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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

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.

- 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.
- 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.

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.

- 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.
- 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.
- 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.
- 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.
- 11) Proposed mitigation measures should be evaluated to determine they fully mitigate the project's impacts.

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 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

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)

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.
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
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