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May 28, 2008

Eric Gibson, Interim Director  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, CA 92123-2960

SUBJECT: County of San Diego General Plan Update 2020 (Log No. 02-ZA-001) SCH #2002111067 – Response to Notice of Preparation of an Environmental Impact Report

Dear Mr. Gibson:

The City of Escondido appreciates the opportunity to respond to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the County's General Plan Update. We look forward to working with you and your staff to coordinate planning efforts in the vicinity of Escondido. Our comments focus primarily on the North County Metro Community Planning Area Draft Land Use Plan (Draft Plan). We have several areas of concern that we feel should be assessed in the DEIR that include: land use changes within Escondido's Sphere of Influence, the provision of public services, coordination of our circulation elements, the provision of utilities, and other issues described below:

***Land Use and Planning:***

For unincorporated areas within Escondido's General Plan and Sphere of Influence Areas the Draft Plan proposes densities that exceed Escondido's General Plan densities. Areas within Escondido's Sphere of Influence are presumed for eventual annexation. The Draft Plan should include adequate infrastructure (or funding) concurrent with development to support increased densities within these areas with regard to fire, parks, sewer, water, etc. to ensure that deficiencies are not created.

***Public Services:***

Fire Services - Several unincorporated areas surrounding Escondido's City Limits are served by the City's Municipal Fire Department. Increasing county densities in these areas will potentially increase the calls for service and require additional staffing and purchasing additional equipment. The DEIR should assess the existing (and proposed) fire protection needs for the proposed density increases and develop criteria to ensure adequate fire protection is in place concurrent with development. Our contact for Fire Service issues is Dominick Arena, Division Chief Fire Marshal. He can be reached at (760) 839-5403.

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Recreational Services - The proposed increased county densities surrounding Escondido will generate an increased demand on parks and recreational facilities. The City of Escondido currently maintains a General Plan Quality of Life standard for park acreage to serve its residents. The DEIR should evaluate additional County parkland needs and the location of park space based on the population generated by increased densities to avoid impacting City facilities. Our contact for recreational services is Robin Bettin, Assistant Director of Community Services. She can be reached at (760) 839-6269.

***Transportation and Traffic:***

Proposed increased densities in unincorporated areas around Escondido may impact City streets and intersections. The DEIR should analyze impacts to Escondido's Circulation System not only generated by increased densities within the City's General Plan and Sphere of Influence Areas, but also outlying areas that rely on Escondido's circulation system for access including Valley Center, Ramona, and Hidden Meadows, in order to coordinate our circulation elements and identify improvements within the City and Sphere of Influence. We request that the impacts be assessed using the City's Circulation Element Designations and the City's Quality of Life standards for areas within our boundaries. Homi Namdari, Assistant City Engineer at (760) 839-4597 is our contact for traffic related issues.

***Utilities and Service System:***

Waste Water – Proposed residential densities in several unincorporated areas within Escondido's General Plan and Sphere of Influence Areas appear too high for relying upon on-site septic programs. Therefore, the DEIR should assess sewer capacity needs and establish a mechanism for funding improvements necessary to determine ultimate facility requirements. Facilities for treating anticipated waste water will need to be included as part of the discussion for increasing densities in these areas. The City's policy for providing sewer service only includes those properties annexed within Escondido's corporate boundaries (unless a separate agreement is approved by the City Council, LAFCO and the County). Annexation to the City would, in many cases result in lower densities than those proposed by the County's General Plan Update. The DEIR will need to analyze densities in these areas and include programs, facilities and property for addressing anticipated sewage treatment that does not rely upon Escondido's treatment facility.

Escondido's land outfall line is a 36-inch diameter pipeline that conveys 18 million gallons of waste water per day from the City's Hale Avenue Resource Recovery Facility (HARRF) 14 miles to the coast. The outfall line primarily parallels Escondido Creek traversing private property in the unincorporated county within a 20-foot-wide easement. The DEIR should evaluate policies that address development along the outfall line to ensure access, and operations and maintenance activities are not impeded along the entire reach. Potential mitigation measure could include a requirement to plot the existing outfall easement on all development applications and to notify City Utilities Division of all pending development applications along the easement. Angela Morrow, Deputy Utilities Manager at (760) 839-4038 is our contact for the City's wastewater facilities.

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Water – Several unincorporated areas surrounding Escondido's City Limits are served by the City's Municipal Water Department. Increasing densities in these areas will potentially increase the water demand and infrastructure requirements. The DEIR should assess the existing (and proposed) water needs for the proposed density increases and establish criteria to ensure adequate infrastructure is in place concurrent with development. Our contact is Richard Walker, Water Treatment Plant Superintendent. He can be reached at (760) 839-5460.

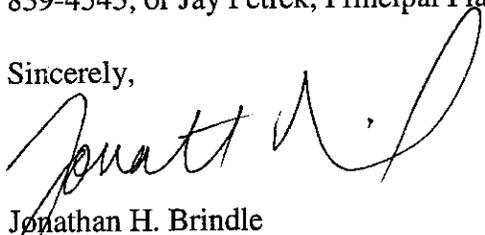
Hydrology - Proposed increased densities in unincorporated areas around the City of Escondido will potentially increase impervious surfaces and increase water runoff. Several unincorporated areas surrounding Escondido drain into the City's storm water systems; increases in volumes may adversely impact the City's infrastructure. The DEIR will need to analyze impacts to the City's storm water system from increased densities within Escondido's General Plan and Sphere of Influence Areas. Homi Namdari, Assistant City Engineer is our contact for the City's storm water system. He can be reached at (760) 839-4597.

***Biological Resources:***

The City of Escondido owns large landholdings within its Sphere of Influence in the unincorporated area within the county's MSCP North County Amendment Area, including Stanley Peak and the former Cruz property along Valley Center Road. The DEIR should evaluate policies regarding conservation and management of these properties in the event that these areas are annexed into the City of Escondido. Barbara Redlitz, Assistant Planning Director is our contact for the City's MHCP and she can be reached at (760) 839-4546.

We appreciate the opportunity to comment on the NOP and look forward to receiving a copy of the DEIR addressing the above-listed concerns. Please feel free to call either myself at (760) 839-4543, or Jay Petrek, Principal Planner, at (760) 839-4556, if you have any questions.

Sincerely,



Jonathan H. Brindle  
Director of Community Development

cc: Barbara Redlitz, Assistant Planning Director  
Dominick Arena, Division Chief Fire Marshal  
Edward Domingue, Public Works Director  
Homi Namdari, Assistant City Engineer  
Angela Morrow, Deputy Utilities Manager  
Robin Bettin, Assistant Director of Community Services  
Richard Walker, Water Treatment Plant Superintendent