

Comment Letter I61

**From:** Larry & Linda Hanson <larrylinda2@att.net>  
**Sent:** Friday, August 11, 2017 9:18 PM  
**To:** Kristin Blackson  
**Subject:** traffic on Nutmeg

Dear Ms. Blackson,

My name is Linda Hanson; I live at 1020 Yuma Glen, Escondido, in the Via Verdes Estates. I, and many of my neighbors are very concerned about the increased traffic on Nutmeg if/when the new homes are completed in the old Escondido Country Club. Traffic is so bad right now; cars travel terribly fast on Nutmeg just north of El Norte Parkway. Sometimes we have to wait a long time just to get out of our neighborhood to go south on Nutmeg to El Norte Parkway, and it's even worse to have to make a left hand turn to go north. (One of my neighbors said he counted 18 cars once before he could make his right hand turn to go south on Nutmeg.) So... what is going to be done about the traffic on Nutmeg if/when the new homes are completed? The number of cars that travel south on Nutmeg to El Norte Parkway is bad now and will be terrible if/when the new homes are completed!! A signal light or stop signs (with a special left hand turn lane for northbound traffic) at Nutmeg & Yuma Glen would be a big help. At least we could safely leave and enter our neighborhood. It is not very safe as it is right now and will only be worse if nothing is changed to handle any additional traffic.

Thank you for your taking the time to read this. I just wanted to share my concerns.  
 Sincerely,  
 Mrs. Linda Hanson

I61-1

Response to Comment Letter I61

Larry and Linda Hanson  
 August 11, 2017

I61-1

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

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public

	<p>objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.</p>
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Comment Letter I62

**From:** Joanne Hewitt [joanne.hewitt@sbcglobal.net]  
**Sent:** Tuesday, July 04, 2017 11:52 AM  
**To:** Kristin Blackson  
**Subject:** The Villages

Hello Ms. Blackson,

I voted no on Prop H. Most of the voting population in Escondido voted no as well, which resulted in the defeat of Prop H. Therefore, why am I - W/E - the people of Escondido having this conversation about 392 homes? No! The significant impacts that supposedly can be mitigated are simply numbers that meet quotas; not the reality of the negative impact on good health (physical and mental) from a noisy environment, air pollution caused by traffic emissions, stated as the only **unavoidable impact**, among other things such as desecration to wildlife - great horned owls, many species of hawks and egrets to name a few. Additional intangible things such as congestion (which equals wasted time) in grocery stores and at gas stations causing stress and a lower satisfaction with the overall quality of life, will persist and take a toll on everyone. The Villages will plunder my neighborhood.

In the words of the artist Joni Mitchell "They paved paradise and put up a parking lot".

Submitted by Escondido registered and active voter,

Joanne Hewitt  
 Phone: 760-746-6978



**Response to Comment Letter I62**

**Joanne Hewitt**  
**July 4, 2017**

**I62-1** The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project. No further response is required or necessary.

**I62-2** The City acknowledges the comment letter, and notes it expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment.

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**Comment Letter I63**

**From:** Katey Hoehn <katey01@gmail.com>  
**Sent:** Monday, August 7, 2017 8:40 PM  
**To:** Mike Strong; Kristin Blackson; Ed Gallo; John Masson; Michael Morasco; Olga Diaz; Sam Abed  
**Cc:** Katey Hoehn  
**Subject:** Response to the DEIR For The Villages (former ECC property)--Traffic

Mayor Abed, Deputy Mayor Masson, City Councilmen, Mr. Strong & Ms. Blackson:

As a 20-year resident of the Escondido Country Club community I have observed the ever increasing volume of cars using County Club Lane as a short-cut to San Marcos and/or Highway 78 via Woodland Parkway, thereby avoiding the congestion at the I-15 & H-78 interchange. With the absence of golf cart traffic and fewer pedestrians on the sidewalks, that traffic has increased both in volume and speed.

I actually live on Country Club Lane and I can tell when there is a major traffic accident or another traffic nightmare on the I-15 southbound. On a normal day when I leave my home at 7AM there is a continuous flow of cars, running the stop sign at Nutmeg and speeding (well in excess of the posted 25 MPH) to their destinations to make up for time lost on I-15. Most days I have a difficult time trying to get out of my own driveway but on days with accidents and/or congestion on the I-15 southbound, I have had to rely on the kindness of strangers to slow down and let me exit my drive.

I read of the plan in the DEIR to put a controlled signal at the corner of Nutmeg and Country Club Lane as part of the traffic mitigation. That will not solve the problem. Adding another 800+ cars each morning will only make it worse. Many of the cars exiting the proposed 392 home development, will be heading south on Nutmeg at Country Club Lane and many will make the right-hand turn to continue on to San Marcos or the coast via Woodland Parkway/H-78, only increasing the westbound traffic on Country Club Lane in the morning and reversing it in the early afternoon/evening. With the inability to increase access to the southbound I-15 at El Norte Parkway (CalTrans issue) this will become the route of choice for savvy commuters

I63-1

I63-2

**Response to Comment Letter I63**

**Katey Hoehn  
 July 12, 2017**

**I63-1**

The comment addresses general concern regarding traffic, which was thoroughly analyzed in Section 2.7, Transportation and Traffic, of the EIR. Additionally, a Traffic Impact Assessment (TIA) was completed for the proposed project which quantifies traffic impacts the project may have on the surrounding transportation network. As shown in Table 2.7-14 of Section 2.7, Transportation and Traffic, all intersections will operate at a level of service (LOS) C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15 which relies on Caltrans' approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The proposed

each morning.

Having read the mediation statement (or lack thereof) re. the I-15 freeway on-ramp, I also have to wonder about all the new traffic coming from the area of Ash/Vista Avenue/Lehner. There are over 160 new homes being built by KB Homes, Shea Builders and Lennar Construction. Those drivers will also be using the El Norte Parkway entrance to the I-15, adding to the congestion. To expand the circle of influence, we will also have the 2000+ homes, soon to be approved by San Diego County, between Deer Springs Road and Nutmeg Terrace. That project will have in excess of 4500 trips per day, most of those on the I-15 corridor at some point. SANDAG has already declared the I-15 "tapped out" to solve the commuter traffic problem between H-78 and Carmel Mountain Ranch. That stretch of highway experiences about 305,000 vehicle trips per day. SANDAG has already spent \$10 million trying to mediate the problem with its I-15 Integrated Corridor Management system.

Further complicating traffic on Country Club Lane will be additional families from the Villages transporting their children to local schools. Escondido Union and Escondido High School Districts do not provide transportation for their students. It is the parents' responsibility. There are four schools east of Centre City Parkway that the students will attend and right now during peak times you must wait for at least two lights, or even three light sequences, to cross over Centre City Parkway. It is foreseeable for the eastbound traffic to be backed up under the I-15 each morning and the wait to cross Centre City Parkway extended if another 392 homes are approved.

Southbound drivers from The Villages will be using both Sunbury and Firestone (right-turn only) to reach El Norte Parkway rather than wait in long lines to exit the Country Club area on Country Club Lane, to the east of Cenote's Grill. Speed will also be an issue on both streets in the family-oriented area with many young children.

I am amazed that New Urban West honestly believes that adding a couple of traffic signals, a round-a-bout and constructing a median at Firestone will mediate the traffic problems on Country Club Lane, brought on by their massive housing proposal of 392 homes known as The Villages.

Katey Hoehn  
1110 W. Country Club Lane  
Escondido, CA 92026  
(760) 738-2011

I63-2  
Cont.

I63-3

project would therefore not create a significant impact to traffic congestion, as mentioned in the comment. The City acknowledges the comment and notes it expresses the opinions of the commentator. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I63-2**

See response to I63-1. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I63-3**

See response to I63-1. The TIA accounts for vehicle trips to local schools. The City acknowledges the comment letter, and notes it expresses general opposition. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**Comment Letter I64**

**From:** Katey Hoehn <katey01@gmail.com>  
**Sent:** Thursday, August 17, 2017 11:28 AM  
**To:** Kristin Blackson; Bill Martin; Mike Strong  
**Cc:** Sam Abed; John Masson; Ed Gallo; Olga Diaz; Michael Morasco; Katey Hoehn  
**Subject:** Noise/Air Quality Concerns - The Villages DEIR

August 17, 2017

To: Kristin Blackson, Bill Martin & Mike Strong

CC: Mayor Sam Abed and Council Members John Masson, Ed Gallo, Olga Diaz, and Mike Morasco

Re: Noise & Air Quality Concerns with The Villages DEIR – Former Escondido Country Club property

Reading through the DEIR it is readily apparent that it is extremely biased toward the developer and having a contract planner prepare it would explain the bias. Plus as stated in the DEIR and reiterated by the “authors/experts” present Monday night, July 31, 2017, the document meets the minimum CEQA standards---example: traffic/noise. While the regulations state that the measurements can not be taken during a week with a holiday in it and that was met, the technicians were only on-site for two hours each in the AM and in the PM. The minimum time allowed under CEQA. That might work in an open field but the Escondido Country Club area is designated “urbanized” by the City and deserves to be treated as such but that would take both time and money. The overall report was completed in record time and used as part of professional portfolio and resume for career advancement and a marketing tool, stressing the completion of the report in just over four (4) months.

I64-1

**Response to Comment Letter I64**

**Katey Hoehn  
 August 17, 2017**

**I64-1** The City acknowledges the comment and notes it expresses the opinions of the commentator about political issues that do not appear to relate to any physical effect on the environment, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I64-2** The comment addresses concern regarding noise, which was analyzed in Section 2.6, Noise, of the EIR. The Project would be required to implement mitigation measures M-N-1 through M-N-6, thus reducing noise related impacts to a less than significant level. To comply with the City’s 60 dBA community noise equivalent level (CNEL) exterior noise standard for single-family and duplex rear yards, noise barriers would be required for some home lots along Country Club Way and Nutmeg Street within the Project boundaries; see Table M-N-1, Barrier Heights at Rearyard Boundaries, for specific locations (EIR page 2.6-21). Contrary to the comment, the Project would not result in noise levels in excess of the 60dBA standard when mitigation is in place. The

While attending the "Open House" for the DEIR at the City Hall on Monday evening, July 31<sup>st</sup>, I had the opportunity to discuss the issue of increased noise due to the massive housing project. The installation of a controlled intersection at the corner of Nutmeg & Country Club Lane will increase the noise level to a point where the developer must build a sound barrier wall of 8' on the south side of Country Club Lane, west of Nutmeg for the new homeowners but those residents living on the north side of Country Club Lane and on the NE & NW corners of Nutmeg/Country Club Lane are not provided for. Apparently the noise will not bother them. The neighbor on the NW corner has both a side-yard and backyard exposed. Two of the four immediate neighbors on Country Club Lane have patios facing the street but again the noise apparently will not interfere with the daily activities of these current residents. The proposed mitigation efforts will do nothing to reduce the noise impacts (exceeding 60 decibels) for current property owners near the corner of Nutmeg & Country Club Lane. The situation is not unique to the Nutmeg intersection. There are other noise barriers abutting new construction along Country Club Lane to the west.

I64-2

Obviously the construction will take years (completion 2023) as outlined on Table 2.1-4 Construction Phasing Assumptions. The noise and dust both will eliminate the quiet enjoyment of our neighborhood as well as destroy our quality of life. There are no considerations for residents with asthma (both seniors and children), decreased lung capacity due to cancer or surgery and/or COPD with the many thousands of cubic yards of dirt being moved from one Village site to another. The topography will have to be significantly changed for the construction of 392 homes. The 109 acres of ground has not been graded or exposed for over 60 years, there are millions of microbes that will become airborne, including those from toxic fertilizers used on the course before being banned by the Federal agencies and the most recent chicken manure incident. As current homeowners/residents, we will be forced to live in air-conditioning, without opening our windows for fresh air, for the next 5-6 years. The air quality will be marginal at best during this extended time. Many neighbors have already discussed being forced out of their homes and needing to move for health reasons due to the extensive grading required for 392 homes, resulting in hazardous air quality for the entire community. The alternative projects with fewer homes and 7000' lots will minimize this grading issue.

I64-3

I64-4

I64-5

The DEIR has charts reflecting the number of pieces of heavy equipment (diesel) to be used during different phases of grading and construction but who is going to verify that the developer doesn't exceed those numbers? Several of the charts seem very unrealistic when listing the total number of pieces of equipment in each phase. Regardless, these diesel machines will contribute to the disruption of our lives by increasing the noise pollution and diminishing the air quality with their exhaust during the next 5 to 6 years. This is an in-fill project and both the noise and the exhaust will be trapped within the circle of existing homes.

I64-6

**I64-3**

noise analysis analyzed impacts to the nearest sensitive receptors, in this case residences, located in close proximity to the Project site.

The comment generally addresses concerns regarding noise and air quality. These issues were discussed and analyzed in the EIR in the following sections: Section 2.6, Noise, and Section 2.1, Air Quality. See response (2), above for response pertaining to noise. With implementation of PDF-AQ-1, conformance with SDAPCD Rule 55, Fugitive Dust Control, and dust control measures requiring the active sites to be watered at least two times daily (resulting in an approximately 55% reduction of particulate matter), the project would have a less than significant impact related to dust on the surrounding residences. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I64-4**

The comment generally addresses concerns regarding the potential risk of contamination from fertilizers used on the prior golf course. This issue was discussed and analyzed in the EIR in Section 2.5 Hazards and Hazardous Materials. As discussed in Section 2.5, an environmental database record search was completed for the Project site and surrounding properties. Land uses in the Project area that may handle or have handled or have generated hazardous wastes include former agricultural uses. These former agricultural

	<p>areas could have a potential risk of site contamination from historical use of herbicides, pesticides, and fertilizer uses. It should be noted that any required cleanup would have been completed in order to allow the residential development that currently occupies the surrounding area. During the preparation of the Phase I ESA, “no evidence of hazardous material release(s) onto the Project site was found” (EIR page 2.5-1). The Project site was listed as American Golf Corp. and Escondido Country Club Maint. in the HAZNET, LUST, San Diego Co. SAM, San Diego Co. HMMD, SWEEPS UST, Hist CORTESE, RGA LUST, Hist UST, and AST environmental databases. These listings reflect the handling of regulated hazardous materials (including pesticides) and the removal of a leaking and corroded gasoline underground storage tank (UST) in 1990. Although time has passed since any hazardous materials may have been used since adoption of the current applicable regulations, residual contamination may exist on site, the uncovering of which could represent a potentially significant impact. M-HZ-1 would reduce this potential impact to a less than significant level. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I64-5</b> See responses to I64-3 and I64-4 pertaining to air quality and hazardous materials.</p>
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<p>Finally we have the issue of blasting and the fact that this project (392 homes) will have to completely change the topography of the 109 acres in order for it to be completed. To mitigate the noise of the blasting, they will only blast for 3 minutes per hour. Wow---what a concession! If the noise level exceeds the City's ordinances, especially for an "in-fill" project, it doesn't matter if it is 3 minutes or 20 minutes. It's against the City's code and therefore, against the law.</p> <p>The DEIR shifts between a distance of 50 feet and 100 feet from existing residences when discussing possible impacts and their mitigation plans. The measurements seem to be adjusted to suit the developer's needs but they are not consistent. They are even measured differently in different tables for the same distances. There was no evidence of pre-blasting surveys being (done on neighborhood residences) included in the DEIR. When calculating AP42 emission factors for the explosives to be used, the multipliers used are 35 years old and based on blasting at western surface coal mines---not the ground beneath the ECC property. There were no core samples taken. Dudek has even acknowledged that it is possible for there to be some minor structural damage to the residences within 100 feet of the blasting due to the anticipated bedrock layering. This means there is a greater chance of stress cracks and related foundation issues as well. The alternative projects on 7000' lots will not require extensive blasting and will not change the topography of the property.</p> <p>There are significant shortcomings in the DEIR and I hope the City turns down this project and sends NUWI/Schlesinger back to the drawing boards. The Brookside development at Reidy Creek is an excellent example of what they are capable of doing and could do on the ECC property if the City will support the citizens and not "fold under" the weight of threatened lawsuits, which I am sure are being drafted as you read this email.</p> <p>Katey Hoehn – A 20-Year Resident of the ECC Neighborhood 1110 W. Country Club Lane Escondido, CA</p>	<p><b>I64-6</b> The comment addresses general concern regarding construction equipment compliance. The City shall be responsible for monitoring of M-AQ-2, which provides restrictions of construction equipment. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I64-7</b> As indicated in Figure 2.6-2 of the EIR, some blasting will occur in central and southern portion of the proposed Village 3. As analyzed in Section 2.6.2.3, the shortest distance between potential blast locations and existing residences is approximately 100 feet (property lines are as close as 50 feet, but the OSMRE standard is based upon distance to residence, rather than property line). Based on the reference blasting noise level, the closest residential receiver will experience noise levels approaching 93 dBA Lmax over the course of the blast, which will likely occur for only a few seconds. As required to comply with the more general construction noise limit of 75 dBA Leq 1-HOUR, blasting would be limited to no more than 3 minutes within any given hour. Although some blasting noise may be noticeable to nearby residents, the single-event, temporary noise levels generated by the blast will not exceed the OSMRE and the CFR</p>
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	<p>standards for air blasts, and therefore noise impacts due to blasting were determined in the EIR to be less than significant (EIR page 2.6-11). The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I64-8</b> As indicated in Figure 2.6-2 of the EIR, some blasting will occur in central and southern portion of the proposed Village 3. As discussed in Section 2.6.2.3 of the EIR:</p> <p style="padding-left: 40px;">According to the California Department of Transportation’s Transportation and Construction Vibration Guidance Manual (Caltrans 2008), it is unusual for damage to be caused to residential structures from the vibrations caused by blasting activities, given the restrictions imposed under OSMRE (30 CFR 816.67).</p> <p>The EIR further identified that for residential structures, the threshold of damage for vibration is approximately 3.0 in/sec (PPV) for cosmetic cracking and damage. While it is not common for blasting activities to cause damage to residential structures, the analysis provided in the EIR conservatively assumed that some minor structural damage to the closest residences (i.e., within 100 feet), could potentially occur without mitigation (Impact-N-5). Mitigation</p>
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	<p>Measure M-N-6 requires that the blasting contractor design the blasts to reduce vibration velocity levels below the damage threshold of 3.0 inches per second at the closest nearby residences (i.e., as close as 100 feet from the blast area). Therefore, the EIR concluded that the project would not cause damage to surrounding residences due to blasting activities and the project would result in less than significant impacts related to blasting.</p> <p><b>I64-9</b> The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the EIR.</p>
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Comment Letter I65

TO: Email - Escondido City Council Members:  
 Mayor Sam Abed ([sabed@escondido.org](mailto:sabed@escondido.org))  
 John Masson ([jmasson@escondido.org](mailto:jmasson@escondido.org))  
 Olga Diaz ([odiaz@escondido.org](mailto:odiaz@escondido.org))  
 Ed Gallo ([egallo@escondido.org](mailto:egallo@escondido.org))  
 Mike Morasco ([mmorasco@escondido.org](mailto:mmorasco@escondido.org))

Email - City Planning Division:  
 Mike Strong ([mstrong@escondido.org](mailto:mstrong@escondido.org))  
 Kristen Blackson ([kblackson@escondido.org](mailto:kblackson@escondido.org))

U.S. Mail – Escondido City Hall  
 Planning Division  
 201 North Broadway  
 Escondido, CA 92025

FROM: Vivian Holland, Homeowner ([vivholland@usa.net](mailto:vivholland@usa.net))  
 1782 Solana Glen  
 Escondido, CA 92026  
 760.743.8486  
 Barcelona Community – Adjacent to Escondido Country Club Property

SUBJECT: R-1-7 Zoning per Escondido 2012 General Plan

Our community is against any changes to the Zoning R-1-7 on the Escondido Country Club property. Moreover, we DO NOT want any variances given to the set-backs or any other variance item on the property which would change the R-1-7 Zoning or the number of units to be built on the property that is in existence at the present time.

1. REASONING: The investor knew at the time of purchase what the property was zoned and what could be built on it. He took the risk and invested in the property anyway. Then he decided he could build out the property to the maximum and make a huge profit. The voters of the City of Escondido, voted that idea OUT by over 60%. The investor took his case to court and won. (Never should one person determine that a vote by the people in a majority vote be discarded. Over 60% of those voting had their wishes thrown out by one person who doesn't even live in the community or our city for that matter.)

Our Country Club property and community cannot withstand the onslaught of having so many homes built that the congestion would be so great to overwhelm our streets. Our streets were not designed to hold the number of vehicles proposed to travel our area. The EIR thinks that by having roundabouts our traffic congestion should be mitigated. This is erroneous thinking. Look at the foreign countries where they have these and see the accidents that are caused by them. It only makes driving confusing. It does NOT allviate traffic.

I65-1

I65-2

Response to Comment Letter I65

Vivian Holland  
 July 7, 2017

I65-1 As stated in Chapter 3.1.5, Land Use, page 3.1.5-12,

“The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City’s General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.”

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

Today, not only do we have our own traffic from our small community around the Country Club property but we have to contend with the traffic coming down the 15 Freeway South cutting off at Country Club Lane through to the West end of El Norte Pkwy., to get to the 78 Freeway West and to San Marcos. If another 800+ cars join this congestion we become an extension of the freeway system. (Please THINK AHEAD - In addition to this, when another influx of cars from the proposed building site at Deer Springs Road is approved we will have to call ourselves the Country Club Lane Freeway. This could add another 1500+ cars to our area in addition to what this builder is proposing. This is a serious concern to our neighborhood. Please consider this a horrible idea and DO NOT CHANGE THE ZONING FROM R-1-7). Keep our neighborhood clean and inviting. We want to enhance and better our community not make it look like a neighborhood jungle filled with houses and cars.

I65-2  
Cont.

Let the purchaser of the Country Club property build on the property with the existing zoning of R-1-7 with no variances. If the number of homes built is kept to approximately 150 and they are larger homes, they will fit into the existing aesthetic of the neighborhood. This will mitigate the traffic, noise pollution, air quality and aesthetics our community has been so worried about.

I65-3

2. After reading the EIR regarding the Flood Plains and Drainage our community is very concerned about the rain water runoff from the Country Club property onto the Barcelona property which is connected by an eight foot high storm drain running under Country Club Lane. We propose this water be redirected underground so it can no longer run onto our property and do damage.

REASONING: Mike Strong, Kristen Blackson and John Masson were given thumb drives with a video of the rainwater running onto the Barcelona property from the Country Club property from the 2016/2017 winter rains. This water was the excess that could not soak into the ground but was the run off to our property. You can see from the video the amount and speed of the water. These waters flowed within five feet of our existing backyard walls. The water cut our arroyo deeper. We use to have large rocks all along our arroyo to hold the dirt in place but the speed and depth of the water washed all of the rocks downstream so now we have no rocks at all.

I65-4

This water is the "excess water" that could not soak into the ground of the over 100 acres of unencumbered land of the Country Club property. If 392 homes/condos are allowed to be built on the acreage, most of the land will turn into hardscape (i.e. streets, driveways, sidewalks, stucco, and roofs), where the water will run off, not soak in. Our property lies at the end of this runoff. This runoff will be increased by 60% to 80% more due to the proposed hardscape. Our property becomes very distressed from your existing run off, we will not be able to contend with an increase.

The proposal from the EIR states there will be two holding basins for water near the front of the property in which gravel and plants will be placed to filter the water (against pollution). These will not keep the rushing water from ruining our property.

**I65-2**

the new homes, and the Project's villages would retain the character of the surrounding land (EIR pages 3.1.5-13 and 3.1.5-14). The City acknowledges the comment and notes it expresses the commenter's opinions and does not raise an issue related to the adequacy or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

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

The Barcelona community would like to see the water runoff be redirected to an underground outlet so the runoff will no longer be directed onto our property making it our responsibility and not theirs.

Through the years and up to this point we have been good neighbors and cleaned up and paid for the Country Club's debris as it has come onto our property. We foresee the future becoming so much more expensive for us to keep our property clean and inviting with the proposal of the 392 unit Country Club build out, that we will have to give serious thought to how we can mitigate our expenses in the future. Can we go to a the new HOA for the property or to the city?

Please do not allow any change in the Zoning R-1-7 or give ANY variances to the Country Club property.

Thank you for considering these very important points and please vote with the over 60% of the Escondido voters that turned down this proposal of so many units being built on the Escondido Country Club property.

Vivian Holland <viviholland@usa.net>  
 1782 Solana Glen  
 Escondido, CA 92026  
 760.743.8486  
 Homeowner/Board Member  
 Barcelona Homeowner's Association

↑ I65-4  
Cont.

I65-5

considered significant and unavoidable.

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.

**I65-3** The Project objective, "Assist the City in implementing the General Plan's housing goals by increasing the City's housing stock and diversifying the range of housing opportunities," is an adequate and reasonable objective for a development project and has been reviewed and accepted by the City. The reduced-density alternative would include fewer units; however, the footprint of disturbance to construct the reduced number of residences would be roughly the same as the Project because the lot sizes would be larger, which is why this alternative was dismissed. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I65-4** The comment addresses general concern for water drainage, which received extensive analysis in the EIR. As stated in the EIR, "*the Project would not (1)*

	<p><i>result in substantial erosion or siltation on or off site, (2) result in flooding on or off site, or (3) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff” (EIR page 3.1.4-17). Therefore, impacts to drainage are considered less than significant.</i></p> <p>Additionally, as discussed in Section 3.1.4.2.2 of the EIR, the Project site is not located within a 100-year flood hazard area. Therefore, no impacts would occur with respect to flood hazard areas. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I65-5</b> The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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Comment Letter I66

8/6/2017

TO: Escondido Planning Division – Michael Strong & Kristen Blackson

Cc: Major Abed, Council Members Masson, Diaz, Gallo & Morasco

SUBJECT: My opposition to The Villages project & DEIR

Escondido has been my home for 53 years. I chose the Escondido Country Club neighborhood for my retirement home in 2004. Having been a local real estate broker for 38 years, I knew what a great neighborhood it was. The open space view from my backyard on Portola Ave replaced the unobstructed view of Mt. Palomar that I had lived with the previous 28 years. It was essential to me that my “last” home would also have a beautiful open view.

I object to changing the present zoning of R-1-7. The General Plan established this zoning. The property owner knew this zoning when he acquired it. Maxing profits for the owner and developer is no justification to down-zoning this land. We neighbors should not have to bear the burden of this massive project.

I object to the declaration that no mitigation is needed for traffic other than modifications to Country Club Lane and Nutmeg. Most new residents of the proposed The Villages will be commuting via either I-15 or CA 78. Traffic on La Brea will increase dramatically. Drivers will avoid Country Club Lane if they must drive south on I-15 or West on 78. They will use my street Portola Ave. to access Nutmeg and El Norte. As it is now, commuters race up our street on morning and evening drive times. The intersection of La Paloma on the west – Memory Lane on the east – and Nutmeg is extremely dangerous and will remain so even with the proposed widening of Nutmeg. Additionally, drivers who go east on Portola must jog right briefly on La Habra & immediately turn left onto La Paloma. La Paloma is lined with parked cars on both sides most hours of the day and night because the Buena Ventura community does not have sufficient parking for it’s residents. After attending the meeting on 7/31 at city hall, I know the traffic engineers did not look at this area. It’s common sense to know that an additional 800 to 1000 cars in the neighborhood will have substantial impact on our streets.

I object to the esthetics of this project. Since CEQA only requires photos from public places, the DEIR does not fairly and accurately represent the views from existing homes. This is an in-fill project so there are few “public” views. A home next to the former golf course most likely has a backyard of 10 ft to property line. The 6-packs (30 condos) proposed adjacent to La Mirada Ave. will create a visual wall of approximately 30 ft tall. The developer’s change to make one-story units adjacent to existing homes is only a token gesture when you recognize the attached other two units will be two-stories. The small (tiny) lot sizes – the tiny front, side and rear setbacks – are not compatible to this neighborhood.

I object to the underlying purpose of this project is to cure the blight created by the property owner. Why should an owner be rewarded for destroying the condition of his land and

I66-1

I66-2

I66-3

I66-4

Response to Comment Letter I66

Pat Hunter  
August 6, 2017

I66-1

The City acknowledges the comment as an introduction to comments that follow, and notes it expresses general opposition for the project, as well as concern for obstruction of views, which received extensive analysis in the EIR, specifically in Section 3.1.1, Aesthetics. As discussed in Section 3.1.1, Aesthetics, The pad elevations for the new residential development have been designed to be lower than the existing development in most areas so that existing near views of the golf course are replaced by views of the landscaped Greenbelt/Open Spaces. The Greenbelt/Open Space areas would enhance the screening and buffering of views from surrounding residences and roadways. Due to its distance and lower elevation, the Project site is not visible from any of these major roads or open space areas. The CEQA Guidelines indicate that private view are not protected or analyzed under CEQA, which is why all view analysis in the EIR was done for public views only.

The comment also expresses concern for zoning. The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. As stated in Section

	<p>3.1.5, Land Use, of the Draft EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals. Section 3.1.5 of the Draft EIR describes and analyzes the Project’s land use and design compatibility. Appendix 3.1.5-1 to the Draft EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project’s potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the Draft EIR concludes that the Project does not conflict with the City’s General Plan and Zoning Ordinance. The comment does not raise an issue related to the adequacy of this land use and zoning analysis as provided in the Draft EIR; therefore, no further response is provided.</p> <p><b>I66-2</b> The comment cites a general concern regarding traffic, which was analyzed in Section 2.7, Transportation and Traffic, of the EIR.</p> <p>Regarding the performance of the circulation system, as shown in Tables 2.7-14, 2.7-15, and 2.7-16 of Section 2.7, Transportation and Traffic, with mitigation incorporated, potentially significant impacts at all roadway segments and intersections will be less than significant with one exception. The</p>
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	<p>Project would result in a significant impact to the El Norte Parkway on-ramp to I-15 southbound during the AM peak hour. Because the improvement necessary to mitigate the identified impact would be located within the jurisdiction and control of Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact can and may be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable.</p> <p>If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers with the Draft EIR, if the Project is approved.</p> <p>The comment does not raise any specific issues related to the adequacy of information and analysis provided in the Draft EIR; therefore, no further response can be provided. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I66-3</b> As stated in Section 3.1.1 Aesthetics, “The significance determination as to whether the Project</p>
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buildings? Because of complete neglect and lack of responsibility on the part of the owner, this property is an eyesore and a serious fire hazard. It probably is also a health hazard because the buildings and empty pool are unsafe.

I object to the concept that the open spaces and most amenities will be available to the general public. Of course, a restaurant and bar will be open to the public. But the walking trails, parks, playgrounds, etc. most likely will not. Why would the new residents pay for the upkeep and insurance needed with heavy public use? It makes no sense and I believe it is developer hype and puff to sell his development.

The existing homeowners in the Escondido Country Club community are entitled to our property rights. We bought our homes with the belief and understanding this neighborhood was built out. Since an in-fill housing project seems inevitable on the ECC land, why not endorse a project that truly "fits" into what's already here.

Keep the R-1-7 Zoning. Reject The Villages Project. It's the right decision for this area.

Respectfully submitted by,

/s/

Patriaia A. Hunter

1240 Portola Ave., Escondido, CA 92026

↑ I66-4  
Cont.

I66-5

I66-6

would result in substantial degradation of visual character and quality is based on the previously described analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area” (EIR page 3.1.1-19). Additionally, the Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area (EIR page 3.1.1-12). Therefore, the privacy and visual quality will remain below a level of significance. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I66-4**

The City acknowledges the comment letter, and notes it expresses general opposition for the project. As discussed in Section 2.5 Hazards, the Project site is not mapped in the high or very high fire severity zone (EIR page 2.5-5). Regarding the hazards from existing structures, Asbestos-containing materials (ACMs) may be present within these structures, which could pose a threat to human health if disturbed, and would be a potentially significant impact (Impact HZ-3). The existing structures may contain lead-based paint, which could pose a threat to human health if disturbed, and would be a potentially significant impact (Impact HZ-4). Impact HZ-3 would be reduced to a less than significant level. Implementation of M-HZ-3 would ensure that workers are not exposed to lead-based paint during

	<p>demolition activities; this would be achieved by sampling the materials of the structures prior to demolition. Implementation of M-HZ-3 would reduce Impact HZ-4 to less than significant (EIR page 2.5-28). See Response 3 above for concerns regarding aesthetics. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I66-5</b> As stated in Section 3.1.8, Recreation, “The walking trails and pocket parks would be open to the surrounding neighborhoods and the Escondido Country Club Community. The Project’s recreational facilities would be privately developed and maintained; however, they are available for public use” (EIR page 3.1.8-8).</p> <p><b>I66-6</b> The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p>
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Comment Letter I67

ROBERT A. JACKSON  
**ARCHITECT**  
 1880-B Fairway Park  
 Escondido, California 92026-1093  
 Voice: 760-743-4240  
 e-mail: [rajarch@cox.net](mailto:rajarch@cox.net)

July 24, 2017

City of Escondido Council Members:

**Re: Proposed development of the Escondido Country Club property.**

As an owner of a Fairway Park Condominium that faces the first fairway that was the golf course and a licensed Architect for over 54 years I am appalled at what Michael Schlesinger and Urban West are trying to force on our community.

I67-1

The current zoning of "Open Space" as voted by the people should remain and only allow uses compatible with that zone.

In my years as an Architect I have had the opportunity to work on many and varied projects including tract housing. Until now I have never seen such a blatant disregard for design and the affect that this proposed project will have on our community. It is a "Slum Waiting to Happen". The presentations by Urban West are what we call "Eye Wash accompanied by Archi-Babble". The students in my 3<sup>rd</sup> year design class at USC produced better design, renderings and more coherent presentations than Urban West has done.

I67-2

If, and I use the "IF" word any development of the Escondido Country Club property will take place I believe there are certain criteria that must be met.

I propose the following:

1. Deed an easement to each of the less than 7000 sq. ft. lots bordering the golf course to bring up the area to that requirement. Taxes on the easement to remain the obligation of the developer in perpetuity.
2. All new lots shall be a minimum of 7000 sq. ft. and only permit one single family, one story dwelling with all of the required setbacks.
3. In addition streets shall have curbside planting and concrete sidewalks.
4. Cul-d-sacs should be a major design criteria as well as green belts between the developed areas.
5. A landscape plan should be required and implemented prior to sale of any housing.
6. No public facilities should be allowed except for a reduced size golf course or walking paths.
7. Replace all of the trees removed by the development and plant them in the new curbside area.

I67-3

**Response to Comment Letter I67**

**Robert A. Jackson**  
**July 24, 2017**

**I67-1**

The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. It should be noted, however, that as stated in Section 1.3.10 of the EIR, the Project site is currently zoned residential (R-1-7). The Project site is not currently zoned open space as described in the comment. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I67-2**

The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I67-3**

The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City of Escondido has an application process for land development

In addition to required Environmental Impact Reports, the City should create an Architectural Review Board to oversee the design and approval of all developments including housing, commercial, and industrial projects. This is not a new innovation and where created and properly administrated the design review process has produced better projects and lasting community pride.

As an Architect I have had to go through this process several times and I find it time consuming and sometimes irritating. But in the end, if the board is properly staffed with professionals who understand design and development, better projects benefit the community as a whole.

I believe that the majority of Escondido residents would prefer the golf course to be brought back and revitalized to benefit the community. If this is not possible let it remain "Open Space" and let the owner continue to do weed abatement and what ever is required for public safety.

It is better to look at wild open space than a future slum.

Sincerely,



Robert A. Jackson

↑  
I67-3  
Cont.

proposals, which complies with the California Environmental Quality Act (CEQA) statute and CEQA Guidelines. CEQA requires the City to respond to any comments received on the draft environmental document. When all public comments are addressed, the environmental document is then finalized for adoption by the decision maker. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**Comment Letter I68**

**From:** Klaasje Johnson <klaasje.johnson@att.net>  
**Sent:** Tuesday, August 15, 2017 8:49 AM  
**To:** Kristin Blackson  
**Subject:** Safety Concern on Nutmeg/Via Alexandra

Ms Kristin Blackson  
 Contract Planner  
 Planning Department  
 City of Escondido

Dear Ms. Blackson:

As a resident on Via Alexandra, I have often been nearly rear-ended by southbound traffic on Nutmeg while waiting to make a left turn onto my street due to oncoming traffic. Regardless of the outcome of the decision on the development of the abandoned golf course, I can only assume that traffic and this danger will increase. I urge the Planning Department to consider the reconfiguration of the Nutmeg/Via Alexandra intersection, allowing for a designated left turn lane.

Thank you for your consideration.

Sincerely Yours,

Klaasje Johnson, Ed. D.

I68-1

**Response to Comment Letter I68**

**Klassie Johnson**  
**August 15, 2017**

**I68-1**

The comment addresses general concern regarding traffic, which was analyzed in Section 2.7, Traffic, of the Draft EIR. As shown in Table 2.7-14 of Section 2.7 Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15, which relies on Caltrans' approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The comment does not raise any specific issue related adequacy of the Draft EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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Comment Letter I69

**From:** Lisa Koch [mailto:mtn2lake@gmail.com]  
**Sent:** Sunday, July 02, 2017 3:10 PM  
**To:** John Masson <jmasson@escondido.org>  
**Subject:** Stop Country Club build out

Dear Mr. Mayor,

We have lived in the "Escondido Country Club" for 20 years. We paid extra for a home in this area, gladly doing so in order that we might enjoy the ambiance this area offered. How we have loved living here! The quiet wide open spaces and lovely views of the golf course, hillsides near and far, vast numbers of beautiful and mature trees, numerous species of birds including water fowl who frequented this area regularly and other migratory birds and ducks. The peaceful serenity of this area is lovely. It is a unique and precious area to Escondido, and the thousands of people who live in and around this area.

I69-1

It would be a heart breaking shame for that to change by having the open spaces of the former golf course turned into a housing development with additional roads and so forth.

I69-2

The noise,

I69-3

traffic congestion

I69-4

and loss of serenity to this entire valley here will be lost. I shutter to imagine the rows of two-story houses high which will tower high above the existing neighborhoods, blocking views for hundreds of us.

I69-5

I69-6

Surface streets in this area already get so jammed up in the mornings and afternoons in particular. If I-15 is heavy with traffic, which happens more and more, the surrounds streets get so congested it is ridiculous. It has to pose some real safety issues in some ways, and certainly makes it a nightmare for anyone stuck in it! Nutmeg/Nordahl, Country Club, El Norte Pkwy and Center City Pkwy all go through this area and all get backed up like you can't believe. What will happen if hundreds of new homes are put into the middle of all that? How can these roads adequately service them?

I69-7

I69-8

Please dear sir, we respectfully ask you to stand up for the citizens of Escondido. Please do whatever you can to stop this development from proceeding.

I69-9

Wouldn't it make a lovely area for a vineyard, botique hotel and such? Something that might lend itself to the beauty this area offers, as well as financial benefit to Escondido.

Thank you for your consideration.

Sincerely,  
 Jeff & Lisa Koch  
 1628 Pinehurst Ave  
 Escondido CA 92026

Response to Comment Letter I69

Jeff and Lisa Koch  
 July 2, 2017

**I69-1** The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I69-2** The City acknowledges the comment letter, and notes it expresses general opposition for the Project, but does not raise any issue concerning the adequacy of the Draft EIR.

**I69-3 & 4** The comment addresses general concern regarding traffic and noise, which were analyzed in Section 2.6, Noise, and Section 2.7, Transportation and Traffic, of the EIR. The Project would be required to implement mitigation measures M-N-1 through M-N-6, thus reducing noise related impacts to a less than significant level.

Regarding the performance of the circulation system, as shown in Tables 2.7-14, 2.7-15, and 2.7-16 in Section 2.7, Transportation and Traffic, with mitigation incorporated, potentially significant impacts at all roadway segments and intersections will be less than significant with one exception. The

	<p>Project would result in a significant impact to the El Norte Parkway on-ramp to Interstate 15 (I-15) southbound during the AM peak hour. Because the improvement necessary to mitigate the identified impact would be located within the jurisdiction and control of the California Department of Transportation (Caltrans), the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact can and may be mitigated to a less than significant level, the impact at this location is considered significant and unavoidable.</p> <p>If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.</p> <p>The comment does not raise any specific issues related to the adequacy of information and analysis provided in the EIR; therefore, no further response can be provided. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I69-5 &amp; 6</b> As analyzed in Section 3.1.1, Aesthetics, of the EIR, the Project would not result in significant visual or</p>
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	<p>aesthetic impacts. As stated in Section 3.1.1, Aesthetics, <i>“The significance determination as to whether the Project would result in substantial degradation of visual character and quality is based on the analysis of the eight key views, as well as assessment of the overall character and visual quality of the site, and the surrounding area”</i> (EIR page 3.1.1-19). The Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area (EIR page 3.1.1-12). Also, Figure 1-7 from the EIR illustrates surrounding land uses, which includes existing two-story residential development. Lastly, the City’s General Plan includes Residential Development Policy 3.10: Encourage proportionate numbers of two-story dwelling units within single-family detached subdivisions to promote variety and avoid monotonous streetscapes and visual impacts. The comment does not raise any specific issue related adequacy of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I69-7 &amp; 8</b> See response to I69-3 regarding traffic.</p> <p><b>I69-9</b> The City acknowledges the comment as a conclusion to the comment letter. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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Comment Letter I70

August 1, 2017  
 Kristin Blackson  
 Contract Planner  
 City of Escondido  
 201 North Broadway  
 Escondido, California



RE: Draft EIR The Villages-Escondido Country Club  
 ENV 16-0010; SUB 16-0009 (SCH#2017011060)

Dear Ms.Blackson:

I have been present at an Escondido City meeting where property owners from the County Club were present. They came to express their views on the proposed use of the 109.3 acres which are in the middle of their homes where the country club and golf course use to be.

Upon reviewing the latest plan for which public comment will only be received up to August 11, 2017, I notice that some of the homeowners concerns back then are still of concern. The number of units proposed, in this Impact Report, is still in my view of concern. 392 more residential homes will create more traffic, noise, use more water in an area where water is sparse and precious, create more trash for landfills. Can the existing facilities support the additional water runoff associated with this new development as well? The 4-6 cluster homes should also be redesigned for smaller one family dwellings, as this community is not a several story multi-dwelling community.

Open space is needed to support the habitat for the wildlife that now thrives in this area. Open space is also needed by the people who live here to allow adequate space to recreate and enjoy clean air and a healthy environment. The plants that now live there are all part of this excellent ecosystem. However this land is used, hopefully it will incorporate these healthy factors in its' people's lives, wildlife, trees, and plants as well.

To quote the " Notice of Availability" : "The project would result in a significant unavoidable long-term cumulative traffic impact at the I-15 southbound on ramp at El Norte Parkway." " Until Caltrans concurs and authorizes improvements which would improve this traffic problem, this on-ramp will continue to have significant impact.

Hopefully, in conjunction with the City of Escondido and the Country Club residents, a plan can be forged that can preserve our lifestyle, environment, and health.

Thank you for listening to my concerns and taking them into consideration when planning for the Escondido Country Club area.

*Arlene Koefler*  
 Arlene Koefler  
 Owner  
 2056 Vera Lane  
 Escondido, Ca.

I70-1  
 I70-2  
 I70-3  
 I70-4  
 I70-5

Response to Comment Letter I70

Arlene Koefler  
 August 1, 2017

I70-1

The City of Escondido (City) acknowledges the commenter's concern regarding the number of dwelling units proposed. The City of Escondido has an application process for land development proposals, which complies with California Environmental Quality Act (CEQA) law and CEQA Guidelines. The Environmental Impact Report (EIR) included analysis of the proposed Project, as well as reduced alternatives (138 units, 158 units, and 279 units). The comment addresses general subject areas such as traffic, noise, water, and trash, all of which received extensive analysis in the EIR in Sections 2.7, Traffic; 2.6, Noise; 3.1.9, Utilities; and 3.1.7, Public Services, respectively. For these issue topics, all potential impacts are found to be less than significant with one exception (the traffic impact located at the El Norte Parkway/Interstate (I-) 15 southbound ramp). The EIR includes Mitigation Measure M-TR-5, which would provide an additional Single-Occupancy Vehicle (SOV) lane to the southbound on ramp. If implemented, M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that

	<p>Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers with the EIR, if the Project is approved. Given that the comments are general, a general response is all that is required (<i>Paulek v. California Dept. Water Resources</i> (2014) 231 Cal.App.4th 35, 47).The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I70-2</b> The commenter expresses general concerns about existing stormwater facilities supporting runoff associated with the proposed development. As discussed in Section 3.1.4, Hydrology and Water Quality:</p> <p style="padding-left: 40px;">Incorporation of Project-related surface drains, greenbelts, vegetated swales, and vegetated stormwater detention basins, as</p>
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detailed in **PDF-HY-1** through **PDF-HY-4**, would prevent excessive, concentrated surface flows on site, which in turn could result in erosion induced siltation of downstream water bodies. In addition, these Project features would prevent increased downstream flow volumes, runoff rates, and surface water pollution. As a result, the Project would not (1) result in substantial erosion or siltation on or off site, (2) result in flooding on or off site, or (3) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Additionally, the implementation of several project design features, as described in Section 3.1.4, Hydrology and Water Quality, of the EIR would ensure that impacts related to runoff would remain below a level of significance. Based on the analysis provided in the EIR, it has been demonstrated that the Project would not result in significant impacts related to runoff associated with the proposed development. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

	<p>The City also acknowledge the commenter’s preference for the redesign of the 4-6 unit cluster homes. The City would like to clarify that these are single-family homes. The Project does not propose any multi-family homes. Also, as stated in Section 3.1.5, Land Use, of the EIR:</p> <p style="padding-left: 40px;">“The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes).</p> <p>The commenter is also referred to Figure 1-7, Surrounding Land Uses, in the EIR which depicts the surrounding land uses more specifically. The surrounding land uses consist of single-family residential development that includes detached residences on a variety of lot sizes (ranging from 2,300 square feet to 7,000 square feet), attached residence/duplexes (ranging from 2,000 square feet to 4,000 square feet), and several common-interest developments.</p> <p><b>I70-3</b> The City acknowledges the commenter’s request for open space. The Project, as proposed, includes a 48-acre Open Space System and greenbelt. The comment</p>
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	<p>does not raise an issue related to the adequacy of any specific section or analysis of the EIR. Therefore, no further response is required. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I70-4</b> The commenter is correct. Please refer to response to I70-1. The Draft EIR includes Mitigation Measure M-TR-5, which would provide an additional SOV lane to the southbound on ramp. If implemented, M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the Draft EIR, if the Project is approved.</p>
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	<p><b>I70-5</b> The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment.</p>
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Comment Letter I71

**From:** Kristin Blackson  
**To:** [Jonathan Frankel](#)  
**Cc:** [Mike Strong](#)  
**Subject:** FW: Draft-EIR Report Escondido Country Club  
**Date:** Wednesday, July 05, 2017 6:06:17 AM

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

From: Norma [norma.kosoff@yahoo.com]  
 Sent: Sunday, July 02, 2017 1:03 PM  
 To: Kristin Blackson; Mike Strong  
 Subject: Draft-EIR Report Escondido Country Club

I just reviewed the EIR Report. I have accepted that there will be homes on the golf course. After reviewing the report, one of my primary concerns is the pressure to include various sizes of home on various sized lots. I have all ready lost \$100 - \$150,000 on the value of my home. I paid a premium to live on a golf course. If 50 years ago, when the golf course was approved by the council, the zoning was changed from R-1-7 to open space, we would not have this problem. I can accept some condos on the old golf course, holes 8, 9, and 11. This area already has condos. New Urban's proposal has condos across the street on holes 12, 13, 14, and 15. This area has only single family homes. This would dramatically affect the value of their homes.

I favor the plan for 138 - 158 homes primarily because with the larger lots, the homes will have higher prices and will result in higher prices for my home.

I have not read the 650 page report. I don't know if the flood zone on holes 10, 7 and 17 has been addressed. These areas after a rain are flooded. When we had the golf course we could play these holes but the cart had to stay on the cart path. This would be the case for 2 - 7 days. It seems irresponsible to allow houses to be built on these holes.

My other concern was for traffic. Widening roads could help. But the proposal is to add lanes to various intersections. This will help marginally. The biggest problem is having more cars on the road. With more homes there will be more cars.

I believe the group from Renew our County Club has the same objectives as we do, except they on the whole bought their homes within the last 3-4 years at a reduced price. They want to have something built on the course. We do too except we want to have fewer homes on larger lots so the prices will be higher and we will have fewer cars on the road.

I can accept the limitations that are included in the report for the stated objectives.

I71-1  
 I71-2  
 I71-3  
 I71-4  
 I71-5  
 I71-6

Response to Comment Letter I71

**Christina Kosoff**  
**July 2, 2017**

**I71-1** The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I71-2** The City acknowledges the comment regarding zoning of the project and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**I71-3** The City acknowledges the comment and preference for one of the project alternatives and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment does not raise an issue related to the adequacy

	<p>of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I71-4</b> As discussed in Section 3.1.4.2.2 Hydrology and Water Quality of the EIR, the Project site is not located within a 100-year flood hazard area, and the Project does not propose to place housing in the floodplain. Therefore, no impacts would occur with respect to flood hazard areas.</p> <p><b>I71-5</b> The EIR found that with implementation of the proposed project, that there would be 11 traffic-related impacts. However, with implementation of the Specific Alignment Plan (SAP) and mitigation measures M-TR-1 through M-TR-8, street segments, intersections, and ramps meters would all operate at an acceptable LOS level. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard</p>
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	<p>deemed appropriate by the City. Thus, the EIR concluded that impacts associated with traffic were found to be less than significant.</p> <p><b>I71-6</b> The City acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p>
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Comment Letter I72

The Villages EIR Comment Card

Name Norma Kosoff  
 Address 1541 David Dr.  
 City Escondido State CA Zip 92026  
 Phone (760) 746-7500 Email norma.kosoff@yabpo.com

Comments

*There is not one thing I agree with in this plan. The property and property values have been stolen by the developers. My husband and I, in our retirement, have lost \$200,000 in value. For a story book on tiny lots will ever give that back to us. We have been misled. The traffic situation cannot be mitigated. Adding to the freeway on Highway to El Norte is already a challenge. Getting from my house on David to the 78 on Woodland already takes 1 hr. To go 3 miles. Nothing can be done to widen the road. Since Woodland belongs to San Marcos, have read nothing about*

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

I72-1

I72-2

I72-3

Response to Comment Letter I72

**Norma Kosoff**  
**July 2, 2017**

**I72-1** The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I72-2** The comment cites a general concern regarding traffic, which was analyzed in Section 2.7, Transportation and Traffic, of the EIR. Regarding the performance of the circulation system, as shown in Tables 2.7-14, 2.7-15, and 2.7-16 in Section 2.7 Transportation and Traffic, with mitigation incorporated, potentially significant impacts at all roadway segments and intersections will be less than significant with one exception. The Project would result in a significant impact to the El Norte Parkway on-ramp to Interstate 15 (I-15) southbound during the AM peak hour. Because the improvement necessary to mitigate the identified impact would be located within the jurisdiction and control of the California Department of Transportation (Caltrans), the City cannot ensure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact can and may be mitigated to a less than significant level, the impact at

their approval since it will greatly impact their schools. Breed is an ugly thing and that our retirement has been stolen, its time to think and care about the couple of 1000 homeowners who live in the community of Escondido Country Club. The City allowed this to happen and its time for them to step up to support their constituents. Please do whats right this time

↑ I72-3  
Cont.

I72-4

this location is considered significant and unavoidable.

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.

**I72-3**

As stated in Section 3.1.7, Public Services, the majority of the Project site (located on the eastern portion of the site) is served by the Escondido Unified School District) and Escondido Union High School District. A portion of residents fall into the San Marcos Unified School District (SMUSD). Based on SMUSD generation rates, the Project would generate approximately 17 elementary students, 5 middle school students and 4 high school students (SMUSD 2017). The Woodland Park Middle School is currently over capacity; however, the Project's addition of 5 students to this school would not be a substantial increase to warrant expansion or construction of new school facilities or otherwise need to be analyzed, indirectly, for parts of the physical environment related to changes in school attendance. The City will include the comment as part of the Final EIR for

	<p>review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I72-4</b> The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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Comment Letter I73

The Villages EIR Comment Card

Name Rudy & MJ Leonardo  
 Address 1005 Hawaii Place  
 City Escondido State \_\_\_\_\_ Zip 92026  
 Phone ( ) \_\_\_\_\_ Email rleonardo@gmail

Comments

Most affected in my area is the heavy traffic when we exit off our street. Traffic will be very heavy on Nutmeg St. going N & S and also from Gary Lane. This is our concern on how to control such traffic if more houses are built off Gary Lane from Nutmeg St. Otherwise this even blind sided every time we turn left towards Nutmeg South & how much more if there are a lot of cars driving south of Nutmeg, then we will stuck wait at the corner till it clears traffic.  
 The Country Club & Nutmeg 4 way stop is getting heavy & there is a lot of traffic dis obedient drivers who never stop there.

I73-1

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

Response to Comment Letter I73

Rudy and MJ Leonardo  
 July 31, 2017

I73-1

As discussed in Section 2.7, Transportation and Traffic, of the EIR, the study area includes 17 existing intersections, 19 street segments, 1 freeway ramp meter, and 1 freeway segment. More specific to the commenter's concerns, the study area includes street segments of Nutmeg (from El Norte Parkway to Centre City Parkway), three intersections along Nutmeg (Nutmeg/Centre City Parkway, Nutmeg/Country Club Lane and Nutmeg/El Norte Parkway/Nordahl Road) and the Country Club Lane/Gary Lane intersection.

As part of the Project, a Street Alignment Plan (SAP) is proposed for the segment of Country Club Lane fronting the Project site, from Golden Circle Drive in the west to Nutmeg Street in the east (see Figure 1-1, Project Site Plan, in Chapter 1, Project Description; and Figure 2.7-3, Project Traffic Distribution). The SAP would provide a series of intersection improvements designed to calm traffic speeds and enhance pedestrian and bicycle circulation. Proposed improvements include the provision of roundabouts at Golden Circle Drive, Firestone Drive, and La Brea Street; traffic signals with pedestrian crosswalks at Gary Lane and Nutmeg Street; and narrowed lanes and

	<p>buffered bike lanes. The traffic calming measures are intended to reduce any potential Project impacts, but also provide a benefit to the neighborhood through enhanced public safety along Country Club Lane including the Nutmeg/Country Club Lane intersection that the commenter is concerned about.</p> <p>The analysis provided in the EIR concluded that implementation of the SAP and mitigation measures M-TR-1 through M-TR-7 would reduce any potential impacts resulting from addition of Project traffic to a level less than significant, except the El Norte Parkway on-ramp to I-15 which relies on Caltrans to allow the proposed mitigation measure to be completed.</p> <p>The commenter's concern regarding disobedient drivers is acknowledged. Traffic violations are not the responsibility of the Project applicant, but rather the City's police department.</p>
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Comment Letter I74

Here are some of my concerns regarding traffic impacts:

1. The intersection at La Brea and Portola needs to be evaluated for traffic impacts. The Villages proposes to add two new road entrances on La Brea St. north of Portola Ave and south of Westwood Pl. The La Brea Street segment #18 between Country Club Lane and Cortez Ave doesn't discuss the impact of additional vehicles that decide to drive on Portola Ave to reach Nutmeg St instead of going via the main street of Country Club Lane.
2. Other intersections off Portola need to be evaluated for traffic impact. The intersections are at La Habra St. and Portola Ave; La Habra St. and La Paloma Ave; La Paloma Ave and Nutmeg. The additional vehicles from residents exiting the two new road entrances on La Brea will significantly impact these residential streets. These intersections are south of Country Club Lane and north of Via Alexandria #15 which has been identified as having a significant direct impact on traffic.

I74-1  
I74-2

Thank you for listening.

Linda Linderman  
1360 La Mirada Way  
Escondido, CA 92026  
760-233-0937

Response to Comment Letter I74

Linda Linderman  
August 7, 2017

I74-1

Unclassified local roadways such as Portola Drive are not analyzed per the City of Escondido's Traffic Impact Analysis Guidelines (2014). These guidelines indicate that generally, 200 ADT of project traffic would need to affect a classified roadway (Local Collector or larger) to warrant inclusion in analysis. La Brea Drive would primarily serve the eastern portion of Village 3 via Driveway G, which would result in approximately 30 outbound AM Project trips, and 40 inbound PM Project trips. Of these totals, only a percentage would be oriented to/from Nutmeg Street via La Paloma Avenue. This small amount of Project traffic would not warrant analysis.

I74-2

See response to I74-1. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

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Comment Letter I75

Dear Mike and Kristen,  
 After pouring through the EIR for the ECC, I found that the traffic count for W Country Club Ln in particular was done in May of 2016. Well over a year ago. Living on Country Club Ln, I know that the volume of traffic has increased greatly since then. With the growth of CSUSM, combined with the growth of Palomar College and the drivers that are coming from the north of Escondido on the I 15 and using Country Club Ln as a thruway. **Almost every driver ignores and disregards the existing traffic laws.** They use CCL because they can avoid the bottle neck at the I 15 - 78 merge and they are also avoiding the traffic signals on El Notre Pky. For this reason I would suggest that another traffic volume survey be done as soon as school is in session again.

Building 392 homes on the old golf course will exacerbate an all ready major problem in this area. Fewer homes should be built in the future and major traffic control is needed now.

Thank you in advance,

Jim Martin  
 1730 W Country Club Ln.  
 760-975-3120

I75-1

Response to Comment Letter I75

Jim Martin  
 August 14, 2017

I75-1

The City disagrees that the traffic data is inaccurate or otherwise outdated. While noting perceived growth of nearby colleges, the comment provides no evidence of substantive cumulative development or network changes in the Project area since September 2016, when the traffic counts were conducted, that would affect the result of that analysis.

Moreover, agencies typically consider baseline counts to be valid for a period of at least two years absent extenuating circumstances such as substantive cumulative development or network changes in the immediate vicinity of a project. Neither has occurred in the past year in the immediate vicinity of the Project.

In fact, a review of historic traffic counts from City records shows that volumes on these roadways have, on average, experienced minor volume increases of approximately 100 Average Daily Trips/ years. Specifically the following record show past traffic counts in the area.

- Country Club Lane: El Norte Parkway to Golden Circle Drive = 4,900 ADT ( Year 2000)
- Country Club Lane: Golden Circle Drive to

	<p style="text-align: center;">Nutmeg Street = 3,700 ADT (Year 1998)</p> <p>As compared with existing 2016 traffic volumes (6,290 ADT and 5,330 ADT, respectively) from the Table 2.7-1 of the DEIR, these volumes show an increase of approximately 100 ADT/year. This is well within accepted 10% variation of daily traffic expected for a given segment, which for these segments would be between 630 and 530 ADT, respectively. Based on this historical comparison, no substantive changes in ADT would be expected to have occurred in the single year that has elapsed since baseline counts were conducted.</p> <p>The comment also alleges that drivers cut-through Country Club Lane to avoid traffic on I-15/ SR-78 and El Norte Parkway, and that “almost every driver ignores and disregards existing traffic laws.” This comment raises concerns with existing traffic safety; it does not cite potential hazards resulting from the Project or any specific issues related to the adequacy of the analysis provided in the Draft EIR. The Draft EIR evaluated potential Project impacts relative to traffic hazards at page 2.7-22. As stated therein, as part of the Project via the proposed Specific Alignment Plan, traffic calming measures would be implemented both at the primary intersections along Country Club Lane, as well as on the tangent street segment between intersections, to more safely</p>
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accommodate pedestrian and vehicular circulation. Roundabouts would also be installed, which would be designed to reduce speeds and enhance the existing circulation system. Additionally, the Project proposes to install adaptive signalization along El Norte Parkway to improve traffic flow and improve conditions of the southbound I-15 on-ramp. (Draft EIR pages 2.7-1 through 2.7-2.)

As part of the Specific Alignment Plan, the Project will incorporate the following improvements: two roundabouts (at Golden Circle Drive and La Brea Street); intersection enhancements at Firestone Drive (all-way stop control with pedestrian crosswalks and curb bulbouts); traffic signals with crosswalks at Gary Lane and Nutmeg Street; and narrowed lanes with buffered bike lanes. (See also, Draft EIR page 2.7-1 through 2.7-1, 2.7-22; Figures 2.7-1a and 2.7-1b; Appendix 2.7-2, Figures 2.7-1a and 2.7-1b.) These improvements are designed to calm traffic in the area, including specifically on Country Club Lane, and to more safely accommodate pedestrian, bicycle, and vehicular circulation. (*Ibid.*) To the extent that, as alleged in the comment, cut-through traffic is occurring to avoid traffic signals on El Norte Parkway, these traffic calming measures may have a further benefit of deterring the use of Country Club Lane as a cut-through route.

	<p>The Project also incorporates features which will reduce reliance on motor vehicles and vehicle miles traveled (VMT) for both future Project residents and the surrounding community. These features are described in the Draft EIR Chapter 2.7, and Appendix 2.7-2 and include: the bike and pedestrian improvements incorporated in the SAP; development of community amenities (commercial and recreation) open to the public; and construction of bus bays on Country Club Lane. (See, Responses to NCTD-1 through NCTD-3.)</p> <p>Appendix 3.1.5-1, City General Plan Policy Consistency Analysis Table, further discusses the Project’s compliance with City goals and policies concerning mobility and infrastructure, including those addressing safety and cut-through traffic. (See, Appendix 3.1.5-1, p. 3.1.5-18 through 3.1.5-23) The Table explains the Project would be consistent with City Goal 1 of providing, “[a]n accessible, safe, convenient, and integrated multimodal network...” because the project would incorporate traffic calming measures, a greenbelt trail for pedestrians, and trails and routes for bicycles to safely connect the Project and surrounding community. (Appendix 3.1.5-1, p. 3.1.5-18.) The Table also shows the Project would be consistent with City Policy 9.3, to “[p]rotect residential neighborhoods from cut-through traffic and other traffic-related issues by implementing</p>
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	<p>appropriate traffic calming measures,” as the Project would implement the traffic calming measures along Country Club Lane; implement adaptive signalization along El Norte Parkway, and provide for improvements to the southbound I-15 on-ramp. (Appendix 3.1.5-1, p. 3.1.5-23)</p> <p>In sum, with the Project’s proposed improvements and traffic calming measures, the Project would not substantially increase hazards due to a design feature or incompatible use, and impacts would be less than significant.</p>
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**Comment Letter I76**

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

From: David McFarland [mcdes@pacbell.net]  
 Sent: Monday, July 10, 2017 11:02 AM  
 To: sabed@escondido.org; jmasson@escondido.org; Ed Gallo; odiaz@escondido.org; mmorasco@escondido.org  
 Cc: Kristin Blackson  
 Subject: Protecting the Escondido Country Club neighborhood

To all City Council and affiliated parties;  
 Thank you for taking a couple of minutes to read this.

Hi, my name is David McFarland, I live on Firestone Drive in Escondido, we are backed up to the open space formerly known as the Escondido Country club golf course. I have owned my architectural business for 36 years, I went to Escondido High school (class of 80), so I am very familiar with the neighborhood and have been following the current & past projects very closely. I am not a part of ECCHO or ROCC, although I do have a good friend who started ROCC, but I do not support them, if anything I support ECCHO, but not 100%. I have several concerns to the proposed 392 homes in the ECC as follows;

1) The most important to me and a promise made by 'you' the City of Escondido, is the conforming to the existing neighborhood. The proposed plans consists of 2500-3500 sf lots (some larger) which is 1/2 of the current zoning R-1-7 which has a min. of 7000 sf lots. How is this keeping with the neighborhood? And the mini cluster condo's, where is that in our neighborhood. I have attached some photos at the bottom showing the Harmony Grove neighborhood build by the same developer (NUW). This does not match our neighborhood and would completely change the feel of it.

2) I know the EIR process is on-going, but the density issue is a big concern, sure it may meet state min. requirements, but it will kill the feel that is the 'Escondido country club' an area built with open space as an anchor point of why we live here. It's already busy with traffic, I can only imagine how horrible it would become. I am not for no-growth, but would like to see the same type of homes build, both one & two story home on normal lots a min. of 6000 sf consisting of about 150 to 200 homes max. along with the same trails and amenities as planned.

3) I live on Firestone Drive and am backed up to the old golf course, some say it's a blight, but I look out everyday to wildlife and open space beauty everyday. On Firestone drive there are the largest homes in the entire ECC area, ours is 2550 sf and they have several 2700+sf home on that street, which means they are also the most expensive and we pay the most taxes. So why are they putting the mini cluster condo's behind Firestone Drive, it doesn't make any sense at all. Living on the old golf course, we already have some of the smallest lots due to the open space behind us, I would like to see the cluster condo units disappear from the project or relocated to a different area not a impacted by large homes.

4) Traffic will be horrible and ruin our neighborhood, Country Club Ln., Nutmeg, & Firestone Drive are already a shortcuts for many to the 78 highway. I could't imagine it with almost 400 new homes with 800+ new drivers.

5) All of the other EIR areas are a concern as well, from schools, environmental, flooding, and others. The natu environment and existing wildlife habitat is a concern as well, we live on the open space and see the bird habitat alone as a concern, there is breeding, nesting and a lot of rare species we see all of the time. Who is studying these amazing and beautiful creatures, and what is going to happen the them?

Thank you for all you are doing for the City and the residents of our great neighborhood.

Sincerely,  
 David & Terri McFarland

I76-1

I76-2

I76-3

I76-4

I76-5

I76-6

I76-7

I76-8

I76-9

I76-10

**Response to Comment Letter I76**

**David McFarland**  
**July 10, 2017**

**I76-1**

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

**I76-2**

The commenter raises concerns regarding the rezone and proposed lot sizes. The City has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. As stated in Section 3.1.5, Land Use, of the EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the proposed discretionary approvals. Section 3.1.5 of the EIR describes and analyzes the Project's land use and design compatibility. Appendix 3.1.5-1 to the EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project's potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the EIR concludes that the Project does not conflict with the City's General Plan.

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

The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.

The EIR considers a reasonable range of alternatives. The EIR evaluates four alternatives in detail: (1) No Project/No Development Alternative; (2) 158-Unit

	<p>Reduced-Density Alternative; (3) 138-Unit Reduced-Density Alternative; and (4) 279-Unit Reduced-Density Alternative (EIR Chapter 4 and page 4-6). As required under CEQA, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). As stated in Section 4.7.1 of the EIR:</p> <p style="padding-left: 40px;">“It is assumed the existing R-1-7 zoning would remain the same under the two reduced-density alternatives (158-Unit and 138-Unit); therefore, all lots would be a minimum of 7,000 square feet.”</p> <p>The Project’s environmental documents will be presented to the City for final decision with the Project as currently proposed, and with an analysis of the range of alternatives presented in the EIR.</p> <p><b>I76-3</b> The City acknowledges this comment, which states opinions and raise general concern regarding density, lot sizes and traffic. Please see Response McFarland-2 regarding density and lot sizes.</p> <p>Regarding traffic, as analyzed in Section 2.7, Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15,</p>
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	<p>which relies on Caltrans' approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City.</p> <p>If implemented, M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and</p>
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	<p>adopted by the decision-makers with the EIR, if the Project is approved.</p> <p><b>I76-4</b> See response to I76-3.</p> <p><b>I76-5</b> See response to I76-3.</p> <p><b>I76-6</b> The City acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p> <p><b>I76-7</b> Refer to response to I76-3 regarding traffic concerns.</p> <p><b>I76-8</b> The comment raises general concern regarding schools, flooding and biological resources. The Project’s impacts to school was fully evaluated in Section 3.1.7, Public Services, in the EIR. The Project’s impacts relative to hydrology and flooding were evaluated in Section 3.1.4, Hydrology and Water Quality in the EIR. Biological resources, including potential impacts to birds, wildlife and sensitive rare species, were analyzed in Section 2.2, Biological Resources, in the EIR. As stated in Section 2.2.1.3,</p> <p style="padding-left: 40px;">“...sensitive vegetation communities/habitat types consist of land that supports unique vegetation communities or the habitats of rare or endangered species or</p>
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	<p>subspecies of animals or plants. The Project site is characterized by disturbed and developed land associated with the abandoned Escondido Country Club and golf course. Native and naturalized habitat is largely absent from the site, with the exception of the small stands of freshwater marsh, disturbed wetland, and non-native riparian habitat in the southeastern portions of the site. As a whole, these areas are dominated by non-native plant species; however, scattered native species (e.g., broad-leaved cattail, arroyo willow) are present in limited numbers that contribute to the biological function of these areas”(Citation).</p> <p>The EIR requires implement of mitigation measures M-BI-1 (nesting bird and raptor avoidance), M-BI-2 (restoration, preservation and management of on-site open space) and M-BI-3 (mature and protected tree replacement) to ensure that any potential impacts relative to biological resources would be less than significant.</p> <p><b>I76-9</b> See response to I76-9.</p> <p><b>I76-10</b> The City acknowledges this conclusory comment.</p>
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**Comment Letter I77**

**From:** David McFarland <mc-des@pacbell.net>  
**Sent:** Wednesday, August 9, 2017 5:41 PM  
**To:** Sam Abed; John Masson; Ed Gallo; Olga Diaz; Michael Morasco; Kristin Blackson  
**Subject:** I do not accept the Escondido CC EIR as written

To all City Council and affiliated parties;  
 Thank you for taking a couple of minutes to read this.

I do not accept the Escondido CC EIR as written- 392 homes is way to many.

Hi, my name is David McFarland, I live on Firestone Drive in Escondido, we are backed up to the open space formerly known as the Escondido Country club golf course.  
 I have owned my architectural business for 36 years, I went to Escondido High school (class of 80), so I am very familiar with the neighborhood and have been following the current & past projects very closely.  
 I am not a part of ECCHO or ROCC, although I do have a good friend who started ROCC, but I do not support them, if anything I support ECCHO, but not 100%.  
 I have several concerns to the proposed 392 homes in the ECC as follows:

- 1) The most important to me and a promise made by 'you' the City of Escondido, is the conforming to the existing neighborhood.  
 The proposed plans consists of 2500-3500 sf lots (some larger) which is 1/2 of the current zoning R-17 which has a min. of 7000 sf lots. How is this keeping with the neighborhood? And the mini cluster condo's, where is that in our neighborhood. I have attached some photos at the bottom showing the Harmony Grove neighborhood build by the same developer (NUJW). This does not match our neighborhood and would completely change the feel of it.
- 2) I know the EIR process is on-going, but the density issue is a big concern, sure it may meet state min. requirements, but it will kill the feel that is the 'Escondido country club' an area built with open space as an anchor point of why we live here.  
 It's already busy with traffic, I can only imagine how horrible it would become.  
 I am not for no-growth, but would like to see the same type of homes build, both one & two story home on normal lots with a min. of 7000 sf consisting of about 150 homes max. along with the same trails and amenities as planned.
- 3) I live on Firestone Drive and am backed up to the old golf course, some say it's a blight, but I look out everyday to wildlife and open space beauty everyday.  
 On Firestone drive there are the largest homes in the entire ECC area, ours is 2550 sf and they have several 2700+sf home on that street, which means they are also the most expensive and we pay the most taxes.  
 So why are they putting the mini cluster condo's behind Firestone Drive, it doesn't make any sense at all.  
 Living on the old golf course, we already have some of the smallest lots due to the open space behind us, I would like to see the cluster condo units disappear from the project or relocated to a different area not impacted by large homes.
- 4) Traffic will be horrible and ruin our neighborhood. Country Club Ln., Nutmeg, & Firestone Drive are already shortcuts for many to the 78 highway. I could't imagine it with almost 400 new homes with 800+ new drivers.
- 5) All of the other EIR areas are a concern as well, from schools, environmental, flooding, and others. The natur environment and existing wildlife habitat is a concern as well, we live on the open space and see the bird habitat alone as a concern, there is breeding, nesting and a lot of rare species we see all of the time. Who is studying these amazing and beautiful creatures, and what is going to happen to them?  
 The big question is 'how did this even happen?' As homeowner who bought a home on a open space golf course, thinking I would always have an open space behind me. Someone dropped the ball big time, the city has admitted their was a grammatical error somewhere down the timeline to change the use from open space to R 17 zoning. You may fear more lawsuits from STR, but be prepared to have close to 120 home backed up to the course lining up for their own lawsuit.  
 Thank you for all you are doing for the City and the residents of our great neighborhood.

Sincerely,  
 David & Terri McFarland

I77-1  
 I77-2  
 I77-3  
 I77-4  
 I77-5  
 I77-6  
 I77-7  
 I77-8  
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 I77-10  
 I77-11

**Response to Comment Letter I77**

**David and Terri McFarland**  
**August 9, 2017**

**I77-1** The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I77-2** The commenter raises concerns regarding the rezone and proposed lot sizes. The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The Project seeks a zone change to Specific Plan SP Zone. As stated in Section 3.1.5, Land Use, of the EIR, the Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the proposed discretionary approvals. Section 3.1.5 of the EIR describes and analyzes the Project's land use and design compatibility. Appendix 3.1.5-1 to the EIR (City of Escondido General Plan Policy Consistency Analysis Table) includes a comprehensive policy consistency analysis for the proposed Project and addresses the Project's potential conflicts with applicable land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The analysis provided in the EIR concludes that the Project does not conflict with the

	<p>City's General Plan.</p> <p>The Project's density and compatibility with the surrounding area were analyzed in Section 3.1.5, Land Use, of the Draft EIR. As stated in Section 3.1.5:</p> <p>The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.</p> <p>The EIR considers a reasonable range of alternatives. The EIR evaluates four alternatives in detail: (1) No</p>
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	<p>Project/No Development Alternative; (2) 158-Unit Reduced-Density Alternative; (3) 138-Unit Reduced-Density Alternative; and (4) 279-Unit Reduced-Density Alternative (EIR Chapter 4 and page 4-6). As required under CEQA, each of these alternatives was selected for its potential to avoid or minimize significant impacts associated with the Project while also meeting most of the basic Project objectives (EIR page 4-2). As stated in Section 4.7.1 of the EIR:</p> <p>“It is assumed the existing R-1-7 zoning would remain the same under the two reduced-density alternatives (158-Unit and 138-Unit); therefore, all lots would be a minimum of 7,000 square feet.”</p> <p>The Project’s environmental documents will be presented to the City for final decision with the Project as currently proposed, and with an analysis of the range of alternatives presented in the EIR.</p> <p><b>I77-3</b> The City acknowledges this comment, which states opinions and raise general concern regarding density, lot sizes and traffic. Please see response to I77-2 regarding density and lot sizes.</p> <p>Regarding traffic, as analyzed in Section 2.7, Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15,</p>
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which relies on Caltrans' approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City.

If implemented, M-TR-5 would reduce the impact to less than significant. However, because the improvement would be located within the jurisdiction and control Caltrans, the City cannot assure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact could be mitigated to a level less than significant, the impact at this location is considered significant and unavoidable for purposes of the analysis. If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding

	<p>considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.</p> <p><b>I77-4</b> Refer to response to I77-3.</p> <p><b>I77-5</b> Refer to response to I77-3.</p> <p><b>I77-6</b> The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I77-7</b> Refer to response to I77-3 regarding traffic concerns.</p> <p><b>I77-8</b> The comment raises general concern regarding schools, flooding and biological resources. The Project’s impacts to school was fully evaluated in Section 3.1.7, Public Services, in the EIR. The Project’s impacts relative to hydrology and flooding were evaluated in Section 3.1.4, Hydrology and Water Quality in the EIR. Biological resources, including potential impacts to birds, wildlife and sensitive rare species, were analyzed in Section 2.2, Biological Resources, in the EIR. As stated in Section 2.2.1.3:</p> <p style="text-align: center;">sensitive vegetation communities/habitat</p>
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	<p>types consist of land that supports unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants. The Project site is characterized by disturbed and developed land associated with the abandoned Escondido Country Club and golf course. Native and naturalized habitat is largely absent from the site, with the exception of the small stands of freshwater marsh, disturbed wetland, and non-native riparian habitat in the southeastern portions of the site. As a whole, these areas are dominated by non-native plant species; however, scattered native species (e.g., broad-leaved cattail, arroyo willow) are present in limited numbers that contribute to the biological function of these areas.</p> <p>The EIR requires implement of Mitigation Measures M-BI-1 (nesting bird and raptor avoidance), M-BI-2 (restoration, preservation and management of on-site open space) and M-BI-3 (mature and protected tree replacement) to ensure that any potential impacts relative to biological resources would be less than significant.</p> <p><b>I77-9</b> Refer to response to 177-8.</p> <p><b>I77-10</b> The City acknowledges the comment and notes it</p>
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	<p>raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.</p> <p><b>I77-11</b> The City acknowledges this conclusory comment.</p>
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Comment Letter 178

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

**From:** Alissa Meredith [alissa.meredith5757@gmail.com]  
**Sent:** Monday, July 24, 2017 3:01 PM  
**To:** Sam Abed; John Masson; Ed Gallo; Olga Diaz; mmorrales@escondido.org; Kristin Blackson  
**Subject:** Comments Re: The Villages

Thank you for making the information about the EIR and the mitigation details for the Villages available on your website.

I have several concerns.

**Traffic Concerns:**

In looking carefully at the traffic section of your report I do not see any discussion of traffic safety issues near my home, 1121 La Mirada Ave.

All of the traffic intersections in the report are the large artery intersections. I have major concerns about the intersections of smaller street that will be significantly impacted. I will address only those near my home as that is what I am familiar with, however, I suspect that there are other areas where there are concerns, especially where the smaller streets provide egress to major arterials and the freeways. For example, I understand that Firestone is already impacted as a path to the freeway.

The new intersection at East driveway from Village 3 to La Brea: This is on a curve and also at the top of a hill from Country Club leading to a challenge with visibility. This will be most risky during early morning commuter traffic when people are moving fast and after dark. I don't believe there are any street lights in this area.

There are currently no stop signs to support right of way at the intersections of : La Brea and Portola, Portola to La Habra and La Habra to La Paloma. I suspect that this route would be used by the new residents especially the residents of the East section of Village 3, to access Nutmeg on the way to I-15 S.

In addition, when these motorists exit the neighborhood from La Paloma turning onto Nutmeg there will be at high risk for collisions without a traffic light as there are likely to be long delays at that intersection during rush hour. As frustration builds multiple accidents are likely ( see below comments about traffic circles)

Traffic Circles. I find traffic circles much more dangerous than 4 way stop signs. In my experience, rather than slowing traffic traffic circles can and often do lead to people driving faster between circles.

178-1

178-2

178-3

178-4

178-5

178-6

Response to Comment Letter 178

Alissa Meredith  
 July 24, 2017

**178-1** The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**178-2** The comment expresses concerns about specific streets in the vicinity of the Project (La Mirada and Firestone). As described in Section 2.7 Transportation and Traffic, Project access is described and includes those two streets. It further describes the SAP which provides a series of intersection improvements designed to calm traffic speeds, enhance pedestrian and bicycle circulation, and improve overall circulation. Intersection improvements (stop/signal control, crosswalks, bulbouts) are proposed at Gary Lane, Firestone Drive, and Nutmeg Street and would, in conjunction with the proposed trails, encourage and facilitate pedestrian circulation along the corridor. Additionally, the various traffic calming measures proposed in the SAP will help to reduce potential safety issues at the intersection at La Brea. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

	<p><b>178-3</b> Please see response to 178-2, which describes the various traffic calming measures proposed in the SAP that will help to reduce potential safety issues at the intersection at La Brea. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>178-4</b> The comment addresses general concern regarding traffic, which was analyzed in Section 2.7, Traffic, of the EIR. As shown in Table 2.7-14 of Section 2.7 Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15, which relies on Caltrans' to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final</p>
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<p>It already takes some time to turn onto Nutmeg from La Paloma to exit my neighborhood. With a traffic circle, which I believe is planned for Country Club and Nutmeg, during high travel times, there will be continuous traffic going South on Nutmeg making it even harder to get out of my neighborhood. With a traffic light, which I suspect is more expensive than a traffic circle, there would more likely be gaps in the stream of traffic as the light switches to allow cars from the less traveled roads to travel south on Nutmeg.</p> <p><b>Parking:</b></p> <p>In the report I do not see any comments about concerns about parking, in particular the lack of available parking impacting the roads adjacent to the project.</p> <p>I have specific concerns about East Village 3 (being one of the most dense sections of the Villages plan) The intersection at La Paloma and La Habra is already somewhat dangerous, especially after dark as there is already parking on both sides of La Paloma and the southern end of La Habra in the evenings. I suspect that most of this is due to overflow parking from the nearby Condo development. Imagine the impact of the additional overflow parking from 392 houses in the proposed small amount of street parking available within the villages.</p> <p>As I looked at the East Village 3 section, I noted that for all of the 6 plexes there is no parking for any of the homes other than inside the garages. I also did not see any additional parking for visitors. In my experience, people often do not park in their garages as they are used for storage or other purposes. In addition, with our dependence on cars, it is not unusual for homes to require more than 2 parking spaces for room-mate situations, grown children or other family members living there who have cars.</p> <p>In addition, when I looked at the written mitigation plan, I noted that the exit from the East Village 2 section is called a "driveway" not a street. This would indicate to me that it is a private road which in my experience means it would be narrower than a normal road and usually has one side or both that are fire lanes and therefore do not allow any street parking.</p> <p>I am very concerned that there will be a great deal of impact on street parking along La Brea, at the site of the entrance of the "driveway" from the East Village 3, adding to the danger of this already potentially dangerous intersection. I am very concerned about additional parking on La Habra, Portola and even La Mirada Ave and Way.</p> <p>I do not see any discussion of this concern or any additional parking planned in the current plan. This is a gross oversight.</p> <p><b>Lot size concerns:</b></p> <p>It does not seem right that the highest density of the Villages is in Village 3 where it is completely surrounded by R7000 density housing. The existing areas of increased density, from what I can recall, are in the areas of Village 1 which in the current plan has the least density.</p> <p>I appreciate your careful consideration of my concerns.</p>		<p>decision on the Project.</p> <p><b>178-5</b> This comment expresses concern with the intersection of La Paloma and Nutmeg. As described in Section 2.7, Transportation and Traffic, of the EIR, Mitigation Measure M-TRA-4 identifies that the applicant shall construct improvements on southbound Nutmeg Street between La Paloma Avenue and Via Alexandra to provide a wider travel lane and curb, gutter, and sidewalk improvements. These improvements will enhance vehicular, pedestrian, and bicycle circulation and will increase capacity to mitigate the impact. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>178-6</b> The City acknowledges the comment as general concern with traffic circles. The commenter does not provide substantial evidence for the claims that roundabouts, also known as traffic circles, are more dangerous than 4 way stop signs. Roundabouts are considered the highest flowing of traffic control alternatives (signals, stop controls). Caltrans has determined the roundabout is the safest intersection control. According to the Caltrans highway design manual, roundabouts experience few angle or crossing collisions. Roundabouts reduce the frequency and severity of collisions, especially when compared to the performance of signalized intersections in high speed</p>
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	<p>environments (Caltrans 2017). The benefits of roundabouts are outlined by Caltrans as follows (Caltrans 2017):</p> <ul style="list-style-type: none"> <li>• Fewer conflict points typically result in fewer collisions with less severity. Over half of vehicle to vehicle points of conflict associated with intersections are eliminated with the use of a roundabout. Additionally, a roundabout separates the points of conflict which eases the ability of the users to identify a conflict and helps prevent conflicts from becoming collisions.</li> <li>• Roundabouts are designed to reduce the vehicular speeds at intersections. Lower speeds lessen the vehicular collision severity. Likewise, studies indicate that pedestrian and bicyclist collisions with motorized vehicles at lower speeds significantly reduce their severity.</li> <li>• Roundabouts allow continuous free flow of vehicles and bicycles when no conflicts exist. This results in less noise and air pollution and reduces overall delays at roundabout intersections. The comment does not raise any specific issue related adequacy of the EIR. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</li> </ul> <p><b>178-7</b> This comment expresses concern over the lack of</p>
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	<p>available parking. The issue of adequate parking is not an environmental threshold evaluated under CEQA. However, parking for the Project has been reviewed by the City and is indicated in the Project’s Tentative Map. The City acknowledges the commenter’s concerns, which will be included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
	<p><b>178-8</b> Please see response to 178-7. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p>
	<p><b>178-9</b> Please see response to 178-7. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.</p>
	<p><b>178-10</b> The City acknowledges the comment as concern about the driveway widths for the Villages. The internal driveways were designed to meet City standards at 24 feet. Though parking would not be allowed on these driveways, all other streets would have parking available and sufficient to meet the demands of the Project. This comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
	<p><b>178-11</b> Please see response to 178-7. This comment is included in the Final EIR for review and consideration by the</p>

	<p>decision makers prior to a final decision on the Project.</p> <p><b>178-12</b> The Project’s density and compatibility with the surrounding area were analyzed in Section 3.1.5, Land Use, of the EIR. The following is stated in Section 3.1.5:</p> <p style="padding-left: 40px;">The Project site is currently designated in the Land Use Element of the General Plan as Residential Urban I, which allows for up to 5.5 dwelling units per acre. The Project includes a total of 392 dwelling units on approximately 109.3 acres, which results in a density of 3.6 dwelling units per acre... The location, density, and intensity of suburban-style development within this community area have mainly developed through planned residential development and are generally characterized by low-density single-family neighborhoods, with pockets of medium-density single-family development (duplex units and small detached homes). The design of the Project site as proposed with the 48-acre Open Space System and greenbelt is context sensitive, and would visually and physically be compatible with surrounding land uses.</p> <p>Therefore, the Project is not inconsistent with the surrounding environment; see also Section 3.1.5.1.1, Surrounding Land Uses, and Figure 1-7, Surrounding</p>
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Land Uses of the EIR. The surrounding land uses consist of single-family residential development that includes detached residences on a variety of lot sizes (ranging from 2,300 square feet to 7,000 square feet), attached residence/duplexes (ranging from 2,000 square feet to 4,000 square feet), and several common-interest developments. Overall, densities range from 2.7 to 8.3 dwelling units per acre; see Figure 1-7, Surrounding and Uses.

**References**

Caltrans (California Department of Transportation). 2017. "Highway Design Manual." Accessed September 26, 2017. <http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0400.pdf>.

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Comment Letter I79

The Villages EIR Comment Card

Name JOHN MILLER  
 Address 1999 GOLDEN CIRCLE DR  
 City ESCONDIDO State CA Zip 92026  
 Phone (760) 747-1851 Email BJK8515@PANAHEALTHS.COM

Comments

SEE ATTACHED

The bottom line is that the vast majority of the community does not want a 392 home development. Even the City at large rejected a similar plan put forth by Sitr by two to one. The proposed development is completely out of character with the existing community. It is blocks of two story row houses crammed together on tiny lots. Take a ride down to the Harmony Grove area where a similar development planned by NUWI has taken shape. It would be unconscionable to impose such a thing on the Country Club. Regardless of their mitigation efforts there will be big increases in traffic and noise, there will be a loss of view for some and a loss of privacy for many with new two story homes. The original developers of the area were allowed variances and/or specific plans by the city which allowed them smaller substandard lots, reduced set-backs and road standards in exchange for open space, the golf course. A large majority of homes in the country club are on smaller substandard lots. These property owners are owed the open space traded away by these variances and plans. This is a matter of fairness. Related to this is The Doctrine of Equitable Servitude, which may serve as an enforcement mechanism. ECCHO created an excellent White Paper which has a summary of the history of the Country Club and analyzed five of the 26 projects approved as part of the Country Club. The analysis at that point shows that only 158 additional homes are permissible. A subsequent study, taking into account all of the developments in the Country Club brings that number down to 137. If you, or any member of the City questions these findings, I suggest you commission your own study. If you come up with a different number, then get together with the authors of these studies and find the reason. This is important because it may serve as part of the basis for denial of the NUWI plan. The city has a moral and legal obligation to deny this development.

Like many seemingly intractable problems, this one has an easy solution. Deny the NUWI specific plan. There is no law that requires the City to approve a variance or specific plan. Michael Schlesinger, Sitr, and NUWI have no legal recourse. The community at large and the residents of the Country Club will be happy. The threat of legal action by ECCHO et al goes away.

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

I79-1  
I79-2  
I79-3  
I79-4  
I79-5

Response to Comment Letter I79

John Miller  
 July 31, 2017

I79-1 As stated in Section 3.1.1, Aesthetics:

“The pad elevations for the new residential development have been designed to be lower than the existing development in most areas so that existing near views of the golf course are replaced by views of the landscaped Greenbelt/Open Spaces. The Greenbelt/Open Space areas would enhance the screening and buffering of views from surrounding residences and roadways (namely West Country Club Lane, La Mirada Street, La Brea Street and Portola Avenue). Additionally, the Project would be designed to maintain a relatively low profile and would be similarly scaled to residential development in the area... The Project would not substantially interrupt or obstruct available views from any scenic vistas. No designated scenic vistas would be impacted by the Project” (EIR page 3.1.1-12).

The Project includes a Specific Plan proposal and detailed design guidelines, which provide a framework

	<p>for requiring the development to be context sensitive and be appropriately sited, scaled, and designed to complement the existing environment. The design guidelines require that the Project be designed to relate to community character, design context, and site design. The Specific Plan design guidelines would ensure appropriate scale of development and an aesthetically pleasing architectural character. Therefore, the Project would not adversely affect public views. In many areas, the site is set back at an appropriate distance and shielded by vegetated slopes or context-sensitive landscaping. Therefore, impacts relative to the substantial degradation of visual character and quality as a result of implementation of the Project would be less than significant (EIR page 3.1.1-19). The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I79-2</b> The City has an application process for land development proposals, which complies with the California Environmental Quality Act (CEQA) statute and CEQA Guidelines. CEQA requires the City to respond to any comments received on the draft environmental document. When all public comments are addressed, the environmental document is then finalized for adoption by the decision maker. The comment cites a general concern regarding traffic, which was analyzed</p>
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in Section 2.7, Transportation and Traffic, of the EIR.

Regarding the performance of the circulation system, as shown in Tables 2.7-14, 2.7-15, and 2.7-16 in Section 2.7, Transportation and Traffic, with mitigation incorporated, potentially significant impacts at all roadway segments and intersections will be less than significant with one exception. The Project would result in a significant impact to the El Norte Parkway on-ramp to Interstate 15 (I-15) southbound during the AM peak hour. Because the improvement necessary to mitigate the identified impact would be located within the jurisdiction and control of the California Environmental Quality Act (Caltrans), the City cannot ensure at this time that Caltrans will permit the improvement to be made. Therefore, although the impact can and may be mitigated to a less than significant level, the impact at this location is considered significant and unavoidable.

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects a balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision makers with the EIR, if the Project is approved.

	<p>Project noise impacts, Impact N-1 through Impact N-4, were addressed through mitigation measures M-N-1 through M-N-6, thus reducing all noise related impacts to a less than significant level. Therefore, no more specific response is required. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I79-3</b> See Response I79-1 above.</p> <p><b>I79-4</b> As stated in Section 3.1.8, Recreation:</p> <p>“The Project would replace an abandoned golf course and would result in an increase of approximately 392 single-family dwelling units in the City and provide approximately 48 acres of open space. The Project incorporates an extensive Open Space System that includes approximately 4 miles of walking trails, a series of pocket parks, and environmental drainage/landscape features that act as buffers... The Project’s recreational facilities would be privately developed and maintained; however, they are available for public use... Additionally, the developer would be required to pay the City’s park fee of \$4,129 per dwelling unit, minus the eligible parkland provided on site by the Project. This payment of \$1,618,568</p>
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	<p>would ensure that the City’s established park land and recreational facility standards are met with respect to the additional needs created by the development” (EIR pages 3.1.8-8 and 3.1.8-9).</p> <p>The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I79-5</b> The City acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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**Response to Comment Letter I80**

**Cindy and Scott Morford  
August 2, 2017**

**Comment Letter I80**

**From:** Cindy M  
**To:** [Mike Strong](#); [Kristin Blackson](#)  
**Subject:** ECC R-1-7 Zoning and Draft EIR  
**Date:** Wednesday, August 2, 2017 5:56:03 PM

The following has also been sent to the City Council.

Please do not alter the current Zoning of the Escondido Country Club. R-1-7 Zoning has been explained as an error. This "error", whether intended or not, has changed the historical zoning of the area. The City of Escondido, not just the ECC community, voted to preserve the area as Open Space. All the Districts of Escondido approved Open Space, not housing, in the area by an overwhelming majority. The voters have been misled with the "erroneous" zoning and now we run the risk of being misled again by thinking our vote and voices matter.

I80-1

The current state of the ECC is not a "blight" on the community. Building 392 homes will bring "blight". Must every inch of land be developed? Do we want Escondido to look like Mira Mesa, Hillcrest, and almost every other area of the county? We go past Harmony Grove regularly and we have seen maybe 3 families. It doesn't appear that even half of the houses are occupied. New housing isn't bringing in residents to Escondido; otherwise Harmony Grove would be a bustling community. On the contrary, the unchecked growth is driving away residents who moved to North County to escape the urban blight of San Diego.

I80-2

What will 392 homes bring to Escondido? More noise, air, and water pollution. More traffic. A loss of natural beauty. A diminished way of life for the residents in the area. The residents of the ECC neighborhood are not like people that move next to an airport and then complain about airplane noise. We are people that moved to a quiet community with what we thought was a fixed amount of growth. That fundamental purpose of moving to this area will drastically change with 392 homes (which can equate to at least 800 more people and cars). The traffic in the area has already become troublesome. The proposed solution of New Urban West depends on Cal-Trans approval. However, we do not see a Plan B if Cal-Trans doesn't approve their suggestions. We've been told that it appears that Cal-Trans will approve, but they have their own budget concerns that can change without regard to our situation.

I80-3

What of the trees, plants and other wildlife that have occupied the area while it was a golf course and now? Mature trees will be replaced 1:1 and Protected Trees 2:1, but will it be with comparable species? You cannot replace a Tiger with a House Cat. Similar, but not the same. Does "open space" just mean there isn't a house on it? Will it be just a grassy field like at Harmony Grove or a shrub-lined sidewalk? That is not what we, or the wildlife, consider open space.

I80-4

Let's remember why we love Escondido. It isn't covered in development but has green space. It has everything we need with small town appeal. We choose to drive a 60 mile round trip commute in order to have the way of life current Escondido provides. If continued development, at the ECC and elsewhere, is the future of Escondido then we, and others, will leave the beautiful city that we have called Home for so many years.

I80-5

Thank you,

Cindy and Scott Morford

**I80-1** The following is stated in Section 3.1.5, Land Use (EIR page 3.1.5-12):

The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City's General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.

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

	<p>site planning would buffer the existing residents from the new homes and the Project’s villages would retain the character of the surrounding land (EIR pages 3.1.5-13, 3.1.5-14). The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I80-2</b> The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I80-3</b> The City of Escondido has an application process for land development proposals, which complies with CEQA law and CEQA Guidelines. The comment addresses general subject areas, Noise, Air Quality, Water Pollution, Traffic, and Biological Resources which received extensive analysis in the EIR. The comment does not raise any specific issue regarding that analysis.</p> <p>Additionally, as shown in Table 2.7-14 of Section 2.7 Transportation and Traffic, all intersections will</p>
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	<p>operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-ramp to I-15 which relies on Caltrans' approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist's perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City's General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The Project would therefore not create "gridlock" on the existing neighborhood. The City acknowledges the comment and notes it expresses the opinions of the commenter. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I80-4</b> The following is stated in Section 2.2.5 of the EIR:</p> <p style="padding-left: 40px;">The Project applicant shall prepare and submit to the City of Escondido (City) and/or other responsible agencies of the Project for approval a Restoration Plan for</p>
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the establishment/reestablishment and enhancement of sensitive habitat within the Project's open space. The Restoration Plan shall provide for replacement of impacted sensitive habitat, i.e., wetland/riparian sensitive natural communities and jurisdictional wetlands and waters in an amount to satisfy a no-net-loss standard for both function and spatial area of wetland and non-wetland resources. The Restoration Plan shall include 5 years of maintenance and monitoring to ensure the restoration effort is successful.

Additionally, the following is stated in Section 2.2.5 of the EIR:

The Project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The Project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City's Director of Community Development.

This will mitigate the removal of tree and other

	<p>impacts to natural resources on-site. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I80-5</b> The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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Comment Letter I81

The Villages EIR Comment Card

Name Michael S. Mortensen

Address 1827 Tawny Place

City Escondido State CA Zip 92026

Phone (760) 745-1181 Email RXJANE@COX.NET

Comments

THE ZONING FOR ESCONDIDO COUNTRY CLUB AREA IS R-1-7  
IT SHOULD REMAIN AS SUCH FOREVER!  
AS A LONG TIME RESIDENT OF ECC COMMUNITY MY QUALITY  
OF LIFE WILL BE AFFECTED NEGATIVELY BY THE PROPOSED  
HIGH DENSITY HOUSING! PLEASE PRESERVE OUR COMMUNITY!  
THIS OUTSIDE INFLUENCE BY NURZI + OTHERS IS COMPLETELY  
UNNECESSARY + UNWANTED.

I81-1  
I81-2

THANK YOU

Michael S. Mortensen

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

Response to Comment Letter I81

Michael S. Mortensen  
August 7, 2017

I81-1

As stated in Section 3.1.5, Land Use (page 3.1.5-12), “the Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City’s General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.” Appendix 3.1.5-1, Consistency Analysis Table, analyzes whether the Project is consistent with relevant adopted local land use policies. The policy analysis provided in the EIR concluded that the Project would not conflict with the General Plan and Zoning Ordinance. Additionally, the landscape and site planning would buffer the existing residents from the new homes and the Project’s villages would retain the character of the surrounding land (EIR pages 3.1.5-13, 3.1.5-14). The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy or analysis of the EIR. The

	<p>City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the Project.</p> <p><b>I81-2</b> The City acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the Project. No further response is required or necessary.</p>
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Comment Letter I82

The Villages EIR Comment Card

Name Jane Mortensen  
 Address 1827 Tawny Place  
 City Escondido State CA Zip 92026  
 Phone (760) 745-1181 Email rxjane@cox.net

Comments

I am opposed to the development of  
390+ houses in the area of Escondido  
Country Club.

I82-1

This area of Escondido is R-1 Zoning  
at the present time. 7000 sq. ft lots  
are to be considered.

I82-2

You are a developer who wants to  
~~not~~ ignore this fact & build too many  
houses in this area.

I82-3

Traffic congestion is my main concern  
and ruining the peace & quiet, which now  
exists, is also my concern. I want  
the peace & quiet to remain - with  
fewer houses - (less than 200 houses -  
single story & some 2 story houses.

I82-4

I82-5

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

Response to Comment Letter I82

**Jane Mortensen**  
**August 7, 2017**

**I82-1** The City acknowledges the comment letter, and notes it expresses general opposition for the Project but does not raise any issue concerning the adequacy of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

**I82-2** As stated in Chapter 3.1.5, Land Use (EIR page 3.1.5-12):

The Project involves construction of a planned residential development and open space system, as allowed under the General Plan and Zoning Ordinance. To establish this, the Project seeks the following approvals: a General Plan Amendment to the City's General Plan Land Use Element, a zone change to Specific Plan SP Zone, a Tentative Map, and a Specific Plan (see Figure 3.1.5-3, Proposed General Plan Land Use, and Figure 3.1.5-4, Proposed Zoning). The Project would be consistent with the General Plan and Zoning Ordinance upon issuance of the foregoing approvals.

Additionally, Appendix 3.1.5-1, City General Plan

	<p>Policy Consistency Analysis Table, analyzes whether the Project is consistent with relevant adopted local land use policies. The policy analysis provided in the EIR concluded that the Project would not conflict with the General Plan and Zoning Ordinance. Further, the landscape and site planning would buffer the existing residents from the new homes and the Project’s villages would retain the character of the surrounding land (EIR page 3.1.5-13, 3.1.5-14).</p> <p>The City acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I82-3</b> The City acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I82-4</b> As shown in Table 2.7-14 of Section 2.7 Transportation and Traffic, all intersections will operate at a LOS C or better and all roadway segments will be mitigated to below a level of significance with exception the El Norte Parkway on-</p>
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	<p>ramp to I-15 which relies on Caltrans’ approval to implement the proposed mitigation measure. The concept of LOS is defined as a qualitative measure describing operational conditions within a traffic stream, and the motorist’s perception of operations. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. According to the City’s General Plan, Mobility Element streets and intersections shall be planned and developed to achieve a minimum LOS C as defined by the Highway Capacity Manual as amended or updated, or such other national standard deemed appropriate by the City. The proposed Project would therefore not create “gridlock” on the existing neighborhood.</p> <p>The City acknowledges the comment and notes it expresses the opinions of the commentator. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>I82-5</b> The comment addresses a general subject area, noise, which received extensive analysis in Section 2.6 of the Draft EIR. The Project would be required to implement mitigation measures M-N-1 through M-N-6, thus reducing noise related impacts to a less than significant level. The comment does not raise any</p>
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	<p>specific issue regarding that analysis. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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