial/residential acreage ratios of other communities in the area.

I will close by suggesting that city seems to be ignoring one of the buried (literally) treasures that could serve as the nucleus for any re-development of the City of Escondido, and that is Escondido Creek. Although there was a recent study on restoring the creek to some level of attraction and use, it seems it is a minor consideration in any discussion on the future of Escondido. We believe the creek can be a preeminent feature and attraction to those considering living in a future City of Escondido, rather than the dangerous blight and eye-sore it is today. Imagine a year round creek flowing through a wooded riparian path running right through the middle of the city with bike and walking paths, overlooks, sitting areas, and parks all interlinked with other paths running to the outer areas of the community. Combine this with well planned, higher-end condo and retail developments adjacent to this area and I think people would flock to the city, and pay a higher premium to do so.

We feel the city planners should guide the development of the city by ignoring the short term benefit of more commercial and industrial development and move the vision of our future to one of a more livable community that attracts residents not businesses.

We appreciate the opportunity to voice our opinion and hope our comments reach those working on the plans for the future of the City of Escondido and surrounding communities.

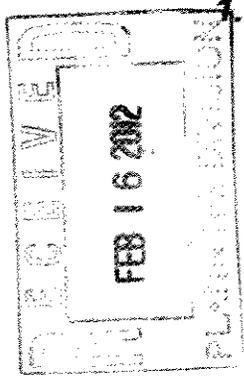
Thanks,

Bill & Marilyn Morgan  
2472 Live Oak Road  
Escondido, CA (2029

THE FOLLOWING MINORITY REPORTS  
ARE BEING SUBMITTED BY PAMELA  
STAHL AND LISA PRAZEAU, MEMBERS OF  
THE CITY COUNCIL APPOINTED CITIZEN'S  
COMMITTEE

1

Jay Petrek



### 1. Circulation Q of L

Lisa & Rick Paul dissented. Pam was absent for vote but also opposed.

- Allowing lower than level "C" not acceptable.
- Congestion (idling traffic) increases greenhouse gas emissions.
- Idea of getting people out of their cars is not working (article in NCT 9/21/09 by Dave Downey). Article attached.
- Increasing density at same time as allowing more congestion decreases quality of life for all residents and only benefits developers.

### 2. School Q of L

Vote was to maintain current language.

Pam was not present for vote, but she dissents.

- "Both school districts cite concerns regarding their ability to accommodate future growth" -quoted from staff report.
- Concern regarding development of high density in downtown and impacts to Central School.
- Portable classrooms is way of life in Escondido schools and should not continue.

### 3. Water Q of L

Pam was not present, but dissents.

Modify GP Q of L reducing 600 gallons per day to 540 gallons per day.

- Conservation is needed, but not if there is not a corresponding reduction in building permits when there <sup>are</sup> mandatory reductions imposed on residents.
- This modification penalizes existing residents while promoting developers' interest.

4. A subsequent vote on water was to include in the GP regulating issuance of residual permits during times of water shortage that is determined to mean when conservation is mandated for existing residents (i.e. level 2 drought conditions).

building

Vote 5-6 Motion failed. Lisa & Pam were among those voting for the motion. Minutes are not clear who the other 3 were.

NOTE:

8/30/10

Turned into City Hall at approx. 12:25 PM,  
(due by 5 PM).

P.S.

- Existing residents of Escondido & San Diego County are continually voicing their sense of unfairness & outrage at the same time that developers continue building at will. <sup>^</sup> with being forced to reduce water usage

**5. Water**

Motion – “To plan for the community’s water needs based on the desired vision for build out, incorporate appropriate water conservation & not an artificial cap”.

Pam dissents.

- Along with mandatory water conservation, there should be restrictions on building permits.
- Ultimate build out should not exceed 165,000.

**6. Park/Open Space Q of L**

Pam was not present for vote; vote was unanimous.

According to the staff report, Lisa expressed concerns re: lack of open space in recent downtown residential projects.

According to Jerry Lenhard’s notes of the December 17<sup>th</sup> meeting, (taken at request of Pam) Lisa stated many projects have no amenities. We need to provide by law x number of acres per x number of residents. Who pays for all of this. Jon Brindle says now projects must provide space.

7. SPAs 2<sup>nd</sup> and 4<sup>th</sup> (Daley Ranch and Valley View) should be examined for reduction in density. Motioned failed. Lisa, Pam & Rick Paul voting for.

- Proposition S intensity should hold.

8. Smart Growth Areas should be evaluated for feasible & desirable density increases without regard to any density reductions elsewhere in G P.

Vote 7-4 (Lisa, Pam, Elmer & Paul no).

- Leads to build out figure where deficiencies reduce quality of life for existing residents.

- Leads to existing residents (taxpayers) subsidizing increased infrastructure needs of high build out figure.

**9. Annexation Policy – “retain current G P policy” Vote 1-10. Pam voting yes.**

- Because property taxes paid by annexed property owners are not sufficient for infrastructure expenses, existing residents pay for this development.
- Property taxes paid for by owners of annexed properties does not offset cost of providing services.

~~10. Annexation Policy~~

**11. Annexation Policies – “Consider proactive G P policies for annexation throughout community”.**

Vote 9-2 (Lisa & Pam voting No).

- Property taxes paid by annexed property owners does not offset cost of infrastructure.
- Existing residents (taxpayers) *subsidize cost of* pay for infrastructure for annexed properties.

**12. Annexation Policy – “Consider proactive annexation policies that may include provisions of municipal services in deficiency areas without requiring property owners to finance improvements in areas that address city goals & visions”.**

Vote 9-2 (Pam & Lisa voting No).

- Existing residents (taxpayers) end up paying for services to annexed areas.
- Q of L is reduced for existing residents.

**13. Annexation Policy – “Revisit annexation fees to determine their appropriateness for accommodating G P’s goals & visions”.**

Vote 9-2 (Pam & Lisa voted No).

- Annexation fees should not be reduced, thus increasing costs to existing residents.
- Deficiencies should be paid for by those being counted as new city residents.

14. **Clustering Policy** - "Retain current language (Clustering is not intended to maximize the density on yield or to circumvent the existing zoning)".

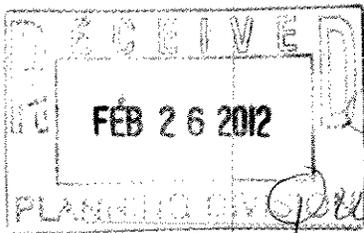
Vote 3-8 Motion failed. (Lisa and Pam voting in favor).

- Retaining this policy gives a heads up to developers about intent to preserve open space & not to develop the most possible number of lots.
- Current language in G P provides advance notice to developers that current provisions may not result in the maximum number of units.
- Danger in watering down current language because of abuses of clustering (examples given at the meeting).
- If as some on committee say that clustering does not result in maximum density of yield, why remove this from the policy?

15. Pam asked for policies in G P relating to standards for Smart Growth areas (open space, recreational amenities, playgrounds for children, desirable landscaping, setbacks, etc, *re are some* guidelines for downtown area, but nothing for other SGA's.

Vote 1-1-8. (Pam voting <sup>yes</sup> No, Lisa abstaining).

- Design in SGA's other than downtown are not addressed in G P. Staff say it will be addressed by design guidelines & specific project conditions. Thus far, *the many* developments built are lacking ~~ab~~ such amenities.
- Many of these developments already built do not have open space or amenities. They consist of buildings & cement. They will be tomorrow's blighted areas.



Jay Petred  
and statements

1 of 3

Questions" from Pamela Stahl

at the Public Workshop on the

General Plan Update 2/16/12

1) In going through the "Side By Side" Comparison of Existing (adopted) and Draft (proposed) General Plan Goals & Policies (The matrix), I note at least 17 policies in the Growth Management and Neighborhood Protection act (Proposition 5) where the word "shall" is deleted in the proposed policy for the General Plan Update. I would like to know from the City attorney if removing "shall" weakens the policy. I list those policies here with page numbers:

Land Use Policy A1.1 pg. 6

Land Use Policy A1.3 pg. 6

Land Use Policy B1.3 pg. 9  
Land Use Policy B1.7 pg. 10  
Residential Policy B2.1 pg. 16  
Residential Policy B2.5 pg. 18  
P.D. Zoning Policy C3.1 pg. 144  
P.D. Zoning Policy C3.2 pg. 144  
SPA Policy C3.4 pg. 145  
SPA Policy C4.2 pg. 146  
SPA Policy C4.3 pg. 146  
SPA Policy C4.4 pg. 146  
Cluster Policy D1.3 pg. 149  
Cluster Policy D1.4 pg. 149  
Cluster Policy D1.8 pg. 150  
Cluster Policy D1.9 pg. 150  
Cluster Policy D1.10 pg. 150

2) In reviewing the same matrix referred to above in question number 1, I see approximately 40 policies that are in the Growth Management and Neighborhood Protection act and which are either deleted or changed in the General Plan Update. Proposition 5 was approved in 1998 by a significant majority of Escondido

voters. How does the city intend to educate the voters on the changes to Proposition 5?

3) I am submitting tonight the minority reports issued by Pamela Stahl and Lisa Prageau, members of the General Plan Update Issues Committee. These reports refer to Quality of Life Issues, Annexation Policy and Clustering Policy.

4) I am submitting copies of my questions/statements for each city council member, the mayor, the city clerk & Jay Petrek. I have extra copies for the press and for interested people in the audience.



**PALA TRIBAL HISTORIC  
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road  
Pala, CA 92059  
760-891-3510 Office | 760-742-3189 Fax



January 19, 2012

Jay Petrek  
City of Escondido  
201 North Broadway  
Escondido, Ca 92025



Re: Escondido GPU, Downtown SPU & Climate Action Plan

Dear Mr. Petrek,

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at [sgaughen@palatribe.com](mailto:sgaughen@palatribe.com).

Sincerely,

Shasta C. Gaughen, PhD  
Tribal Historic Preservation Officer  
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

TRANSMITTED TO CONSULTANT  
ON 1/31/12



-----Original Message-----

From: William [mailto:w.w.stephenson@gmail.com]

Sent: Thursday, February 23, 2012 2:50 PM

To: Jay Petrek

Subject: USGBC: LEED for Neighborhood Development

Mr. Petrek,

I attended the recent community workshop on the Escondido general plan update (given in the Mitchell Room) and I briefly spoke with you afterwards regarding the complete absence of any mention of LEED design and development standards being applied to Escondido's GPU process, which you confirmed as true, which I feel is a stunning over-site by our city council.

Is there any way I can help you bring to the City Councils attention the importance and many benefits to our community if our city integrated the LEED for Neighborhood Development (LRRD-ND) principles into our GPU.

Please check out the link provided below for more information on the LEED-ND Rating System.

I was informed by Dolly Mc Quiston, President of the Escondido Chamber of Citizens (ECOC) that you will be our guest speaker next Tuesday evening, Feb 28. at Jerry Harmons home. I would like you to include the LEED for Neighborhood Development in your presentation because of the publics general lack of awairness of these entities, programs and standards. I look forward to your visit.

<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>

