



Barbara J. Redlitz, Director  
Community Development Department  
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June 15, 2015

BY EMAIL AND U. S. MAIL

Beth Ehsan  
Land Use/Environmental Planner  
County of San Diego Planning & Development Services  
5510 Overland Ave. Suite 310  
San Diego, CA 92123

RE: Comments on the Valiano Specific Plan Project Draft Environmental Impact Report (Case Nos.: PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002)

Dear Ms. Ehsan:

We appreciate the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Valiano Specific Plan project and are submitting the following comments. Because the City Council has not taken a position regarding the project we feel that close coordination between the City, County and the developer will be needed to insure that all impacts are properly analyzed and mitigated in a timely and effective manner.

This project is of interest to the City of Escondido because a significant amount of project traffic is directed north and east through City roadways that already operate at substandard levels of services. Given the number of significant and unmitigable traffic impacts, a full range of alternatives must be considered.

We request that the Mitigation Monitoring and Reporting program identify a clear methodology for determining fair share contributions, ensuring funds collected reflect current construction costs, and that they be effectively collected. The DEIR should consider an approach where fair share contributions are allocated to development of the most critical improvements rather than broadly allocating contributions in a manner that will not result in any improvements.

The following are more detailed staff comments on the DEIR:

- 1) This project is within the City of Escondido's General Plan and Sphere of Influence boundary. The site is designated Estate I and Rural II with slope

Sam Abed, Mayor    Michael Morasco, Deputy Mayor    Olga Diaz    Ed Gallo    John Masson

E-1    The comment is introductory and is not at variance with the environmental document.

E-2    The comment indicates that the MMRP identify a methodology for fair share contributions that ensures funds collected reflect current construction costs and that they be effectively collected. The Project TIA (Appendix H of the EIR) states that physical mitigation is recommended at each impacted location as opposed to a fair share contribution. Therefore, fair share contributions are not recommended to mitigate Project traffic impacts for locations in the City of Escondido and the identification of a fair share methodology is not necessary. Per negotiations with the City as outlined in their letter dated December 22 (Comments E--23 – E-27), it should be noted that the Applicant has agreed to pay a fair share contribution for improvements to Citracado Parkway, although the Project did not cause a significant impact to this roadway.

E-1

E-2

E-3

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dependent variable densities of 1 unit per 1, 2, 4, 20 acres, and 1 unit per 2, 4, 20 acres respectively. The project is a significant departure from what is identified in Escondido's General Plan with regard to density, intensity, urban form and other aspects. The DEIR fails to conduct a comparative 'plan-to-plan' analysis of the existing County General Plan and policies, existing City of Escondido General Plan and policies, and the proposed amendment. This analysis is important when considering all project impacts. Escondido's General Plan is online at: <http://www.escondido.org/general-plan.aspx>

2) The DEIR aesthetic analysis should include a mitigation measure requiring additional slope vegetation. The landscape concept plan appears to strategically locate trees in a manner that exposes a majority of development increasing the aesthetic impact related to buildings and glare, rather than providing effective screening. As viewed from Escondido, the project will appear to 'stair-step' up the slopes with minimal landscaping to visually screen the project. The project's aesthetic impact would be reduced by requiring additional landscaping that would diminish the visual impact of views from offsite.

3) Page 3.1.7-1 of the DEIR states that the San Marcos Fire Department's Station #3 at 404 Woodland Parkway "is approximately 1.5 miles from the Project site." Based on existing roads and access points, the actual driving distance is significantly further away and should be more accurately reflected in the DEIR.

4) While the Valiano project is within the San Marcos Fire Department's service area, first responders are likely to arrive from the Escondido Fire Department, given the jurisdictions' mutual aid agreement and proximity of the City's Fire Station #1 at 310 N. Quince Street, and Fire Station #6 at 1735 Del Dios Highway. The 20-foot wide emergency access off Hill Valley Drive is less than the minimum standard of 24 feet and poses a safety concern for emergency personnel. Staff recommends widening the subject emergency access to 24 feet.

5) Regarding the Off-site Sewer Options Alternatives, the City of Escondido does not necessarily concur with statements concluding that an agreement with the City of San Diego for purchase of sewer capacity in the Escondido wastewater system needs no input from the City of Escondido. Additionally, the physical connection to the Hale Avenue Resource Recovery Facility (HARRF) would require considerable cost, reconstruction of a lift station, and additional sewer lines that would become City of Escondido facilities.

E-3 A plan to plan analysis is not required with the City of Escondido's General Plan because the Valiano Project site is located within the County's jurisdiction and the governing planning document is the County General Plan.

E-4 The comment indicates that the Project should include additional mitigation (e.g., additional landscaping) due to aesthetic impacts from views from the City of Escondido. The closest point of the City of Escondido boundary to the homes stepping up the eastern-facing hillside is approximately 0.5-mile distant, with most City residences located farther away. Based on topography alone, approximately 90 homes in the City looking over Eden Valley could potentially have views to some portion of the Project. These include homes along the east-west trending streets rising in elevation, or along the more westerly sides of generally north-south streets. (Homes to the east of adjacent tract homes at generally the same elevation were not counted as their views would be blocked by the intervening structures and associated vegetation.) Streets reviewed include such roadways as Live Oak Road, Oak View Way, Chardonnay Way, Amethyst Way, Allenwood Lane, Chateau Place, and Silver Oak Place. Not all of the roughly 90 homes have open views toward the Project—some of them are not oriented toward the Project, or have vegetation blocking the view.

Other areas in City jurisdiction near Eden Valley include the commercial/ industrial businesses located between Progress Place and Hill Valley Drive. Those businesses have parking lots located between their structures and views to the south, along with landscaping on the slope between their edging walls and Hill Valley Drive. Another use would be the hospital and training circuit trail that extends along its perimeter. To the extent that hospital rooms may look toward the Project and patients may look toward that view, the Project would be visible, especially given the height of the medical facility and lack of screening of windows at higher stories. The hospital is a medical facility, however, with a focus on health. The actual effect on views toward the Project from the hospital, or potential glare toward the hospital from the Project, would be negligible. This is both because the purpose of the hospital does not give it any sort of protected status relative to views (i.e., the presence, or absence, of views do not comprise primary criteria in whether one enters

E-4  
cont.

a hospital), and curtains or blinds are available in each room to close in case of potential glare. Relative to the circuit trail, as described in the Project EIR, the primary location with views toward the Project from that trail is the SDG&E transmission line right-of-way, where vegetation is kept low and the site can be seen along the right-of-way. At its closest point, the trail is approximately 0.5 mile east of the closest Project parcel (Neighborhood 3). The portions of the site which are most visible, the eastern-facing slopes along the western boundary of the Project, are approximately 0.9 mile or further in distance. The distance from the Project, combined with the screening vegetation and the likelihood of the trail user's attention being focused toward the training facility, in addition to the visual distraction provided by the much more visible hospital structure, plantings, and patios immediately to the east, and presence of transmission lines in the immediate view, result in awareness for Project development being rated low from this trail. The commercial buildings, hospital and trail are not further addressed in this response. The remainder of this response addresses views toward the Project from homes in the City.

The Proposed Project would largely consist of residential buildings that would not incorporate the use of highly reflective materials. The landscape plan is as dense as possible while still conforming to strict fire requirements relative to new developments and residential planting/proximity to structures.

As depicted in Figure 2.1-9b of the EIR, a number of the Project homes would also orient more northerly, or be otherwise angled on their lots, due to the roads that access the lots following more natural contours rather than just grading straight across the face of the hill. This simulation shows potential Project effects from a point just west of the City boundary. As demonstrated by the simulation, structural massing does not result in a notable visual impact from this area. Afternoon glare also would be generally low (with the sun moving southerly of these residences), to non-existent (as the sun drops west and behind the high ridgeline above the homes, which would be located on the eastern side of the slopes. As described in Subsection 2.1.2.8 of the EIR, consideration also was given to the potential for glare resulting from solar panels. As stated in the EIR:

*These panels are typically constructed of primarily dark absorptive material that is designed to capture as much light energy as possible. Because they are designed to get as much sun exposure as possible, they are routinely placed on roofs, which would have visibility to viewers from off-site elevated viewpoints. Current technology results in these panels being less reflective than prior models. To be conservative, however, it is noted that sun may be reflected during some times of day when the panel is located at a particular view angle. If this should occur, there is*

- E-4 cont. *a chance that glare may be experienced by a viewer. Because this may occur only for a short duration per day under worst-case conditions (i.e., reflection 365 days per year; assuming no diffusion related to cloud cover or atmospheric conditions), visual impacts related to glare from solar/photovoltaic panels would not be significant; since building materials incorporated into the Project design would not be highly reflective, overall impacts would be less than significant.*
- In addition to the above-noted Project design elements, many of the homes in Escondido also are variously shielded. Some are not at elevations that could be affected. As noted above, some are not oriented with primary view/windows toward the Project or have views to the east otherwise blocked by residential landscaping in the neighborhood, intervening homes or their own yards. Taking all of these elements into consideration, combined with the low level of reflective materials and the landscaping plan provided, additional landscaping to diminish visual impacts from these homes due to structures and related glare is not warranted.
- E-5 The comment requests a correction to the EIR. The distance from the Project site to the SMFD’s Station #3 at 404 Woodland Parkway has been corrected in the EIR.
- E-6 The comment indicates that the Project should widen Hill Valley Drive to 24 feet for emergency access. The Project would improve private roads to meet the County’s Private Road Standards, with an exception to allow a 20-foot width for approximately 185 feet of Hill Valley Drive versus 24 feet required in the County Consolidated Fire Code. Hill Valley Drive would be gated, unless the additional right-of-way (ROW) can be acquired in the future, as a secondary roadway for the Project and used and managed for ingress and egress during an emergency event. County Planning & Development Services (PDS) is able to support an exception on Hill Valley Drive as a gated emergency access for the Project because the Project conforms to all Fire Code access standards without the excepted access and only the Project’s emergency traffic would likely utilize the narrower section due to its location near the gate. Additional paving and easement beyond the aforementioned width would impact the existing buildings located on the private properties. Additionally, negotiations with the private property owners to obtain the additional easement to meet the 40-foot easement width have been unsuccessful. The SMFD has found the reduced improvement and easement width to be acceptable. Therefore, it was determined that the exception would not adversely affect the safety and flow of traffic in this area. Hill Valley Drive would be improved to private road standards (24 feet paved width) if the right of way or easement becomes available for use or purchase; it would then be used as a day-to-day access and not only for emergency purposes. Improvements for Hill Valley Drive as an alternative access road are listed in Subsection 2.8.2.10 of the EIR.

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The comment makes a correction to the EIR. The Escondido sewer option would require mutual consent and agreements with the City of San Diego, City of Escondido and the County in a scenario with the County acquiring sewer capacity via the City of San Diego. Under this scenario, similar to the Escondido service option addressed in Subchapter 4.5 of the EIR, the Project sewer flows would be conveyed through new and existing City of Escondido sewer pipelines to the City's sewer plant Hale Avenue Resource Recovery Facility (HARRF) through a transportation or conveyance agreement between the City of Escondido and the County. No new sewer pipeline connections are currently proposed at HARRF as existing Escondido pipelines would convey flows. This option for sewer would additionally provide much needed upgrades to existing facilities with the construction by the Project of a new City of Escondido replacement sewer pump station and force main, and provide critical needed wet weather storage for the City of Escondido's use to mitigate potential overflows in to Escondido Creek during storm events. The Project on-site sewer system would be owned and operated by the County and the new sewer pump station and force main would be part of the Escondido sewer system.

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E-8

6) The following project-related comments are provided by the Escondido Fire Department as recommended mitigation measures for minimizing safety concerns:

- a. Fire Lanes shall be marked and stenciled, "No Parking Fire Lane."
- b. Fuel modification zones adjacent to roadways shall be 30 ft.
- c. All new homes shall be fire sprinklered.
- d. Hydrants spacing and fire flow shall comply with San Diego County Fire Code.
- e. All-weather fire access roadways, fire hydrants, and an adequate water supply shall be installed prior to arrival of combustibles on job site.
- f. Provide secondary access at Hill Valley Drive for phases 3 & 4 prior to bringing combustibles on site.
- g. Driveways over 150 feet in length shall require a hammerhead turnaround.
- h. Roadway grades shall not exceed 20.0%. Roadway grades exceeding 15.0% shall be constructed with concrete (not asphalt). The angle of departure and angle of approach of a fire access roadway shall not exceed 7 degrees (12%) with a cross-slope of no more 5%.
- i. Provide automatic emergency access gates with opticom and Knox switch. Provide manual gates with Knox padlock and Knox box.

E-9

E-10

6) The City of Escondido Engineering Division staff provided comments to the DEIR preliminary traffic study in an email on January 22, 2015 (copy attached). Engineering staff comments expressed concerns regarding the inaccurate assumption of the existing roadway capacity and levels of service determination for Auto Park Way and Country Club Drive, and lack of evaluation of Kauana Loa Drive and Harmony Grove Road. In addition, staff raised the concern that the study did not evaluate the project impact on Citracado Parkway with the proper redistribution of traffic after Citracado Parkway is completed as a connector between HWY 78 and I-15.

E-11

The revised traffic study did not address the City's comments and as a result the traffic distribution that is a basis for the determination of impacts is flawed. Impacts to Auto Park Way are expected to change based on a more appropriate trip distribution. The City would appreciate the opportunity to work the project applicant and County staff to develop a traffic study that more accurately reflects the existing conditions, anticipated project traffic impacts and appropriate mitigation.

E-8

The comment indicates that a number of measures should be included to minimize safety concerns. Specific responses to each letter are below.

- a. Section 4.2.2 of the FPP (Appendix L of the EIR) has been revised to include stenciling on fire lanes.
- b. The FPP includes 30 feet on either side of a roadway for an FMZ in Section 4.5.2.5.
- c. The FPP states that all buildings would be fully protected with automatic fire sprinkler systems in Section 4.3.1.
- d. Hydrant spacing and fire flows would meet local fire requirements as required by the San Marcos Fire Department. Section 4.3.3 of the FPP has been revised to address this comment.
- e. The FPP includes installation of all-weather fire access roadways (Section 4.2.6), fire hydrants (Section 4.3.2), and water supply (Section 4.3) prior to arrival of combustibles on the job site.
- f. The FPP addressed providing access prior to delivery of combustible materials for each phase in Section 4.2.7.
- g. The FPP includes emergency vehicle turnarounds on fire lanes exceeding 150 feet in length in Section 4.2.4.
- h. Section 4.2.8 of the FPP has been revised to include a comment regarding the angle of departure and angle of approach of a fire access roadway.
- i. Section 4.2.7 of the FPP has been revised to include the following additional sentence: Manual gates shall be provided with Knox padlock and Knox box.

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Comment E-9 refers to Comments E-18 through E-23. See Responses E-18 through E-23.

E-10

Comment E-10 refers to Comments E-18 through E-23. See Responses E-18 through E-23.

E-11

Comment E-11 refers to the analysis trip distribution. See Responses E-18 through E-23. There has been close coordination between the City, County, and the developer and it was determined that the trip distribution is appropriate.

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- E-12 7) The DEIR mitigation measure proposes removal of parking on Country Club Drive in order to provide the local collector capacity for the roadway. It is inappropriate to assume a local collector capacity for this roadway simply by removing parking given the current road conditions. The City recommends a traffic mitigation measure to require full improvement of Country Club Drive to Local Collector standards in order to utilize Local Collector traffic volume capacities.
- E-13 8) The EIR inappropriately proposes overriding findings for the Mission Road / Auto Park Way intersection. The City recommends that intersection improvements be evaluated and that the project pay a fair share contribution in an amount agreed to by the City.
- E-14 9) Lack of improvements on Kauana Loa Drive and Harmony Grove Road will be subject to project traffic impacts. The City recommends that these streets be improved as a mitigation measure.
- E-15 10) As an active CIP project and a Regional Arterial Roadway, the analysis should include Citracado Parkway as a major future project access. Traffic impacts should be evaluated both with and without this roadway's extension. The City looks forward to working with the County and developer to develop the appropriate mitigation which could include a fair share contribution toward this improvement project.
- E-16 11) Proposed mitigation measures should be evaluated to determine they fully mitigate the project's impacts.
- E-17 We extend an invitation to County staff to resolve City concerns regarding the project and to develop implementable measures in the City of Escondido which properly mitigate project impacts. Please contact me at (760) 839-4546 or email at [bredlitz@ci.escondido.ca.us](mailto:bredlitz@ci.escondido.ca.us) if you would like to schedule a meeting. We look forward to addressing our concerns and appreciate your consideration.

Sincerely,



Barbara J. Redlitz, AICP  
Director of Community Development

cc: Julie Procopio, Assistant Director of Public Works  
Michael Lowry, Fire Chief

- E-12 The comment makes a correction to the EIR regarding parking on Country Club Drive and requests added mitigation to improve Country Club Drive to Local Collector standards. The County and the Applicant met with the City of Escondido and based on the agreement reached between the City and the Applicant outlined in the letter dated December 22, 2015 (refer to Comments E-24 through E-27), the following improvements of Country Club Drive between the existing industrial park east to Auto Park Way have been added to the Project. The Project would improve the intersection at Auto Park Way and Country Club Drive traveling west of the intersection with connected sidewalks, an additional left turn pocket on Country Club Drive, adding a right turn pocket (through restriping) on Auto Park Way traveling west onto Country Club Drive, and widening Country Club Drive to provide a paved width of 36 feet consisting of two travel lanes and a 10-foot striped center turn lane starting 220 feet southwest of Auto Park Way for a length of approximately 830 feet. The Project would provide improvements along Kauana Loa Drive consisting of adding up to 2 feet of pavement to areas of Kauana Loa Drive that are designated as of concern to the City of Escondido and installation of traffic calming measures such as speed and curve signage, striping, "Bott's Dots" along the centerline, and radar speed signs in both directions approaching the angled curve along this segment (such improvements would not require relocation of any existing facilities or acquisition of additional right of way).
- E-13 The comment claims that the City's overriding findings for improvements to Mission Road/Auto Park Way should be evaluated for a fair share. The City of Escondido's General Plan Update concluded that the impact to the Mission Road/Auto Park Way intersection was significant and unmitigable and utilized overriding findings due to the lack of available mitigation. Therefore, it is accurate for the Project's EIR to reach the same conclusion. In addition, the City of Escondido does not have a program listing the Mission Road/Auto Park Way intersection as a location where improvements are required; and therefore a fair share contribution cannot be made.  
  
The CEQA Findings from the City of Escondido General Plan Update, 2012 that reference the subject intersection are included in Appendix K of the TIA
- E-14 The County appreciates this comment. However, the Kauana Loa Drive/Harmony Grove Road intersection and Kauana Loa Drive were analyzed as part of the Project's traffic analysis and impacts were calculated to be

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- E-14 cont. less than significant. Due to the low amount of Project traffic forecasted to travel on Harmony Grove Road, impacts were determined to be less than significant and the roadway was not analyzed in detail. Therefore, this Project should not be required to include mitigation measures. It should be noted that Applicant has agreed to install Project Design Features along Kauana Loa Drive per the letter dated December 22, 2015 (Comments E-24 through 27) even though no impacts have been identified. This Project Design Feature has been added to the EIR in Subsection 1.2.1.2.
- E-15 The comment indicates that Citracado Parkway should be evaluated as a future Project access road. The Project TIA assumes that Citracado Parkway is not constructed in the near-term baseline condition since it was not fully funded. The TIA also includes a long-term 2035 analysis where the Citracado Parkway extension is fully included (among other area roadway improvements). The analysis without and with the connection can be seen in Section 9.0 (near-term) and Section 10.0 (Year 2035) in the TIA. In Section 10.0, when comparing the “Year 2035 with General Plan Land Use” scenario to the “Year 2035 with the Proposed Project” scenario, no traffic impacts would occur even though traffic impacts occurred under the near term scenarios. This is mostly due to the area roadway buildout assumed in the Year 2035 analysis.
- E-16 Consistent with the City’s comment, Table 13-1 of the TIA states the post mitigation level of service of each intersection and street segment and also concludes whether the improvement mitigates the impact to less than significant. In addition, the number of units which can be built before the impact would occur is provided.
- E-17 The comment is conclusion statement and is not at variance with the environmental document. The County PDS and the Applicant have met with the City to discuss some of the items discussed in your comment letter.



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**From:** Homi Namdari [mailto:Hnamdari@ci.escondido.ca.us]  
**Sent:** Thursday, January 22, 2015 11:26 AM  
**To:** Ortiz, Francisco "Nick"  
**Cc:** Ehsan, Beth; Abraham Bandegan; Jay Petrek; Julie Procopio; Owen Tunnell  
**Subject:** FW: Valliano Comments

Nick,  
Below is the list of our comments:

- 1. The capacity used for Auto Park Way in the analysis is the average of a 6 lane and 4 lane Major which is not a correct assumption. Considering the very high volume of traffic using this segment based on the trip distribution, there is a very high possibility of congestion on Auto Park Way between Country Club Dr and Mission Rd. When a segment has different cross sections, it is recommended that the lower capacity be used in traffic analysis.
- 2. Although a significant impact has been detected on Country Club Drive from Auto Park Way to Hill Valley Dr, no improvement has been proposed for this segment and the only improvement suggested is for the intersection of Country Club Dr and Auto Park Way and removal of parking along the Country Club Dr corridor. Connectivity of improvements on the City side of Country Club with roadway widening and sidewalk shall be proposed as a mitigation measure to enhance the capacity of Country Club Dr. to accommodate for the existing and additional traffic from the project. The length of the left-turn pocket should be adequate to accommodate the left-turn volume and roadway should be improved to its local collector specification to reach the assumed capacity of 15000 ADT. The feasibility of split phasing at the intersection of Auto Park Way and the impact of this new phasing on LOS should be checked. A Continuous sidewalk and pedestrian path of travel along Country Club Dr should also be provided.
- 3. A long stretch of Kauana Loa Dr is in City of Escondido. Kauana Loa Dr is an unimproved road with no drainage, no sidewalks and a very sharp and sub-standard curve. The study assumes a capacity of 8000 veh/day for the road and assumes a 771 veh/day increase in ADT for this segment in existing+project condition. By completion of Citracado Pkwy, Kauana Loa Dr will have a major role in access to/from project using Citracado Pkwy. The assumed 771 veh/day extra trips on this segment will increase after the addition of the Citracado Pkwy extension to the network. Currently the speed of traffic on this stretch is higher than the design speed of the roadway. Roadway improvements, capacity enhancement measures and extra signage and striping together with measures of traffic calming to increase safety and mobility in this corridor should be mitigation measures. (See attached City/County boundary)

- E-18 The County appreciates this comment. However, using four lanes as the capacity would result in an analysis that is too conservative and does not accurately portray traffic conditions, based on the cross-section of Auto Park Way between Mission Road and Country Club Drive with multiple turn lanes in a short distance. In terms of Auto Park Way between Mission Road and Country Club Drive, Auto Park Way approaching Mission Road contains nine lanes, six northbound lanes and three southbound lanes. This road narrows to five lanes and then four lanes for about 300 feet. Additional turn lanes are then provided approaching Country Club Drive. Based on these various cross sections, a five-lane capacity is most accurate and was therefore assumed in the analysis.
- E-19 The comment recommends connectivity of improvements on the City of Escondido side of Country Club Drive as mitigation for traffic impacts. This issue is discussed in Response E-12. This comment was first made prior to public review of the DEIR and after consideration of the comment, the DEIR was changed to include the requested sidewalk and road widening. Since that request, the City of Escondido met with the County and the developer in the field and it was determined that widening would include a center lane in this road section to further reduce Project direct and cumulative impacts. Specifically, the Project would install a 5-foot wide sidewalk for approximately 830 feet on the west side of the street At the north end of Country Club Drive south of Auto Parkway. This would connect two currently disconnected sections of sidewalk; one extending approximately 220 feet southerly of Auto Parkway, and one extending approximately 1,380 feet north of the intersection of Country Club Drive and Hill Valley Drive. A 6-inch curb and gutter would be located between the sidewalk and street pavement. Four above-ground power poles are located within this area and one would require relocation west of the sidewalk and the other three would be protected in place. On the east side of Country Club Drive, paralleling the new sidewalk segment on the other side of the road and wherever existing driveways would not interrupt the improvements, a 6-inch (street-side) asphalt berm would be backed by a 5-foot wide decomposed granite pathway. The

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E-19 cont. significant unmitigable traffic impacts (1A and 1B) identified in the DEIR are no longer considered unmitigable because the City and Applicant have reached an agreement on the proposed mitigation as outlined in the letter dated December 22 from the City (see Comments and Responses E-24 through E-27). Therefore, CEQA does not require recirculation of the EIR.

E-20 The comment indicates that the feasibility of split phasing should be verified. Table 13.1 of the TIA (Appendix H of the EIR) shows that the Country Club Drive/Auto Park Way intersection would be mitigated and operate at Level of Service (LOS) C with the implementation of the split phasing in the east/west direction. The implementation of split phasing has been reviewed and found to be viable. In addition, a sidewalk would be provided along the north/west side of Country Club Drive with a continuous center turn lane.

E-21 The comment indicates that traffic calming measures on Kauana Loa Drive should be included as mitigation due to Project traffic increases, the unimproved nature of Kauana Loa Drive, an assumption of 8,000 ADT, and the statement that it will be further impacted by completion of Citracado Parkway. Kauana Loa Drive carries 1,480 average daily trips (ADT) under existing conditions and 2,250 ADT with the Project. Mitigation measures to Kauana Loa Drive are not warranted based on these low volumes, even if a lower roadway capacity was utilized in the analysis. Completion of the Citracado Parkway extension was included in the Year 2035 analysis of Kauana Loa Drive, as shown in Table 10-3 of the TIA. There would be no change to the traffic analysis required; impacts to Kauana Loa Drive would be less than significant and no mitigation would be warranted.

While a mitigation measure is not warranted, the Project includes a Project Design Feature to improve Kauana Loa Drive from approximately 1,500 feet east of Country Club Drive to Harmony Grove Road. Improvements include traffic calming measures such as speed and curve signage, striping, “Bott’s Dots” along the centerline, and radar speed signs in both directions approaching the angled curve along this segment. Figure 1-15c of the EIR provides a conceptual drawing of the proposed traffic calming features.

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E-22

4. Project distribution in 2035 does not send/receive any trips to/from the extension of Citracado Pkwy. Project distribution should change after addition of Citracado Pkwy to the network. Currently, close to 80% of the trips generated are sent/received to/from North and SR78 which will change with the addition of Citracado extension.

E-23

5. Intersection of Koana Loa and harmony Grove road needs attention and should be a part of overall traffic calming plan for the Koana Loa Dr.

We appreciate your consideration of our comments. If you have any questions, please do not hesitate to contact me or Abe Bandegan, Associate Traffic Engineer.

Regards,

Homi Namdari  
Assistant City Engineer  
[hnamdari@escondido.org](mailto:hnamdari@escondido.org)  
(760) 839-4085

E-22

The statement that Project distribution does not utilize Citracado Parkway in 2035 is inaccurate. A manual Project distribution was not prepared for the Year 2035 time frame. Rather, a traffic model was utilized which includes the extension of Citracado Parkway. Therefore, the model assumes Project trips would utilize Citracado Parkway once the extension is completed.

E-23

The comment indicates that the Kauana Loa Drive/Harmony Grove Road intersection should be a part of overall traffic calming on Kauana Loa Drive. The Kauana Loa Drive/Harmony Grove Road intersection was analyzed as part of the Project's traffic analysis; however, impacts were determined to be less than significant and inclusion in an overall traffic calming plan would not be necessary.



Jay Petrek, AICP  
Director of Community Development  
Planning Division  
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Phone: 760-839-4671 Fax: 760-839-4313

December 22, 2015

David Sibbet, Planning Manager  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 301  
San Diego, CA 92123

Re: Valiano Specific Plan Memorandum of Understanding

Dear Mr. Sibbet:

The City of Escondido provided an Environmental Impact Report (EIR) comment letter to the County of San Diego regarding the proposed Valiano Specific Plan on June 15, 2015. As you are aware, the project is located in the western quadrant of Escondido's General Plan and Sphere of Influence areas, and will generate impacts associated with the 326 single family residential units proposed. The June 15<sup>th</sup> letter outlined various issues regarding the project. City of Escondido and Integral Communities' representatives have been working to resolve issues pertaining to the Specific Plan. The purpose of this letter is to outline the resolutions developed, and to state that there are no outstanding issues from the City of Escondido.

In an effort to address particular impacts, City staff and the developer have entered into a Sewer Facilities *Memorandum of Understanding* (MOU) and *Traffic Mitigation Funding Agreement* (TMFA) that was authorized by the Escondido City Council on December 9, 2015. Implementation of the features in the MOU and TFMA will satisfactorily address all remaining issues the City of Escondido has regarding the Valiano Specific Plan.

**Sewer Facilities MOU:**  
The City of Escondido will provide wastewater treatment for the Valiano Specific Plan, as identified in one of the EIR's project alternatives. The MOU requires the developer to reconstruct an existing sewer pump station, install new gravity and force mains, and provide a 5.5 million gallon wet weather storage facility befitting the community. In addition, the developer would pay city sewer connection fees and would be credited a portion of the developer's costs incurred in the construction of the sewer facilities improvements. The developer would also reimburse the City for its review of plans and inspection of the various sewer projects. The MOU would only become effective if the County approves the development project and if the City and County are able to enter into a sewer service agreement.

Sam Abed, Mayor    Michael Morasco, Deputy Mayor    Olga Diaz    Ed Gallo    John Masson

E-24 This comment introduces the following comments (E-25 through E-27) that supersede previous comments from the City of Escondido. The letter dated December 22, 2015 summarizes the agreements made between the City of Escondido and the Applicant approved by City Council on December 9, 2015.

E-25 If the referenced alternative is implemented (the "Connection to the City of Escondido Hale Avenue Resource Recovery Facility [HARRF]" alternative discussed in Subchapter 4.5 of the EIR), the Sewer Facilities Memorandum of Understanding (MOU) will be implemented.

COMMENTS

RESPONSES


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Traffic (TMFA):

The TMFA identifies the developer's obligations to address project-related traffic impacts identified in the EIR. Mitigation measures identified in the TMFA include improvements to various streets and intersections involving portions of Country Club Drive, Auto Park Way, Hill Valley Drive, Kauana Loa Drive and Harmony Grove Road. The developer will also provide a one-time fair share contribution of \$250,000 for eventual completion of Citracado Parkway. The TMFA stipulates that the Citracado Parkway contribution and other street improvements be completed before issuance of the first certificate of occupancy.

As previously stated, implementation of the features in the MOU and TMFA will satisfactorily address all remaining issues the City of Escondido has regarding the Valiano Specific Plan, including the Environmental Impact Report (EIR), and no issues remain outstanding. If you have questions regarding this matter please contact me at (760) 839-4556 or email me at [jpetrek@escondido.org](mailto:jpetrek@escondido.org).

Sincerely,



Jay Petrek, AICP  
Director of Community Development

cc: Graham Mitchel, City Manager  
Ed Domingue, Director of Public Works  
Chris McKinney, Director of Utilities  
Julie Procopio, Assistant Director of Public Works  
Angela Morrow, Deputy Director of Utilities  
Paul Tryon, Integral Communities

E-26 The improvements identified in the Traffic Mitigation Funding Agreement (TMFA) would be implemented by the Proposed Project. See Responses E-12, E-19, and E-21 to previous City of Escondido comments regarding these improvements.

E-27 The comment is not at variance with the environmental document as it confirms that with implementation of the features discussed in the letter, the City of Escondido would have no issues remaining with the EIR.