

APPENDIX A

NOP and Comment Letters Received

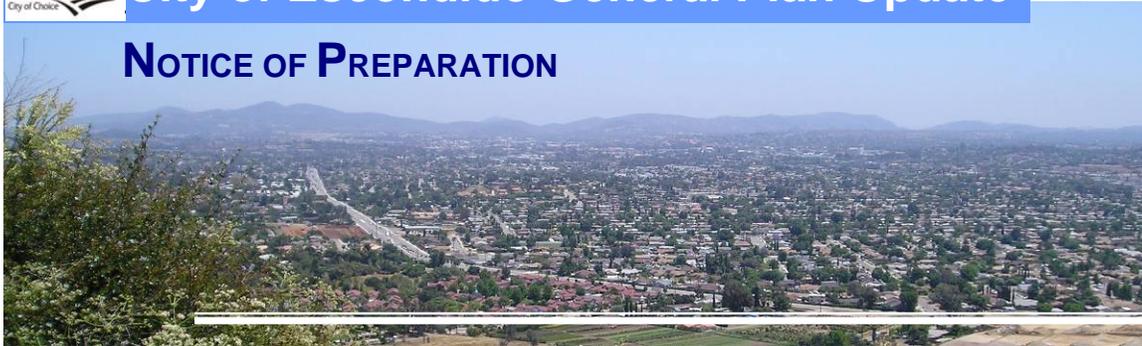
Notice of Preparation
Letters Received During the NOP Comment Period
Letters Received After the NOP Comment Period

Notice of Preparation



City of Escondido General Plan Update

NOTICE OF PREPARATION



Date: July 22, 2010



(California Code of regulations, Title 14 (CEQA Guidelines) Sections 15082, 15103, 15375)

To: State Agencies
Responsible Agencies
Local and Public Agencies
Trustee Agencies
Interested Parties

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

**Subject: NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN
City Case Numbers: PHG 09-0020, PHG 10-0016**

The City of Escondido will be the Lead Agency for the preparation of a Program Environmental Impact Report (EIR) for the City of Escondido 2050 General Plan Update and Climate Action Plan (proposed project). We need to know the views of your agency (and the views of other interested parties) as to the scope and content of the environmental information germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approvals associated with the proposed project.

The proposed description, location, alternatives, and the scope of the environmental assessment are contained in the attached materials. Since an EIR will be prepared the City is not required to complete an initial study. To assist agencies and the public in understanding what will be covered in the EIR, the attached materials contain the typical information covered by an initial study checklist as specified in Appendix G of the California Environmental Quality Act Guidelines.

Due to the time limits mandated by State Law, your response must be sent at the earliest possible date, but not received later than 5:00 p.m. August 30, 2010.

Please send your response to Jay Petrek, Principal Planner, City of Escondido Planning Division, at the address shown above. We will need the name for a contact person in your agency. Written comments may also be submitted via e-mail to jpetrek@escondido.org. Additional information about the proposed project may be obtained on the city's General Plan Update website at: <http://www.ci.escondido.ca.us/gp-update/index.html>

Project Title: City of Escondido General Plan Update & Climate Action Plan
Project Applicant: City of Escondido, Planning Division
Project Location: City of Escondido and surrounding Planning Area, San Diego County, California

Signature: Jay Petrek
Jay Petrek, Principal Planner
City of Escondido Planning Division
(760) 839-4556

Date: July 22, 2010



City of Escondido General Plan Update & EIR

NOTICE OF PREPARATION



DATE:
July 22, 2010

COMMENTS DUE:
August 30, 2010



ESCONDIDO 2050 GENERAL PLAN UPDATE (CASE No: PHG 09-0020) CLIMATE ACTION PLAN (CASE No: PHG 10-0016)

The City of Escondido will be the Lead Agency for the preparation of a Program Environmental Impact Report (EIR), as defined in Section 15168 of the CEQA Guidelines for a proposed update to the City's General Plan, which was adopted in 1990 and currently serves as Escondido's blueprint for development (Attachments 1 and 2 depict Escondido's Planning Area Boundaries and General Plan Land Use Map). It is anticipated that land use amendments associated with the Update would trigger a 1998 local initiative (Proposition "S"), which requires voter approval of the General Plan. The City Council has directed to prepare the Update in time for the November 2012 General Election.

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 conservation 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:

- a) Land Use
- b) Housing
- c) Circulation
- d) Community Facilities and Services
- e) Community Protection and Safety (includes Noise)
- f) Community Open Space / Conservation
- g) Economic Prosperity
- h) Growth Management
- i) General Plan Implementation
- j) Specific Planning Areas

Pursuant to Section 15063 of the CEQA Guidelines an Initial Study has not been prepared for the plan. The EIR will consider all potential environmental effects of the plan to determine the level of significance of the environmental effect, and will analyze the potential effects to the detail necessary to make appropriate determinations on significance. In addition, the EIR may also consider those environmental issues which are raised by responsible agencies, trustee agencies, and members of the public or related agencies during the NOP process. Additional information on Escondido's General Plan Update efforts can be found on its website at: <http://www.ci.escondido.ca.us/gp-update/index.html>. An electronic version of this notice is posted at: www.escondido.org/gp-update/EIR-Notice-of-Preparation.pdf.

We need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to your organization, in connection with the proposed plan; specifically, we are requesting the following:

1. If you are a public agency, state if your agency will be a "responsible" or "trustee" agency for the plan and list your agency's permits or approvals that will be required for the project and its future actions;
2. Identify significant environmental effects and mitigation measures that you believe need to be explored in the EIR with supporting discussion of why you believe these effects may be significant;
3. Describe special studies and other information that you believe are necessary for the City to analyze the significant environmental effects, alternatives, and mitigation measures you have identified;
4. For public agencies that provide infrastructure and public services, identify any facilities that will be required to provide services;
5. Indicate whether a member(s) from your agency would like to meet with City staff to discuss the scope and content of the EIR's environmental information.
6. Provide the name, title, telephone number, postal and e-mail addresses of the contact person from your agency or organization that we can contact regarding your comments;
7. Identify alternatives that you believe need to be explored in further detail in the EIR. Due to the time limits mandated by State law, responses from responsible agencies, other agencies and organizations must be sent and received by the City of Escondido not later than 30 days following the publication of this Notice of Preparation (5:00 p.m. August 30, 2010). Comments may be sent to:

Jay Petrek, AICP
Project Manager
Escondido Planning Division
201 N. Broadway
Escondido, CA 92078
Jpetrek@escondido.org
tele: (760) 839-4556
fax: (760) 839-4313

If response from your agency or organization is not received, we will presume that your agency or organization has no response to make. A responsible agency, trustee agency, or other public agency may request a meeting with City representatives in accordance with Section 15082(c) of the CEQA Guidelines.

General Plan Preliminary Land Use Study Areas

A primary focus of the General Plan Update involves assuring the long-term sustainability of Escondido's future by promoting quality, managed growth, ensuring the adequate provision of infrastructure, preserving perimeter viewsheds, and respecting and enhancing the character of established single family neighborhoods. Staff has conducted a preliminary review and analysis of potential land use amendment areas involving Smart Growth areas, a full range of employment land use areas (see Attachment 3), and minor "clean-up" amendments to correct inconsistencies with current land use patterns. The nature of recommended Land Use Study Areas includes:

1. Employment Opportunity Areas

Several potential study areas involve expanding Escondido's employment lands by reassigning residentially designated areas (Attachment 3). These include areas east of I-15 along Imperial Drive; areas north and south of the Escondido Research Technology Center (ERTC); at the Felicita Avenue/I-15 interchange, and Nutmeg Street at Centre City Parkway. Based on prior research, Escondido's percentage of land devoted for employment purposes is comparably less than surrounding communities. This has been noted as an explanation for the out-migrating pattern of Escondido commuters involving a disproportionate number of residents seeking employment outside the community affecting the "jobs/housing" balance.

Additional study areas aimed at enhancing existing employment areas include south and east of the I-15/ Highway 78 interchange; properties south of the Mercado Area; and areas bounded by I-15, West Valley Parkway and Ninth Avenue, and Westfield's Shopping Town. An evaluation of these areas could include proximity to existing and planned transit facilities, lot consolidation incentives as a mechanism for attracting larger businesses, developing regional entertainment facilities, establishing a professional and business service "near-sourcing" center for regionally-based bio-technical and bio-medical firms, improving aesthetics and/or transitioning land uses to more employee-intensive, higher quality and higher paying employment.

2. Residential / Transit Intensification Areas

Accommodating additional population above Escondido's existing General Plan residential capacity is proposed to be clustered in specific mixed-use "nodes" in concert with "Smart Growth" principles (Attachment 3). Based on existing and projected transit patterns focused infill development will be close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources. Study Areas for establishing these mixed-use development nodes are in the Downtown Specific Plan Area, East Valley Parkway near Ash Street, South Escondido Boulevard near Felicita Avenue and near Citracado Parkway, and Westfield's Shopping Town.

3. Educational Focus Area

The area between Palomar College's satellite campus (East Valley Parkway at Midway Drive) and Palomar Hospital's downtown facility is proposed for evaluating opportunities for attracting and clustering educational institutions (Attachment 3). Policies promoting East Valley Parkway as the area for attracting and locating higher educational universities, technical colleges, vocational schools, and job training facilities are recommended to foster Escondido's sustainability and promote a more educationally competitive environment that provides a direct path to employment.

4. Corrective / "Clean-Up" Amendment Areas

Several changes in land use and ownership patterns have occurred since the last General Plan Update that warrant re-designation. Most notably is the acquisition of several properties by public agencies (including the City) for dedication as either open space or other municipal/governmental purposes. Reclassifying properties to reflect their appropriate designation will establish a more accurate map for planning purposes. Note: These areas are not identified in Attachment 3.

5. Public Land Classifications

The General Plan currently includes "Public Land" (P) as the sole designation identifying properties owned by public entities that customarily serve a variety of purposes. In this manner, the City's police firing range, Hale Avenue Resource Recovery Facility, Daley Ranch Open Space Preserve, and active park sites are all identified with the same General Plan "P" land use designation. Refining the "Public Land" designation will provide a more detailed identification of the actual/intended land use for more accurate planning purposes. Note: These areas are not identified in Attachment 3.

Escondido's Climate Action Plan

The General Plan Update will include a number of goals, policies and programs that are aimed at reducing Escondido's greenhouse gas emissions both from the perspective of City operations and as they relate to community-wide transportation and development. In concert with the General Plan Update a strategic Climate Action Plan (CAP) will be developed and assessed in the EIR that will guide future efforts to reduce emissions and will help the City realize emissions reductions as quickly and cost-effectively as possible. The climate action planning process will serve as the City's program for setting more specific targets for reduction of greenhouse gas emissions and for discussing and selecting specific reduction measures that are practical and implementable in Escondido.

Features in the General Plan and Climate Action Plan that the EIR will assess includes:

- a) Escondido's share of regional growth as defined through the 2050 Regional Growth Process by guiding it to locations benefiting from existing or planned infrastructure, transit, and support services. Note: Escondido's fair share of regional growth is anticipated to be between 3,000 and 4,500 dwelling units above the current General Plan generating approximately 9,500 – 14,250 additional persons).
- b) Maintaining established Quality of Life Standards in outlying areas but re-evaluating standards for the urban core that reflect planning goals.
- c) Updating the Housing Element to meet state-mandated criteria.
- d) Evaluating clustering policies to ensure that the resulting development projects are compatible with surrounding areas pertaining to yield, open space, and lot width.
- e) Increasing residential densities and intensities in Smart Growth Areas in close proximity to transit without compromising the character of adjacent single family neighborhoods.
- f) Identifying additional neighborhoods with potential historic status.
- g) Establishing "Smart Growth" and "Healthy Community Concepts" that:
 - ❖ Create exciting places with a mix of uses that appeal to a wide range of residents and visitors.
 - ❖ Preserve existing neighborhood densities and improve their character.
 - ❖ Incorporate sustainability in new and retrofitted development.
 - ❖ Utilize energy efficient, green construction design principles.
 - ❖ Identify clear intensity/capacity assumptions for each land use category.
 - ❖ Recognize the value of potable water and treated wastewater and maximize their re-use.
 - ❖ Enhance accessibility to recreation and open space opportunities.
 - ❖ Improves opportunities for alternative transportation (walking, cycling, transit)
- h) Refining Growth Management provisions to ensure coordination of the pace/rate of development with the ability to provide necessary infrastructure and services.
- i) Refining General Plan boundaries and urban densities in outlying areas.
- j) Amending the land use designation from residential to employment (office, business park, research and development, entertainment, etc.) involving up to approximately 450 acres in several locations and establishing new General Plan Land Use categories depicting high-quality employment land uses.
- k) Establishing clear sewer service boundaries to ensure that the HARRF (City's sewer treatment facility) and supporting infrastructure are carefully sized.
- l) Incorporating energy efficiency and conservation strategies to reduce fossil fuel emissions created as a result of transportation, building, city operations, and other appropriate sectors within the General Plan. Note: A Greenhouse Gas Emissions study would evaluate fossil fuel emissions generated from activities within Escondido under current conditions, build-out conditions, and several alternative community "Smart Growth" land-use scenarios.
- m) Expanding the Downtown Specific Plan Area Boundary (SPA #9) to include the existing Palomar Hospital (west campus), areas north of Washington, south of Fifth Avenue, and west of Centre City Parkway.
- n) Expanding the Harmony Grove Specific Planning Area Boundary (SPA #8) to include areas north of the new Palomar Hospital (east campus) and south of Escondido Creek.
- o) Establishing new Area Plans in the vicinity of I-15 and Hwy 78 for the purpose of targeting desirable high-wage / high-quality employment opportunities.
- p) Incorporating regional transit facilities as identified in SANDAG's Regional Transportation Plan.

- q) Re-configuring all or a portion of the Second Avenue / Valley Parkway one-way couplet through Downtown to two-way traffic.
- r) Downgrading certain Circulation Element Streets where considerable constraints and/or lower traffic volumes warrant reclassification.
- s) Incorporating Multi-Habitat Conservation Program (MHCP) policies.
- t) Updating information pertaining to mineral resources.

Issues to be Addressed in the EIR

The EIR will address issues related to aesthetics, agricultural resources, air quality, biology, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and circulation, public utilities and services systems, and greenhouse gas and global climate change.

Cumulative Impacts

This section will address the impacts associated with the General Plan build-out along with other known, approved or reasonably foreseeable development activity in the City and region. The analysis will be based on a list of known and foreseeable projects in the region as well as development forecasts. The analysis will address each identified issue area and will identify appropriate mitigation measures for any identified cumulative impacts.

Refining General Plan Land Use Alternatives, Text Preparation, and Consultant Selection

An appointed General Plan Issues Committee has been convened to recommend and comment on various alternative land use scenarios. Public outreach will occur to solicit input during the summer 2010. This information would be brought back to the City Council where recommendations would be made on the preferred and/or range of land use alternatives that would be selected for a thorough evaluation in the General Plan EIR.

The analysis will contain a qualitative and comparative evaluation of the land use alternatives to address the likely impacts associated with the various land use patterns. If one or more of the alternatives from the planning process are not sufficient to meet the legal requirements of alternatives (fail to meet project objectives or do not lessen an environmental impact), then different alternatives will be proposed for inclusion. The "No Project" alternative will analyze the development of the site based on existing land use and zoning designations. The City encourages suggestions and recommendations during the NOP comment period regarding the nature and content of the alternatives to be considered.

Staff has posted the Draft General Plan Introduction, Vision, Goals, & Quality of Life Standards, Economic Prosperity, and Growth Management Elements on the City's website for public review. Additional information on Escondido's General Plan Update efforts can be found on its website at: <http://www.ci.escondido.ca.us/gp-update/index.html>.

Escondido's Location and Population:

Escondido is located in northern San Diego County, approximately 30 miles north of downtown San Diego and 18 miles east of the Pacific Ocean (Attachment 1). Escondido's corporate boundaries encompass 37.36 square miles. The community is situated in a natural valley at approximately 615 MSL and surrounded by rolling hills and rugged terrain ranging up to 4,200 MSL. Escondido is bounded on the north by the unincorporated communities of Valley Center and Hidden Meadows, on the west by the City of San Marcos, on the south by Lake Hodges and San Diego's city limits, and on the east by unincorporated San Diego County. Interstate 15 bisects Escondido in a north-south direction and State Route 78 transitions from freeway to surface streets in an east-west direction through the community.

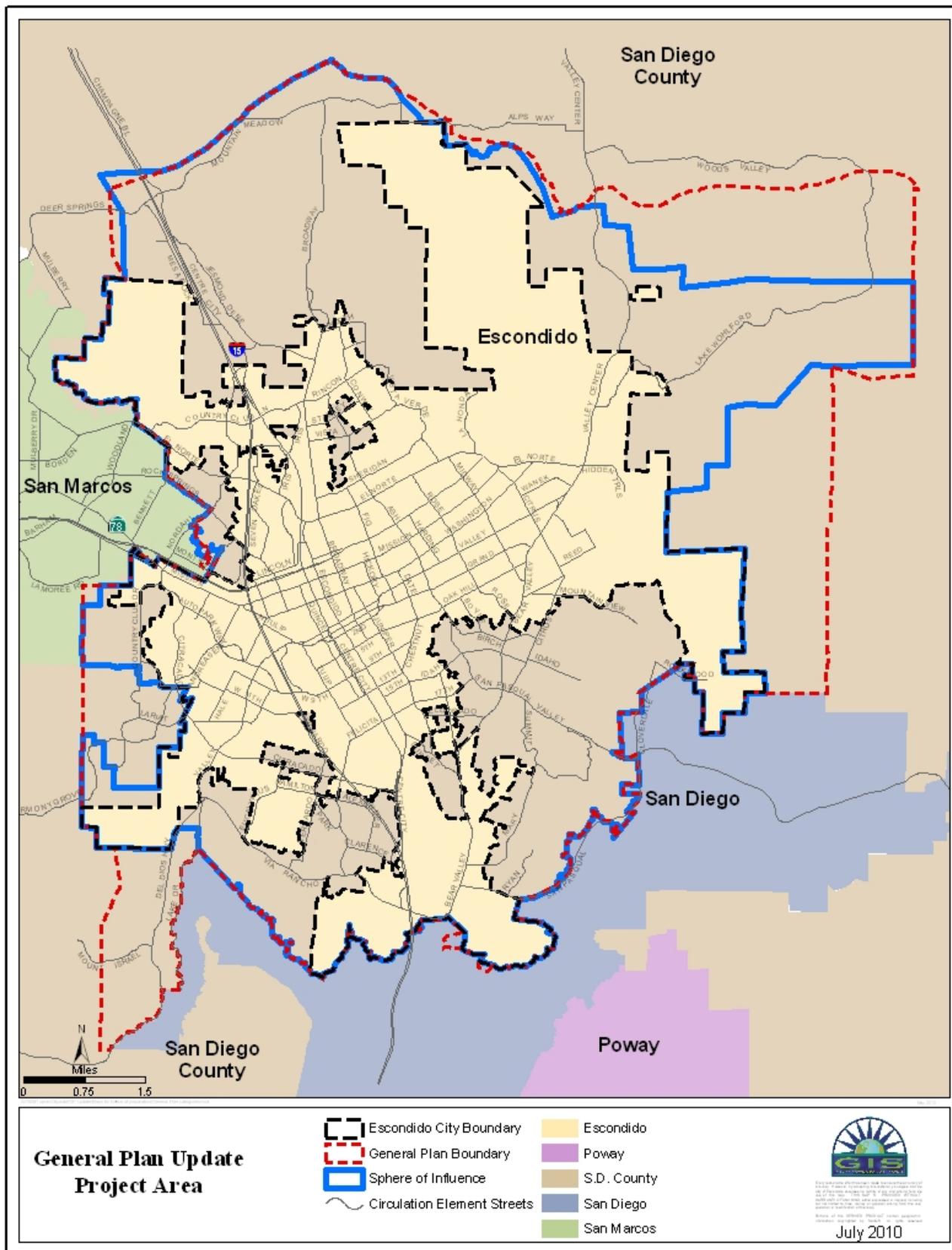
The General Plan Area that includes the city limits and surrounding county territory is approximately 80 square miles (Attachment 2). Approximately 144,800 residents live within Escondido's corporate boundaries with an additional 12,000 – 15,000 persons residing in Escondido's surrounding unincorporated General Plan Area. The community's median age is 32.3 and the household median size is 3.12 persons. Escondido's ethnicity is 45% White, 45% Latino, 5% Asian, 2% Black and the remaining classified as Native American, Hawaiian/Pacific Islander and Mixed Race/Other. The 2009 median household income is \$46,960.

Escondido's Modern History:

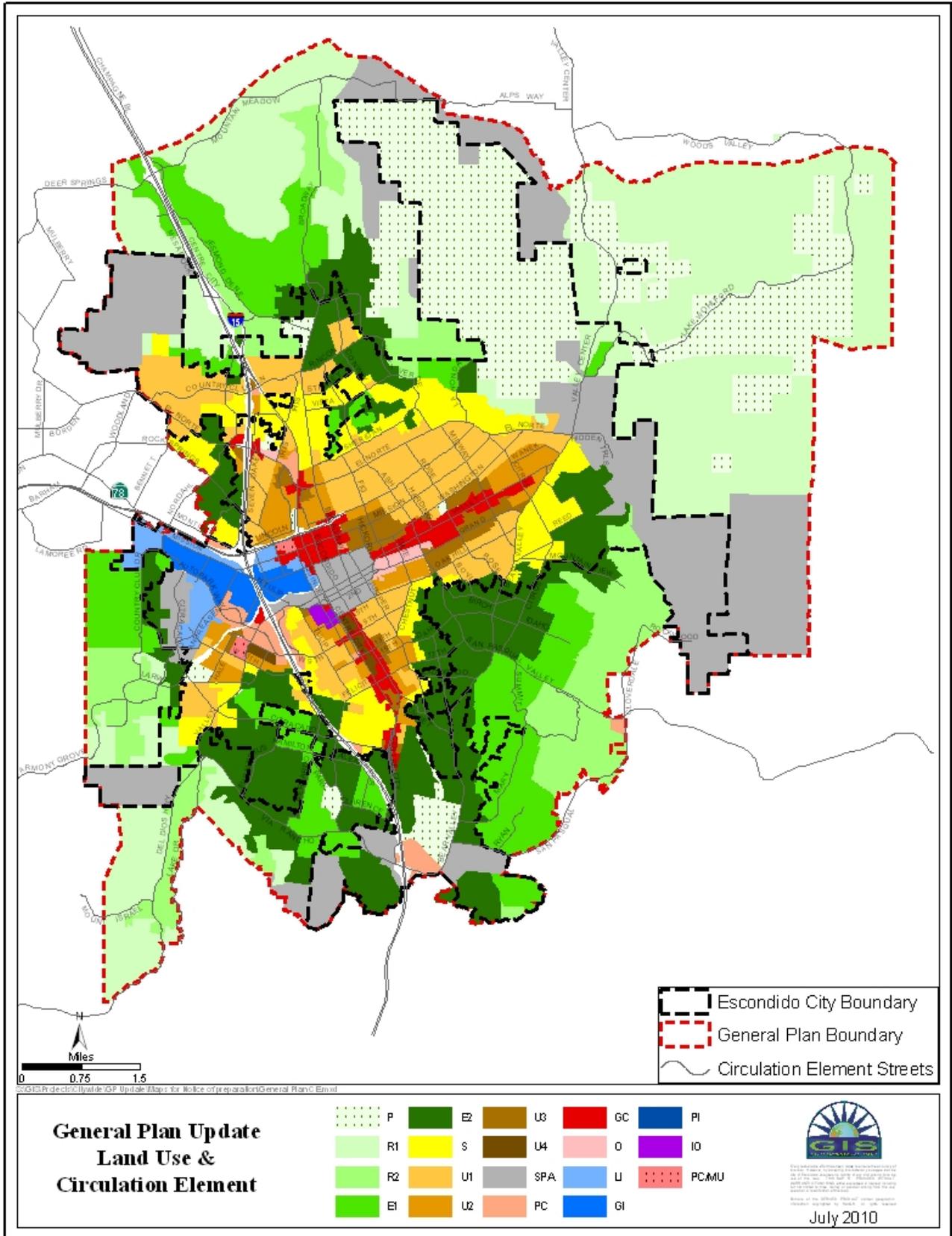
Escondido was founded in 1888. Origins of the City are directly traced to agricultural uses and production. Over time, Escondido's position has transitioned to become inland Northern San Diego County's vibrant center for retail, services, health care and cultural facilities while maintaining a special feeling of small-town living. Escondido maintains a vital, historic and walk-able downtown, a wide variety of services, recreational amenities, and family-oriented neighborhoods. Escondido is a full-service "general law" city with municipal police, fire, water, sewer, cultural arts center, parks and library services.

Several regional facilities are located in Escondido serving residents and the surrounding communities. These include Palomar Pomerado Hospital with 450+ patient beds and full trauma center (currently under construction), Westfield Shopping Town Regional Mall with 1.2 million square feet of retail space, Escondido Autopark a 60-acre master planned development containing numerous dealerships, California Center for the Arts that is the city-owned cultural facility containing a 2,500-seat performing arts center, 400-seat community theater, conference facilities, and 10,000 square foot children's museum, and Sempra Energy's 500-megawatt electric generating facility. Visit the City of Escondido's website at: www.ci.escondido.ca.us.

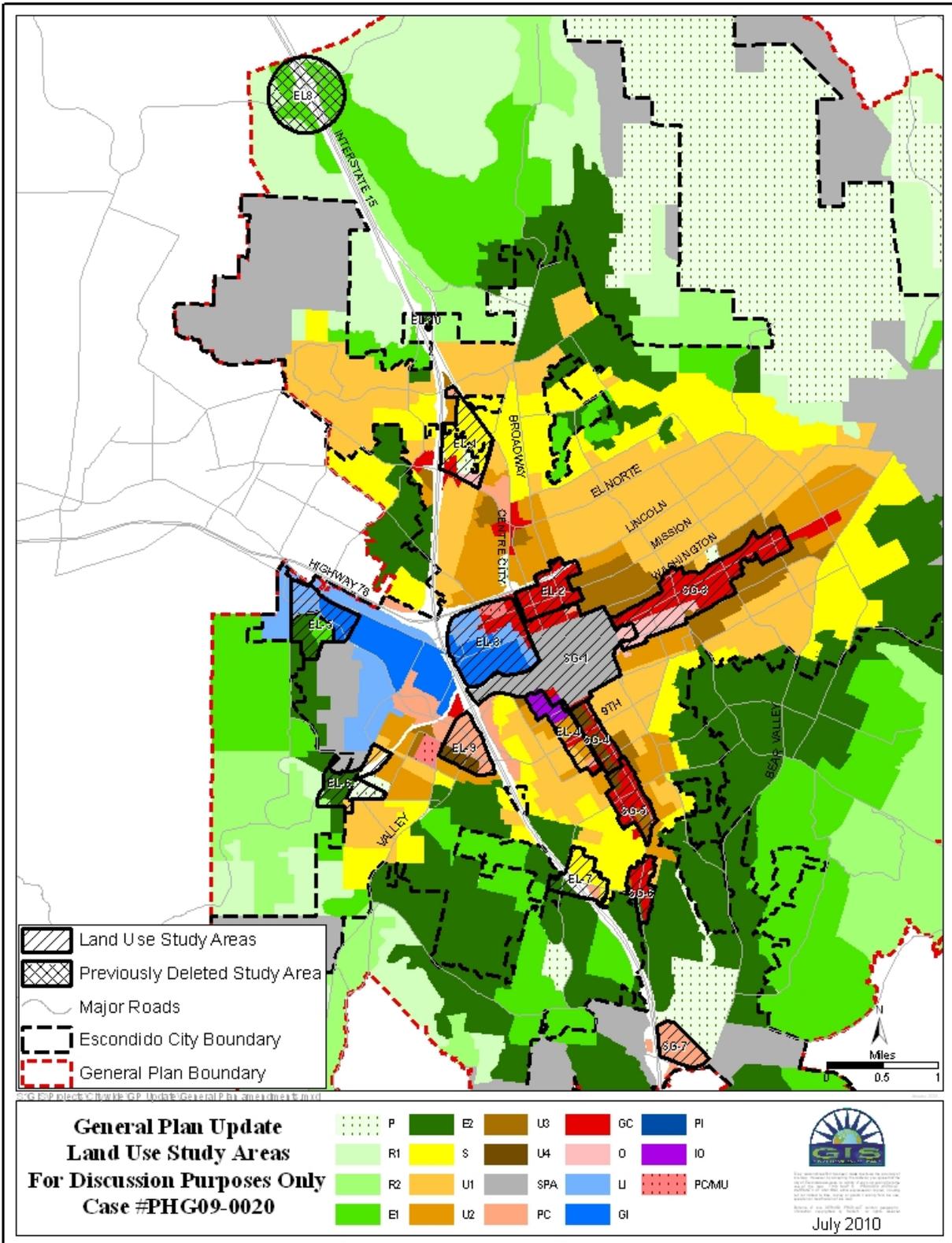
ATTACHMENT 1



ATTACHMENT 2



ATTACHMENT 3



Note: Detailed aerial image exhibits of Amendment Study Areas are on-line at: www.escondido.org/gp-update/General-Plan-Amendment-Area-Exhibits.pdf

Letters Received During the NOP Comment Period

**Comments Received on the
Notice of Preparation (NOP) of a
Program Environmental Impact Report (PEIR) for the
Escondido General Plan Update and Climate Action Plan (CAP)**

Issued July 22, 2010

NOP Comment Letters Received (Agency/Individual/Organization and Date of Letter)

1. Governor's Office of Planning and Research, July 26, 2010
2. City of San Diego, August 30, 2010
3. City of San Marcos, August 30, 2010
4. County of San Diego, August 30, 2010
5. San Diego Local Agency Formation Commission, August 17, 2010
6. Escondido Union High School District, August 30, 2010
7. Rincon del Diablo Municipal Water District, August 25, 2010
8. Vista Irrigation District, August 18, 2010
9. San Diego Sheriff's Department, September 14, 2010
10. California Public Utilities Commission, August 12, 2010
11. Elfin Forest/Harmony Grove Fire Department, August 30, 2010
12. Elfin Forest/Harmony Grove Town Council, August 30, 2010
13. SANDAG, August 25, 2010
14. Native American Heritage Commission, July 27, 2010
15. California Emergency Management Agency, August 3, 2010
16. Department of Toxic Substances Control, August 16, 2010
17. Department of Environmental Health, Site Assessment and Mitigation Program, August 16, 2010
18. San Diego County Archaeological Society, Inc. August 7, 2010
19. San Diego County Department of Environmental Health, Hazardous Materials Division, August 26, 2010
20. Federal Energy Regulatory Commission, August 24, 2010
21. Holly and Chad Fisher, September 7, 2010
22. David R. Shibley, September 8, 2010
23. Mark Rodriguez, September 3, 2010
24. Janean Huston (and neighbors), August 30, 2010
25. Bill and Marilyn Morgan, August 23, 2010

NOP Comment Letter Checklist

Commenter	Comment	Location in EIR where the comment is addressed
1. Governor’s Office of Planning and Research	Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility within 30 days of receipt of the NOP form the lead agency.	Comment does not require response in EIR.
2. City of San Diego	The PEIR should present a thorough analysis of issues as well as reasonable alternatives and mitigation measures.	Alternatives/ Mitigation Measure discussion in each environmental issue section.
	Coordination with City of San Diego staff is recommended to achieve continuity and consistency with the City of San Diego’s General Plans and policies, as well as those being proposed by the County of San Diego where all three jurisdictions share common boundaries.	General Plan Update issue. Not applicable to EIR.
	The area that borders City of San Diego jurisdiction is unique because it is part of the San Dieguito Watershed which includes a municipal water source (Lake Hodges), groundwater supply (San Pasqual Valley), and an agricultural preserve (San Pasqual Valley). The City of San Diego’s land use policies and goals are committed to maintaining this unique area for rural or undeveloped purposes to protect water and other resources. The PEIR should address any adjacency issues that would affect these unique land uses as they are described in the City of San Diego’s General Plan, community plans, policies and goals.	Land Use and Planning EIR section.
	Address any projects (public infrastructure, residential, commercial, and recreational) that occur within Escondido and may extend into City of San Diego’s jurisdictional boundaries.	Project Description and Cumulative Analysis discussion at the end of each environmental issue section.
	Address any future land annexations and associated impacts from development.	Land Use and Planning EIR section.
	Review City of San Diego Council Policy 600-45, which provides for the protection of the water, natural, and scenic resources of the San Pasqual Valley. San Diego Council Policy 600-45 is included as an attachment to the City of San Diego NOP comment letter.	Land Use and Planning EIR section.
	Address how drinking water supply and groundwater resources would be impacted (specifically Lake Hodges) by the project.	Hydrology/Water Quality and Utilities/Service Systems EIR sections.
	Address and include City of San Diego’s “Source Water Protection Guidelines.”	Hydrology and Water Quality EIR section.
	The No Project Alternative should address water supply and water quality for Lake Hodges.	Alternatives EIR section.
	Analyze effects on regional water quality.	Hydrology and Water Quality EIR section.
Determine if water quality impacts are cumulatively considerable and would impact adjacent jurisdictions.	Hydrology and Water Quality EIR section.	

Commenter	Comment	Location in EIR where the comment is addressed
	Evaluate existing storm drains and discharges into the watershed, how to mitigate impacts and effects on adjacent jurisdictions.	Hydrology and Water Quality EIR section.
	Evaluate compliance with the Watershed Urban Runoff Management Plan and Jurisdictional Urban Water Runoff Management Plan as they relate to the San Diego Municipal Storm Water Permit and Hydromodification Management Plan.	Hydrology and Water Quality EIR section.
	Analyze how new trails and increased usage (from connection to City of San Diego trails) could affect public services such as security (patrols), maintenance (erosion control, trash collection), water quality and City of San Diego lease holders in the San Pasqual Valley.	Recreation EIR section.
	Address effects from an increase in surface water runoff on Lake Hodges and San Pasqual Valley and identify Best Management Practices.	Hydrology and Water Quality EIR section.
	Address the potential for the project to result in changes to absorption rates and drainage patterns which could affect the rate of surface runoff and consequently affect groundwater and water quality in the area.	Hydrology and Water Quality EIR section.
	Streambed restoration, grassy swales in parking lots (such as Westfield Shopping Center or Kit Carson Park) and other Low Impact Development standards should be considered for inclusion as General Plan policies to reduce or minimize impacts.	General Plan Update issue. Not applicable to EIR.
	Evaluate viewshed changes that would occur along common jurisdictional borders.	Aesthetics EIR section.
	Describe how land at Lake Hodges and in San Pasqual Valley is part of the City of San Diego's designated Cornerstone Lands in the Multiple Species Conservation Program.	Biological Resources EIR section.
	Clarify why areas outside of the City of Escondido's Sphere of Influence are included in the PEIR.	Project Description EIR section.
	Within areas outside of Escondido's Sphere of Influence and within the County of San Diego, include any land use changes proposed by the County of San Diego's General Plan Update.	Land Use and Planning EIR section.
	Provide a comparative analysis and plan-to-ground assessment of the direct and cumulative impacts of the existing plan and the proposed land use scenarios to the City of San Diego's land use goals and objectives, as well as those land uses proposed by the County of San Diego where all three jurisdictions interface.	Land Use and Planning EIR section.
	Evaluate the cumulative impacts of increased density through future annexations, roads, and allowed expansions such as 'granny flats' to resources in the City of San Diego.	Project Description and Cumulative Analysis discussion at the end of each environmental issue section.
	Although not an environmental issue, the City of Escondido may want to consider refining the overall General Plan boundaries to eliminate confusion as part of any corrective or "clean-up" changes to the General Plan map. For example, the red-dashed line on Attachment 1 of the NOP shows the Escondido General Plan Boundary extending into the City of San Diego's jurisdiction, which gives the impression that the City of Escondido has a land use interest within City of San Diego jurisdiction, but no explanation is provided.	General Plan Update issue. Not applicable to EIR.

Commenter	Comment	Location in EIR where the comment is addressed
	Under a mutual agreement between the City of San Diego and City of Escondido, the City of San Diego owns 5 million gallons per day (MGD) and 7.57 MGD annual average and peak flow treatment at the Hale Avenue Resources Recovery Facility (HARRF) and Escondido's Land and Ocean Outfall at San Elijo, respectively. Currently, City of San Diego's Pump Station 77 conveys approximately 4 MGD of wastewater generated in the Rancho Bernardo area to the City of Escondido's HARRF. City of San Diego also has the right of refusal to another 0.3 MGD of treatment capacity at the HARRF.	Utilities and Service Systems EIR section.
	Identify any significant traffic impacts to City of San Diego transportation facilities and mitigation measures.	Transportation and Traffic EIR section.
	Use City of San Diego Significance Determination Thresholds (January 2007) to evaluate significant traffic impacts to City of San Diego facilities.	Transportation and Traffic EIR section.
	Intersections within the City of San Diego should be evaluated and significant traffic impacts to these intersections should be mitigated.	Transportation and Traffic EIR section.
3. City of San Marcos	Attachment 1 of the NOP includes an area located south of La Moree Road in the Escondido General Plan boundary that is within the City of San Marcos Sphere of Influence as approved by the San Diego Local Agency Formation Commission (LAFCO). Please remove this area from the Escondido General Plan boundary.	General Plan Update issue. Not applicable to EIR.
	There are land area pockets within the Escondido city boundary that are also within the San Marcos Fire Protection District (SMFPD), which is a subsidiary district of the City of San Marcos. Some of these areas are isolated and may be more adequately served by the City of Escondido with fire stations in closer proximity. Examples include areas off of Rockhoff Road, Metcalf Street, and within Land Use Study Area 1 north of W. El Norte Parkway. The City of San Marcos requests that the General Plan Update and EIR consider whether the detachment of these areas from the SMFPD and attachment to the City of Escondido may more adequately serve these areas.	Public Services EIR section.
	Provide mitigation measures to demonstrate how impacts associated with City of Escondido projects located within the San Marcos Fire Protection District will be accomplished. Consider a mitigation measure to annex areas into the San Marcos Fire Protection District Community Facilities District 2001-01 to provide a funding source for the provision of fire services.	Public Services EIR section.
	Any updates to the City of Escondido Recreation/Trails Master Plan should be considered in the context of the connection to any City of San Marcos Trail.	Not applicable to EIR scope.
	The build out condition impact analysis for San Marcos roadways and intersections should be based on SANDAG Series 11 combined North County Model.	Transportation and Traffic EIR section.
	Consider a Traffic Demand Management Plan as a component of the traffic analysis.	Transportation and Traffic EIR section.
	The City of San Marcos would like to review the scope of the traffic analysis to be prepared as part of the EIR.	Not applicable to EIR scope.

Commenter	Comment	Location in EIR where the comment is addressed
	Escondido and San Marcos should work together to improve traffic flow across jurisdictional boundaries by interconnecting signals on arterial and other major streets.	Not applicable to EIR scope.
	Evaluate impacts to the SR-78 that result from General Plan land use changes.	Transportation and Traffic EIR section.
	Escondido should implement an in-lieu payment fee structure for future development that shall be specifically set aside for SR-78 improvements.	Transportation and Traffic EIR section.
	Any update to the Circulation Element should be considered in the context of the connection to any City of San Marcos roadway.	Transportation and Traffic EIR section.
	If the change in the land uses per the General Plan Update would result in an increase in the surface runoff into San Marcos Creek then mitigation measures such as financial contribution to improve downstream facilities should be considered.	Hydrology and Water Quality EIR section.
	Potential land use changes that could result in increased runoff discharge rates and durations, where such increased rates and durations are likely to cause increased erosion of channel bed and banks, sediment pollutant generation, or other impacts to beneficial uses and stream habitat due to increased erosive should have corresponding mitigation policies that include the most current County of San Diego Hydromodification Management Plan development requirements.	Hydrology and Water Quality EIR section.
	The SDRWQCB recently adopted the BACT1 TMDL which affects inland creeks and water bodies for bacteria loading. If the potential land use changes would result in an increase in bacteria pollutant loading then mitigation measures to reduce those concentrations should be applied.	Hydrology and Water Quality EIR section.
	The City of San Marcos has recently developed and presented to the SDRWQCB, in conjunction with the County of San Diego and the City of Escondido, a Nutrient Management Plan for the Upper San Marcos Creek Watershed. The City is the lead in this voluntary stakeholder effort being overseen by the SDRWQCB and anticipates that Escondido will also reduce its pollutant loads in concert with the City as this effort moves forward. It is encouraged that the cities of San Marcos and Escondido, and the County of San Diego, continue to work closely at a staff level to implement the Management Plan.	Not applicable to EIR analysis.
	Priority Development Projects (PDPs) that discharge to San Marcos Creek would be subject to Low Impact Development and Hydromodification standards identified in the City of San Marcos SUSMP, and a Water Quality Technical Report shall be required for priority SUSMP projects for review and approval by the City. The City is responsible for all water quality discharges into the City storm drain system under its Municipal Storm Water Permit (Permit) and therefore all discharges shall be effectively treated prior to leaving a project site for pollutants anticipated to occur by the project per the City of San Marcos Permit. The EIR should have mitigation measures that fully assess water quality impacts to downstream water bodies listed as impaired and the City's ability to meet pollutant load allocation.	Hydrology and Water Quality EIR section.
	Analyze General Plan changes in relation to the objectives under Permit No. R9-2007-0001 issued by the SDRWQCB.	Hydrology and Water Quality EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
4. County of San Diego	Projects that could have potentially significant adverse effects to the unincorporated County should evaluate impacts using the County of San Diego Land Use and Environment Group Guidelines for Determining Significance.	Project Description EIR section.
	The NOP and attached map 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 to understand what the project is proposing.	Project Description EIR section.
	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.	Hydrology and Water Quality EIR section.
	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.	General Plan Update Issue.
	The City of Escondido's General Plan Update boundaries extend beyond both the City's boundaries and its Sphere of Influence (SOI) boundaries. There are areas where the draft Escondido Land Use Map is different from the County General Plan Update Land Use Map. Outside its SOI, the Escondido General Plan appears that it would return the densities in these unincorporated areas to the densities of the outdated General Plan, rather than the County General Plan Update.	General Plan Update Issue. Land Use and Planning EIR section.
	The County is interested in the City of Escondido's intentions to annex these areas in the future. Past discussions with City staff have indicated that the City may have no intention of annexing some areas shown within the General Plan planning area or SOI. If there is no intention of annexing these areas, then the County recommends that the land use designations for those areas be revised to either reflect the County General Plan Update Land Use Map or preferably be removed from the Escondido General Plan planning area.	General Plan Update Issue. Not applicable to EIR.
	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 the NOP.	Project Description EIR Section.
	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.	Land Use and Planning EIR Section.
	Identify any discrepancies in proposed roadway classifications between the Escondido General Plan Update and the County General Plan Update Mobility Element.	Transportation and Traffic EIR Section.
	Analyze how the Escondido General Plan Update and Climate Action Plan will impact the County of San Diego Multiple Species Conservation Program.	Biological Resources EIR Section.
SPA 2, 3 and 4 in the unincorporated areas of the County are either wholly or mostly within Pre-Approved Mitigation Areas (PAMA) of the North County MSCP. No explanation is provided as to what uses are expected within these SPAs. Analyze how these SPAs and other areas of PAMA within the scope of the General Plan Update will be maintained in a manner consistent with the North County Plan.	Biological Resources EIR Section.	

Commenter	Comment	Location in EIR where the comment is addressed
	The General Plan boundary includes lands owned and managed by the County Department of Parks and Recreation (DPR) including the Del Dios Highlands Preserve and Felicita County Park. These lands appear to be designated R1 or R2 in Attachment 2 of the NOP. 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.	General Plan Update Issue. Not applicable to EIR.
	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).	General Plan Update Issue. Climate Action Plan Issue. Recreation and Biological Resources EIR sections.
	If impacts to parks and preserves or existing and planned trails are unavoidable, coordination with DPR to determine appropriate mitigation measures is requested.	Recreation EIR section.
	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 in the County of San Diego's Circulation Element, in particular: <ul style="list-style-type: none"> • Deer Springs Road • North Centre City Parkway • Mountain Meadow Road • Valley Center Road • Lake Wolhford 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 	Transportation and Traffic EIR section.
	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.	Transportation and Traffic EIR section.
	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.	Transportation and Traffic EIR section.
	The PEIR should coordinate with County staff on the list of near-term/cumulative proposed/pending projects for the analysis of cumulative traffic conditions.	Transportation and Traffic EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
	The PEIR should identify any discrepancies in proposed roadway classifications between Escondido's General Plan Update and the County's General Plan Update Mobility Element.	Transportation and Traffic EIR section.
	Escondido's General Plan boundary includes areas of the unincorporated County. Within the southwestern portion of the boundary is the Harmony Grove Sewer Maintenance District (SMD). 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 District to receive reclaimed water from the development. Maps are attached to the County of San Diego NOP letter.	Utilities and Service Systems EIR section.
5. San Diego LAFCO	The EIR should discuss the following issues: 1) how the project area is proposed to receive public services; 2) the ability of existing agencies to provide services; 3) a description of existing infrastructure and the capability, availability, and capacity of services (e.g., connection distances to facilities, response times for police and fire protection, capacity of regional facilities, etc); and 4) an analysis of any associated jurisdictional, Sphere of Influence, and municipal service review changes. These areas of special interest to LAFCO are enumerated in Government Code Sections 56425, 56430, 56434, 56653, 56668.	Public Services and Utilities/Service Systems EIR sections.
	The agricultural resources discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Agricultural Resources EIR section.
	The hydrology and water quality discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Hydrology and Water Quality EIR section.
	The land use and planning discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Land Use and Planning
	The population and housing discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Population and Housing EIR section.
	The public services discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Public Services EIR section.
	The public utilities and service systems discussions and analyses in the EIR should include discussions that are germane to LAFCO's statutory responsibilities.	Utilities and Service Systems EIR section.
	One of the prerequisites in State law for inclusion of territory within a city Sphere of Influence is that the subject territory must be included within the City's General Plan boundary; therefore, it is important for the project's EIR to disclose and discuss any proposed adjustments to the City's General Plan boundary (expansions or contractions) in relation to LAFCO's statutory responsibilities.	Project Description EIR section.
	The preservation of prime agricultural lands, as defined by Government Code Section 56064, is a statutory priority of LAFCO (Government Code Section 56377). San Diego LAFCO Policy L-101 discourages jurisdictional change proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its Sphere of Influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use. Therefore, the agricultural resources discussion	Agricultural Resources EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
	<p>in the EIR should identify all prime agricultural lands (per the LAFCO statutory definition cited above) that are located within the existing and proposed Sphere of Influence, and provide a discussion of any measures adopted by the City to preserve prime agricultural lands for agricultural use. The discussion should also reference the associated LAFCO required factor of analysis (Government Code Section 56668(e) and the effect of the project on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016.</p>	
	<p>The County of San Diego is currently engaged in a comprehensive update to the adopted General Plan for the unincorporated areas of San Diego County. The City of San Marcos is also undergoing an update to their adopted General Plan. As the City of Escondido’s Sphere of Influence includes unincorporated County territory and is adjacent to the City of San Marcos, it is important for the Escondido General Plan Update EIR to include discussions on the differences between the existing and proposed land use designations of the agencies within and adjacent to the sphere territory.</p>	<p>Project Description Land Use and Planning EIR sections.</p>
	<p>San Diego LAFCO has recently adopted Policy L-107 (attached to NOP Letter), which addresses jurisdictional conflicts related to proposed changes of organization or reorganization. The policy requires the subject proposal’s applicant to demonstrate that adjacent jurisdictions and interested parties have been consulted, that any jurisdictional conflicts have been identified, and that the identified conflicts have been resolved or remain unresolved. Therefore, the EIR should identify any jurisdictional conflicts that were resolved or remain unresolved.</p>	<p>Project Description EIR section.</p>
	<p>The City should evaluate whether rezoning should be established for the unincorporated areas within the General Plan boundary. This establishment of rezoning as part of the General Plan Update would remove any uncertainty regarding the City’s potential zoning within the sphere territory and avoid the need for subsequent City Council rezoning actions and separate environmental determinations.</p>	<p>General Plan Update Issue. Not applicable to EIR.</p>
<p>6. Escondido Union High School District</p>	<p>The General Plan has a vision to promote a quality of life by providing ‘quality educational facilities.’ Attachment 3 to the NOP lists ‘education’ to be within Area SG-3. The document uses the term ‘education’ as an all inclusive concept and does not distinguish between various education venues: private schools, charter schools, public education, community colleges, etc. This coalescence of all educational needs can be misleading relative to their individual facility needs and associated land use relationships.</p>	<p>General Plan Update Issue. Not applicable to EIR.</p>
	<p>General Plan Area SG-3 is proposed for educational uses and states “Residential development would be prohibited outside the proposed ‘urban village’ area in order to preserve retail, office and educational character.” A typical community desire, and a current success with Escondido public schools, is that they are neighborhood schools sited within residential neighborhoods – not within retail and office areas. The allowance of schools within a broader ‘range’ of land use areas would better serve the community as a whole. School facilities that serve a wider variety of community users/needs will have a stronger and wider community relationship fostering greater opportunities for success.</p>	<p>General Plan Update Issue. Not applicable to EIR.</p>

Commenter	Comment	Location in EIR where the comment is addressed
	<p>The District's current school facilities are adequate to accommodate the current student population with some allowance for small growth. However, looking out 30-40 years, as the population increases and the need to provide new school facilities increases, the availability of adequate land to build schools on will decrease exponentially due to a multitude of variables. The General Plan needs to address this potential otherwise it will most likely present a need to acquire educational property through eminent domain, which potentially could occur in an area deemed non-conforming to the General Plan. It might be more productive at this time to envision future opportunities and plan for them in lieu of leaving this discussion when it presents itself.</p>	<p>General Plan Update Issue. Public Services EIR section.</p>
<p>7. Rincon del Diablo MWD</p>	<p>The scope appears to be lacking in terms of concerns with the availability of imported water into the region.</p>	<p>Utilities and Service Systems EIR section.</p>
	<p>The General Plan should consider demand reduction and water efficiency as a principal of new development.</p>	<p>General Plan Update Issue. Not applicable to EIR.</p>
	<p>Consider the following within the Climate Action Plan. Reductions in agricultural land-use and replacement with residential or commercial will likely add to the region's heat signature by a number of factors (see Rincon del Diablo MWD comment letter for complete list)</p>	<p>Climate Action Plan Issue. Not applicable to EIR.</p>
	<p>Rincon currently provides recycled and potable water services within its boundaries and has significant investment to continuing to deliver these services to both the developed and undeveloped properties within its boundaries. Additionally, Rincon is engaged in developing alternative sources for both non-potable and potable water supplies to meet the needs in the District including the development and management of the groundwater basin underlying its boundaries. Rincon will exercise its authorities provided for within State law to develop and manage any enterprises appropriate to serve the needs of the residents of the District.</p>	<p>Utilities and Service Systems EIR section.</p>
<p>8. Vista Irrigation District (VID)</p>	<p>Attachment 3, Area EL-10 (Exhibit 10). VID owns and operates the Vista flume and siphon system. The potable water transmission facility transmits treated water from the Escondido Vista Water Filtration Plan (EVWFP) to VID's service area. The flume and siphon system is a combination of gravity and pressurized facilities which extend for a distance of 11.25 miles from the EVWFP to the Pechstein Reservoir within a 50-foot wide VID easement. A siphon section of the Vista flume crosses Area EL-10 within a 50-foot easement. VID Flume Easement No. FC05 encumbers the subject property(s) within Area EL-10.</p>	<p>Utilities and Service Systems EIR section.</p>
	<p>VID should be involved in the planning, design and construction of any improvements to insure that improvements or upgrades are incorporated in the most efficient manner. Cooperative coordination between the agencies will minimize conflicts, costs and public inconvenience.</p>	<p>Utilities and Service Systems EIR section.</p>
<p>9. San Diego County Sheriff's Department</p>	<p>The San Diego County Sheriff's Department has no comments on the NOP.</p>	<p>Comment does not addressment in the EIR.</p>

Committer	Comment	Location in EIR where the comment is addressed
10. California Public Utilities Commission	As the state agency responsible for rail safety within California, the Commission’s Rail Crossing Engineering Section (RCES) recommends that the City add language to the plan so that any future planned development adjacent to or near the North County Transit Development Board right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/designations with respect to railroad right-of-way.	Transportation and Traffic EIR section.
	Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way.	Transportation and Traffic EIR section.
	Language should be in place so that any traffic impact studies undertaken should also address traffic increase impacts over affected crossings and associated proposed mitigation measures.	Transportation and Traffic EIR section.
11. Elfin Forest/Harmony Grove Fire Department	The Elfin Forest/Harmony Grove Fire Department (EFHGFD) is a County Service Area (CSA 107) and provides fire and medical emergency services to the EL-6 study area. A special benefit fee, which is collected from our property owners, does not cover the full costs of these services and EFHGFD must rely on fundraising activities as well as the pursuit of grant monies to fill our deficit.	Comment does not addressment in the EIR.
	EFHGFD opposes the annexation of EL-6 and supports the No Project Alternative in order to keep CSA 107 whole. While all cities which endeavor to prepare a working General Plan for their future is to be commended, we believe that a proposal to expand the City of Escondido from its existing 37 square miles to 80 square miles in the course of 40 years is extremely aggressive and unsupportable.	General Plan Update Issue. Not applicable to EIR.
	EFHGFD is not certain of all impacts that may result from implementation of the General Plan Update. We will closely follow the cumulative impacts section, particularly as it relates to increased traffic (especially on Harmony Grove Road), air and noise pollution, the reduction of agricultural lands by urban sprawl and the effects on the Escondido Creek Watershed area.	Transportation and Traffic, Air Quality, Noise, Agricultural Resources and Hydrology/Water Quality EIR sections.
12. Elfin Forest/ Harmony Grove Town Council	EL-6 General Plan Amendment Study Area impacts the community of Harmony Grove. To designate this area as industrial as is suggested in the NOP could cause significant adverse impacts to the community and prevent the realization of the residents’ vision as detailed in our Draft Community Plan.	Land Use and Planning EIR section.
	Negative impacts to the community from the General Plan include the encouragement of urban sprawl development that encroaches on the historic rural community and increases both vehicle miles traveled and greenhouse gas emissions.	Aesthetics, Transportation and Traffic, and Global Climate Change EIR sections.
	Negative impacts to the community from the General Plan include significant safety hazards from truck and commuter traffic.	Transportation and Traffic EIR section.
	Negative impacts to the community from the General Plan include degradation of air quality associated with increasing density and intensive land uses.	Air Quality EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
	Negative impacts to the community from the General Plan include fragmentation of historic rural neighborhoods.	Aesthetics and Cultural Resources EIR sections.
	Negative impacts to the community from the General Plan include degradation of the lifestyle in the rural agricultural communities, with loss of property values of the rural home sites and loss of land for agricultural and equestrian business opportunities, which are specifically encouraged in the Elfin Forest and Harmony Grove Community Plan.	Agricultural Resources EIR section.
	Negative impacts to the community from the General Plan include the removal or protection of lands with significant physical or environmental constraints or hazards: ridgelines and possible disruption of wildlife corridors along Escondido Creek.	Aesthetics, Geology and Soils, and Biological Resources EIR sections.
	Negative impacts to the community from the General Plan include the loss of open space and natural resources.	Biological Resources EIR section.
	Negative impacts to the community from the General Plan include the degradation of aesthetics and scenic views in the valley.	Aesthetics EIR section.
	Recognize and support the new proposed Elfin Forest and Harmony Grove Community Plan already proposed for these communities.	General Plan Update Issue. Not applicable to EIR.
	Extend the Escondido General Plan study area to include all of Harmony Grove, so that through the General Plan Update process the City has the ability to include and support the Harmony Grove Community Plan.	General Plan Update Issue. Not applicable to EIR.
	Recommend that the new General Plan accept and adopt all the provisions which exist in the Harmony Grove portion of the Elfin Forest and Harmony Grove Community Plan. This should include an agricultural/equestrian district overlay that would allow special animal and livestock keeping, breeding, and boarding privileges, a trail system suitable for equestrian use and low density zoning to encourage small family-owned organic farms.	General Plan Update Issue. Not applicable to EIR.
	Consider and develop a plan for a sufficient buffer area between the adjacent future industrial/commercial uses in EL-6 and the existing rural residential uses. This buffer area should be structural as well as visual, in the sense that industrial truck traffic and high-speed commuter routes, which cause significant adverse impacts in rural residential/equestrian areas, would not be allowed to enter into or negatively impact Harmony Grove.	General Plan Update Issue. Not applicable to EIR.
	Review and draft policies in the new General Plan that will require that if the parcels in EL-6 are annexed into the City of Escondido that the City will commit to restore to its natural state the Escondido Creek that runs through this area.	General Plan Update Issue. Not applicable to EIR.
	Respect the Circulation Element of the proposed San Diego County General Plan which commits to maintain all the roadways in Harmony Grove and Elfin Forest as narrow low-speed roads. In no case should any truck traffic or commuter traffic increase the level of service on our rural roads.	General Plan Update Issue. Not applicable to EIR.
	Seek the approval of the San Dieguito Planning Group (which is anticipated to be the representative planning group for Harmony Grove by 2011) before processing the annexation of any parcels in EL-6.	General Plan Update Issue. Not applicable to EIR.

Commenter	Comment	Location in EIR where the comment is addressed
	Consider the proposed San Diego County General Plan for the community of Eden Valley.	General Plan Update Issue. Not applicable to EIR.
13. SANDAG	Environmental review should include consideration of applicable policy objectives contained in the Regional Comprehensive Plan (RCP) and Regional Transportation Plan (RTP).	Land Use and Planning and Transportation and Traffic EIR sections.
	The traffic analysis for the project should consider balancing the needs of motorists, transit riders, pedestrians, and bicyclists.	Transportation and Traffic EIR section.
	SANDAG is currently developing the 2050 RTP. Based on the General Plan Update's timeline, we request that you coordinate its development with the 2050 RTP and Sustainable Communities Strategy (SCS) efforts, in addition to the 2030 RTP.	General Plan Update Issue. Land Use and Planning and Transportation and Traffic EIR sections.
	SANDAG has a new Regional Growth Forecast that extends to 2050 and that should be considered in the EIR.	Population and Housing EIR section.
	Consider promoting alternatives to driving alone during peak periods such as carpooling, bicycling, telecommuting, flexible work hours for employees, and the potential of a Transportation Demand Management (TDM) plan as part of this project to help mitigate regional transportation impacts.	General Plan Update Issue. Transportation and Traffic Land Use and Planning and Transportation and Traffic EIR sections.
	Provide appropriate connectivity and facility integration to nearby local residences and businesses.	General Plan Update Issue. Not applicable to EIR.
	Improved bicycle and pedestrian access to local destinations can help mitigate the traffic effects of the project and provide mobility options for residents.	General Plan Update Issue. Transportation and Traffic General Plan Update Issue.
	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 these criteria as part of the General Plan Update.	General Plan Update Issue. Not applicable to EIR.
	In the analysis of greenhouse gas emissions, consider the following: AB 32, SB 97, EO S-13-08, SANDAG Regional Energy Strategy, SCS, and Climate Action Strategy.	Global Climate Change EIR section.
	The City should consider locating smart growth/mixed-use/transit-oriented development in the area associated with the potential California High-Speed Rail station.	General Plan Update Issue. Not applicable to EIR.
	Consult with North County Transit District (NCTD), and Caltrans to coordinate planned transit and/or highway improvements.	General Plan Update Issue. Not applicable to EIR.
	When analyzing future (2030) traffic conditions, SANDAG recommends using the transportation network included in the RTP Reasonably Expected Funding scenario.	Transportation and Traffic General Plan Update Issue.
Evaluate, where appropriate, the project 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 of Smart Growth, and 4) Parking Strategies for Smart Growth.	Land Use and Planning and Transportation and Traffic EIR sections.	

Commenter	Comment	Location in EIR where the comment is addressed
14. Native American Heritage Commission (NAHC)	Perform early consultation with the persons on the attached list of Native American contacts. Consultation with interested Native American tribes and individuals, including those on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA, 36 CFR Part 800.3, and the President's Council on Environmental Quality and NAGPRA.	Cultural Resources EIR section.
	NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archeologist is employed during the environmental planning processes.	Cultural Resources EIR section.
	Contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP).	Cultural Resources EIR section.
	Consider avoidance when significant cultural resources could be affected by the project.	Cultural Resources EIR section.
	Provide provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains.	Cultural Resources EIR section.
	The results of the Sacred Lands File search are confidential.	Cultural Resources EIR section.
	Construction or excavation must be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner medical examiner can determine whether the remains are those of Native Americans.	Cultural Resources EIR section.
15. California Emergency Management Agency	In preparing the General Plan, the City should examine the sections of State planning law that involve potential hazards the City may face. Relevant underlined sections of the State planning law are included in the NOP letter.	General Plan Update Issue. Not applicable to EIR.
	Determine the hazard issues of the community. Include a table which identifies these specific issues and where they are addressed in the General Plan.	Hazards and Hazardous Materials EIR section.
	The State planning law includes a requirement for consultation with State agencies in regard to information related to hazards.	General Plan Update Issue. Not applicable to EIR.
16. Department of Toxic Substances Control	Evaluate whether conditions within the project area pose a threat to human health or the environment by reviewing the databases listed in the comment letter.	Hazards and Hazardous Materials EIR section.
	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.	Hazards and Hazardous Materials EIR section.
	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 substances 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.	Hazards and Hazardous Materials EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
	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 (ACM). If other hazardous chemicals, lead-based paints or products, mercury or ACM are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.	Hazards and Hazardous Materials EIR section.
	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 of and not simply placed in another location onsite. Land disposal restrictions may be applicable to such soils.	Hazards and Hazardous Materials EIR section.
	If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor.	Hazards and Hazardous Materials EIR section.
	Hazardous materials and hazardous waste generation must be managed in accordance with the applicable state and local regulations.	Hazards and Hazardous Materials EIR section.
	DTSC can provide cleanup oversight through an Environmental Oversight Agreement.	Hazards and Hazardous Materials EIR section.
17. Site Assessment and Mitigation Program	The Site Assessment and Mitigation Program had no comments on the NOP.	Comment does not require addressment in the EIR.
18. San Diego County Archeological Society	The San Diego County Archeological Society had no comments on the NOP.	Comment does not require addressment in the EIR.
19. San Diego County Department of Environmental Health Hazardous Materials Division	The County Hazardous Materials Division (HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for permitting, underground storage tanks, above ground petroleum storage, risk management plans and medical waste.	Hazards and Hazardous Materials EIR section.
	All designated areas (EL-1 through EL-10 with the exception of EL-8 and SG-3 through SG-7 & SG-1) propose commercial office mixed use, medical offices, retail and research and development type facilities. Permitting of such facilities requires a review by the HMD to ensure compliance with all required laws and regulations.	Hazards and Hazardous Materials EIR section.
20. Federal Energy Regulatory Commission	Please include the Lake Wohlford Dam and Escondido Canal projects in your flood plan, if those project's flood studies are not included.	Hydrology and Water Quality EIR section.
21. Holly and Chad Fisher	Concerned about the General Plan in the area of 2625 Ginger Way, Escondido CA 92029 and opposed to rezoning the properties on Ginger Way and Ross Drive to medical use only. There are plenty of vacant industrial buildings and open space in the area to suffice the needs for medical buildings in this area.	General Plan Update Issue. Not applicable to EIR.
	Address where the City plans to get water for the new developments.	Utilities and Service Systems EIR section.
	Recommend maintaining existing areas rather than destroying habitat to build more buildings and plant non-native plants that take more water.	General Plan Update Issue. Not applicable to EIR.
	Will residents in the unincorporated County area get to vote on the General Plan?	General Plan Update Issue. Not applicable to EIR.

Commenter	Comment	Location in EIR where the comment is addressed
	How is the City planning to bring in new businesses? The State has been driving out businesses with high taxes and it seems most businesses are leaving the State.	General Plan Update Issue. Not applicable to EIR.
	Why does the City need my property, when there is plenty of vacant property and vacant commercial buildings in my area?	General Plan Update Issue. Not applicable to EIR.
22. David R. Shibley	Study Area EL-7 should be expanded along Gamble Street/Citracado Parkway so that it extends all the way from the east and west sides of I-15 at Citracado Parkway/Gamble Street to Centre City Parkway.	General Plan Update Issue. Not applicable to EIR.
	Recommend coordination with North County Transit District to provide for bus transportation that would allow the currently designated Community Centers and North County Fair, Center City and Felicita Drive and Citracado Parkway/Centre City Parkway to be moved from the SANDAG “potential” category to the “planned/existing” category which would place the City in a stronger category of financial assistance for SANDAG Smart Growth funds.	General Plan Update Issue. Not applicable to EIR.
	City Council should consider designating a “Mixed Use Transit Corridor” and/or employment lands to a stretch of Citracado Parkway from the existing SANDAG Smart Growth Village at Citracado Parkway and Center City Parkway west along the north and south sides of Citracado Parkway to the east and west sides of I-15 and the I-15 intersection with Citracado Parkway/Gamble Street and Felicita Drive.	General Plan Update Issue. Not applicable to EIR.
	Request that the intersection at I-15 be designated a Smart Growth Community Center and that the Mixed Use Transit Employment Land Corridor be extended to connect the two centers.	General Plan Update Issue. Not applicable to EIR.
23. Mark Rodriguez	Constituents of emerging concern in recycled water is a statewide concern and a draft report from the science advisory panel recommends what chemicals in recycled water should be monitored.	Utilities and Service Systems and Hydrology and Water Quality EIR sections.
	Development areas and their planned development strategies as a biotech hub should also include the Escondido Research and Technology Center (ERTC) and Palomar Hospital West.	General Plan Update Issue. Not applicable to EIR.
	Evaluate impacts from supplying recycled water to General Plan and cumulative projects in terms of water and air quality.	Hydrology and Water Quality and Air Quality EIR sections
	Cumulative impacts from the multiple power generating facilities and the new Palomar Hospital West should be considered in the EIR. Include the options being considered and the discharge expected from those projects.	Utilities and Service Systems EIR section.
24. Janean Huston (and neighbors)	Escondido General Plan Update and EIR should remove any County land within the area of EL-5 from the planning area.	General Plan Update Issue. Not applicable to EIR.
	Since most of the EL-5 area is within the City limits, we ask the City 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 EL-5.	General Plan Update Issue. Not applicable to EIR.
	This project does not blend with our existing community character and will have an adverse visual and environmental impact on all of Eden Valley by siting buildings that may project above the ridgeline and resulting in a scale of development that is incompatible with the existing setting.	Aesthetics EIR section.

Commenter	Comment	Location in EIR where the comment is addressed
	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’s General Plan Update 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 special animal and livestock keeping and breeding, a trail system suitable for equestrian use, and low density zoning to encourage small family-owned organic farms.	General Plan Update Issue. Not applicable to EIR.
25. Bill and Marilyn Morgan	Concerned about the plans for the area defined in the NOP as EL-5 and EL-6. Would like to explore the venues available for voicing concerns.	General Plan Update Issue. The City will include the Morgan’s and all other NOP commenters on the distribution list for all future opportunities for public input into the EIR process.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

Notice of Preparation

July 26, 2010



To: Reviewing Agencies

Re: Escondido General Plan Update and Climate Action Plan Case #PHG09-0020, PHG10-0016
SCH# 2010071064

Attached for your review and comment is the Notice of Preparation (NOP) for the Escondido General Plan Update and Climate Action Plan Case #PHG09-0020, PHG10-0016 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2010071064
Project Title Escondido General Plan Update and Climate Action Plan Case #PHG09-0020, PHG10-0016
Lead Agency Escondido, City of

Type NOP Notice of Preparation

Description 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 conservation 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:

- a) Land Use
- b) Housing
- c) Circulation
- d) Community Facilities and Services
- e) Community Protection and Safety (includes Noise)
- f) Community Open Space/Conservation
- g) Economic Prosperity
- h) Growth Management
- i) General Plan Implementation
- j) Specific Planning Areas

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
Cross Streets Grand Avenue
Lat / Long
Parcel No. Varies
Township 12S **Range** 2W **Section** 17 **Base**

Proximity to:

Highways Hwy 78, I-15
Airports No
Railways AT&SF
Waterways Escondido Creek
Schools Escondido HS/Escondido ES
Land Use Varies

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; 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

Document Details Report
State Clearinghouse Data Base

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

Date Received 07/26/2010 **Start of Review** 07/26/2010 **End of Review** 08/24/2010

<input type="checkbox"/> <u>Resources Agency</u> Nadell Gayou	<input type="checkbox"/> Fish & Game Region 1E Laune Harnsberger	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Game Region 2 Jeff Drongesen	<input type="checkbox"/> Public Utilities Commission Leo Wong	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> Dept. of Boating & Waterways Mike Sotelo	<input type="checkbox"/> Fish & Game Region 3 Charles Amor	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Fish & Game Region 4 Julie Vance	<input type="checkbox"/> State Lands Commission Marina Brand	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Colorado River Board Gerald R. Zimmerman	<input type="checkbox"/> Fish & Game Region 5 Don Chadwick Habitat Conservation Program	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 12 Chris Herre	<input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> Dept. of Conservation Rebecca Salazar	<input type="checkbox"/> Fish & Game Region 6 Gabrina Gatchel Habitat Conservation Program	<input type="checkbox"/> <u>Business, Trans & Housing</u>	<input type="checkbox"/> Caltrans, District 13 Chris Herre	<input type="checkbox"/> RWQCB 5 Central Valley Region (5)
<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Fish & Game Region 6 I/M Brad Henderson Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> Caltrans - Division of Aeronautics Sandy Hesnard	<input type="checkbox"/> RWQCB 6 Central Valley Region (5)	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Cal Fire Allen Robertson	<input type="checkbox"/> Dept. of Fish & Game M George Isaac Marine Region	<input type="checkbox"/> Caltrans - Planning Terri Pencovic	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> Central Valley Flood Protection Board James Herota	<input type="checkbox"/> <u>Other Departments</u>	<input type="checkbox"/> California Highway Patrol Scott Loetscher Office of Special Projects	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> Office of Historic Preservation Ron Parsons	<input type="checkbox"/> Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	<input type="checkbox"/> Housing & Community Development CEQA Coordinator Housing Policy Division	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Dept. of General Services Public School Construction	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)	<input type="checkbox"/> Other
<input type="checkbox"/> California Department of Resources, Recycling & Recovery Sue O'Leary	<input type="checkbox"/> Dept. of General Services Anna Garbeff Environmental Services Section	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office	
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam	<input type="checkbox"/> Dept. of Public Health Bridgette Blinning Dept. of Health/Drinking Water	<input type="checkbox"/> State Water Resources Control Board Steven Herrera Division of Water Rights	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)	
<input type="checkbox"/> Dept. of Water Resources Resources Agency Nadell Gayou	<input type="checkbox"/> <u>Independent Commissions, Boards</u>	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)	
<input type="checkbox"/> Conservancy	<input type="checkbox"/> Delta Protection Commission Linda Flack	<input type="checkbox"/> CEQA Coordinator	<input type="checkbox"/> RWQCB 9 San Diego Region (9)	
<input type="checkbox"/> Fish and Game	<input type="checkbox"/> Cal EMA (Emergency Management Agency) Dennis Castrillo	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator		
<input type="checkbox"/> Dept. of Fish & Game Scott Flint Environmental Services Division	<input type="checkbox"/> Governor's Office of Planning & Research State Clearinghouse			
<input type="checkbox"/> Fish & Game Region 1 Donald Koch				



THE CITY OF SAN DIEGO

August 30, 2010

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

SUBJECT: Notice of Preparation for the Escondido General Plan Update (Case No.: PHG 09-0020) and Climate Action Plan (Case No.: PHG 10-0016)

Dear Mr. Petrek,

The City of San Diego has received and reviewed the Notice of Preparation for the Program Environmental Impact Report (PEIR) dated, July 22, 2010 and appreciates the opportunity to comment. We have identified environmental issues as described below that may have a significant effect on the incorporated lands bordering the City of San Diego. The PEIR should present a thorough analysis of these issues as well as reasonable alternatives and mitigation measures. Coordination with City of San Diego staff is recommended to achieve continuity and consistency with the City of San Diego's General Plans and policies, as well as those being proposed by the County of San Diego where all three jurisdictions share common boundaries.

General:

The area that borders City of San Diego jurisdiction is unique because it is part of the San Dieguito Watershed which includes a municipal water source (Lake Hodges), groundwater supply (San Pasqual Valley), and an agricultural preserve (San Pasqual Valley). The City of San Diego's land use policies and goals are committed to maintaining this unique area for rural or undeveloped purposes to protect water and other resources. The PEIR should address any adjacency issues that would affect these unique land uses as they are described in the City of San Diego's General Plan, community plans, policies and goals.

In addition, the City of San Diego is the land use authority for the incorporated areas along the southern municipal boundary of the City of Escondido and would be a "responsible" agency under CEQA for any permits or approvals for projects that may extend into City of San Diego jurisdiction. Such projects include but are not limited to public infrastructure (roads, pipelines, storm drains, etc.), residential or commercial development and recreational uses, including trails. The City of San Diego requests that the PEIR identify "covered" projects near the City of San Diego's jurisdictional boundaries or projects that could extend into or affect the City of San Diego and that the PEIR include appropriate project-level



Development Services

1222 First Avenue, MS 501 • San Diego, CA 92101-4155
Tel (619) 446-5460

analysis. In addition, any future land annexations and associated impacts from development should also be addressed.

City Planning & Community Investment (Brian Schoenfisch, Senior Planner – 619.533.6457)

Please review the City of San Diego's Council Policy 600-45 (Attached), which provides for the protection of the water, natural, and scenic resources of the San Pasqual Valley. The Policy calls for coordination between adjacent jurisdictions in protecting these valuable resources.

Public Utilities Department - Water (Jeffery Pasek, Watershed Manager – 619.533.7599)

1. Water Quality

- a. Lake Hodges is currently a source of potable water for the Santa Fe Irrigation District and San Dieguito Water District and it will become a source of potable water for the Olivenhain Water District and other agencies in the future. To what extent would implementation of the General Plan impact drinking water supply and groundwater resources? The PEIR should address these issues and include the City of San Diego's "Source Water Protection Guidelines" when implementing the General Plan. These guidelines provide Best Management Practices (BMPs) for protecting water resources such as Lake Hodges and ground water in San Pasqual Valley. These BMPs include methods to reduce or eliminate nutrients (nitrogen and phosphorus), total organic carbon, salts (total dissolved solids) or sediment from entering the reservoir. The "No Project" Alternative should also address this issue since without treatment or mitigation measures, water quality in Hodges Reservoir and this groundwater basin could continue to degrade.
- b. The City of San Diego requests that the PEIR include a thorough analysis of the GPU's regional effects on water quality, including a determination of whether impacts will result in any cumulatively considerable or significant impacts in our jurisdiction. For example, existing storm drains and discharges into the watershed should be investigated to determine methods to mitigate any impacts.
- c. The PEIR should evaluate compliance with the Watershed Urban Runoff Management Plan and Jurisdictional Urban Water Runoff Management Plan as they relate to the San Diego Municipal Storm Water Permit and Hydromodification Management Plan (NPDES Permit No. CASO108758) jointly administered by both jurisdictions and other regional co-permittees.

2. Recreation

Both of our cities are part of the San Dieguito River Park JPA and share common goals and objectives for trails at Lake Hodges and San Pasqual Valley. The PEIR should include a thorough analysis of new trails and increased usage that would result from a connection to trails in the City of San Diego. New trails could affect public services such as security (patrols), maintenance (erosion control, trash collection, etc.), water quality, and the City of San Diego's lease holders in the San Pasqual Valley.

3. Groundwater

The PEIR should address the effects that an increase in surface water runoff would have at Lake Hodges and San Pasqual Valley. This increase in surface water runoff would occur when future development results in an increase in impervious services. BMPs should be required during and after construction as well as long term solutions to mitigate degraded runoff.

4. Hydrology

To what extent would implementation of the General Plan result in changes to absorption rates and drainage patterns which would affect the rate of surface runoff? This could also affect groundwater and water quality as discussed in Item 1 above. Streambed restoration, grassy swales in parking lots (such as Westfield Shopping Center or Kit Carson Park) and other Low Impact Development standards should be considered for inclusion as General Plan policies to reduce or minimize impacts. Existing storm drain discharges into the watershed should be investigated to determine appropriate BMPs to reduce impacts.

5. Visual Quality

The PEIR should include a thorough analysis of changing view sheds along common jurisdictional borders as development occurs.

6. Biological Resources / MSCP Cornerstone Lands

Land at Lake Hodges and in San Pasqual Valley is part of the City of San Diego's designated Cornerstone Lands in the Multiple Species Conservation Program. This should be described in the Biology and Land Use sections of the PEIR. Cornerstone Lands provide for important wildlife corridors and supports a rich assemblage of plant and animal species.

7. Land Use

- a. The Del Dios area and the area east of Escondido are shown as being within the General Plan boundaries of the City of Escondido yet outside the Sphere of Influence boundaries. Much of this area is located in an unincorporated portion of San Diego County and owned by the City of San Diego Water Fund. The PEIR should clarify why these areas are included within the General Plan boundaries since these areas are outside the Sphere of Influence. It is recognized that there are no proposed changes in land uses in this area by the City of Escondido but this analysis should also include any land use changes proposed by the County of San Diego's General Plan Update. See item No. 8 below.
- b. The PEIR should provide a comparative analysis and plan-to-ground assessment of the direct and cumulative impacts of the existing plan and the proposed land use scenarios to the City of San Diego's land use goals and objectives, as well as those land uses proposed by the County of San Diego where all three jurisdictions interface. The cumulative impacts of increased density through future annexations, roads, and allowed expansions such as "granny flats" to resources described above in the City of San Diego should be thoroughly examined.

8. Maps

Although not an environmental issue, the City of Escondido may want to consider refining the overall General Plan boundaries to eliminate confusion as part of any corrective or "clean-up" changes to the General Plan map. For example, the red-dashed line on Attachment 1 of the NOP shows the Escondido General Plan Boundary extending into the City of San Diego's jurisdiction, which gives the impression that the City of Escondido has a land use interest within City of San Diego jurisdiction, but no explanation is provided.

Mr. Petrak
August 30, 2010
Page 4 of 4

Public Utilities Department – Waste Water (Mehdi Rastakhiz, Associate Engineer – 619.533.5155)

Under a mutual agreement between the City of San Diego and City of Escondido, the City of San Diego owns 5 MGD and 7.57 MGD annual average and peak flow treatment at the Hale Avenue Resources Recovery Facility (HARRF) and Escondido's Land and Ocean Outfall at San Elijo. Currently, City of San Diego's Pump Station 77 conveys approximately 4 MGD of wastewater generated in the Rancho Bernardo area to the City of Escondido's HARRF. City of San Diego also has the right of refusal to another 0.3 MGD of treatment capacity at the HARRF.

Development Services Department – Transportation Planning (Ismail Elhamad, Associate Traffic Engineer – 619.446.5494)

1. The Draft Environmental Impact Report (Draft EIR) should identify any significant traffic impacts to City of San Diego transportation facilities due to General Plan Update. Any identified traffic impacts should be minimized (through selection of alternatives) and mitigated.
2. The significance thresholds listed on pages 70-71 of the City of San Diego's Significance Determination Thresholds (January 2007) should be used to evaluate significant traffic impacts in the City of San Diego.
3. Intersections within the City of San Diego should be evaluated, and significant traffic impacts to these intersections should be mitigated.

Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. The City respectfully requests that you please address the above comments in the EIR.

Sincerely,



Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

Attachment: City Council Policy 600-45

cc: Ann French Gonsalves, Senior Traffic Engineer, Development Services Department
Jeffrey Pasek, Watershed Manager, Public Utilities Department
Brian Schoenfisch, Senior Planner, City Planning & Community Investment
Mehdi Rastakhiz, Associate Engineer, Public Utilities Department

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

SUBJECT: PROTECTION OF WATER, AGRICULTURAL, BIOLOGICAL AND CULTURAL RESOURCES WITHIN THE SAN PASQUAL VALLEY
POLICY NO.: 600-45
EFFECTIVE DATE: June 27, 2005

BACKGROUND:

For at least 50 years, the San Diego City Council has protected the treasured agricultural preserve of the San Pasqual Valley as well as the public's investment in water resources within the Valley by using land around Lake Hodges and its watershed for agriculture uses which are compatible with the vision to protect water quality, preserve open space and maintain the Valley's rural character.

Beginning in the late 1940's the City of San Diego Water Department began acquiring large parcels of land in the San Pasqual Valley for water-supply purposes. At present time, the City owns most of the land in the Valley, with only a very small portion remaining in private ownership. The Real Estate Assets Department currently manages the land on behalf of the Water Department, leasing the property in a manner which is consistent with the goals of protecting the watershed, rural character and biological resources of the San Pasqual Valley.

The San Pasqual Valley Plan, adopted by the San Diego City Council on June 27th 1995 and amended in March 1996, recognizes the Valley as an important water, agricultural and natural resource, home to San Diego County's most sensitive habitats. The Plan, however, also designates a finite number of sites for limited commercial uses associated with low-impact recreation and agriculture. Today, with the increasing urbanization of surrounding communities, the natural resources of the Valley could be threatened. In the time since the Plan's adoption it has become apparent that some approved land uses are deteriorating the vision for the Valley.

The Multiple Species Conservation Program (MSCP) is a regional conservation plan in which the City of San Diego is a participating member. The City Council, on March 18, 1997, authorized the City's MSCP implementing agreement with the U.S. Fish and Wildlife Agency and the California Fish and Game (R28455), thereby agreeing to implement the City of San Diego MSCP Subarea Plan and other MSCP implementing regulations. Section 1.5.9 of the Subarea Plan sets forth specific management policies and directives for San Pasqual Valley, including biological management measures, land management and planning directives, and access planning guidelines, however these policies do not cover the entire San Pasqual Valley area.

In addition to the adoption of the San Pasqual Valley Plan and the MSCP Subarea Plan, in 2002 the City Council adopted the Strategic Framework Element as part of the City's General Plan Update. The Strategic Framework Element reinforces the preservation of San Pasqual Valley for agricultural use and open space. Further, the General Plan identifies the large City-owned agricultural preserve in the San Pasqual Valley as a unique feature that adds significantly to the overall image and quality of life typical of San Diego.

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

As an historic step in protecting the San Pasqual Valley's vital water resources, preserving its rural character and encouraging appropriate agricultural uses, in 2004 the San Pasqual Vision Plan was drafted. The plan recognizes the groundwater resources, natural habitat values, sustainable agricultural opportunities, cultural and historic resources, and outdoor recreational opportunities present in the San Pasqual Valley and the responsibility of the City to manage these lands. One of the goals listed in the plan is the preparation and adoption of this Council Policy to prohibit any further commercialization of the San Pasqual Valley and protect the rural character.

PURPOSE:

It is the desire of the City of San Diego to ensure the long-term protection of the significant water resources within the San Pasqual Valley, as these resources will play an important role in helping to meet the City's future water supply needs. It is also the desire of the City to preserve the Valley's significant agricultural areas, sensitive native habitats and unique scenic qualities. The irreplaceable glimpses of San Diego's natural and cultural heritage that are preserved within this Valley must not be lost. Significant biological and cultural resources will be protected and properly managed; quality of the groundwater basin will be ensured; appropriate agricultural activities will be facilitated; and compatible, passive recreational uses will be pursued. All of these goals are to be accomplished for the enjoyment and appreciation of future generations. This Council Policy will reinforce the goals of both the General Plan and the San Pasqual Valley Community Plan, which identify the San Pasqual Valley as an agricultural preserve with significant open space values.

POLICY:

It shall be the policy of the City to preserve the existing rural character of the San Pasqual Valley by tailoring the Valley's zoning and land use policies prohibiting any further commercialization and further protecting the Valley's vital water resources. The City shall protect the quality and capacity of the San Pasqual/Lake Hodges Surface Water and Groundwater Basin as well as protect, enhance and restore sensitive habitats within the Valley. The City shall educate the public on the importance of the Valley's resources, in order to build a sense of stewardship to sustain the long-term success of the important natural resources of the San Pasqual Valley. The City is directed to preserve, promote and sustain agricultural uses in the Valley. The City shall seek to build consensus with surrounding jurisdictions and other entities in order to ensure a mutual understanding of the need to be sensitive to the vision for the Valley. Implementation of this Policy should ensure that the primary goal of protecting water resources and subsequent goals of natural habitat preservation, retention of agriculture, and passive recreation are achieved in a manner which is complimentary to each other, thus avoiding any condition in which one goal would compete with another. Together these actions, along with any additional protections which the City Manager may identify, are intended to ensure the permanent protection of the San Pasqual Valley's unique water, agricultural, biological and cultural resources.

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

IMPLEMENTATION:

The protection of water resources, agricultural, biological and cultural resources within the San Pasqual Valley is intended to be implemented through the following actions:

- 1) The City shall institute an amendment to the Land Development Code to tailor the types of uses allowed in the AG-1-1 zone, as to prohibit uses which are detrimental to the vision for the San Pasqual Valley. The City shall next institute a rezone of all City-owned parcels in the Valley from AR-1-1 to AG-1-1, to ensure that all City-owned parcels are in compliance with the vision. This Council Policy is not intended to restrict the ability of the Wild Animal Park to 1) operate its visitor-serving activities within the current or future Park boundaries or 2) to further its animal conservation and propagation mission, including development of new, and renovation or refurbishment of existing, exhibits and facilities, within the limits of its current boundaries or any future leases or rights of entry. Nor is this Policy intended to prohibit those limited commercial uses that are directly associated with the agricultural activities occurring in the Valley. Additionally, the City shall amend the San Pasqual Valley Plan as to strengthen the language describing the types of land uses envisioned for the Valley. In order to complement the Land Development Code Amendment to the AG-1-1 zone, the San Pasqual Valley Plan shall be amended with language clearly establishing the intention for a strict limitation on development within the Valley. The Community Plan language should provide the framework to further protect the Valley's vital natural resources, reinforcing the goals of previously adopted documents to maintain the Valley as an agricultural preserve.
- 2) The City, jointly with other stakeholders, is preparing a San Dieguito River Watershed Management Plan. Preparation of a San Pasqual Groundwater Basin Management Plan is included as part of the City evaluation and potential development of the groundwater while protecting the agriculture resource. These plans shall include an evaluation of how best to effectively protect, manage, and utilize the Valley's water resources, while considering agricultural uses, native habitats, cultural resources, and passive recreational opportunities. As the primary landowner in the San Pasqual Valley, the City of San Diego is responsible for ensuring that there is a high quality drinking water supply for City of San Diego residents. Much of the land owned by the City has the potential to influence the quantity and quality of source water that reaches the groundwater and Lake Hodges, one of the City's water supply reservoirs. The Water Department is responsible for managing these watershed lands and the groundwater basin to meet their water supply objectives.
- 3) In order to provide a comprehensive review of existing and proposed leases in the San Pasqual Valley, the City shall establish a multi-discipline review committee consisting of staff representatives from various City departments. The committee shall prepare an annual report summarizing the status of all leases in the San Pasqual Valley. This report shall also include the status of proposed habitat management actions, as well as the identification of obstacles related to implementation, and a study of leasehold boundaries, including identification of sensitive habitat encroachment. In addition to the report, the City shall establish an encroachment monitoring program to ensure the leaseholders activities are consistent with the terms and conditions of their lease. Finally, the annual report shall provide a summary of ongoing recreation projects in the Valley as well as identify potential areas appropriate for

CITY OF SAN DIEGO, CALIFORNIA
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CURRENT

habitat restoration activities, consistent with the San Dieguito River Watershed Management Plan, which is currently being developed.

- 4) The City shall work with other public agencies to create a comprehensive interpretive program for the San Pasqual Valley, including the construction of an interpretive center. A major component of any successful habitat preservation project is to educate the citizenry about the importance of the natural features which are contained within that area. In order to ensure the long-term success of the San Pasqual Valley it is important for the residents of San Diego to recognize the Valley's unique natural habitat, its historical role in terms of watershed protection. The Valley is a unique natural and archaeological treasure that is envisioned to become a valuable educational and interpretive resource for the surrounding communities. Interpretive programs often encompass informational exhibits, interpretive stations, interpretive signage, educational resources and materials, as well as interpretive centers. The specific location of trails within the planning area would be proposed by organizations such as the San Dieguito River Park Joint Powers Authority (JPA) and reviewed and approved by the Water, Real Estate Assets and Development Services Departments. Existing resources, including the San Pasqual Battlefield State Historic Park, the San Diego Wild Animal Park, Sikes Adobe, the Mule Hill/San Pasqual Trail, the Orfilia Vineyards, the San Diego Archaeological Center and the Ruth Merrill Interpretive Trail should all become key components which will serve as hubs along a developed interpretive corridor. City staff shall work closely with public agencies, organizations and community members to provide a variety of interpretive and educational resources throughout the Valley.
- 5) The City shall establish a San Pasqual Land Use Task Force to devote its focus and attention to current issues which relate to present San Pasqual Valley leaseholds or which affect the integrity and preservation of the Valley. The Task Force shall evaluate the merits of long-term leases, in order to preserve, promote and sustain agricultural uses which are compatible with the protection of water quality. The San Pasqual Land Use Task Force shall be comprised of a total of nine to eleven members from various community groups, City departments and other agencies, including: the San Pasqual/Lake Hodges Community Planning Group, the Rancho Bernardo Community Planning Board, the San Diego Wild Animal Park, the City's Real Estate Assets Department, the City's Water Department, the City's Planning Department, the Farm Bureau, the Natural Resource Conservation District, and a resident selected by the City Councilmember with jurisdiction over the San Pasqual Valley. Members of the Task Force shall be appointed by the Councilmember with jurisdiction over the San Pasqual Valley. Following the completion of their evaluation of the leasehold process, the Task Force shall submit a report of their findings, including recommendations, to the Councilmember.
- 6) The City shall seek to establish cooperative relationships with the surrounding municipalities, agencies and community planning groups, adjacent to the San Pasqual Valley. Because issues such as water quality, ground water recharge and habitat preservation do not necessarily follow jurisdictional boundaries, governmental bodies and other organizations must work together to protect the beneficial uses of the watershed. In order to ensure that development proposed around the perimeter of the Valley, as well as upstream of the Valley, will not have a negative impact on the qualities and resources of the San Pasqual Valley, the City shall meet

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

with neighboring entities to convey the importance of addressing onsite urban runoff and storm water issues, including attention to downstream conditions of concern, flooding, erosion and water quality. In addition, the City shall request that these entities institute a practice of regular notification to the City's Real Estate Assets Department, of any land use proposals around the perimeter of the Valley, which may potentially impact the Valley. This coordination should take account of both public and private development projects, including transportation and public utility projects. The entities involved in this collaborative partnership should specifically include the surrounding jurisdictions of Poway, Escondido and the County of San Diego, as well as other agencies and organizations, including the San Pasqual/Lake Hodges Community Planning Group, the Rancho Bernardo Community Planning Board and the San Dieguito River Park JPA.

- 7) All City Departments shall be required to notify both the San Pasqual/Lake Hodges Community Planning Group and the Rancho Bernardo Community Planning Board of any proposals, public or private, that may affect the lands included within the boundaries of the San Pasqual Valley Plan area. Although the San Pasqual/Lake Hodges Community Planning Group is the City's officially-recognized community planning group for the San Pasqual Valley, per Council Policy 600-24, the Rancho Bernardo Community Planning Board has a long history of participation with land use issues related to the protection of the San Pasqual Valley, therefore will continue this role as well.

- 8) The City shall identify and review ways to ensure the long-term protection of the Valley's unique water, agricultural, biological and cultural resources. One option the City shall explore is the possibility of an amendment to the City Charter establishing the requirement that a majority vote of the people shall be obtained before any development which is inconsistent with the Council-adopted San Pasqual Valley Plan can be approved within the Valley. Included in this potential City Charter amendment should be the language that a majority vote of the people would also be required prior to the sale of any City-owned property within the San Pasqual Valley for purposes other than agriculture or habitat preservation. The City shall also explore the possible establishment of a conservation easement or appropriate land dedication over the Valley to permanently protect water, agricultural and biological resources. Included in this action, the City Attorney shall provide a legal analysis of the applicability of the Williamson Act to publicly-owned agricultural land. Additionally, the City shall explore the potential to dedicate all of the City-owned parcels within the San Pasqual Valley as parkland. All of the above options should take into account the understanding that they would most likely require that the City reimburse the Water Department for the acquisition of the property, as the property was originally purchased for "water storage" purposes. Finally, the City shall study the potential for further land acquisitions to expand the boundaries of the San Pasqual Valley. By exploring these and other options, the City can develop a feasible solution to permanently protecting the precious resources of the San Pasqual Valley.

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

PHASING:

The eight steps outlined as the implementation actions in this policy represent a comprehensive strategy for accomplishing the vision for the San Pasqual Valley, to ensure the long-term protection of the Valley's unique water, agricultural, biological and cultural resources.

Initial steps to implement the vision should include:

- A rezone action for all City-owned property in the San Pasqual valley to AG-1-1 (with the exception of the Wild Animal Park).
- A Land Development Code Amendment to the AG-1-1 zone as to forbid a number of non-agricultural uses that are not appropriate in the Valley.
- A Community Plan Amendment to the San Pasqual Valley Plan.
- On a case-by-case basis, consider entering into long-term leases with those uses that are clearly compatible with the vision for the Valley.
- Ensuring that both the San Pasqual/Lake Hodges Community Planning Group and the Rancho Bernardo Community Planning Board are informed of all planning and land use issues that pertain to the San Pasqual Valley Plan Area.
- Exploration of ways to permanently protect the San Pasqual Valley.

Mid-term implementation actions should include:

- Preparation of a San Pasqual/Lake Hodges Surface Water and Groundwater Basin Management Plan.
- Establishment of a San Pasqual Land Use Task Force.
- Creation of a comprehensive interpretive program.

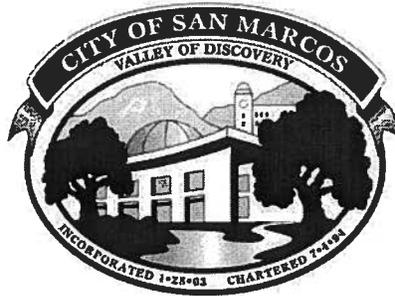
Long-term/ongoing actions include:

- Construction of an interpretive center.
- Preparation of annual status report on leasehold activities.
- Establishment of collaborative partnerships among the adjacent jurisdictions.
- Implementation of the San Dieguito Watershed Management Plan.

HISTORY:

Adopted by Resolution R-300588 06/27/2005

Development Services
1 Civic Center Drive
San Marcos, CA 92069-2918



Tel: 760.744.1050
Fax: 760.591.4135
Web: www.San-Marcos.net

August 30, 2010

Mr. Jay Petrek
Escondido Planning Division
City of Escondido
201 N. Broadway
Escondido, CA 92078

Subject: Escondido 2050 General Plan Update (Case No: PHG 09-0020)
Climate Action Plan (Case No: PHB 10-0016)
Environmental Impact Report Notice of Preparation

Dear Mr. Petrek:

Thank you for giving the City of San Marcos an opportunity to respond to the City of Escondido General Plan Update Notice of Preparation (NOP) for an Environmental Impact Report (EIR). The City of San Marcos has the following EIR NOP comments:

Land Use:

- Attachment 1 of the NOP includes an area located south of La Moree Road in the Escondido General Plan boundary that is within the City of San Marcos Sphere of Influence as approved by LAFCO. Please remove this area from the Escondido General Plan boundary.

Public Services/Fire Protection:

- There are land area pockets within the Escondido City boundary that are also within the San Marcos Fire Protection District (SMFPD) a subsidiary district of the City of San Marcos. Some of these areas are isolated and may be more adequately served by the City of Escondido with fire stations in closer proximity. Examples include areas off of Rockhoff Road, Metcalf Street, and within Land Use Study Area 1 north of W. El Norte Parkway. The City of San Marcos therefore requests that the General Plan Update and EIR consider whether the detachment of these areas from the SMFPD and attachment to the City of Escondido may more adequately serve these areas.
- The City requests that the DEIR provide mitigation measures to demonstrate how impacts associated with City of Escondido projects located within the San Marcos Fire Protection District will be accomplished, which should include as a mitigation measure annexation into the San Marcos Fire Protection District Community Facilities District 2001-01 to provide a funding source for the provision of fire services.

Recreation/Trails:

- The City requests that any update to their master plan be considered in the context of the connection to any City of San Marcos Trail.

Transportation and Circulation:

- The City requests that the build out condition impact analysis for San Marcos roadways and intersections be based on SANDAG Series 11 Combined North County Model. In addition, the City recommends consideration of a Traffic Demand Management Plan as a component of the traffic

analysis. The City further requests the opportunity to review the scope of the traffic analysis to be prepared as part of the EIR.

- Escondido and San Marcos should work together to improve traffic flow across jurisdictional boundaries by interconnecting signals on arterial and other major streets.
- Caltrans has indicated that future SR-78 improvements are no longer considered funded by the regional infrastructure system. Portions of SR-78 within the City limits of both San Marcos and Escondido are currently functioning at LOS F. New projects and General Plan buildout of new employment areas will worsen the delays. The City has been collecting a SR-78 interchange impact fee since 1990 which has resulted in three new/upgraded interchanges and several auxiliary lanes. The City of San Marcos is committed to participating in the corridor study and coordinating with SANDAG and Caltrans to determine a supplementary traffic impact fee that will pay for SR-78 capacity upgrades. This said, San Marcos requests that the EIR evaluate impacts to the SR-78 that result from General Plan land use changes, and that Escondido implement an in-lieu payment fee structure for future development that shall be specifically set aside for SR-78 improvements.
- The City requests that any update to their Circulation Element be considered in the context of the connection to any City of San Marcos roadway.

Hydrology/Water Quality:

- If the change in the land uses per the General Plan update would result in an increase in the surface runoffs into San Marcos Creek then mitigation measures such as a financial contribution to improve downstream facilities should be considered.
- Potential land use changes that could result in increased runoff discharge rates and durations, where such increased rates and durations are likely to cause increased erosion of channel bed and banks, sediment pollutant generation, or other impacts to beneficial uses and stream habitat due to increased erosive force, should have corresponding mitigation policies that include the most current County of San Diego Hydromodification Management Plan development requirements.
- Recently, the SDRWQCB adopted the BACT1 TMDL which affects inland creeks and water bodies for bacteria loading. If the potential land use changes would result in an increase in bacteria pollutant loading then mitigation measures to reduce those concentrations should be applied.
- The City of San Marcos has recently developed and presented to the SDRWQCB in conjunction with the County of San Diego and the City of Escondido a Nutrient Management Plan for the Upper San Marcos Creek Watershed. The City is the lead in this voluntary stakeholder effort being overseen by the SDRWQCB and anticipates that Escondido will also reduce its pollutant loads in concert with the City as this effort moves forward. It is encouraged that the cities of San Marcos and Escondido, and the County of San Diego, continue to work closely at a staff level to implement the Management Plan.
- Priority Development Projects (PDPs) that discharge to San Marcos Creek would be subject to Low Impact Development and Hydromodification standards identified in the City of San Marcos SUSMP, and a Water Quality Technical Report (WQTR) shall be required for priority SUSMP projects for review and approval by the City. The City is responsible for all water quality discharges into the City storm drain system under its Municipal Storm water Permit ("Permit") and therefore all

Mr. Jay Petrek
Escondido Planning Division
Escondido General Plan EIR NOP
August 30, 2010
Page 3 of 3

discharges shall be effectively treated prior to leaving a project site for pollutants anticipated to occur by the project per the City of San Marcos Permit. The EIR should have mitigation measures that fully assess water quality impacts to downstream water bodies listed as impaired and to the City's ability to meet pollutant load allocations.

- The City requests that the EIR analyze the General Plan changes in relation to the objectives under Permit No. R9-2007-0001 issued by the Regional Water Quality Control Board, the San Diego region.

Thank you in advance for your consideration of these comments. If you have any questions, please feel free to contact me at (760) 744-1050, x.3237.

Sincerely,



Susan Vandrew Rodriguez
Associate Planner

cc: Jerry Backoff, Planning Division Director
Michael Edwards, City Engineer
Paul Vo, Principal Civil Engineer, CIP
Peter Kuey, Principal Civil Engineer, LD
Mathew Ernau, Fire Marshall
Craig Sargent-Beach, Community Services Director
Erica Ryan, Stormwater Program Manager
Reed Thornberry, Stormwater Water Program Analyst



County of San Diego

ERIC GIBSON
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 894-2960
TOLL FREE (800) 411-0017
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

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>.

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/pcrec/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 if you would like to schedule a meeting.

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)

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

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.

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.sdparcs.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

TRAFFIC/TRANSPORTATION

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

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.

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.

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.

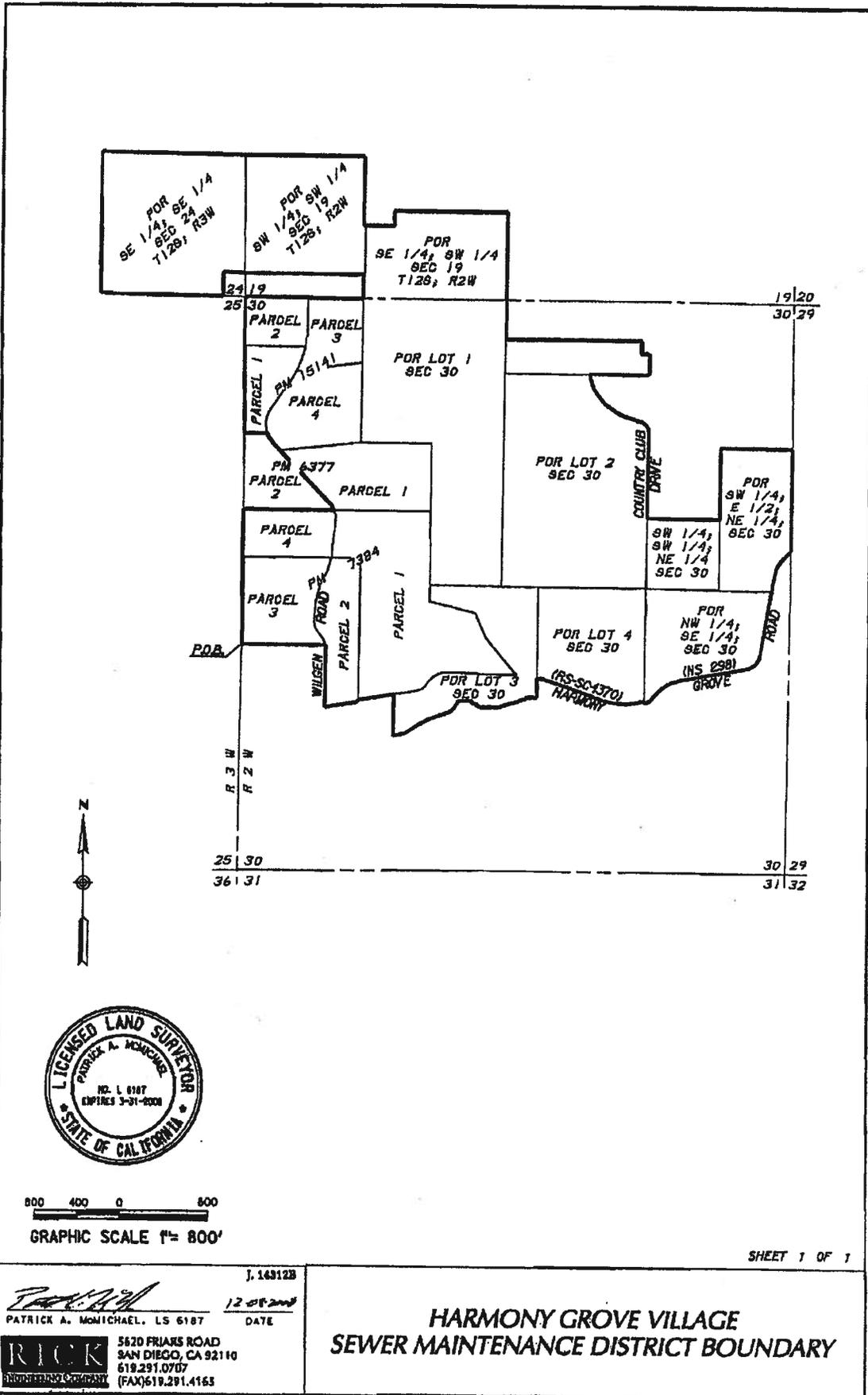
Sincerely,



 ERIC GIBSON, Director
Department of Planning and Land Use

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 Jaszowski, Administrative Secretary, Department of Planning and
Land Use, (via email)



800 400 0 800
 GRAPHIC SCALE (1" = 800')

SHEET 1 OF 1

J. 14312B
 12-08-2008
 DATE
 PATRICK A. MCMICHAEL, LS 6187
RICK 5620 FRIARS ROAD
 SAN DIEGO, CA 92110
 619.291.0707
 (FAX) 619.291.4163

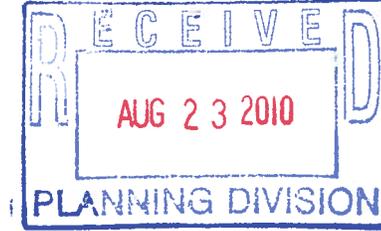
**HARMONY GROVE VILLAGE
 SEWER MAINTENANCE DISTRICT BOUNDARY**



Chairman

Bud Pocklington
South Bay
Irrigation District

August 17, 2010



Vice Chairman

Carl Hilliard
Councilmember
City of Del Mar

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

Members

Bill Horn
County Board of
Supervisors

SUBJECT: Notice of Preparation of an Environmental Impact Report for the City of Escondido General Plan Update and Climate Action Plan (City Case Numbers: PHG 09-0020; PHG 10-0016)

Dianne Jacob
County Board of
Supervisors

Mr. Petrek,

Donna Frye
Councilmember
City of San Diego

Thank you for providing the San Diego Local Agency Formation Commission (LAFCO) an opportunity to provide comments on the above referenced project. LAFCO is empowered by the California State Legislature with discretionary authority over proposed changes to local government organization, extension of municipal services, and any associated sphere of influence actions (California Government Code § 56000, et seq.).

Mark Lewis
Mayor
City of El Cajon

San Diego LAFCO is typically a responsible agency for environmental review under the California Environmental Quality Act (CEQA) when a proposed project requires LAFCO discretionary approval(s). As a responsible agency, LAFCO would typically utilize the lead agency's CEQA documentation; therefore, it is important for the lead agency's environmental documents to be germane to the statutory responsibilities of LAFCO.

John Ingalls
Santa Fe
Irrigation District

LAFCO is directed to exercise its discretionary authority in a manner that encourages orderly development and growth while fulfilling many regional priorities, such as accommodating additional growth within, or through the expansion of local agency boundaries. LAFCO is also required to consider the impact that proposed jurisdictional changes may have on providing necessary governmental services and housing for persons of all incomes.

Andrew L. Vanderlaan
Public Member

Therefore, we offer the following comments:

Alternate Members

Greg Cox
County Board of
Supervisors

- The City of Escondido's General Plan Update proposes several General Plan Amendment Areas (EL-1, EL-5, and EL-6) that include unincorporated parcels, both within and outside of the City's adopted sphere of influence. As the proposed General Plan Update would involve subsequent LAFCO consideration of jurisdictional and/or sphere of influence changes, our comments are provided in the context of LAFCO's possible role as a responsible agency under CEQA.
- For LAFCO's use as a responsible agency, the proposed EIR should include discussions of: how the project area is proposed to receive public services; the ability of existing agencies to provide services; a description of existing infrastructure and the capability, availability, and capacity of services (e.g., connection distances to facilities, response times for police and fire protection, capacity of regional facilities, etc.); and an analysis of any associated jurisdictional, sphere of influence, and municipal service review changes. These areas of special interest to LAFCO are enumerated in Government Code Sections 56425, 56430, 56434, 56653, and 56668.

Sherril Lightner
Councilmember
City of San Diego

Jim Janney
Mayor
City of Imperial Beach

Jo MacKenzie
Vista Irrigation District

Harry Mathis
Public Member

Executive Officer

Michael D. Ott

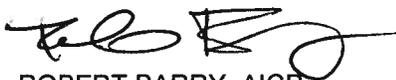
Counsel

Karen Landers

- Specific EIR issue areas of concern to LAFCO will be the discussions and analyses related to agricultural resources, hydrology and water quality, land use and planning, population and housing, public services, and public utilities and services systems. These issue areas should include discussions that are germane to LAFCO's statutory responsibilities.
- One of the prerequisites in State Law for inclusion of territory within a city sphere of influence is that the subject territory must be included within the City's General Plan boundary; therefore, it is important for the project's EIR to disclose and discuss any proposed adjustments to the City's General Plan Boundary (expansions or contractions) in relation to LAFCO's statutory responsibilities.
- The preservation of prime agricultural lands, as defined by Government Code § 56064, is a statutory priority of LAFCO (Government Code § 56377). San Diego LAFCO Policy L-101 discourages jurisdictional change proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use. Therefore, the Agricultural Resources discussion in the EIR should identify all *prime agricultural lands* (per the LAFCO statutory definition cited above) that are located within the existing and proposed sphere of influence, and provide a discussion of any measures adopted by the City to preserve prime agricultural lands for agricultural use. The discussion should also reference the associated LAFCO required factor of analysis (Government Code § 56668(e) ...*the effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016.*
- The County of San Diego is currently engaged in a comprehensive update to the adopted General Plan for the unincorporated areas of San Diego County. The City of San Marcos is also undergoing an update to their adopted General Plan. As the City of Escondido's sphere of influence includes unincorporated territory and is adjacent to the City of San Marcos, it is important for the General Plan Update's EIR to include discussions on the differences between the existing and proposed land use designations of the agencies within and adjacent to the sphere territory.
- San Diego LAFCO has recently adopted Policy L-107, which addresses jurisdictional conflicts related to proposed changes of organization or reorganization. The policy requires the subject proposal's applicant to demonstrate that adjacent jurisdictions and interested parties have been consulted, that any jurisdictional conflicts have been identified, and that the identified conflicts have been resolved or remain unresolved. Therefore, the EIR for the General Plan Update should identify any jurisdictional conflicts that were resolved or remain unresolved.
- The City should evaluate whether rezoning should be established for the unincorporated areas within the General Plan Boundary. This establishment of rezoning as part of the General Plan Update would remove any uncertainty regarding the City's potential zoning within the sphere territory and avoid the need for subsequent City Council rezoning actions and separate environmental determinations.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

Sincerely,



ROBERT BARRY, AICP
Local Governmental Analyst

RB:ra

Attachments: Policy L-101
Policy L-107

Subject

PRESERVATION OF OPEN SPACE AND AGRICULTURAL LANDS

Purpose

To further the policies and priorities of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 regarding the preservation of open space and prime agricultural lands.

Background

The State Legislature has instructed Local Agency Formation Commissions to establish policies that address the preservation of open space (Govt. Codes § 56300 and 56377). LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency’s boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

Policy

It is the policy of the San Diego Local Agency Formation Commission to:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area *or* the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;
2. Require rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;

L-101 LEGISLATIVE POLICY

3. Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Adopted: November 6, 1978
Amended: June 4, 1990
Amended: May 4, 1998
Technically Updated: January 1, 2001

Cross-reference:

SAN DIEGO LAFCO PROCEDURES:
-Open Space and Agricultural Preservation

Subject

JURISDICTIONAL CONFLICTS ASSOCIATED WITH PROPOSED DEVELOPMENT

Purpose

To establish a procedure for cities, special districts, and the County of San Diego to discuss and potentially resolve jurisdictional conflicts associated with development projects that require LAFCO discretionary approval(s).

Background

Proposed development projects that involve annexation of territory to a city or special district can result in conflicts between the proposed and existing land uses and zoning of the respective land use jurisdictions. While LAFCO is prohibited by State Law from directly regulating land use density or intensity, property development, or subdivision requirements (Government Code § 56375(a)(6)), it is required to consider in the review of a jurisdictional proposal, the consistency with city or county general plans (Government Code § 56668(g)).

In terms of city annexation proposals, Government Code § 56375(a)(7) requires LAFCO to base its decision on a proposal to annex territory to a city upon the general plan and rezoning of the subject city. However, LAFCO is also required to consider the following factors in the review of a proposal: the effects of a proposal on adjacent areas (Government Code § 56668(c); the proposal's consistency with city or county general and specific plans (Government Code § 56668(g); the comments of any affected local agency or other public agency (Government Code § 56668(i); and, any information relating to existing land use designations (Government Code § 56668(n). With the exception of (Government Code § 56375(a)(7), LAFCO must consider the same factors when evaluating the annexation of unincorporated territory to special districts.

Within the local development approval process, LAFCO staff has historically encouraged the lead agency for the development to consult with the adjacent jurisdictions in order to identify and resolve any potential jurisdictional issues prior to LAFCO submittal.

To facilitate discussion and resolution of any inconsistencies between the affected

4. The Commission shall consider the agreement in its evaluation of the proposed jurisdictional change to the extent that it is consistent with State Law and San Diego LAFCO policies and procedures. The agreement may reference, but not be limited to, approved tax sharing agreements among subject local agencies.
5. If the parties have consulted in accordance with this policy and are unable to reach agreement, the parties shall, in writing, inform the Executive Officer of the areas in which they are unable to reach agreement and the desired outcome. Thereafter, the proposal shall proceed in accordance with State Law and applicable San Diego LAFCO policies and procedures.
6. Affected local agencies shall be encouraged to explore methods to improve inter- and intra-departmental and jurisdictional communication for the purpose of discussing and commenting on proposed development and jurisdictional changes.

Adopted: May 3, 2010

Cross-reference:

SAN DIEGO LAFCO POLICY:

- L-100 CITY ANNEXATION OF UNINCORPORATED TERRITORY WITHIN SPECIAL DISTRICTS
- L-103 RECOGNITION OF UNINCORPORATED COMMUNITIES

SAN DIEGO LAFCO PROCEDURES:

- SPHERES OF INFLUENCE
- LAFCO-INITIATED PROPOSALS



Escondido Union High School District

BOARD OF EDUCATION

District Service Center

302 North Midway Drive • Escondido, CA 92027-2741
Telephone (760) 291-3200 • FAX (760) 480-3163
Edward J. Nelson, Superintendent

Randy Garcia
Dr. Kurt Marler
George McClure
Jon Petersen
Tina Pope

August 30, 2010

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



**RE: CITY OF ESCONDIDO GENERAL PLAN UPDATE
NOTICE OF PREPARATION OF A PROGRAM EIR**

Dear Mr. Petrek:

The Escondido Union High School District appreciates the opportunity provided by the City of Escondido to respond to the Escondido 2050 General Plan Update Notice of Preparation. The Escondido Union High School District is a vital part of Escondido's economic base with approximately 800 employees and annual budget of approximately \$70 million dollars. The District has several specific and overarching comments which are outlined below.

The Escondido Union High School District (EUHSD) will act as a "responsible" agency relative to the General Plan Update, but will in the future remain to be the "lead" agency on District projects requiring CEQA documentation.

In our efforts to maintain and improve Escondido's quality of life, a quality education is essential. It is often asserted that the vitality of any city is directly associated to the performance of its public school system, which can improve the local economy while attracting businesses. Today's schools must address their interwoven relationship with the community. We must acknowledge that designing schools for the future can not be based on all the concepts of past school facility planning, design and construction.

As stated in the Notice of Preparation, the General Plan has a vision to promote a quality of life by providing 'quality educational facilities'. Attachment 3 also lists 'education' to be within Area SG-3. The document uses the term 'education' as an all inclusive concept and does not distinguish between various educational venues: private schools, charter schools, public education, community colleges, etc. This coalescence of all educational needs can be misleading relative to their individual facility needs and associated land use relationships.

By categorizing a school within a single land use designation (SG-3) is in itself limiting and restrictive rather than focusing on the relationship of the entire community as an interconnection whole. Where schools are restricted to certain land uses has the potential to force school facilities to be build in community areas not compatible or

convenient for the users. General Plan Area SG-3 is proposed for educational uses and states, "...Residential development would be prohibited outside the proposed 'urban village' area in order to preserve retail, office and educational character." A typical community desire, and a current success with Escondido public schools, is that they are neighborhood schools sited within residential neighborhoods – not within retail and office areas. The allowance of schools within a broader 'range' of land use areas will better serve the community as a whole. School facilities that serve a wider variety of community users/needs will have a stronger and wider community relationship fostering greater opportunities for success.

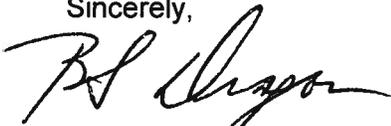
As the City of Escondido continues to grow in population based on the currently proposed General Plan, the need to house future new students will follow. Escondido's growth to an ultimate city build-out will include the development of raw land, in-fill projects, and redevelopment of existing facilities. The District's current school facilities are adequate to accommodate the current student population with some allowance for small growth. However, looking out 30-40 years, as the population increases and the need to provide new school facilities increases, the availability of adequate land to build on will decrease exponentially due to a multitude of variables. The General Plan needs to address this potential otherwise it will most likely present a need to acquire educational property through eminent domain, which potentially could occur in an area deemed non-conforming to the General Plan. It might be more productive at this time to envision future opportunities and plan for them in lieu of leaving this discussion when it presents itself.

The District feels it is imperative that the General Plan address these concerns in order to be better informed now and provide the opportunity to plan for an obtainable quality of life that can be supported by the various future infrastructure needs.

If you have any questions please feel free to contact:

Thomas Clark
Coordinator of Facilities
Escondido Union High School District
302 N. Midway Drive
Escondido, CA 92027
(760) 291-3219
(760) 291-7329 fax
tclark@euhsd.k12.ca.us

Sincerely,



Barry Dragon
Assistant Superintendent of Business Services

C: Ed Nelson, EUHSD
Thomas Clark, EUHSD

8/30/10 - emailed to Jory Petrak at COE
4:13 pm

Jay Petrek - Escondido General Plan / Climate Action Plan EIR - Rincon del Diablo MWD Comments

From: "Randy Whitmann" <RWhitmann@rinconwater.org>
To: <jpetrek@escondido.org>
Date: 8/25/2010 11:36 AM
Subject: Escondido General Plan / Climate Action Plan EIR - Rincon del Diablo MWD Comments

Jay,

Thank you for the opportunity to comment on the scope of the City's upcoming EIR for the General Plan Update. The following is a comment list from the Rincon del Diablo Municipal Water District and our contact information.

Comments

1. Demand Reduction - the scope of the General Plan/EIR appears to be lacking in terms of concerns with the availability of imported water into the region. Although the scope does list to *recognize the value of potable water and treated wastewater and maximize their re-use*, the General Plan should consider demand reduction and water efficiency as a principle of new development.
2. Climate Action Plan - Changes in Land-Use, New Development (Expansion versus Infill), and Local versus Regional Impacts - first, reductions in agricultural land-use and replacement with residential or commercial will likely add to the region's heat signature by a number of factors including: reducing the ag's carbon sequestering effects, generating vehicle trips, and increasing electrical and gas demand. Second, expanding the urban limits also increases the linear boundary and wild land fire interface areas. This in turn increases the need for fire mitigation, fire services, and fire and other service vehicles. Also, growing the region outward may have more of an impact than infill and redevelopment, as it requires the production of pipe and development of raw materials used in expansion of streets and utilities. Third, energy for water and wastewater pumping accounts for a considerable percentage of the energy demand in California. Growing the region will increase dependency upon water imports or energy expensive alternative sources, such as desalinated water. Moreover, most of the energy consumed in Escondido is imported, so the carbon impacts of these transfers occur at distant locations and are not readily seen locally. In a global climate change, this cannot escape the local calculation.

Since all of these elements adds to the carbon emissions, please consider them in your Climate Action Plan.

3. Rincon Public Services - Rincon currently provides recycled and potable water services within its boundaries and has significant investment to continuing to deliver these services to both the developed and undeveloped properties within its boundaries. Additionally, Rincon is engaged in developing alternative sources for both non-potable and potable water supplies to meet the needs in the District including the development and management of the groundwater basin underlying its boundaries. Rincon will exercise its authorities provided for within State law to develop and manage any enterprises appropriate to serve the needs of the residents of the district.

Randy Whitmann
Senior Engineer
1920 North Iris Lane
Escondido, CA 92026
rwhitmann@rinconwater.org
760-745-5522



1391 Engineer Street • Vista, California 92081-8836
Phone (760) 597-3100 • Fax: (760) 598-8757
www.vid-h2o.org



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General Counsel

August 18, 2010

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

Re: Escondido 2050 General Plan Update (Case No. PHG 09-0020)
Climate Action Plan (Case No.: PHG 10-0016)

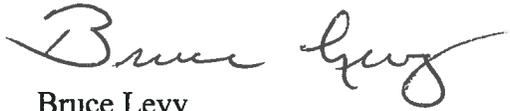
Dear Mr. Petrek:

Vista Irrigation District has reviewed the Notice of Preparation for a Program Environmental Impact Report for the General Plan Update and Climate Action Plan. We are providing the following comments for your consideration when preparing the environmental document.

- 1) Attachment 3, Area EL-10 (Exhibit 10). Vista Irrigation District (VID) owns and operates the Vista flume and siphon system. The potable water transmission facility transmits treated water from the Escondido Vista Water Filtration Plant (EVWFP) to VID's service area. The flume and siphon system is a combination of gravity and pressurized facilities which extend for distance of 11.25 miles from the EVWFP to the Pechstein Reservoir within a 50-foot wide VID easement. A siphon section of the Vista flume crosses Area EL-10 within a 50-foot easement. VID Flume Easement No. FC05 encumbers the subject property(s) within Area EL-10 (recorded October 2, 1925, Book 1136, Page 128, File No. 48369).
- 2) Vista Irrigation District should be involved in the planning, design and construction of any improvements to insure that improvements or upgrades are incorporated in the most efficient manner. Cooperative coordination between the agencies will minimize conflicts, costs and public inconvenience.

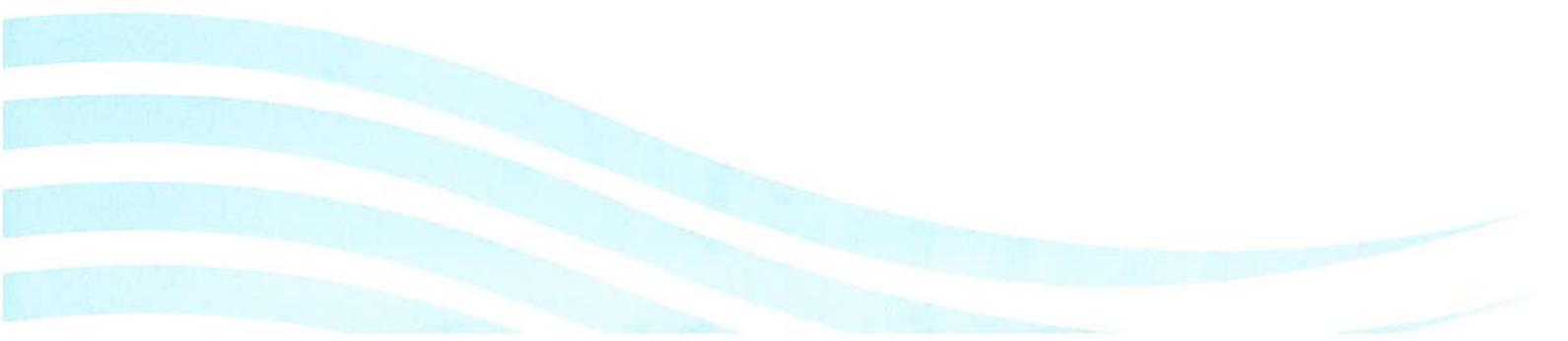
If you need additional information or have questions, please do not hesitate to contact me at (760) 597-3181.

Sincerely,

A handwritten signature in black ink that reads "Bruce Levy". The signature is written in a cursive style with a large, sweeping initial "B".

Bruce Levy
Engineering Projects Manager

Cc: Brian Smith



From: "Mays, Jody" <Jody.Mays@sdsheriff.org>
To: "jpetrek@escondido.org" <jpetrek@escondido.org>
Date: 9/14/2010 2:50 PM
Subject: NOP for General Plan Update and Climate Action Plan

Jay -

The San Diego Sheriff's Department has no comments on the NOP for the City's General Plan Update and Climate Action Plan. Which is good, since the comment period expired before anyone at my agency thought to forward this on to me! Please include me as the contact person for the EIR and all future correspondence regarding this project.

Thanks.

Jody Mays
Sheriff's Project Manager
San Diego County Sheriff's Department
Facilities & Special Projects
9621 Ridgehaven Court
San Diego, CA 92123
858-974-2237
858-974-2176 (fax)
jody.mays@sdsheriff.org

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



August 12, 2010

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



Dear Jay Patrek:

Re: SCH# 2010071064; Escondido General Plan Update and Climate Action Plan Case #PHG09-0020, PHG10-0016

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Completion & Environmental Document Transmittal-Notice of Preparation* from the State Clearinghouse for the proposed general plan update. As the state agency responsible for rail safety within California, RCES recommends that the City add language to the plan so that any future planned development adjacent to or near the North County Transit Development Board right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way.

Language should be in place so that any traffic impact studies undertaken should also address traffic increase impacts over affected crossings and associated proposed mitigation measures.

If you have any questions, or would like to discuss our concerns please contact Laurence Michael, Utilities Engineer at 213-576-7076, ldi@cpuc.ca.gov, or me at rxm@cpuc.ca.gov, 213-576-7078.

Sincerely,

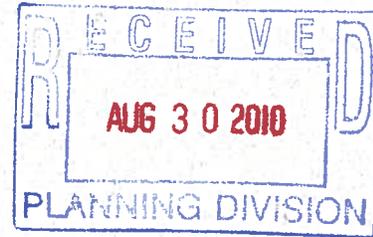
A handwritten signature in black ink, appearing to be "Rosa Muñoz".

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

ELFIN FOREST/HARMONY GROVE FIRE DEPARTMENT INC.
C.S.A. 107
20223 Elfin Forest Road
Elfin Forest, California 92029



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



RE: NOTICE OF PREPARATION OF A PROGRAM EIR FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN FOR THE CITY OF ESCONDIDO.
City Case #: PHG 09-0020, PHG 10-0016

The Board of Directors of the Elfin Forest /Harmony Grove Fire Department, Inc. wishes to comment on this NOP for the program EIR for the City's General Plan Update and Climate Action Plan. We have particular interest in the General Plan Study Area EL-6 [Harmony Grove] and your proposal to consider re-planning and rezoning this area to Specific Plan Area – SPA.

The Elfin Forest/Harmony Grove Fire Department [EFHGFD] is a County Service Area [CSA 107] and provides fire and medical emergency services to the EL-6 study area. A special benefit fee, which is collected from our property owners, does not cover the full costs of these services and EFHGFD must rely on fundraising activities as well as the pursuit of grant monies to fill our deficit.

The proposal to annex Study Area EL - 6, much of which is not in your Sphere of Influence, would have significant economic impacts on EFHGFD and the area we serve. **EFHGFD would lose upwards of \$100,000 in benefit fees from the properties proposed for annexation.** Such piecemeal annexation will undermine our ability to provide fire and medical emergency services for the entire CSA 107 area. If area EL-6 were annexed, EFHGFD would still be providing service to properties across the street from EL-6 thus requiring EFHGFD to provide the same level of service to our properties with less revenue.

Should this annexation be realized, the EFHGFD expects that the City of Escondido will provide CSA 107 with the lost revenues in order to keep us whole. We would also further expect that the Escondido Fire Department would enter into an agreement to provide mutual aid service to properties remaining in CSA 107 that are adjacent Escondido's corporate boundaries.

The EFHGFD, at this point, opposes the annexation of EL - 6 and supports the No Project Alternative in order to keep CSA 107 whole. While all cities which endeavor to prepare a working General Plan for their future are to be commended, we believe that a proposal to expand the City of Escondido from its existing 37 square miles to 80 square miles in the course of 40 years is extremely aggressive and unsupportable.

Mr. Jay Petrek AICP, Principal Planner
City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025
NOP Letter
Page 2

The EFHGFD is not certain of all impacts that may come because of your proposed General Plan Update. We will closely follow the cumulative impacts section particularly as it relates to increased traffic [especially on Harmony Grove Road], air and noise pollution, the reduction of agricultural lands by urban sprawl, and affects on the Escondido Creek Watershed area.

The Elfin Forest Harmony Grove Fire Department thanks you for the opportunity to make our concerns known and addressed. We look forward to reviewing the Program EIR.

Our contact person information is: Frank Twohy, Fire Chief, 760 744-2186 , cell @ 619 851-2801, 20223 Elfin Forest Road, Elfin Forest, CA 92029, ftwohy@eff-fire.org .

Sincerely

A handwritten signature in black ink that reads "Nona T. Barker". The signature is written in a cursive style with a large, prominent initial "N".

Nona Barker
Chair
Elfin Forest-Harmony Grove
Fire Department, Inc.



2010 Board Members:

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20223 Elfin Forest Rd., Elfin Forest, CA 92029

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

August 30, 2010

RE: NOTICE OF PREPARATION OF A PROGRAM EIR FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN. City Case #: PHG 09-0020, PHG 10-0016

The Elfin Forest Harmony Grove Town Council thanks you for the opportunity to comment on this NOP for the program EIR for the City's General Plan Update and Climate Action Plan. In particular we have comments on General Plan Amendment Study Areas EL-5 (Eden Valley) and EL-6 (Harmony Grove) and the proposal to replan and rezone these areas to Industrial Office and Specific Planning Area in the proposed Escondido General Plan Update.

The residents of Eden Valley, Harmony Grove and Elfin Forest, are in the final stages of a long laborious consensus-building planning process with the County of San Diego to develop a vision for our communities as part of the San Diego County General Plan Update. It is especially because of this planning process that we have very specific comments about the City of Escondido's proposed General Plan Update.

HARMONY GROVE

Elfin Forest and Harmony Grove residents prepared the "Draft Elfin Forest and Harmony Grove San Dieguito Community Plan" as part of the County's General Plan Update planning process. It is anticipated that our Community Plan along with the entire County General Plan Update will be adopted by the County Board of Supervisors later this fall. Specifically, Harmony Grove's vision as is reflected in our new Community Plan, page 33, is as follows:

(http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/complan/sandieguito_efhg_070109.pdf)

"The area is rural in nature, extremely quiet, peaceful, and generally remains in its natural state except for the agricultural uses. The dark night sky is an important aesthetic resource. The most scenic views in Harmony Grove are of the hills, valleys, riparian habitat, and grazing farm animals and these visual qualities must be preserved. The area remains non-industrial with low-densities that preserve the community's historic rural agricultural character.

The residents embrace a green community where they continue their rural small-town lifestyle, enjoy keeping leisure and market animals, and live in harmony with the land and the wildlife. The Village is a place where local farmers sell organically grown vegetables and where residents' children often find first homes or where their parents can choose to live in retirement.

The historic rural habitat is preserved where the Village is surrounded by large-lot rural homes and small, family owned farms and vineyards that preserve the critical relationships necessary for this environmentally sensitive and balanced green community. The all-important rural voice is not overwhelmed by the urban voice."

Harmony Grove strongly supports conservation and protection of native species, and is working towards becoming a model green community by recycling animal wastes, using reclaimed water for irrigation, and supporting local organic agriculture. Agricultural uses, especially small family-owned organic farms, are important to the functioning of Harmony Grove and are encouraged as part of an environmentally sensitive community plan. We are working with the County to establish policies and zoning that would maintain an attractive rural neighborhood that encourages responsible animal keeping. There is a range of housing planned to accommodate residents through all stages of life.

In particular, the EL-6 General Plan Amendment Study Area impacts the community of Harmony Grove. To designate this area as industrial as is suggested in this NOP could cause significant adverse impacts to our community and prevent the realization of the residents' vision as detailed in our Draft Community Plan. The negative impacts include:

- Encouragement of urban sprawl development that encroaches on the remaining historic rural community and increases both vehicle miles traveled and greenhouse gas emissions
- Significant safety hazards from truck and commuter traffic
- Degradation of air quality associated with increasing density and intensive land uses
- Fragmentation of historic rural neighborhoods
- Degradation of the lifestyle in the rural agricultural communities, with attendant loss of property values of the rural home sites
- Loss of land for agricultural and equestrian business opportunities, which are specifically encouraged in the Elfin Forest and Harmony Grove Community Plan
- Removal of protection of land with significant physical or environmental constraints or hazards: ridgelines and possible disruption of wildlife corridors along Escondido Creek
- Loss of open space and natural resources
- Degradation of aesthetics and scenic views in the valley

Even though the proposed EL-6 has many potential negative impacts to Harmony Grove, this area of Harmony Grove has already been negatively impacted by previous Escondido developments that were not sufficiently buffered. Because of this there are some existing rural home owners in the EL-6 area who may wish to sell their properties and leave the area because it is no longer a desirable place to live. Therefore this small portion of Harmony Grove may be appropriate to be replanned and zoned to industrial. However this should only occur if, consideration is given as to how to preserve the Harmony Grove community character and retain rural property values while accommodating this limited industrial use.

Therefore, the Escondido General Plan Update and EIR should:

1. Recognize and support the new proposed Elfin Forest and Harmony Grove Community Plan already proposed for these communities.
2. Extend the Escondido General Plan study area to include all of Harmony Grove, so that through the General Plan Update process the City has the ability to include and support the Harmony Grove Community Plan.
3. Recommend that the new General Plan accept and adopt all of the provisions which exist in the Harmony Grove portion of the Elfin Forest and Harmony Grove Community Plan. This should include an agricultural/equestrian district overlay that would allow durable special animal and livestock keeping, breeding, and boarding privileges, a trail system suitable for equestrian use and low density zoning to encourage small family-owned organic farms.

4. Consider and develop a plan for a sufficient buffer area between the adjacent future industrial/commercial uses in EL-6 and the existing rural residential uses. This buffer area should be structural as well as visual, in the sense that industrial truck traffic and high-speed commuter routes, which cause significant adverse impacts in rural residential/equestrian areas, would not be allowed to enter into or negatively impact Harmony Grove.

5. Review and draft policies in the new General Plan that will require that if the parcels in EL-6 are annexed into the City of Escondido that the City will commit to restore to its natural state the Escondido Creek that runs through this area.

5. Respect the Circulation Element of the proposed San Diego County General Plan which commits to maintain all the roadways in Harmony Grove and Elfin Forest as narrow low-speed roads. In no case should any truck traffic or commuter traffic increase the level of service on our rural roads.

6. Finally, we request that the City of Escondido seek the approval of the San Dieguito Planning Group (which is anticipated to be the representative planning group for Harmony Grove by 2011) before proceeding to annex any of parcels in EL-6.

EDEN VALLEY

While the Elfin Forest/Harmony Grove Town Council does not represent the community of Eden Valley, we have heard from a number of Eden Valley residents that they have similar concerns about General Plan Amendment Study Area EL-5. Since they are a neighboring community who shares similar beliefs about their rural lifestyle, we urge you to also consider that the proposed San Diego County General Plan be respected in their community also...

We hope that the City of Escondido will realize the benefit of working with us, your neighbors, and helping all of us, preserve our wonderful rural community.

Sincerely,

Melanie Fallon, Chair
Elfin Forest Harmony Grove Town Council

cc:
Supervisor Bill Horn, San Diego County Board of Supervisors,
San Diego County Board of Supervisors
San Dieguito Planning Group
Devon Muto, DPLU, County of San Diego
Robert Barry, LAFCO

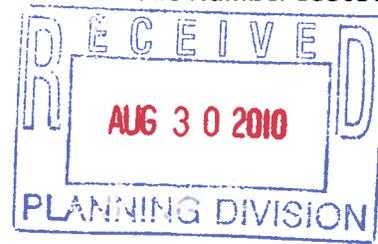


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 Fax (619) 699-1905
 www.sandag.org

August 25, 2010

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

File Number 3330300



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- and*
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- Southern California Tribal Chairmen's Association*
- Mexico*

SUBJECT: Notice of Preparation (NOP) of a Program Environmental Impact Report (EIR) for a General Plan Update and Climate Action Plan

Thank you for the opportunity to comment on the above-referenced NOP. The San Diego Association of Governments' (SANDAG's) comments are made from a regional perspective, emphasize the need for land use and transportation coordination, and are based on policies contained in the Regional Comprehensive Plan (RCP) and the 2030 Regional Transportation Plan (RTP).

State law gives SANDAG the authority to determine whether a project or plan will need to be reviewed for regional significance. SANDAG staff has reviewed this project and determined that it is regionally significant due to the amount of traffic generated. Therefore, environmental review of this project should include consideration of applicable policy objectives contained in the RCP and the RTP.

Multimodal Transportation Analysis

The 2030 RTP sets forth a multimodal approach to meeting the region's transportation needs. As such, it is requested that the traffic analysis for this project also consider balancing the needs of motorists, transit riders, pedestrians, and bicyclists and include the following impact analysis.

Please note that SANDAG is currently developing the 2050 RTP. Based on the General Plan Update's timeline, we request that you coordinate its development with the 2050 RTP and Sustainable Communities Strategy (SCS) efforts, in addition to the 2030 RTP. Also, SANDAG has a new Regional Growth Forecast that extends to 2050 that should be considered in this EIR.

Transportation Demand Management (TDM)

Please consider promoting alternatives to driving alone during peak periods such as carpooling, vanpooling, bicycling, telecommuting, flexible work hours for employees, and the potential of a TDM plan as a part of this project to help mitigate regional transportation impacts. We recommend contacting the SANDAG iCommute program to explore TDM options.

Bicycle/Pedestrian Access

The project should provide appropriate connectivity and facility integration to nearby local residences and businesses. Improved bicycle and pedestrian access to local destinations can help mitigate the traffic effects of projects and provide mobility options for residents.

Smart Growth Opportunity Areas

A key goal of the RCP is to focus growth in smart growth opportunity areas. The proposed project includes eight Smart Growth Opportunity Areas. It appears that this project would contribute to increasing density and intensity targets in these areas. SANDAG commends the project for considering the implementation of smart growth development in these areas as part of the General Plan Update.

Another RCP goal is to provide a variety of affordable and quality housing types for people of all income levels and abilities throughout the region. With the proposed density increases, the plan update would support implementing this goal.

Natural Environment

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 these criteria as part of the General Plan Update.

Other Considerations

It is suggested that consideration be given to Assembly Bill 32, Senate Bill 375, Senate Bill 97, and Executive Order S-13-08, which call for analysis of greenhouse gas emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy, SCS, and Climate Action Strategy that promote the reduction of energy demand and water consumption.

Also, the alignment and potential station location associated with the California High-Speed Rail should be considered. The Land Use Study Area EL-3 southeast of the Interstate 15/State Route 78 interchange is a potential location for a High-Speed Rail station. Attachment 3, Land Use Study Area EL-3, of the NOP recommends that residential development not be permitted in this area to preserve employment opportunities. The city should consider locating smart growth/mixed-use/transit-oriented development in this area; the general plan should not preclude this opportunity due to the potential construction of a High-Speed Rail station in this location.

Consult With North County Transit District (NCTD) and Caltrans

SANDAG advises the project applicant to consult with NCTD, the transit service provider within the project area, and also with Caltrans to coordinate planned transit and/or highway improvements.

Additionally, when analyzing future (2030) traffic conditions, SANDAG recommends using the transportation network included in the RTP Reasonably Expected funding scenario.

Conclusion

We appreciate the opportunity to comment on the NOP for the Program EIR for a General Plan Update and Climate Action Plan and look forward to reviewing the draft EIR when it is released. We encourage the city, where appropriate, to evaluate the project 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.

If you have any questions or concerns regarding SANDAG's comments on this project, please contact me at (619) 699-1943 or sba@sandag.org.

Sincerely,

A handwritten signature in black ink that reads "Susan Baldwin". The signature is written in a cursive style with a long horizontal flourish at the end.

SUSAN BALDWIN
Senior Regional Planner

RSA/ama

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



July 27, 2010

Mr. Jay Petrek, AICP, Principal Planner

CITY OF ESCONDIDO PLANNING DIVISION

210 N. Broadway
Escondido, CA 92025



Re: SCH#2010071064; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "Escondido General Plan Update and Climate Action Plan, Case #PHG09-0020, PHG10-0016;" located in the City Escondido, San Diego County, California.

Dear Mr. Petrek:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources were not identified within the APE identified for the project. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 10.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq.*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

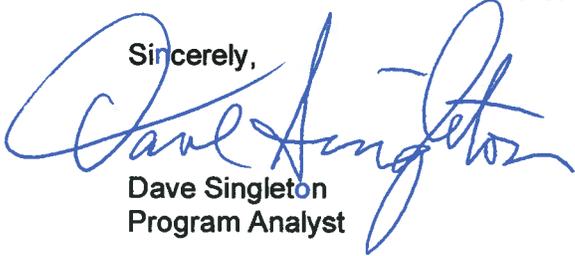
Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or

medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dave Singleton". The signature is stylized and cursive, written over the printed name and title.

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
San Diego County
July 29 2010

Pauma & Yuima
Christobal C. Devers, Chairperson
P.O. Box 369 Luiseno
Pauma Valley CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Pauma Valley Band of Luiseño Indians
Bennae Calac, Tribal Council Member
P.O. Box 369 Luiseno
Pauma Valley CA 92061
bennaecalac@aol.com
(760) 617-2872
(760) 742-3422 - FAX

Rincon Band of Mission Indians
Angela Veltrano, Rincon Culture Committee
P.O. Box 68 Luiseno
Valley Center, CA 92082
council@rincontribe.org
(760) 749-1051
(760) 749-8901 Fax

San Pasqual Band of Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 365 Luiseno
Valley Center, CA 92082 Diegueno
council@sanpasqualtribe.org
(760) 749-3200
(760) 749-3876 Fax

San Luis Rey Band of Mission Indians
Henry Contreras, Most Likely Descendant
1763 Chapulin Lane Luiseno
Fallbrook , CA 92028
(760) 728-6722 - Home
(760) 908-7625 - Cell

San Luis Rey Band of Mission Indians
Carmen Mojado, Co-Chair
1889 Sunset Drive Luiseno
Vista , CA 92081
cjmojado@slrmissionindians.org
(760) 724-8505
(760) 724-2172 - FAX
(760) 917-1736 - cell

San Luis Rey Band of Mission Indians
Russell Romo
12064 Old Pomerado Road Luiseno
Poway , CA 92064
(858) 748-1586

Kupa Cultural Center (Pala Band)
Shasta Gaughen, Assistant Director
35008 Pala-Temecula Rd.PMB Box Luiseno
Pala , CA 92059
cupa@palatribe.com
(760) 891-3590
(760) 742-4543 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010071064; CEQA Notice of Preparation (NOP) ; draft Environmental Impact Report (EIR) for Escondido General Plan Update and Climate Action Plan Case #PHG10-0016; located in the City of Escondido; San Diego County, California.

Native American Contacts
San Diego County
July 29 2010

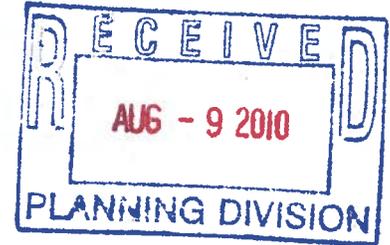
La Jolla Band of Mission Indians
ATTN: Rob Roy, Environmental Director
22000 Highway 76 Luiseno
Pauma Valley CA 92061
lajolla-sherry@aol.com and
(760) 742-3790
(760) 742-1704 Fax

Mel Vernon, Chairperson
San Luis Rey Band of Mission Indians
1044 North Ivy Street Luiseno
Escondido , CA 92026
melvern@aol.com
(760) 746-8692
(760) 703-1514 - cell

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010071064; CEQA Notice of Preparation (NOP) ; draft Environmental Impact Report (EIR) for Escondido General Plan Update and Climate Action Plan Case #PHG10-0016); located in the City of Escondido; San Diego County, California.



August 3, 2010

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

RE: Notice of Preparation for a Draft Environmental Impact Report for the City of Escondido's General Plan Update, SCH# 2010071064

Dear Mr. Petrek:

Thank you for the opportunity to comment on your Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the city's general plan update. In preparing the general plan and accompanying DEIR, the city should examine the sections of state planning law that involve potential hazards the city may face. For your information, I have underlined specific sections of state planning law where identification and analysis of hazards are discussed (see Attachment A).

Prior to the release of the draft general plan or within the DEIR, city staff or your consultants should examine each of the requirements in state planning law and determine if there are hazard issues within the community which the general plan should address. A table in the DEIR (or general plan) which identifies these specific issues and where they are addressed in the general plan would be helpful in demonstrating the city has complied with these requirements. If the DEIR determines that state planning law requirements have not been met, it should recommend that these issues be addressed in the general plan as a mitigation measure.

We note that state planning law includes a requirement for consultations with state agencies in regard to information related to hazards. Cal EMA would be happy to share all available information at our disposal to facilitate the city's ability to comply with state planning and environmental laws.

If you have any questions about these comments, please contact Andrew Rush at (916) 845-8269 or andrew.rush@calema.ca.gov.

Sincerely,

Dennis Castrillo
Environmental Officer

cc: State Clearinghouse

Attachment A
Hazards and State Planning Law Requirements

General Plan Consistency

65300.5. In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.

Seven Mandated Elements

65302. The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals.

The plan shall include the following elements:

(a) A land use element that designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land. The location and designation of the extent of the uses of the land for public and private uses shall consider the identification of land and natural resources pursuant to paragraph (3) of subdivision (d). The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan. The land use element shall identify and annually review those areas covered by the plan that are subject to flooding identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the Department of Water Resources. The land use element shall also do both of the following:

(1) Designate in a land use category that provides for timber production those parcels of real property zoned for timberland production pursuant to the California Timberland Productivity Act of 1982, Chapter 6.7 (commencing with Section 51100) of Part 1 of Division 1 of Title 5.

(2) Consider the impact of new growth on military readiness activities carried out on military bases, installations, and operating and training areas, when proposing zoning ordinances or designating land uses covered by the general plan for land, or other territory adjacent to military facilities, or underlying designated military aviation routes and airspace.

(A) In determining the impact of new growth on military readiness activities, information provided by military facilities shall be considered. Cities and counties shall address military impacts based on information from the military and other sources.

(B) The following definitions govern this paragraph:

(i) "Military readiness activities" mean all of the following:

(I) Training, support, and operations that prepare the men and women of the military for combat.

(II) Operation, maintenance, and security of any military installation.

(III) Testing of military equipment, vehicles, weapons, and sensors for proper operation or suitability for combat use.

(ii) "Military installation" means a base, camp, post, station, yard, center, homeport facility for any ship, or other activity under the jurisdiction of the United States Department of Defense as defined in paragraph (1) of subsection (e) of Section 2687 of Title 10 of the United States Code.

(b) A circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the plan.

(c) A housing element as provided in Article 10.6 (commencing with Section 65580).

(d) (1) A conservation element for the conservation, development, and utilization of natural resources including water and its hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The conservation element shall consider the effect of development within the jurisdiction, as described in the land use element, on natural resources located on public lands, including military installations. That portion of the conservation element including waters shall be developed in coordination with any countywide water agency and with all district and city agencies, including flood management, water conservation, or groundwater agencies that have developed, served, controlled, managed, or conserved water of any type for any purpose in the county or city for which the plan is prepared. Coordination shall include the discussion and evaluation of any water supply and demand information described in Section 65352.5, if that information has been submitted by the water agency to the city or county.

(2) The conservation element may also cover all of the following:

(A) The reclamation of land and waters.

(B) Prevention and control of the pollution of streams and other waters.

(C) Regulation of the use of land in stream channels and other areas required for the accomplishment of the conservation plan.

(D) Prevention, control, and correction of the erosion of soils, beaches, and shores.

(E) Protection of watersheds.

(F) The location, quantity and quality of the rock, sand and gravel resources.

(3) Upon the next revision of the housing element on or after January 1, 2009, the conservation element shall identify rivers, creeks, streams, flood corridors, riparian habitats, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management.

(e) An open-space element as provided in Article 10.5 (commencing with Section 65560).

(f) (1) A noise element which shall identify and appraise noise problems in the community. The noise element shall recognize the guidelines established by the Office of Noise Control in the State Department of Health Care Services and shall analyze and quantify, to the extent practicable, as determined by the legislative body, current and projected noise levels for all of the following sources:

(A) Highways and freeways.

(B) Primary arterials and major local streets.

(C) Passenger and freight on-line railroad operations and ground rapid transit systems.

(D) Commercial, general aviation, heliport, helistop, and military airport operations, aircraft overflights, jet engine test stands, and all other ground facilities and maintenance functions related to airport operation.

(E) Local industrial plants, including, but not limited to, railroad classification yards.

(F) Other ground stationary noise sources, including, but not limited to, military installations, identified by local agencies as contributing to the community noise environment.

(2) Noise contours shall be shown for all of these sources and stated in terms of community noise equivalent level (CNEL) or day-night average level (Ldn). The noise contours shall be prepared on the basis of noise monitoring or following generally accepted noise modeling techniques for the various sources identified in paragraphs (1) to (6), inclusive.

(3) The noise contours shall be used as a guide for establishing a pattern of land uses in the land use element that minimizes the exposure of community residents to excessive noise.

(4) The noise element shall include implementation measures and possible solutions that address existing and foreseeable noise problems, if any. The adopted noise element shall serve as a guideline for compliance with the state's noise insulation standards.

(g) (1) A safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction, and other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body; flooding; and wild land and urban fires. The safety element shall include mapping of known seismic and other geologic hazards. It shall also address evacuation routes, military installations, peakload water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards.

(2) The safety element, upon the next revision of the housing element on or after January 1, 2009, shall also do the following:

(A) Identify information regarding flood hazards, including, but not limited to, the following:

(i) Flood hazard zones. As used in this subdivision, "flood hazard zone" means an area subject to flooding that is delineated as either a special hazard area or an area of moderate or minimal hazard on an official flood insurance rate map issued by the Federal Emergency Management Agency. The identification of a flood hazard zone does not imply that areas outside the flood hazard zones or uses permitted within flood hazard zones will be free from flooding or flood damage.

(ii) National Flood Insurance Program maps published by FEMA.

(iii) Information about flood hazards that is available from the United States Army Corps of Engineers.

(iv) Designated floodway maps that are available from the Central Valley Flood Protection Board.

(v) Dam failure inundation maps prepared pursuant to Section 8589.5 that are available from the Office of Emergency Services.

(vi) Awareness Floodplain Mapping Program maps and 200-year flood plain maps that are or may be available from, or accepted by, the Department of Water Resources.

(vii) Maps of levee protection zones.

(viii) Areas subject to inundation in the event of the failure of project or nonproject levees or floodwalls.

(ix) Historical data on flooding, including locally prepared maps of areas that are subject to flooding, areas that are vulnerable to flooding after wildfires, and sites that have been repeatedly damaged by flooding.

(x) Existing and planned development in flood hazard zones, including structures, roads, utilities, and essential public facilities.

(xi) Local, state, and federal agencies with responsibility for flood protection, including special districts and local offices of emergency services.

(B) Establish a set of comprehensive goals, policies, and objectives based on the information identified pursuant to subparagraph (A), for the protection of the community from the unreasonable risks of flooding, including, but not limited to:

- (i) Avoiding or minimizing the risks of flooding to new development.
 - (ii) Evaluating whether new development should be located in flood hazard zones, and identifying construction methods or other methods to minimize damage if new development is located in flood hazard zones.
 - (iii) Maintaining the structural and operational integrity of essential public facilities during flooding.
 - (iv) Locating, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identifying construction methods or other methods to minimize damage if these facilities are located in flood hazard zones.
 - (v) Establishing cooperative working relationships among public agencies with responsibility for flood protection.
- (C) Establish a set of feasible implementation measures designed to carry out the goals, policies, and objectives established pursuant to subparagraph (B).
- (3) After the initial revision of the safety element pursuant to paragraph (2), upon each revision of the housing element, the planning agency shall review and, if necessary, revise the safety element to identify new information that was not available during the previous revision of the safety element.
- (4) Cities and counties that have flood plain management ordinances that have been approved by FEMA that substantially comply with this section, or have substantially equivalent provisions to this subdivision in their general plans, may use that information in the safety element to comply with this subdivision, and shall summarize and incorporate by reference into the safety element the other general plan provisions or the flood plain ordinance, specifically showing how each requirement of this subdivision has been met.
- (5) Prior to the periodic review of its general plan and prior to preparing or revising its safety element, each city and county shall consult the California Geological Survey of the Department of Conservation, the Central Valley Flood Protection Board, if the city or county is located within the boundaries of the Sacramento and San Joaquin Drainage District, as set forth in Section 8501 of the Water Code, and the Office of Emergency Services for the purpose of including information known by and available to the department, the office, and the board required by this subdivision.
- (6) To the extent that a county's safety element is sufficiently detailed and contains appropriate policies and programs for adoption by a city, a city may adopt that portion of the county's safety element that pertains to the city's planning area in satisfaction of the requirement imposed by this subdivision.

Consistency with Airport Land Use Plans

65302.3. (a) The general plan, and any applicable specific plan prepared pursuant to Article 8 (commencing with Section 65450), shall be consistent with the plan adopted or amended pursuant to Section 21675 of the Public Utilities Code.

Review of Safety Element

65302.5. (a) At least 45 days prior to adoption or amendment of the safety element, each county and city shall submit to the Division of Mines and Geology of the Department of Conservation

one copy of a draft of the safety element or amendment and any technical studies used for developing the safety element. The division may review drafts submitted to it to determine whether they incorporate known seismic and other geologic hazard information, and report its findings to the planning agency within 30 days of receipt of the draft of the safety element or amendment pursuant to this subdivision. The legislative body shall consider the division's findings prior to final adoption of the safety element or amendment unless the division's findings are not available within the above prescribed time limits or unless the division has indicated to the city or county that the division will not review the safety element. If the division's findings are not available within those prescribed time limits, the legislative body may take the division's findings into consideration at the time it considers future amendments to the safety element. Each county and city shall provide the division with a copy of its adopted safety element or amendments. The division may review adopted safety elements or amendments and report its findings. All findings made by the division shall be advisory to the planning agency and legislative body.

(1) The draft element of or draft amendment to the safety element of a county or a city's general plan shall be submitted to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county at least 90 days prior to either of the following:

(A) The adoption or amendment to the safety element of its general plan for each county that contains state responsibility areas.

(B) The adoption or amendment to the safety element of its general plan for each city or county that contains a very high fire hazard severity zone as defined pursuant to subdivision (b) of Section 51177.

(2) A county that contains state responsibility areas and a city or county that contains a very high fire hazard severity zone as defined pursuant to subdivision (b) of Section 51177, shall submit for review the safety element of its general plan to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county in accordance with the following dates as specified, unless the local government submitted the element within five years prior to that date:

(A) Local governments within the regional jurisdiction of the San Diego Association of Governments: December 31, 2010.

(B) Local governments within the regional jurisdiction of the Southern California Association of Governments: December 31, 2011.

(C) Local governments within the regional jurisdiction of the Association of Bay Area Governments: December 31, 2012.

(D) Local governments within the regional jurisdiction of the Council of Fresno County Governments, the Kern County Council of Governments, and the Sacramento Area Council of Governments: June 30, 2013.

(E) Local governments within the regional jurisdiction of the Association of Monterey Bay Area Governments: December 31, 2014.

(F) All other local governments: December 31, 2015.

(3) The State Board of Forestry and Fire Protection shall, and a local agency may, review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element. The State Board of Forestry and Fire Protection and local agency shall review the draft or existing safety element and may

offer written recommendations for changes to the draft or existing safety element regarding both of the following:

(A) Uses of land and policies in state responsibility areas and very high fire hazard severity zones that will protect life, property, and natural resources from unreasonable risks associated with wildland fires.

(B) Methods and strategies for wildland fire risk reduction and prevention within state responsibility areas and very high hazard severity zones.

(b) Prior to the adoption of its draft element or draft amendment, the board of supervisors of the county or the city council of a city shall consider the recommendations made by the State Board of Forestry and Fire Protection and any local agency that provides fire protection to territory in the city or county. If the board of supervisors or city council determines not to accept all or some of the recommendations, if any, made by the State Board of Forestry and Fire Protection or local agency, the board of supervisors or city council shall communicate in writing to the State Board of Forestry and Fire Protection or to the local agency, its reasons for not accepting the recommendations.

Open Space Plans

65560. (a) "Local open-space plan" is the open-space element of a county or city general plan adopted by the board or council, either as the local open-space plan or as the interim local open-space plan adopted pursuant to Section 65563.

(b) "Open-space land" is any parcel or area of land or water that is essentially unimproved and devoted to an open-space use as defined in this section, and that is designated on a local, regional or state open-space plan as any of the following:

(1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.

(2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.

(3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.

(4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.



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:

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:

- 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).

- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - 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.
 - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - 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).
- 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.
- 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.

- 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.
- 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.
- 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.
- 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.
- 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 www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

Mr. Jay Petrek
August 16, 2010
Page 4

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Al Shami', with a long horizontal flourish extending to the right.

Al Shami
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
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
ADelacr1@dtsc.ca.gov

CEQA # 2988

August 16, 2010

To:

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

From:

Danny Martinez, Supervising Environmental Health Specialist
Site Assessment and Mitigation Program
Department of Environmental Health

SUBJECT CASE NUMBERS PHG 09-0020 & PHG10-0016

The Site assessment and Mitigation Program has reviewed the project referenced above. There are currently no issues that involve the Site Assessment and Mitigation Programs at this time, thus, we have no comments on the subject case.

Should you require additional information, please contact danny.martinez@sdcounty.ca.gov
Or (619)338-2456



Danny Martinez
2010.08.16
10:37:47 -07'00'



San Diego County Archaeological Society, Inc.

Environmental Review Committee

7 August 2010



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

Subject: Notice of Preparation of a Draft Program Environmental Impact Report
General Plan Update and Climate Action Plan
City Case Numbers PHG 09-0020, PHG 10-0016

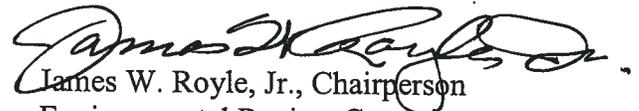
Dear Mr. Petrek:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DPEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DPEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,


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

cc: SDCAS President
File

Jay Petrek - Notice of Preparation of a Program EIR....

From: "Sedghi, Maryam" <Maryam.Sedghi@sdcounty.ca.gov>
To: <jpetrek@escondido.org>
Date: 8/26/2010 10:07 AM
Subject: Notice of Preparation of a Program EIR....
CC: "Vizzier, Michael" <Michael.Vizzier@sdcounty.ca.gov>

Good morning Mr. Petrek,

A couple of weeks back, I received a copy of above mentioned Notice. I work for the County of San Diego Department of Environmental Health, Hazardous Materials Division (HMD). HMD is the Certified Unified Program Agency (CUPA) for San Diego County responsible for regulating hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, aboveground petroleum storage and risk management plans. HMD is also responsible for regulating medical waste. I reviewed the General plan Update report and it appears that all designated areas (EL-1 through EL-10 with the exception of EL -8 and SG-3 through SG-7 & SG-1) propose commercial office mixed use, medical offices, retail, and research & Development type facilities. Permitting of such facilities requires a review by our division to ensure compliance with all required laws and regulations. I'm the supervisor for the Escondido area and would be happy to provide comments on any projects that involve any of the CUPA elements. Below is a link for more information related to our division and the types of inspections we do.
http://www.sdcounty.ca.gov/deh/hazmat/hazmat_permits.html

Please do not hesitate to contact me for any questions.

Thank you,

Maryam Sedghi, R.E.H.S.

Supervising Environmental Health Specialist

San Diego County, DEH

Hazardous Materials Division

Tel: (760) 940-2858

Fax: (760) 940-2853

Maryam.Sedghi@sdcounty.ca.gov

Jay Petrek - Reponses for your 07/22/2010 EIR

From: "Samuel Lee" <Samuel.Lee@ferc.gov>
To: <jpetrek@escondido.org>
Date: 8/24/2010 3:12 PM
Subject: Reponses for your 07/22/2010 EIR

RE: NOTICE OF PREPARATION OF A PROGRAM ENVIROMENTAL IMPACT PEPORT FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN, CityCase Numbers: PHG 09-0020, PHG 10-0016

Jay,

I would like to response to your request EIR under COR T14 S15082, 15103, 15375.

For your "Lake Wohlford Dam" and "Escondido Canal" projects (FERC Project Nos. 176-01-01 and 176-02-01) with Emergency Action Plans (EAP), listing Mr. Lee as the primary contact and Mr. Gerard Maloney as the secondary contact. The office and home phone numbers are as follows:

Wing Lee, Deputy Regional Engineer

Office: (415) 369-3390

Home: (510) 799-0355

Gerard Maloney, Supervisor, Dam Safety Engineering

Office: (415) 3693399

Home: (510) 5251557

Comment:

Please include "Lake Wohlford Dam" and "Escondido Canal" projects to your flood plan, if those project's flood studies are not included. If you want to discuss more about this issue, we can meet after 26th of August EAP Exercise meeting as following:

The Exercise will be held at the City's new Emergency Operations Center (EOC).

Escondido Police and Fire Headquarters

1163 N. Centre City Parkway

Escondido, CA 92026

3RD Floor, Fire Administration

Sign-in at 9:00 AM Thursday August 26, 2010.

Pre-exercise briefing will begin at 9:00 AM. There is no admittance to the building prior to 8:00 AM. Actual exercise will commence sometime between 9:30 and 10:00 and conclude prior to noon.

Best regards,

Sam

Samuel S. Lee, Ph.D.
Civil Engineer, SFRO
Federal Energy Regulatory Commission
901 Market Street, Suite 350
San Francisco, CA 94103
1-415-369-3393
Samuel.Lee@ferc.gov

* Attention all licensees & exemptees: Please send all correspondence to the Regional Engineer.

** CONFIDENTIALITY NOTICE

This email and any attached files are confidential and may be legally privileged. If you have received these in error you must not use, disclose, distribute, copy or retain this email. Please notify us immediately by return mail and then delete all email.



Attn: Barbara Redlitz
City of Escondido
Planning Division
201 N. Broadway
Escondido, CA 92025

Escondido Planning Division,

I am concerned about the general plan in my area at 2625 Ginger Wy, Esc., Ca 92029, (technically Escondido county area). This is our first home, we are only in our 30's, & were really looking forward to retiring at this location. We are opposed to rezoning the properties on Ginger Wy. & Ross Dr. to medical use only. There are plenty of vacant industrial buildings & open space in the area to suffice the needs for medical buildings in this area.

Where does the city plan on getting water for these new developments? I thought we were in water shortage, so wouldn't it be prudent to just maintain the existing areas rather than destroy habitat to build more buildings & plant non-native plants that take more water?

Will I even get to vote on this general plan in 2012 since I am a county resident? Or will Escondido citizens get to decide on our fate/future?

How is Escondido City planning on bringing businesses in? The state of California has been driving out businesses with high taxes, etc. & it seems most businesses are leaving the state of California. Why does the city need my property, when there is plenty of vacant property & vacant commercial buildings in my area?

Holly & Chad Fisher
2625 Ginger Wy
Escondido, CA 92029
(848) 449-3660

Jay Petrek - Re: General Plan

From: Jay Petrek
To: hfsurf@cox.net
Date: 9/7/2010 4:32 PM
Subject: Re: General Plan
CC: Barbara Redlitz

Hello Chad and Holly-

Thanks for your e-mail. Your message included several questions so I've tried to answer them individually. If you need further information feel free to contact me at (760) 839-4556.

1) When people vote in 2012 on this general plan, will I be able to vote on this or is it only Escondido City citizens? Are they going to be the ones to decide our fate/future or will I get a vote?

The area your property is within lies both in the County of San Diego's and City of Escondido's General Plans. Jurisdictions have the responsibility to plan for areas within their General Plans based on the goals and vision of their respective agency. There are instances where the County's vision and General Plan designation for an area is not the same as the city in which that same property exists. Areas in the unincorporated county immediately adjacent to the new Palomar Hospital (including your property) have been identified for studying as potential medical and professional uses based on their proximity to the hospital and other employment land uses to the north, east and west. Results of that study (potential traffic, noise, land use impacts) may result in the City abandoning those efforts, or they may result in identifying the area for a General Plan Amendment. The City Council would ultimately decide whether to place the Amendment on the ballot for voter consideration.

When jurisdictions prepare General Plans that also require voter approval (as in the case of Escondido) typically only residents within that jurisdiction vote on the plan; which would mean that City residents would vote on the City's General Plan. However, that doesn't leave you without the opportunity to voice your opinion or concern. You have the ability to comment on the Environmental Impact Report (EIR), General Plan, and on the amendment process.

2) What happens if I have to annex to the city? Will it cost me money? Will I be able to keep my chickens? Currently, if you initiate a request to annex to the city you would be responsible for paying application fees. The City has directed staff to amend existing General Plan annexation policies to consider waiving annexation fees for properties that meet certain objectives (i.e. provide an opportunity for employment, etc.). If you are part of a larger annexation (for instance, the 40+ acre vacant site near you initiates annexation) and it is determined that including your property would establish a more logical annexation boundary what usually happens is that smaller property owners demand that the larger property owners pay all annexation (and potentially other fees, such as utility connection) as part of agreeing to annex. In that scenario you would not pay any fees.

Any livestock that is permitted in the County is permitted in the City. You simply need to let the City know when you annex what animals you have and those animals would be "grandfathered" in if they are not already permitted by our city zoning ordinances. You should be aware that if your area is ultimately recommended for a General Plan Amendment, we are proposing language that would address the long-term transition of residential uses to allow the continued enjoyment of residential properties until owners feel its in their best interest to consider redeveloping their property.

3) Where is the city going to get the water for all this new development? I thought we were in water shortage, so wouldn't it be prudent to just maintain the existing areas rather than destroy habitat to build more buildings & plant non-native plants that take more water?

The City is preparing a water master plan and the General Plan EIR will assess water needs and usage as part of the process. Provisions in new legislation and local ordinances call for drought tolerant vegetation with native and/or California-friendly plant material that use less water than non-native exotics.

4) How is Escondido City planning on bringing businesses in? The state of California has been driving out businesses with high taxes, etc, & it seems most businesses are leaving the state of California. Why does the city need my property, when there is plenty of vacant property & vacant commercial buildings in my area? Programs for attracting business to the City are on-going through a variety of means including direct contact, Chamber of Commerce partnerships, incentive programs for targeted businesses. While the current economic situation has stymied employment and business opportunities, the General Plan is intended to look far out into the future to give guidance on where growth and development should occur in the next 25-30 years.

I agree there appears to be plenty of vacant property and vacant commercial buildings in your area today. However, that may not hold true in the coming years. Because your area is immediately adjacent to the largest medical facility in North County, within a half mile of an existing light rail transit station, a state highway interchange, and surrounded on three sides by existing medical, office and industrial uses the Citizen's Committee appointed by the City Council felt that your area was worth studying as potential employment land.

Hopefully I've answered your questions, but do call me or e-mail if you have additional inquiries or would like to discuss. My direct office number is (760) 839-4556.

Respectfully,
Jay Petrek

>>> <hfsurf@cox.net> 9/3/2010 10:45 AM >>>

Jay,

I am concerned about the general plan in my area at 2625 ginger wy, esc, ca 92029. When people vote in 2012 on this general plan, will I be able to vote on this or is it only Escondido City citizens? Are they going to be the ones to decide our fate/future or will I get a vote?

What happens if I have to annex to the city? Will it cost me money? Will I be able to keep my chickens?

Where is the city going to get the water for all this new development? i thought we were in water shortage, so wouldn't it be prudent to just maintain the existing areas rather than destroy habitat to build more buildings & plant non-native plants that take more water?

How is Escondido City planning on bringing businesses in? The state of California has been driving out businesses with high taxes, etc, & it seems most businesses are leaving the state of California. Why does the city need my property, when there is plenty of vacant property & vacant commercial buildings in my area?

Concerned citizen,

Chad & Holly Fisher

Jay Petrek - General Plan Update Stud Area EL-7

From: "David R. Shibley" <Shibley1@cox.net>
To: "Jay Petrek" <Jpetrek@ci.escondido.ca.us>
Date: 9/8/2010 4:49 PM
Subject: General Plan Update Stud Area EL-7

Jay: After attending the General Plan Update I would like to request that Study Area EL-7 be expanded along Gamble/Citracado so that it extends all the way from the east and west sides of I-15 at Citracado/Gamble to Centre City Parkway. Specifically and additionally I would like to encourage coordination with the North County Transit District to provide for bus transportation that would allow the currently designated Community Centers at North County Fair, Center City and Felicita and Citracado/Centre City Parkway to be moved from the SANDAG "Potential" category to the "Planned/Existing" category which places the City in a stronger category of financial assistance for SANDAG Smart Growth funds. I would specifically like staff to consider recommending to the Counsel that a designation of "Mixed Use Transit Corridor" and/or employment lands be assigned to Citracado from the existing SANDAG Smart Growth Village at Citracado and Center City Parkway west along the North and South sides of Citracado to the east and west sides of I-15 at the I-15 intersection with Citracado/Gamble and Felicita. I would then also request that the intersection at I-15 be designated a Smart Growth Community Center and that the Mixed Use Transit Employment Land Corridor then connects the two Centers. My reasons are as follows: When Centre City is congested at morning peak commute hours to South I-15, then Citracado from Center City to the on South ramp at I-15 has become a major shortcut and easier way to get on I-15 than the alternative of proceeding directly south on Center City. Several dangerous intersections are on that short stretch of residential from Center City to the eastern edge of the City proposed Study Area EL-7 and the grade is steep with visibility limitations as you crest the grades with four way and two way stop signs. Rezoning to mixed use and/or employment lands on the north and south sides of that short stretch and at the community centers could possibly warrant some smart growth funding for the road widening of Citracado as future projects are constructed. The re-designation would provide economic encouragement to those residential lots redesignated to mixed use or employment land to relocate when development occurs thus perhaps obviating any condemnation concerns. It could take 10 to 15 years to achieve this and by then some of those older homes along that short stretch would be even older and more amenable to relocation, particularly when accompanied with an up-zoned designation that increases the value of the underlying land.

When the new hospital and the new high school on Citracado are completed the City will need a direct connection from I-15 west across Del Dios to the hospital to take traffic off the I-15 intersections at Via Rancho Parkway, Ninth Ave, Valley Parkway, Route 78 and the intersection of Nordahl and Route 78. The City currently has only three east-west major connections within the city limits; one at Route 78, one at Valley Parkway and one at Ninth Ave. You have no east-west connection in the mid south area with the exception of Via Rancho which is the far south and the majority of that is in the unincorporated area. Citracado is the only direct I-15 connection into the hospital and when the hospital opens in 2012 and the new school in 2014 the City will be in dire need of a direct connection.

David R. Shibley
1923 Bedford Place
Escondido, California 92029
Ph: (760) 737-9007 Fax: (760) 737-9789
Shibley1@cox.net

Jay Petrek - Re: General Plan Update NOP

From: Mark Rodriguez <marknrodriguez@cox.net>
To: Jay Petrek <jpetrek@ci.escondido.ca.us>, Barbara Redlitz <Bredlitz@ci.escondido.ca.us>
Date: 9/3/2010 9:45 AM
Subject: Re: General Plan Update NOP
CC: City Council <CityCouncil@escondido.org>

Jay,

The CECs monitoring and compliance will be in addition to the new tougher standards for wastewater discharge and will continue to cost us more. When Sam Abed simply indicates the city can't afford such upgrades then perhaps giving away millions to developers is a major problem.

Mark

http://www.nctimes.com/news/local/sdcounty/article_ad2b4822-1a3b-5931-8def-59b2552606c9.html

On Aug 12, 2010, at 8:29 AM, Jay Petrek wrote:

Mark-

Thank you for your comments. Do you happen to have the electronic link to the PDF report that you could e-mail me? The document size is too large for me to open as an e-mail PDF, but I should be able to access it from the internet. Let me know. Thanks again.

Jay

>>> Mark Rodriguez <marknrodriguez@cox.net> 8/11/2010 6:22 PM >>>

8/11/10

Notice of Preparation of a Program Environmental Impact Report
 General Plan Update and Climate Action Plan
 City Case Numbers: PHG 09-0020, PHG 10-0016

Environmental Effects:

Constituents of emerging concern in recycled water is a statewide concern being looked at by the State Water Board/State Department of Public Health. A draft report from the "science advisory panel" recommend what Chemicals of Emerging Concern (CECs) in recycled water should be monitored. All recycled water permits, including Escondido's will be required to monitor CECs. Considering the General Plan update with development areas and their planned development strategies as a biotech hub should also include the ERTC and PPH West. The impact already felt from supplying recycled water to the Palomar Energy Center will also be greatly impacted in both water and air quality to the region.

<http://www.signonsandiego.com/news/2010/may/22/role-in-biotech-suggested-for-city/>

The cumulative impacts have never been taken into consideration during the multiple power generating facilities or the new Palomar West modification to its Specific Plan. The General Plan build-out will need to include the options being considered and the discharges expected from

those projects.

Attached a copy of the Monitoring Strategies for Chemical of Emerging Concern (CEC) will impact monitoring and reporting requirements for tentative Order No. R9-2010-0032 and R9-2005-0101.

<CA_CEC_RW_Draft_Report_2010Apr15.pdf>

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

August 30, 2010

RE: NOTICE OF PREPARATION OF A PROGRAM EIR FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN. City Case #: PHG 09-0020, PHG 10-0016

Thank you for the opportunity to comment on this NOP for the program EIR for the City's General Plan Update and Climate Action Plan. Eden Valley is not apparently represented by any other Town Council or Planning Boards, but has a 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.

In particular we have comments on General Plan Amendment Study Area EL-5 (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 EL-5, which does NOT lie within the City Limits, and is currently zoned Rural and Agricultural in nature.

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 single-family 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 2-lane, tree-lined residential street with commercial weight limits and is designated as a traffic calming area. The roadside is often used as a multi-use 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 non-agricultural 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.

We ask that the Escondido General Plan Update and EIR remove any County land within the area of EL-5 from the planning area.

Furthermore, since most of the EL-5 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 EL-5. 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.

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 family-owned organic farms.

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.

Janean Huston (and neighbors)
1023 County Club Drive, Escondido, CA 92029

cc: Supervisor Bill Horn and all San Diego Board of Supervisors
San Dieguito Planning Group
Elfin Forest/Harmony Grove Town Council
Devon Muto, County of San Diego DPLU
LAFCO
Residents of the Eden Valley Bugle

Jay Petrek - Comments on the NOP for the GP update and EIR

From: William Morgan <bm2c.morgan@att.net>
To: <jpetrek@escondido.org>
Date: 8/23/2010 8:26 AM
Subject: Comments on the NOP for the GP update and EIR

Hello Mr. Petrek,

My wife and I are residents of the City of Escondido and reside in Eden Valley. We have read the NOP and are concerned about the plans for the area defined in the NOP as EL-5, as well as EL-6. I would like to explore the venues we have available to voice our concerns. Are you the point of contact for comments on the city's plans? What is the best method for doing this, email? Are there any public meetings planned in the future to discuss the plans?

Thank You,

Bill and Marilyn Morgan

Jay Petrek - Fwd: General Plan Update Public Workshops

From: Jay Petrek
To: bm2c.morgan@att.net
Date: 8/23/2010 8:57 AM
Subject: Fwd: General Plan Update Public Workshops

Mr. and Mrs. Morgan-

Thanks for your message. Following is an e-mail that was sent out to individuals who have asked to be included in future notifications of the General Plan. I've added you to that e-mail list so you will receive future notices as well. There are workshops coming up in August and September on the General Plan that are open to the public. You may submit correspondence in electronic and/or hard/copy written form that we will include in the EIR. If you have questions feel free to e-mail or call me at 760-839-4626.

Regards,
Jay Petrek

>>> Jay Petrek 8/12/2010 11:59 AM >>>

Greetings-

Following are updates on the City's General Plan efforts:

The Escondido Planning Division has scheduled two public workshops to discuss the City's General Plan update and inform the public about potential land use and policy changes. Details of the workshop are:

Workshop Dates: Monday, August 30, 2010 and Wednesday, September 15, 2010

Workshop Location: Salons 3-5, California Center for the Art, Escondido

Workshop Address: 340 N. Escondido Boulevard, Escondido, CA 92025

Workshop Time: 6:00 p.m. - 8:30 p.m.

A City Council appointed Citizen's Committee has been working with staff and identified 15 areas in the community that are recommended for study as part of the General Plan update. This information will be included in the General Plan Environmental Impact Report (EIR), which is anticipated to be completed in 2011. Final approval of land use changes will require future public hearings and voter approval, which is slated for the November 2012 election.

Maps of the 15 study areas may be accessed on-line at: <http://www.ci.escondido.ca.us/gp-update/General-Plan-Amendment-Area-Exhibits.pdf>

The City mailed over 16,500 public workshop notices via the U.S. Postal Service to residents and property owners within the 15 study areas, as well as properties within 500 feet of study areas informing affected property owners/residents of the upcoming workshops and inviting them to attend. An electronic version of the workshop notice is on-line at:

<http://www.ci.escondido.ca.us/gp-update/PublicWorkshopNotice.pdf>

A press release has been given to the local news media regarding the workshops. An electronic version of the press release is on-line at: <http://www.ci.escondido.ca.us/gp-update/WorkshopNewsReleaseAugSept.pdf>. Also, a one-eighth page display ad will be printed in the North County Times on August 19, 2010 announcing the workshops and inviting the public to attend.

A new General Plan "hotline" phone number has been established (760) 839-4626 for community members to call if they have questions on the General Plan.

Regards,
Jay Petrek



City of Escondido General Plan Update

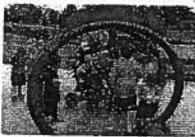
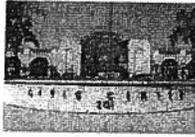
NOTICE OF PREPARATION

FILED
David Butler, Recorder/County Clerk

JUL 27 2010

BY V. Esquivel
DEPUTY

Date: July 22, 2010



(California Code of regulations, Title 14 (CEQA Guidelines) Sections 15082, 15103, 15375)

To: **State Agencies**
Responsible Agencies
Local and Public Agencies
Trustee Agencies
Interested Parties

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

Subject: NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR A GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN
City Case Numbers: PHG 09-0020, PHG 10-0016

The City of Escondido will be the Lead Agency for the preparation of a Program Environmental Impact Report (EIR) for the City of Escondido 2050 General Plan Update and Climate Action Plan (proposed project). We need to know the views of your agency (and the views of other interested parties) as to the scope and content of the environmental information germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approvals associated with the proposed project.

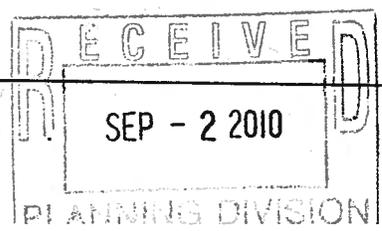
The proposed description, location, alternatives, and the scope of the environmental assessment are contained in the attached materials. Since an EIR will be prepared the City is not required to complete an initial study. To assist agencies and the public in understanding what will be covered in the EIR, the attached materials contain the typical information covered by an initial study checklist as specified in Appendix G of the California Environmental Quality Act Guidelines.

Due to the time limits mandated by State Law, your response must be sent at the earliest possible date, but not received later than 5:00 p.m. August 30, 2010.

Please send you response to Jay Petrek, Principal Planner, City of Escondido Planning Division, at the address shown above. We will need the name for a contact person in your agency. Written comments may also be submitted via e-mail to jpetrek@escondido.org. Additional information about the proposed project may be obtained on the city's General Plan Update website at: <http://www.ci.escondido.ca.us/gp-update/index.html>

Project Title: City of Escondido General Plan Update & Climate Action Plan
Project Applicant: City of Escondido, Planning Division
Project Location: City of Escondido and surrounding Planning Area, San Diego County, California

Signature: 
Jay Petrek, Principal Planner
City of Escondido Planning Division
(760) 839-4556



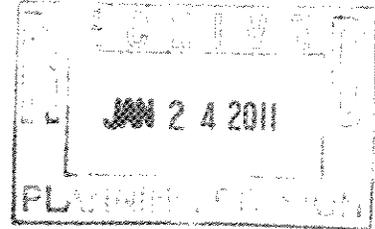
Date: 7/22/10

Other Comment Letters Received

1. Patricia Borchmann, January 22, 2011
2. Maria Quiroz, July 7, 2011
3. San Diego County Regional Airport Authority, March 22, 2010
4. The Escondido Chamber of Citizens, June 8, 2011
5. Governor's Office of Planning and Research, June 15, 2011

January 22, 2011

Patricia Borchmann
1141 Carrotwood Glen
Escondido, CA 92026



Barbara Redlitz
Community Development Director
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: General Plan Update – Policy Development for Nonconforming Uses

Dear Ms. Redlitz,

At a recent public hearing (PHG 20-0014) for expansion (up to 50% processing volume) for an asphalt processing facility, the City Council's approval action signaled an explicit intent to allow unlimited expansion of uses which would likely become nonconforming in a 296 acre study area designated EL-3.

As you know, the EL study area is being evaluated for a change to Planned Industrial and/or a Specific Planning area for its potential capacity as employment lands that could include commercial office, professional services, R&D, or a regional attraction with ancillary uses. The Staff Report reflected that if this change were ultimately incorporated into the General Plan and includes this property, it is likely the existing uses would become legal nonconforming.

At that meeting, the Mayor provided staff direction to proceed with the General Plan update in a manner which would not treat this, or other properties in the EL-3 study area as legal nonconforming, but what does this mean? In the absence of more explicit clarifying language, it appears the intent was to develop policy for implementation which essentially "pretends" that use of this property, and others in the EL-3 study area are not legal nonconforming, or that limits which usually apply to such a definition would not be applied (limits to expansion, or conversion to conforming uses after abandonment).

I imagine that staff will respond by preparing policy language for implementation reflecting Council's action, and would present that to a General Plan subcommittee for initial review – is that an accurate assumption? If so, since the General Plan policy language for implementation is still unfinalized, or is in a development phase, I wanted to see if it may be possible to take certain ideas into consideration, which reflect how other local agencies in the region are approaching similar issues. I thought this may be a helpful tool to advance staff's effort to respond to Council's direction by understanding how other agencies propose to deal with nonconforming uses in their communities, if this approach had not already been undertaken. This approach would be consistent with language already developed in the draft General Plan update portion which has been prepared for the Economic Prosperity Element, under Economic Policy N1.2, as a sort of a benchmarking tool.

TRANSMITTED TO CONSULTANT
ON 7/7/11

I expect that other local agencies also undergoing General Plan updates also confront issues which require the delicate balance to promote and preserve the business communities' efforts to operate in a manner to maximize profit margins, make continued contributions to the local economy, while at the same time recognizing there are visions and goals which reflect opportunities for changes which could upgrade an area, in terms of appearance and operating characteristics which are often controlled by land use. It is well understood that Council's direction reflects an interest to minimize the impact of uncertainty or anxiety for affected business owners so there would be no surprises, or creation of any new or major bureaucratic barriers or obstacles confronting owners who may wish to expand operations. However I think that Council's direction to staff was extremely vague, excessively lenient, and may have been a reflexive response to promote a particular popular business owner, but I don't think was based on a carefully thought-out analysis.

A recent article (North County Times 01-05-11, B-1) indicated that in San Marcos, property owners affected by zoning changes caused by the San Marcos General Plan update will have greater leeway to expand their buildings under a revised code section. Proposed code updates aim to give owners of property deemed nonconforming the ability to build 5% more floor space with permission of Planning Director, and expand by up to 15% with a minor conditional use permit (subsequently increased to 20%).

I think it's important to understand how other agencies also undertaking General Plan updates propose to handle zoning issues pertaining to nonconforming uses, and use this information as a benchmark, as staff prepares policy for General Plan implementation in Escondido. If it has not done so already, perhaps staff can survey how other cities in the greater San Diego region are all proposing to implement policy for nonconforming uses, so whatever policy is ultimately developed for Escondido will not such be a radical exception, or departure from the method applied in other local communities, that an excessively lenient policy in Escondido could become an open door for totally unregulated industrial users.

As a starting point, I think the information about how San Marcos proposes to apply limits to allow 5% expansions administratively, and up to 20% through a minor conditional use permit suggests that the recent policy direction provided by Escondido City Council (for zero limits) is overly permissive, and is inconsistent with policy developed by another local agency immediately adjacent to Escondido, which is also trying to advance it's image, and upgrade expectations in a local economy competing for desirable businesses and users to locate in their community. I feel that Council's recent support for zero limits on nonconforming uses could lead to an undesirable and perhaps unintended outcome, which could actually reduce Escondido's competitive advantage in attracting the type of desirable users anticipated in the EL-3 land use category, especially in an important city entry location which is highly visible to citizens, and visitors alike in our community.

While an approach for suggested expanded analysis may be a departure from Council's specific direction on December 15, 2010, I think it is a reasonable approach to take, and it

would enable staff to develop a comparative analysis, and prepare perhaps a series of policy alternatives to present to a General Plan subcommittee before specific policy language is finalized, through what may become a more incremental approach. I think it's important to proceed carefully by undertaking a broader analysis to compare how policy in Escondido would compare or contrast with other cities in greater San Diego, so Council's action on the ultimate General Plan update would be based on an informed choice. This would avoid a potential consequence where Escondido inadvertently becomes the "Tijuana" of the San Diego region, or the extreme heavy industrial users' dream location with zero controls or limits.

I think City Council members may actually appreciate an expanded staff effort to develop policy based on an expanded comparative perspective, for nonconforming uses in General Plan implementation, than advancing further on a final policy without it, because I expect they would support a preference to act based on a self-aware insight, than without it. Perhaps it would be appropriate to at least present this proposal to the General Plan Subcommittee for response, and authority, as part of an expanded incremental approach. I think the absence of controls on nonconforming uses as specifically expressed by City Council so far would conflict with Economic Prosperity Policy II.3 and II.4, and should be evaluated further.

While I appreciate City Council's interest in achieving cost reductions by minimizing unnecessary expenditures of staff resources or time, I feel the Council would not be supportive of an effort to act on any final policy without having such insight or self-awareness, which may only come from undertaking an expanded comparative analysis.

I appreciate the opportunity to present comments for consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Pat Borchmann', with a long horizontal flourish extending to the right.

Patricia Borchmann

From the desk of Maria Quiroz

In order to build the hospital impact fees were paid. The vast majority of this money is going to existing traffic problems. Caltrans has the Nordahl bridge crossing over State 78 as an "F" rating.

My concern is how the impact fees will be used to offset the additional traffic generated by the new hospital and not the existing traffic problems which is a Caltrans problem, not ours. What is critical is the traffic confusion caused by the emergency vehicles rushing to the new hospital continuously.

In 2009, over 15,000 red light ambulance trips to the emergency room at Palomar Medical Center. Average over 40 trips per day or over three (3) responses per hour, but higher during commute times.

If the emergency vehicle traffic issue is not dealt with, then the hospital is blamed for choosing this location, even though this was all that was available at the time, to meet the seismic requirements.

In all likelihood, if the traffic confusion caused by emergency vehicles is not addressed then the new bridge, after the hospital impact fees have been spent on the bridge, will be rated an "F" by Caltrans.

As the hospital is involved with the planning for the new Nordahl bridge, we could add fire lanes on the sides of the off ramps, as well as, a fire lane on the westside of the new bridge. The plans for the new Nordahl bridge have a ten foot (10') shoulder on the westside that is not yet use dedicated.

What is really important is the widening of the bridge and the off ramps, not the raising of the bridge.

Enclosed find a series of the plans for the Nordahl bridge imposed over the existing improvements.

TRANSMITTED TO CONSULTANT
ON 7/7/11

PALOMAR MEDICAL CENTER

ADVANCED LIFE SUPPORT

(ALS)

January thru December 2009

Total Arrival = 14,932

BASIC LIFE SUPPORT

(BLS)

January thru December 2009

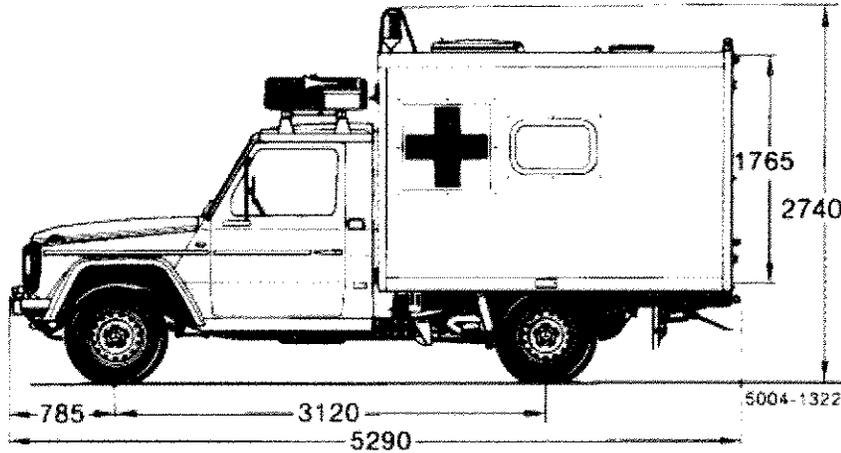
Total Arrivals = 2,467

Hannah, Franny and Luke's homepage

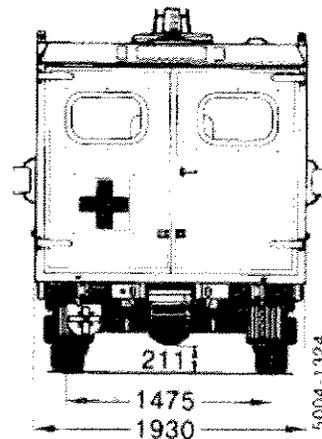
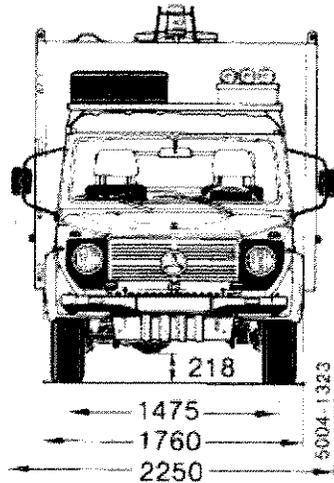
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across
8' wide*

Home > photo album > UNProfor > Convoys > Ambulance

The dimensions of the ambulance



Afb. 1-32
Zijaanzicht



Note: dimensions in [mm] !

For the non-metrics: 1 [inch] = 25.4 [mm]. Do the math !

Add new comment 6346 reads thumbnail 800x800 original

Ambulance

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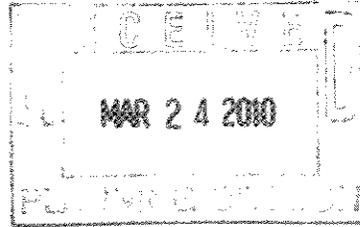
SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

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

Jay

March 22, 2010

Ms. Barbara Redlitz, AICP
City of Escondido
201 North Broadway
Escondido, CA 92025



Dear Ms. Redlitz:

This letter provides an update to my previous letter dated February 10, 2010. On March 4, 2010, the Airport Land Use Commission (ALUC) adopted an amendment to the Airport Land Use Compatibility Plan (ALUCP) for McClellan-Palomar Airport (McClellan-Palomar) that was previously adopted on January 25, 2010. Copies of both ALUCPs are available on the San Diego County Regional Airport Authority's website:

http://www.san.org/sdcraa/airport_initiatives/land_use/adopted_docs.aspx.

The San Diego County Airport Authority (Airport Authority) is tasked as the Airport Land Use Commission (ALUC) for San Diego County. In this capacity, the Airport Authority is responsible for the adoption and amendment of the Airport Land Use Compatibility Plans (ALUCPs) for the county's 16 public-use and military airports. ALUCPs serve to protect the safety of people, property, and aircraft on the ground and in the air, and protect airports from encroachment by new incompatible land uses that could affect their operations. ALUCPs do not address any existing uses, aviation-related development on airport property or airport operations.

State law requires that each local agency having jurisdiction over land uses within an Airport Influence Area (AIA) either, 1) modify its general plan, zoning ordinance, or other applicable land use regulation(s) to be consistent with the ALUCP, or 2) overrule all or part of the ALUCP within 180 days, provided that the local agency complies with certain statutory notice and findings requirements (Pub. Util. Code §21676.) If a local agency fails to take either action, the agency is required to submit all land use development actions involving property within the AIA to the ALUC for consistency review. Your agency is located within the AIA of McClellan-Palomar; therefore it is required to implement or overrule the McClellan-Palomar ALUCP. It is important to note that projects deemed complete per the Government Code on or after January 25, 2010 are subject to that ALUCP and projects deemed complete on or after March 4, 2010 are subject to the amended ALUCP.

State law emphasizes that general plans are the primary mechanism for implementing the compatibility policies of the McClellan-Palomar ALUCP. In fact, once the ALUC has determined that the local agency's general plan is consistent with the ALUCP, or the local agency overrules the ALUCP, the ALUC's authority to review projects within that agency's jurisdiction is limited. At such time, submittal of individual projects for ALUC review is voluntary, and ALUC consistency determinations on projects are advisory and not subject to the overruling provisions associated with mandatory reviews (Pub. Util. Code §21676.5(b)). However, ALUC review remains mandatory for the proposed adoption or amendment of general plan, zoning ordinances or other land use regulations affecting land within the AIA.



SAN DIEGO
INTERNATIONAL
AIRPORT

TRANSMITTED TO CONSULTANT
ON 7/7/11

ALUC staff is happy to answer any questions you may have regarding the McClellan-Palomar ALUCP and implementation requirements as well as meet with you to further discuss the implementation process. I will be contacting you soon to set up an informational meeting about the implementation process if you and/or your staff are interested. Please contact me at (619) 400-2464 or ssawa@san.org if you have any questions in the meantime. We look forward to coordinating with you during this process.

Sincerely,

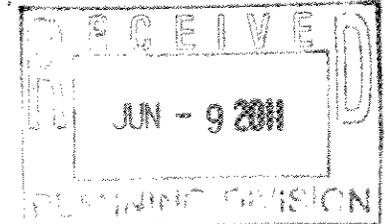
A handwritten signature in cursive script that reads "Sandi Sawa".

Sandi Sawa
Manager, Land Use Planning

the escondido
CHAMBER OF CITIZENS

810 OMAR DR.
ESCONDIDO, CALIFORNIA 92025

June 8, 2011



(response sent on 6/27/11)

Mr. Jay Petrek, Principal Planner
Escondido City Hall
201 N. Broadway
Escondido, CA 92025

Dear Mr. Petrek:

After your presentation to the City Council on the "General Plan Update Status and Climate Action Plan" on March 9, 2011, the Escondido Chamber of Citizens Board drafted the following questions regarding that presentation:

1. How will the revised General Plan Update affect the Growth Management and Neighborhood Protection Act, (Prop. S)?
2. How will the General Plan Update question be presented on the ballot? Will the complete proposed General Plan document be available in voter's sample ballots?
3. The General Plan Update Issues Committee established build-out alternatives ranging from 1,550 to 4,025 net additional residential units. The March 9, 2011, Staff presentation to the City Council established new figures of 3,350 to 5,825 additional residential units. Why the Change?
4. The proposed downtown density increases will increase the stress on existing infrastructure. How will the City pay for the additional capital improvements (schools, roads, sewer capacity, water treatment, etc.) such increase in density will require? Will the city perform a Nexus study to determine the cost of the added infrastructure, and establish developer impact fees accordingly?
5. If there are increases in residential density in the city center, will there be decreases in density on the outer edges of the city?
6. The City Staff presentation included the statement that "The "preferred alternative" in most study areas represents the most intense land uses." Doesn't this statement contradict the statement in the Draft General Plan

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ON 7/7/11



that calls for "strong measures to protect ridgelines, steep slopes, and environmentally sensitive habitats", and the opening statement of the Draft that calls for "an outstanding quality of life"?

7. The Staff's presentation also notes that "The General Plan should allow maximum densities to attract developers; the city will need more than bonus densities to spur development." Does that mean you anticipate waiving Developer Impact Fees too?

We would greatly appreciate your response to these questions in a timely manner.

Sincerely,



Pam Stahl
Member, General Plan Update Issues Committee



Delores McQuiston
President, Escondido Chamber of Citizens.



Barbara J. Redlitz, AICP
Director of Community Development
Planning Division
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4671 Fax: 760-839-4313

June 27, 2011

Delores McQuiston
President, Escondido Chamber of Citizens
810 Omar Drive
Escondido, CA 92025

Re: Letter received dated June 8, 2011

Dear Ms. McQuiston:

Thank you for your letter sent on behalf of the Chamber of Citizens. In providing a response I've included your original questions for easy reference.

1. How will the revised General Plan Update affect the Growth Management and Neighborhood Protection Act, (Prop S)?

Response: Proposition S included Section 1, which amended the General Plan by adding "GP Amendment Policy E2.3" requiring that "permitted land uses in residential areas shall be intensified only when voters approve such changes;" and, Section 2, which was a "readoption and reaffirmation of specific General Plan policies." The current update will be amending residential land uses as well as modifying the wording of policies in the General Plan that are identified in Section 2 of the Proposition Ballot. Staff is preparing a "side-by-side" matrix of existing and proposed General Plan policies for comparison purposes as part of the City Council update scheduled for July 13, 2011.

2. How will the General Plan Update question be presented on the ballot? Will the complete proposed General Plan document be available in voter's sample ballots?

Response: At this time the City Attorney is reviewing options and alternatives for presenting the General Plan on the ballot. A decision will need to be made by next year in order to notify the Registrar of Voters in sufficient time before the November 2012 election. Prior to the November election the complete General Plan will be available in electronic and hardcopy form to provide as much community review opportunity as possible.

3. The General Plan Update Issues Committee established build-out alternatives ranging from 1,550 to 4,025 net additional residential units. The March 9, 2011, Staff presentation to the City Council established new figures of 3,350 to 5,825 additional units. Why the change?

Response: At the September 22, 2010 meeting the City Council did review and establish buildout alternatives in the ranges described above. Direction was also given to refine the range of alternatives. Through that process staff subsequently contracted a consultant (CIC Research, Inc) to evaluate the alternatives and provide additional recommendations. In certain areas it was recommended that alternative intensities be considered for evaluation in order to achieve the build-out vision described on page 2 of the March 9th staff report; specifically, establishing compact, high intensity urban mixed-use residential nodes in close proximity, and at sufficient density and intensity

TRANSMITTED TO CONSULTANT
ON 7/7/11

to support employment, transit, services, shopping, recreation, and entertainment in pedestrian-friendly environments designed to reduce vehicle trips. The densities proposed for evaluation in the EIR allow flexibility in the City Council's ultimate decision for voters to consider, and a smaller buildout than those recommended at the March 9th meeting could be directed to staff.

4. The proposed downtown density increases will increase stress on existing infrastructure. How will the City pay for the additional capital improvements (school, roads, sewer capacity, water treatment, etc.) such increase in density will require? Will the city perform a Nexus study to determine the cost of the added infrastructure, and establish developer impact fees accordingly?

Response: Schools districts are separate jurisdictional entities and their fees are established by the Board of Trustees for each district in accordance with state law. Capital improvements for municipal sewer and water infrastructure improvements associated with new development are financed by connection fees, impact fees, grants and other funding sources. Maintenance of existing facilities and replacement of infrastructure that is not associated with growth are separately financed by ratepayers' monthly service fees, grants and other funding sources. Existing ratepayers do not finance Capital Improvement Projects triggered to correct deficiencies or to expand capacity to serve new development.

Rate studies and master Plans are periodically conducted that include costs for constructing treatment plants and major conveyance systems, as well as maintenance and replacement costs that are associated with new and existing development. A recent study was conducted for water services and the City Council recently adjusted customer water rates as well as connection/impact fees. If the updated General Plan is approved with new buildout densities another study may be warranted and the City Council would have the opportunity to adjust connection impact fees and service fees.

5. If there are increases in residential density in the city center, will there be decreases in density on the outer edges of the city?

Response: At this time the General Plan Update retains the current residential densities on the outer edges of the city. This is consistent with the direction of the General Plan Citizen's Committee and City Council.

6. The City Staff presentation included the statement that "The preferred alternative" in most study areas represents the most intense land uses." Doesn't this statement contradict the statement in the Draft General Plan that call for "strong measures to protect ridgelines, steep slopes, and environmentally sensitive habitats," and the opening statement of the Draft that calls for "an outstanding quality of life?"

Response: Our use of the term "preferred alternative" is intended to reflect the City Council's desire to provide the greatest flexibility for the purpose of California Environmental Quality Act (CEQA) analysis in the Environmental Impact Report (EIR). Under this approach a complete range of options will be cumulatively analyzed in the EIR ensuring that whatever alternative is selected will be adequately examined. Because the density / intensity increases are focused in the urban core, along transportation thoroughfares, and close to existing utility infrastructure, transit, and services, rather than in the perimeter of the community, ridgelines, steep slopes and environmentally sensitive habitats will be preserved. The General Plan update is intended to preserve established single family residential

Delores McQuiston
Escondido Chamber of Citizens
June 27, 2011

Page 3

neighborhoods. The Plan's definition of what constitutes "community ridgelines, steep slopes, and environmentally sensitive habitats" does not change. Any development occurring in these areas now, or under the updated General Plan, would be subject to the same constraints and same densities / intensities.

During the General Plan community workshop the desire for "an outstanding quality of life" was a common theme. However, the perception of what that meant varied based on the individual commenting. Overwhelmingly, the desire to preserve the community's resources was evident, as was the desire to ensure adequate parks, transportation options, services and facilities. For these reasons densities in established single family neighborhoods are not proposed for intensification. Desire was also expressed for providing more employment opportunities, establishing a more vibrant walkable urban core with a variety of densities, and more housing options close to services and transportation, which are the basis for the land use changes.

7. The City Staff presentation also notes that "The General Plan should allow maximum densities to attract developers; the city will need more than bonus densities to spur development." Does that mean you anticipate waiving Developer Impact Fees too?

Response: It is not staff's intention to recommend waiving Developer Impact Fees. The General Plan Update includes a Growth Management policy stating that "all new and infill developments contribute their proportionate share of funding for necessary municipal infrastructure and public facilities." As part of the Economic Development Action Plan staff presented a variety of developer incentives for City Council consideration at their meeting on June 15, 2011. Among the options included streamlining applications to save processing time, and deferring development fees until occupancy (rather than at building permit issuance) which allows the developer to better manage their up-front costs while ensuring that the city collects impact and facilities fees when the actual impact occurs (upon occupancy).

Thank you again for your letter. Please be advised that the next City Council General Plan Update staff is scheduled for July 13, 2011 at 4:30 p.m. in the City Council Chambers. If you have questions please don't hesitate to contact me at (760) 839-4556 or email at jpetrek@escondido.org

Respectfully,



Jay Petrek, AICP
Principal Planner



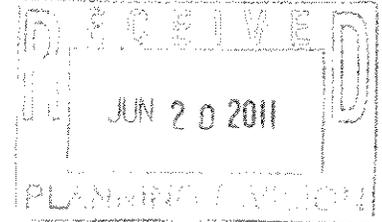
EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

June 15, 2011



Ms. Barbara Redlitz, AICP, Director
City of Escondido
Community Development Department
201 North Broadway
Escondido, CA 92025

Dear Ms. Redlitz:

Pursuant to State statute, the Governor's Office of Planning and Research (OPR) is required to notify cities and counties with general plans that have not been revised within the last eight (8) years (Government Code section 65040.5(a)). Our records indicate that the City of Escondido's General Plan has not been revised in the past eight (8) years or longer.

For purposes of this notification, a revision is considered to be a comprehensive update of at least five (5) of the seven (7) mandatory general plan elements, which have been adopted by the local legislative body. According to our records, the mandatory elements of the General Plan for the City of Escondido were last updated during the years noted.

Land Use:	2000
Circulation:	2000
Housing:	2005
Conservation:	2000
Open Space:	2000
Safety:	2000
Noise:	2000

If this information is incorrect, please contact Cuauhtémoc Gonzalez at the OPR State Clearinghouse via email cuauhtemoc.gonzalez@opr.ca.gov or phone (916) 445-0613 so that we may update our records.

As part of our process to identify jurisdictions with general plans that have not been revised in eight (8) years, OPR surveyed local government planning agencies in the 2010 Annual Planning Survey for current information regarding their general plans. In addition, OPR reviewed General Plan Annual Progress Reports, public notices from the jurisdictions, environmental document filings, as well as websites of individual jurisdictions.

General plans that have not been revised within the past eight (8) years are not necessarily legally inadequate. However, the California Supreme Court has stated that local governments have an implied duty to keep their general plans current (*DeVita v. County of Napa*, 9 Cal. 4th 763 (1995)). Additionally, local governments must review and revise their general plans as often as they deem necessary or appropriate (Government Code section 65103(a)). The general plan statutes do not provide a mandatory minimum time

frame for revision of elements, except for housing elements, which must be revised based on the schedule established in Government Code Section 65588. In addition, Government Code sections 65302 and 65302.1 require certain information be included in general plan elements at the time a jurisdiction next revises its housing element.

Additionally, OPR is also required to report to the Attorney General, cities and counties with general plans that have not been revised in ten (10) years (Government Code section 65040.5(b)). We will report your jurisdiction to the Attorney General only if your general plan becomes 10-years old. If our records indicate that your general plan has not been revised in ten (10) years, we will report this information to the Attorney General in late July 2011.

If you would like to make corrections to our records, please respond by July 15, 2011. This will allow us to update our records prior to notifying the Attorney General of general plans that have not been revised in ten (10) years. If you have any questions or require additional information, please contact Cuauhtémoc Gonzalez at cuauhtemoc.gonzalez@opr.ca.gov or by phone at (916) 445-0613.

Sincerely,

A handwritten signature in black ink that reads "Ken Alex". The signature is written in a cursive, flowing style.

Ken Alex
Director

