



City Council Staff report

March 28, 2012

ATTACHMENT D

Comment Letters



EDMUND G. BROWN JR.
GOVERNOR

February 28, 2012

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

Subject: Escondido General Plan Update, Downtown Specific Plan Update & Climate Action Plan
SCH#: 2010071064

Dear Jay Petrek:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 27, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

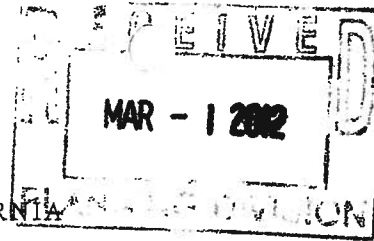
These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

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ON 3/1/12

**Document Details Report
State Clearinghouse Data Base**

SCH# 2010071064
Project Title Escondido General Plan Update, Downtown Specific Plan Update & Climate Action Plan
Lead Agency Escondido, City of

Type EIR Draft EIR
Description The City of Escondido is the Lead Agency for the preparation of a Program EIR, as defined in Section 15168 of the CEQA Guidelines, addressing the Escondido General Plan Update, Downtown Specific Plan Update and Climate Action Plan. A summary of each of these project components is provided below.

Lead Agency Contact

Name Jay Petrek
Agency City of Escondido
Phone (760) 839-4556 **Fax**
email jpetrek@escondido.org
Address 201 North Broadway
City Escondido **State** CA **Zip** 92025-2798

Project Location

County San Diego
City San Diego
Region
Lat / Long 33° 7' 29" N / 117° 4' 51" W
Cross Streets I-15 and SR 78
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 78, I-15
Airports Lake Wohlford Airstrip
Railways NCTD Sprinter Line
Waterways Escondido Creek, Reidy Creek
Schools Escondido HS/Escondido ES
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

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

Date Received 01/12/2012 **Start of Review** 01/12/2012 **End of Review** 02/27/2012



Department of Toxic Substances Control



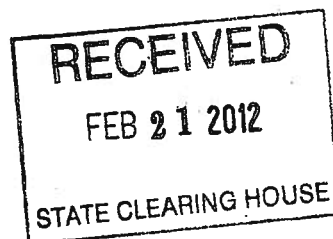
Matthew Rodriguez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

February 21, 2012

*2/27/12
Clear*



Mr. Jay Petrek
City of Escondido Planning Department
201 North Broadway
Escondido, California 92025

NOTICE OF COMPLETION & ENVIRONMENTAL IMPACT REPORT (EIR)
DOCUMENT TRANSMITTAL FOR ESCONDIDO GENERAL PLAN UPDATE (SCH#
2010071064)

Dear Mr. Petrek:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation Report for the above-mentioned project. The following project description is stated in your document: "The General Plan will include an updated vision, with goals, objectives, and policies anticipating a 2050 buildout reflecting the current needs and preferences of the community, and ensuring compliance with state law. The EIR will also include analysis of a Climate Action Plan for developing implementing energy efficiency and conversation strategies to reduce fossil fuel emissions created as a result of transportation, building, and other appropriate sectors within the General Plan. Amendments are proposed involving the following elements: Land Use, Housing, Circulation, Community Facilities and Services, Community Protection and Safety, Community Open Space/Conservation, Economic Prosperity, Growth Management, General Plan Implementation, and Specific Planning Areas".

DTSC sent you comments on Notice of Preparation Report for the above-mentioned project on 8/17/2010, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

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

Sincerely,

Al Shami
Project Manager
Brownfields and Environmental Restoration Program

Mr. Jay Petrek
February 21, 2012
Page 2

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

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
nritter@dtsc.ca.gov

CEQA # 3452



Department of Toxic Substances Control

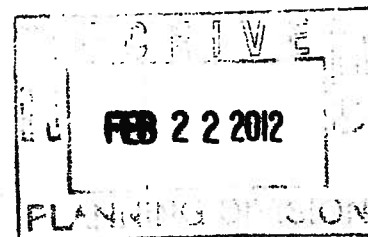
Matthew Rodriguez
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5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

February 21, 2012

Mr. Jay Petrek
City of Escondido Planning Department
201 North Broadway
Escondido, California 92025



NOTICE OF COMPLETION & ENVIRONMENTAL IMPACT REPORT (EIR)
DOCUMENT TRANSMITTAL FOR ESCONDIDO GENERAL PLAN UPDATE (SCH#
2010071064)

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Sincerely,

Al Shami
Project Manager
Brownfields and Environmental Restoration Program

TRANSMITTED TO CONSULTANT
ON 2/23/12

Mr. Jay Petrek
February 21, 2012
Page 2

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

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
nritter@dtsc.ca.gov

CEQA # 3452

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ON 2/22/12

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

PLANNING DIVISION

4050 TAYLOR STREET, M.S. 240

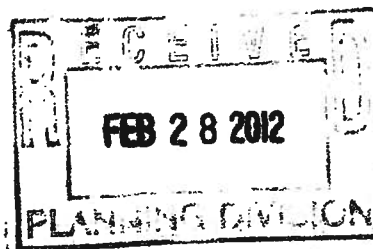
SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Flex your power!
Be energy efficient!*

February 27, 2012

11-SD-15

Various

Escondido General Plan and Specific Plan Update and
Climate Action Plan

DEIR

SCH 2010071064

Mr. Jay Petrek
City of Escondido
Planning Department
201 N. Broadway
Escondido, CA 92025

Dear Mr. Petrek:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Escondido General and Specific Plan update and Climate Action Plan. Caltrans would like to submit the following comments:

- The California Governor's Office of Planning and Research states the following regarding general law and policy concerning the relationship between Regional Transportation Plans (RTP) and General Plans (GP):
 - *When preparing or revising a General Plan, cities and counties should carefully analyze the implications of regional plans for their planning area. General Plans are required to include an analysis of the extent to which the General Plan's policies, standards, and proposals are consistent with regional plans.*
 - *The policies and plan proposals contained in the land use and circulation elements should reflect the RTP and Regional Transportation Improvement Program (RTIP). Clearly, transit standards, congestion management measures, proposed facilities, and transportation related funding may directly affect land use patterns and capital improvements. Although there is no explicit requirement that the RTP and RTIP be consistent with local general plans, good practice dictates that cities and counties should address these regional goals, policies, and programs to the extent they are relevant.*
- The city should cooperate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on/off ramps is adequate.

- Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled (VMT) and the number of trips per household. Therefore, Caltrans encourages local agencies as part of their General Plan updates to work towards a safe, functional, interconnected, multi-modal system integrated with land use planning that supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. Transit accommodations can be accomplished through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements which can improve mobility and alleviate traffic impacts to State facilities serving the City: Interstate 15 (I-15) and State Route 78 (SR-78). Such proposed accommodations in Caltrans R/W should be coordinated early with Caltrans staff; contact Chris Schmidt, Caltrans Transportation Planning, Public Transit Branch (619-220-7360).
- **SR-78 Corridor Study:** The San Diego Association of Governments (SANDAG) and Caltrans are currently working on the SR-78 Corridor Study for improving transportation and land use along the SR-78 corridor. The SANDAG project manager for the SR-78 Corridor Study is Rachel Kennedy (619-699-5638), and the Caltrans project manager is Robin Owen (619-688-2507).
- **SANDAG 2050 RTP:** With SANDAG's Sustainable Communities Strategy efforts in the 2050 RTP Update, per Senate Bill 375 (SB 375), Caltrans encourages the City to coordinate with SANDAG to address regional strategies to reduce greenhouse gases (GHG) and VMT as part of the City's General Plan update.
- **The California Complete Streets Act of 2008:** Beginning January 1, 2011, Assembly Bill 1358 requires that any substantive revision of the circulation element of the general plan includes planning for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways in a manner that is suitable to the context of the general plan. The Act defines all users as motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. Caltrans supports Complete Streets policies and continues to implement our own Complete Streets directive, DD-64-R1.
- **Traffic Impact Study:** A significant impact is identified in the Traffic Impact Study (TIS) of the EIR for the General Plan update on I-15 at Valley Parkway. The TIS as part of the EIR documented that this significant impact was unmitigatable. Caltrans has provided the City as part of previous development reviews, potential improvements at this freeway ramp location. It is recommended the attached improvements be considered as mitigation for future land developments that may have impacts at the location.

Mr. Jay Petrek
February 27, 2012
Page 3

If you have any questions or require further information, please contact Marisa Hampton at (619) 688-6954 or email at marisa.hampton@dot.ca.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'Jacob Armstrong', written in a cursive style.

JACOB ARMSTRONG, Chief
Development Review Branch

I-15 MANAGED LANES-NORTH VALLEY PKWY NB OFF DOUBLE RIGHT TURN

SECTION	CURRENT ESTIMATE			
ROADWAY ITEMS	UNIT	QUNTITIES	UNIT PRICE	TOTAL
CLEARING AND GRUBBING	M2	3,300	4	13,200
EROSION CONTROL	M2	3,300	5	16,500
EARTHWORK	M3	1,000	30	30,000
CLASS 2 AB	M3	300	85	25,500
HMA PAVEMENT	TONN	250	180	45,000
DRAINAGE	LS	1	30,000	30,000
PLANTING	LS	1	15,000	15,000
IRRIGATION AND WATER EXP.	LS	1	50,000	50,000
3 YEARS PLANT ESTABLISH.	LS	1	18,000	18,000
TRAFFIC ELECTRICAL	LS	1	70,000	70,000
TRAFFIC ITEMS	LS	1	15,000	15,000
MINOR ITEMS	LS	1	20,000	20,000
SUB-TOTAL				318,500
CONTINGENCY 20%	LS	1	1	63,700
SUPLEM. WORK	LS	1	1	20,000
STATE FURNISH	LS	1	1	20,000
MOBILIZATION 8%	LS	1	1	25,480
TOTAL CAPITAL COST				447,680
DESIGN SUPPORT				44,768
CONSTRUCTION SUPPORT				67,152
TOTAL PROJECT COST				560,000



State of California - The Natural Resources Agency

DEPARTMENT OF FISH AND GAME

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
<http://www.dfg.ca.gov>

EDMUND G. BROWN JR., Governor

CHARLTON H. BONHAM, Director



March 2, 2012

Mr. Jay Petrek
City of Escondido
Planning Department
201 North Broadway
Escondido, California 92025

Subject: Comments on the Draft Environmental Impact Report for the Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Project, City of Escondido, San Diego County, California (SCH # 2010071064)

Dear Mr. Petrek:

The California Department of Fish and Game (Department) has reviewed the above-referenced draft Environmental Impact Report (EIR) dated January 12, 2012. The comments provided herein are based upon information provided in the draft EIR, our knowledge of sensitive and declining vegetation communities in the County of San Diego, the City of Escondido's (City) draft Multiple Habitat Conservation Program (MHCP) Subarea Plan (SAP) goals, and the North County Multiple Species Conservation Plan (NC MSCP). The Department acknowledges and appreciates the willingness of the City to accept comments for this draft EIR until March 2, 2012.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code §2050 et seq.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City is participating in the Department's NCCP program through the preparation of its draft SAP. The Department also is responsible for the administration of the Streambed Alteration Agreement Program, which oversees potential threats to the State's wetlands resources.

The proposed project is located in northwestern San Diego County in the City. The City is located approximately 30 miles north of San Diego and approximately 18 miles east of the Pacific Ocean. Located approximately 615 feet above mean sea level (AMSL), the City is situated in a natural valley and is surrounded by rolling hills and rugged terrain ranging up to 4,200 feet AMSL. The unincorporated communities of Valley Center and Hidden Meadows bound the City on the north, and the City of San Marcos bounds the City on the west. The City is bounded on the south by Lake Hodges and the City of San Diego and on the east by unincorporated San Diego County. Interstate 15 (I-15) bisects Escondido in a north-south direction and State Route (SR) 78 transitions from freeway to surface streets in an east-west direction through the City.

Conserving California's Wildlife Since 1870

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ON 3/2/12

The project has three components: an update to the existing City General Plan (General Plan Update) including the Housing Element (General Plan Update), implementation of an update to the existing City's Downtown Specific Plan (Downtown Specific Plan Update), and creation and implementation of an Escondido Climate Action Plan.

The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

1. The draft EIR (Section 4.4) provides a good summary of the MHCP and City's SAP, which is still in progress. Currently the U.S. Fish and Wildlife Service (Service) 4 (d) interim Habitat Loss Permit is not available to the City. Therefore the draft EIR should recommend consulting with the Service to determine the appropriate steps to initiate the process for acquiring a 4 (d) interim Habitat Loss Permit (HLP) from the Wildlife Agencies (Service and Department) for any impacts to coastal sage scrub while the plan is in-progress. Projects under the General Plan Update that result in impacts to sensitive habitat should also provide adequate mitigation following the City's draft SAP and ensure adequate funding for long-term management of the mitigation site.
2. The draft EIR identifies (Section 4.4.3.1) that impacts to sensitive species could be potentially significant because some study areas currently include open space (e.g., Nutmeg Street Study Area and the Imperial Oakes Specific Planning Area while other study areas are located adjacent to open space areas (e.g., Escondido Research and Technology Center North and South SPA, the I-15/Felicita Road Corporate Office Target Area, the Westfield Shopping Town Target Area and Kit Carson Park). Additionally, development that would occur outside of the study areas and growth that will be accommodated in the City's sphere-of-influence could impact sensitive species and habitat. Although development within the urban core would generally not result in the removal of natural habitat, development (including nurseries) would have the potential to remove stands of trees or other vegetation that provides nursery sites to wildlife, particularly birds. The proposed General Plan Update circulation network also proposes new roadways in undeveloped areas that would have the potential to impede wildlife movement. Roads that may impact wildlife movement include the proposed extension of Mountain Meadow Road (crosses through the northern habitat area, slightly north of Daley Ranch) and the extensions of Citracado Parkway and Lariat Drive (would cross a small portion of the southwestern habitat area). Until the City's SAP is completed, the City does not have incidental take authorization for impacts to listed species. Accordingly, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Additionally, a 10 (a) permit from the Service may be required for take of federally-listed species. For impacts to coastal sage scrub, an interim 4 (d) permit would be required (see comment 1).
3. The draft EIR states on page 4.4-22 that "protection and replacement standards include making every feasible effort to preserve sensitive biological habitat and species and onsite or offsite mitigation at a ratio of 1:1 or higher." While 1:1 may be an acceptable mitigation ratio for impacts to some habitats (e.g., unoccupied non-native grassland), it would not be acceptable, for example, for impacts to CSS while the City's SAP is still in-progress.

4. The draft EIR (Section 4.4, page 4.4-21) concludes that golden eagles (*Aquila chrysaetos*) potentially occur in the General Plan Update planning area and that impacts to the eagle may be significant. If impacts to golden eagle nesting or foraging habitat may occur from the General Plan Update, the Wildlife Agencies recommend that the City consult with the Service on the need to obtain a Golden Eagle permit pursuant to the Bald and Golden Eagle Protection Act and related new regulations (74 FR 46835-4687, "Eagle Act Regulations) that went into effect on November 10, 2009.
5. The General Plan provides many policies to provide interim resource protection until the City's SAP is completed and approved. Some of these include, but are not limited to, the following:
 - a. Quality of life standard 8 (Open Space System) which requires a system of open space corridors, easements, acquisition programs and trails to be established in the Resource Conservation and Community Health and Services Elements. Further, quality of life standard 8 states that significant wetlands, riparian or woodland habitat, and habitat for rare or endangered species shall be protected in coordination with state and/or federal agencies having jurisdiction over such areas.
 - b. Biological and Open Space Resources Policies 1.2, 1.6 through 1.9, 1.11, and 1.13 require the City to maintain open space and rural residential uses around the perimeter of the City; preserve and protect significant wetlands, riparian, and woodland habitats and rare, threatened or endangered plants and animals and their habitats; require mitigation of resources either onsite or offsite at ratios consistent with state and federal regulations; require surveys be prepared for proposed development projects located in areas potentially containing significant biological resources; prohibit the removal of significant stands of trees unless needed to protect public safety; require appropriate barriers to be constructed to restrict access to areas containing sensitive biological resources; and promote the use of native plants for public and private landscaping purposes within the City.
 - c. Open Space Land Use Policy 12.1, which establishes the Open Space/Park land use designation to identify properties reserved for active and passive parks, habitat preservation, and public safety purposes.
 - d. Residential Clustering Policies 5.2 and 5.6, which encourage utilization of clustering as tool to preserve slopes, ridgelines and sensitive habitats, and require the City to limit density transfers from areas containing sensitive biological resources.
 - e. Planned Development Policy 6.3, which identifies requirements for planned development proposals such as minimization of grading and removal of native vegetation; preservation of the creeks and their adjoining vegetation; and the protection and management of areas supporting rare and endangered plant and animal species.
 - f. Open Space Land Use Policies 12.3 and 12.4, which encourage the preservation of land within the planning area and require the City to explore options to purchase land for recreation or open space purposes that is owned by other public agencies and available for acquisition, as appropriate.

- g. Biological and Open Space Resources Policies 1.7 and 1.8, which require the preparation of a biological survey for development projects that would potentially impact significant biological resources. In the event that significant biological resources are adversely affected, appropriate state and federal agencies must be consulted to determine adequate mitigation for replacement of the resource.

The Department recommends that the General Plan Update include the following policies to minimize impacts to sensitive species and habitats and to ensure it would not significantly impact the City's ability to complete its SAP:

- h. A policy to complete the City's SAP should be identified as a high priority in the General Plan Update and the associated Implementation Plan/Action Plan. The Department recommends that 3-5 years be identified as a reasonable time period to substantially or entirely complete the SAP. Moreover, the draft EIR concludes in Section 4.4 and on page 4.4-39 (Issue 4) that many impacts to sensitive species and to habitat conservation planning from the General Plan Update would be less than significant when the City's SAP is completed and approved. Until that time, the federal and state permitting processes would be the method to ensure that any impacts to listed species are less than significant. This underscores the importance of completing the City's SAP and of including such a policy in the General Plan Update and Implementation Plan/Action Plan.
- i. A fire protection policy that minimizes the removal of native cacti in areas located within or adjacent to areas identified for conservation in the City's SAP, especially where populations of coastal cactus wren (*Campylorhynchus brunneicapillus*, "cactus wren") occur. The City contains one of the core populations of cactus wren in the MHCP Planning area. Retaining native cacti (a low-combustive plant) can contribute to preserving habitat for the cactus wren and help to ensure that additional development authorized under the General Plan Update would not result in a significant impact to cactus wren.
- j. Policies that direct locating public use trails along the edges and perimeter of proposed core lands and linkages included in the City's draft SAP and to avoid encroachment into sensitive habitats or defined (or subsequently identified) wildlife movement areas. The Department recommends that, for any trails designated in the City's SAP preserve, that a Public Access Plan (PAP) to be developed for the trail. The PAP should include a trail compatibility analysis to ensure that impacts to species (e.g., golden eagle, cactus wren, etc.) are avoided, impacts to habitat are minimized and, where appropriate, performing additional monitoring of public trail usage where problems exist.
- k. A policy that the City will actively consult and work with the California Department of Forestry and Fire Protection and the Wildlife Agencies to incorporate appropriate review and mitigation (e.g., CEQA) for impacts to habitat and species into vegetation management projects.
- l. A policy that actions to meet the requirements of AB 375 for sustainable community planning should not be at the expense of multi-species preservation or implementation of the City's draft SAP. For instance, green infrastructure should be viewed as less sustainable in the backcountry versus in existing urban area (viewed as more sustainable). In this case, the latter would be more sustainable because there is no trade-off between green infrastructure and natural habitat. In other words, the push for

green infrastructure should not conflict with the City's draft SAP or other regulations that promote species and habitat protection. As an example, although a "wind farm" may be a "green project," it may not be consistent with the goals and objectives of MHCP.

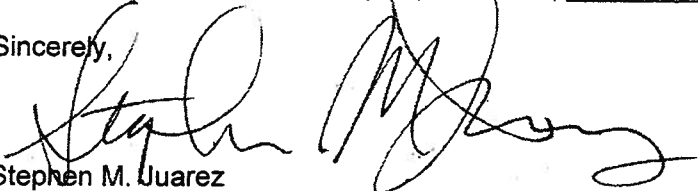
- m. A policy to integrate the City's draft SAP with watershed planning, greenhouse gas reductions (global climate change) and other regional planning involving natural resources. This would potentially allow the City to maximize access to multiple sources of grant funding for conservation-related purposes.
- n. A policy that all existing and planned SAP conserved lands that contribute to biological preservation will be redesignated to open space-conservation as part of the General Plan Update and Implementation Plan/Action Plan. The underlying zoning could remain unchanged under the General Plan Update, but then be rezoned as an action item in the Implementation Plan/Action Plan (e.g., as part of Community Plan updates). This would shift the land use development in the SAP preserve areas from a land development first focus to a biological minimization focus that is more sensitive to the natural environment.
- o. A policy for fire protection that emphasizes that for optimal protection against wildfires, "hardening of the structure" should occur first, and then defensible space can supplement structural design requirements. A policy called "Building and Site Design" (or equivalent) should be added that requires UBC/structural "hardening" measures (e.g., boxed eaves, fire rated windows/walls, fire retardant native vegetation, etc.) in project design as part of, and preceding, defensible space measures, especially where located within or adjacent to City SAP preserve and/or Wildlife Agency (Department and Service) lands. All defensible space should be included within the project footprint and property boundary of project applicants. The General Plan Update should establish a policy that the City will not allow variances or other project approvals where it would necessitate impacts to Wildlife Agency and/or SAP-preserve lands (e.g., brush management).
- p. A policy that monitoring and enforcement is a critical part of natural resource planning and implementation (e.g., encroachment, trail management). Without enforcement (e.g., adequate number of rangers, ensuring that new, unauthorized trails are not being cut/maintained, etc.), realization of conservation goals set forth in the Resource and Conservation Element and other goals in the General Plan Update may be problematic.
- q. A policy (e.g., Resource Conservation Element) that provides adequate interim protection of biological resources from the period between the discretionary approval and issuance of grading permits. This time period should also be tracked in City records. Often, there is a considerable lag time between the hearing approval and ministerial permits, which leaves "protected" resources at risk. In most cases, the applicant needs to be clearly held responsible for protecting these resources until the transfer of management responsibility has been transferred (along with any endowment or funding mechanism) to another entity approved by the City and the Wildlife Agencies. Failure to account for this interim protection potentially results in management organizations refusing to assume unanticipated clean-up or restoration obligations and could affect the City from achieving conservation goals for MHCP covered species and habitats.

- r. The General Plan Update should take into account all proposed fuel modification zones and maintenance activities (including a buffer area) when planning conservation goals and habitat preserves, and acknowledge that these zones/activities should be undertaken outside the preserve boundaries, consistent with the obligations of the City's draft SAP. If such zones/activities have to occur in the preserve boundaries due to new fire regulations, then the General Plan Update should identify a policy of no net habitat loss from fuel modification within the preserves.
 - s. To address potential impacts from wildlife movement corridors, a policy to limit brush management in wildlife movement and corridor areas as well as provide bridge and crossing to facilitate movement.
6. The Department recommends that the draft EIR for the General Plan Update provide an updated status of Daley Ranch and credits available (e.g. page 4.4-5/Focused Planning Areas).
7. The General Plan should clearly distinguish between "active" and "passive" recreational uses (i.e., provide an inclusive list of both) and describe which uses would be allowed on and adjacent to various types of open space (e.g., City's SAP preserve lands, active parks, urban amenity, etc.). Moreover, the General Plan Update and Implementation/Action Plan should describe how much annual funding goes into administrative versus stewardship and monitoring, management and enforcement.
8. The General Plan combines several important areas commonly associated with open space, including recreation, trails, biological conservation, water-resource issues, global climate change, etc. The Department recommends including language in the General Plan Update that would establish biological conservation as the primary objective within the SAP preserve system wherever potential recreation or other resource conflicts may become an issue.
9. The General Plan Update should acknowledge the City's open space network (including MHCP preserve lands) as "green capital or infrastructure." This infrastructure is essential to the City's responsibility to balance the preservation of environmental resources with its obligation to meet the region's growth needs. The General Plan Update should include policy language that clearly defines and demonstrates that adequate funding (aside from speculative regional funding sources) is available to carry-out the Plan's "green infrastructure," including implementing the conservation actions, management activities, and necessary enforcement in the SAP.
10. The General Plan and/or Implementation/Action Plan should identify the target number of rangers and preserve managers per 1,000 acres of open space (categorized into biological, active, passive, etc.) and identify an overall goal to have at least one preserve manager in each region or SAP plan area of the City.
11. The planning boundaries for the County's North County (in-progress) and South County (approved) MSCP are located adjacent to the City in various locations. Any annexation of these lands by the City would require approval from the Wildlife Agencies to ensure it would not significantly impact the NC MSCP, including, but not limited to, wildlife movements, covered species, conservation goals and biological core and linkage areas.

Mr. Jay Petrek
March 2, 2012
Page 7 of 7

The Department appreciates the opportunity to comment on this draft EIR. We are hopeful that further coordination with us will ensure the protection we find necessary for the biological resources that would be affected by this project. If you have questions or comments regarding this letter, please contact Bryand Duke (858) 637-5511, Bduke@dfg.ca.gov or Randy Rodriguez of the Department (858) 467-4201, RFRodriguez@dfg.ca.gov.

Sincerely,

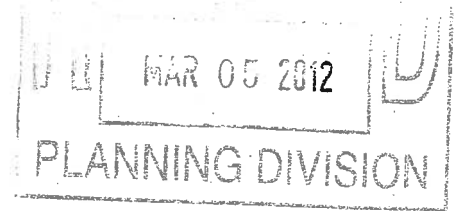


Stephen M. Juarez
Environmental Program Manager
California Department of Fish and Game

cc: State Clearinghouse (fax only)
Janet Stuckrath, U.S. Fish and Wildlife Service
Diane Sandman, Atkins Global (Emailed copy)
Kim Howlett, Atkins Global (Emailed copy)

Jay Petrek

From: Janet_Stuckrath@fws.gov
Sent: Monday, March 05, 2012 9:05 AM
To: Jay Petrek
Cc: BDuke@dfg.ca.gov
Subject: Escondido General Plan Update



In Reply Refer To:
FWS/CDFG-12B0100-12TA0212

Jay,
The Service has reviewed the Draft Environmental Impact Report (EIR) for the Escondido General Plan Update, Downtown Specific Plan Update, and the Climate Action Plan Project. We offer the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

In 2007, the Service revoked City's ability to process the loss of coastal sage scrub through the 4(d) rule (Habitat Loss Permit). Therefore, the EIR should indicate that impacts to coastal sage scrub occupied by the coastal California gnatcatcher (*Polioptila californica californica*) will require either a section 7 consultation with the Service if there is a Federal nexus or a section 10 (HCP) if there is no Federal nexus.

The Critical Habitat paragraph on page 4.4-12 describes critical locations rather than critical habitat as defined by the Service. Please clarify whether this is intended to be a discussion of critical locations for Multiple Habitat Conservation Plan (MHCP) covered species or whether it should be a discussion of critical habitat designated by the Service for Federally listed species within the General Plan areas.

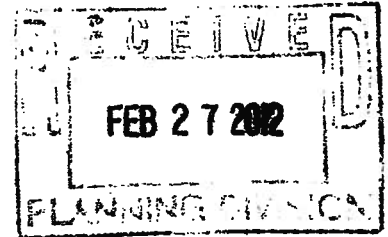
Thank you for the opportunity to comment on the draft EIR. If you have any questions or concerns with these comments, please contact me at (760) 431-9440 extension 270 or Janet_Stuckrath@fws.gov

Janet Stuckrath
Carlsbad Fish and Wildlife Office
(760) 431-9440 ext. 270

TRANSMITTED TO CONSULTANT
ON 3/5/12

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

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



February 24, 2012

Mr Jay Petrek, AICP
City of Escondido
Planning Division
201 North Broadway
Escondido, California 92025-2798

Re: **City of Escondido General Plan Update Draft Environmental Impact Report**

Dear Mr Petrek:

The San Diego County Regional Airport Authority (SDCRAA) appreciates notice of availability of a draft environmental impact report (EIR) for the project referenced above and offers the following comments.

On pages III-21 and VI-23, it is recommended that "the County of San Diego", as the official name of the government entity, be cited as the owner and operator (rather than sponsor) of McClellan-Palomar Airport. San Diego County is a generic term referring to the geographic location (as used in our own agency name) apart from the specific agency of government. Similarly, it would be preferable to say that the airport is located in the "city" (rather than "City") of Carlsbad as a geographic location apart from the specific municipal corporation, particularly given that the airport is not owned or operated by that City government.

While the description of the Airport Influence Area (AIA) on page III-21 is accurate, that discussion might be augmented to note that no overflight notification areas from the McClellan-Palomar Airport - Airport Land Use Compatibility Plan (ALUCP) apply to land within Escondido, nor does Escondido contain any terrain penetrations to McClellan-Palomar Airport airspace surfaces.

Aviation Policy 11.2 (pages III-41 & X-33) should indicate that all applicable development should be in conformance with the McClellan-Palomar ALUCP. As worded, the policy states that all development in the AIA is required to be in conformance with the General Plan. A general plan must be made consistent with an adopted ALUCP, not the other way round, or the affected local agency must override the ALUCP through a State statutory procedure.

The statement on page VI-23 that the ALUCP requires new residential development to be conditioned with a real estate disclosure statement mixes ALUCP terminology. The ALUCP requires a permitting local agency to condition new residential uses proposed within the overflight notification area to record that notification on affected properties, but none of the overflight notification area extends into Escondido. By contrast, State law requires that professionals in real estate transactions disclose to prospective property owners that a property is located within an AIA if that circumstance applies, but this does not place any conditioning or recordation requirement upon the City of Escondido or property owners. A portion of the AIA does extend into Escondido, as accurately mapped in Figure III-10, and real estate



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Mr Petrek
Page 2

professionals are thus obligated to make such disclosure for affected properties in the practice of their profession.

Similarly, Noise Policy 5.15 (pages VI-35 and X-49) would involve only real estate professionals in disclosure, rather than McClellan-Palomar Airport itself or the County of San Diego as its owner/operator.

Thank you for the opportunity to offer comment on the General Plan Update draft EIR. Please contact Ed Gowens at (619) 400-2244 or egowens@san.org if you have any questions regarding this letter.

Yours truly,

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

Angela Jamison
Manager
Airport Planning

cc: Amy Gonzalez, SDCRAA – Director, Counsel Services
Sandy Hesnard, Caltrans – Division of Aeronautics
Chris Schmidt, Caltrans, District 11
Peter Drinkwater, Director, County of San Diego Airports

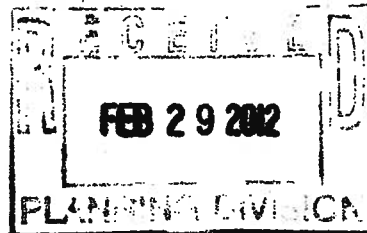


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 www.sandag.org

February 27, 2012

File Number 3330300

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



MEMBER AGENCIES

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- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

Dear Mr. Petrek:

SUBJECT: Comments on the City of Escondido's Draft Environmental Impact Report for a General Plan Update, Downtown Specific Plan Update and Climate Action Plan

Thank you for the opportunity to comment on the City of Escondido's Draft Environmental Impact Report (DEIR) for a General Plan Update, Downtown Specific Plan Update, and Climate Action Plan. Our comments, which are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan (2050 RTP), are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth principles.

SANDAG staff has several specific and general comments for your consideration. SANDAG recommends the following comments be addressed and analyzed in the Draft EIR. These comments are outlined below.

Specific Comments

General Plan

Chapter I – Vision and Purpose:

- Page I-6: SANDAG and Regional Planning Efforts - No mention of the Regional Transportation Plan (RTP). Please refer to the recently adopted (2050 RTP), adopted in October 2011.
- Page I-10: Transportation and Mobility - Use all caps for "SPRINTER" throughout the entire plan.
- Page I-13: Quality of Life Standard 1: Traffic and Transportation - Please refer to the 2050 RTP, Chapter 8, Transportation Demand Management (TDM) for inclusion in this section. Also, consider including Complete Streets policies.

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 ON 2/29/12

Chapter II – Land Use and Community Form

- Page II-68 – SANDAG supportive of Target Area 4 Guiding Principles to support investments made for the Escondido BREEZE *Rapid* bus.

Chapter III – Mobility and Infrastructure

- Page III-2: Figure III-1 - see comment referring to Chapter I, page I-13.
- Page III-3: B. Regional Transportation Planning - second paragraph, edit first sentence to read as "The RTP is meant to be action-oriented, practical, and flexible and to consider both short-term and long-term issues....." Add sentence referring to the RTP being updated every 4 years immediately following. Edit second sentence to read as "Federal guidelines also recommend identifying both the unconstrained and revenue constrained financial resources necessary to accelerate programming....."
- Page III-10: Transit System - Escondido Rapid is a Rapid Bus service not Bus Rapid Transit (BRT) service.
- Page III-11: Transit System, Figure III-4 - Please refer to Appendix A of the 2050 RTP. This figure is missing BRT service routes including routes 608 and 610, Escondido-downtown express and Temecula, Escondido to downtown. Also, it seems that there may be possible confusion between rapid arterial bus routes versus BRT service. Is the intent of the map to only show extensions of the SPRINTER and arterial rapid service or all BRT, SPRINTER, and arterial rapid planned improvements? If so, consider listing other improvements for SPRINTER and BRT as stated in Appendix A of the 2050 RTP.
- Pages III-15-16: Street Network - Consider widening pedestrian path within the pedestrian zone.
- Page III-19 – Typo – "NCTD"
- Page III-33: Complete Streets Policies - Consider aligning and integrating a comprehensive policy with 2050 RTP policies.
- Page III-34: Pedestrian Network - Consider adding to Pedestrian Network Policy 3.1, data collection/walkability analysis as keys efforts for monitoring performance of pedestrian facilities.
- Page III-35: Bicycle Network - Consider adding to Bicycle Network Policy 3.1, data collection as a key effort for monitoring performance of bicycle facilities.
- Page III-37: TDM – Please refer to Chapter 8 from the 2050 RTP for additional TDM programs.
- Page III-37 – SANDAG supports Transit System Policies 5.5 and 5.6.

- Pages III-38-39: Street Network – Consider including/integrating/referencing within Street Network policies complete street, pedestrian network, bicycle network, transit system, TDM policies. Also, consider incorporating into street network policies, Technical Appendix 20 within the 2050 RTP, which requires all local agency roadway projects seeking federal funds to perform a non-single occupancy vehicle analysis prior to projects being incorporated within the RTIP.
- Page III-40: Traffic Calming - Consider within Traffic Calming Policy 9.1 incorporating safe routes to schools, safe routes to transit, TDM (schoolpools), and other programs.
- Throughout Document – Escondido BREEZE *Rapid* is not a BRT, it should be classified as a Rapid Bus. See page 6-12 of the 2050 RTP for definitions of transit services.

Chapter X – Implementation Program

- Page X-12: Regional Agencies-See comment above to Chapter I, page I-6.

City of Escondido Draft General Plan EIR

Draft EIR Chapter I – Executive Summary

- Page 1-13: Summary of Project Impacts – Provide explanations for significant and unavoidable project impacts for the following intersections:
 - I-15 SB ramps/Valley Parkway (LOS F, PM peak hour).
 - I-15 SB ramps/Via Rancho Parkway (LOS E/F, AM/PM peak hours, respectively).

Draft EIR Chapter 3 – Project Description, Location, and Environmental Setting

- Pages 3-40-41: Quality of Life Standard 1 Traffic and Transportation - Please refer to comment above for the Draft General Plan, Chapter I, Page I-13.

Draft EIR Chapter 4 – Transportation and Traffic

- Figure 4.16-3 – Please refer to comments above for Draft General Plan Chapter III - Mobility and Infrastructure, Figure III-4.
- Figure 4.16-3 – Add layer showing Future Metropolitan Transit System (MTS) I-15 BRT Route.
- Page 4.16-9 – Suggest adding that a Transit Queue Jump lane exists on Valley Parkway east of Centre City Parkway.
- Page 4.16-45 (first paragraph) – Both NCTD and MTS provide service to the project area. MTS provides local bus service from Del Lago Transit Station to San Diego. MTS provides Express Bus service from Escondido to San Diego.

- Page 4.16-45 (second paragraph) – NCTD operates “Rapid Bus” service not BRT service. SANDAG constructed but does not operate the Escondido BREEZE Rapid (Route 350). See page 6-12 of the 2050 RTP for definitions of transit services. The Escondido BREEZE Rapid does not connect to MTS trolley.
- Page 4.16-45 (3rd paragraph) – Capitalize SPRINTER.
- Page 4.16-45 (3rd paragraph) – The 2 major bus transfer points within the project area include Escondido Transit Center and Del Lago Transit Station. Del Lago BRT station is located near the intersection of I-15, Del Lago Blvd, and Avenida Magoria. There are timed transfers between NCTD Route 350 and MTS Route 20 bus routes. There are no major bus transfer points at Westfield or Second Ave.
- Page 4.16-47 – Capitalize SPRINTER, COASTER, and BREEZE.
- Page 4.16-50: Regional/Local – Please update the Congestion Management Program to the Congestion Management Process. SANDAG and the local jurisdictions opted out of the state Congestion Management Program. Refer to Technical Appendix 20 in the 2050 RTP and the Congestion Management Process Web site¹ for additional information.
- Consider including the Pedestrian Master Plan in this section.
- Page 4.16-82: Infeasible Mitigation Measures – Please refer to comment above, Draft EIR Chapter I, Executive Summary, page 1-13.

Draft EIR Appendix I – Traffic Impact Analysis

- Page 14: Future Volumes Traffic Model – Four managed lanes are included to on I-15 from SR 163 to SR 78 only. Improvements on I-15 north of SR 78 to the Riverside county line include four toll lanes, not managed lanes. General comment- There is no mitigation proposed or explanation for significant and unavoidable project impacts for the intersections mentioned in Draft EIR Chapter 1, Executive Summary. Please work with Caltrans to develop proposed mitigation for these intersections.
- Draft EIR Appendix I-3 Complete Streets Assessment provides a well-established multimodal existing conditions framework. Per the Regional Multimodal Transportation Analysis Report, consider incorporating into Draft EIR Appendix I-1 Traffic Impact Analysis, existing and planned transit service impacts.

Climate Change Plan

Chapter 4: Greenhouse Gas (GHG) Reduction Programs and Regulations

- Pages 4-6 and 4-7 regarding “SANDAG ENERGY ROADMAP PROGRAM.” Please update the description of Escondido’s Roadmap and bulleted section from the second half of paragraph onward. Replace all language beginning with, “Currently, Escondido is in Phase 2 of the Roadmap Program; energy assessments....” Suggested language is:

¹ <http://www.sandag.org/index.asp?projectid=13&fuseaction=projects.detail>

- Escondido began its Energy Roadmap with SANDAG in April 2011. As of February 2012, baseline electricity and natural gas use for 29 municipal sites was established through this program. The 29 preliminary energy assessments indicated that almost all Escondido municipal sites were performing significantly more efficient than the comparable facilities in California and the nation. Either in response to a specific issue discovered through the site assessment process, or as instructed by city staff, eight sites and two technologies citywide were identified to be further evaluated in the form of comprehensive energy audits. The energy assessments were performed at no cost to the City. Escondido is finalizing its Energy Roadmap with SANDAG, which is scheduled for completion in March 2012. The government operations component of the Roadmap includes the following elements:
 - Saving Energy in City Buildings and Facilities
 - Demonstrating Emerging Energy Technologies
 - Greening the City Vehicle Fleet
 - Developing Employee Knowledge of Energy Efficiency
 - Promoting Commuter Benefits to City Employees
- The communitywide component of the Roadmap will provide the following elements:
 - Leveraging Planning and Development Authority, including smart growth development policies, energy efficient building upgrades, and clean and efficient transportation options
 - Marketing Energy Programs to Local Residents, Schools, and Businesses
 - Supporting Green Jobs and Workforce Training

Page 4-18. In the bulleted measures for R2-E1: NEW RESIDENTIAL ENERGY EFFICIENCY REQUIREMENTS, the following edits are suggested:

- Install ENERGY STAR-qualified or equivalent appliances, including air conditioning and heating units, dishwashers, clothes washers, etc.;
- Install solar water heaters;
- Install ENERGY STAR-qualified or equivalent windows and appropriate insulation per climate zone;
- Install ENERGY STAR-qualified or equivalent lighting;

Page 4-18, INSET Table "GHG Reduction Potential." Suggest the following edits:

- These emissions reductions assume all new residential units will increase energy efficiency an average of 10% beyond currently adopted California Title 24 standards. Based on the 2008 Title 24 standards, this results in a 25% decrease in electricity and natural gas use from new residential developments.
- Private Costs: \$4.06 million (one time cost). 100% units going 10% beyond 2008 Title 24 is approximately equivalent to 83% of units increasing efficiency to 15% beyond Title 24.
- Potential Funding Sources: Rebates and incentives from San Diego Gas & Electric (SDG&E) and/or California Center for Sustainable Energy (CCSE).

Page 4-19: R2-E2: NEW COMMERCIAL ENERGY EFFICIENCY REQUIREMENTS, suggested edits to following bulleted measures:

- Install ENERGY STAR-qualified or equivalent appliances, including air conditioning and heating units, dishwashers, etc.;

- Install ENERGY STAR-qualified or equivalent windows and appropriate insulation for climate zone;
- Install ENERGY STAR-qualified or equivalent lighting; and
- Install ENERGY STAR-qualified or equivalent computer systems and electronics to reduce electricity need from plug load.

Page 4-19: INSET BOX on GHG Reduction Potential.

- These emissions reductions assume all new residential units will increase energy efficiency an average of 10% beyond currently adopted California Title 24 standards. Based on the 2008 Title 24 standards, these emissions reductions assume a 25% decrease in electricity and natural gas use from new commercial developments.
- Private Costs: \$4.6 million (one time cost). The cost is based on an estimated \$1.00 per square foot to achieve 10% beyond 2008 Title 24 standards (Anders 2009).
- Potential Funding Sources: SDG&E and CCSE.

Page 4-20: R2-E3: NEW RESIDENTIAL RENEWABLE ENERGY REQUIREMENTS. Delete the following bulleted statement as this topic is new construction:

- Energy retrofits of existing buildings in order to offset energy use.

Page 4-21: R2-E4: NEW COMMERCIAL RENEWABLE ENERGY REQUIREMENTS. Delete the following bulleted statement as this topic is new construction:

- Energy retrofits of existing buildings in order to offset energy use.

Page 4-22: R2-E5: EXISTING RESIDENTIAL ENERGY RETROFITS

- Replace inefficient air conditioning and heating units with ENERGY Star-qualified or equivalent models;
- Replace older, inefficient appliances and electronic equipment with ENERGY STAR-qualified or equivalent models;
- Seal and insulate homes to stop drafts, block heat loss in winter, and block heat gain in summer;
- Replace old windows with ENERGY STAR-qualified or equivalent windows; and
- Replace inefficient and incandescent lighting with energy efficient lighting.

Page 4-23: R2-E6: EXISTING COMMERCIAL ENERGY RETROFITS. Suggest making identical edits to bulleted measures as proposed for R2-E5 on page 4-22.

Chapter 7: Implementation

Page 7-5: 7.2 Step 2, Financing and Budgeting.

- Energy Upgrade California. Replace SDG&E Web site for Energy Upgrade California with State of California's Web site. Energy Upgrade California is larger than just the SDG&E rebate. The California-wide Web site provides homeowners and contractors with all programs and funding available. See <https://energyupgradeca.org/overview>.

Page 7-5: 7.2 Step 2, Financing and Budgeting.

- California Solar Initiative (CSI). The information is out of date. The following revision to the paragraph and Web site is proposed:

In January 2006, the California Public Utilities Commission (CPUC) adopted the CSI to provide more than \$3 billion in incentives for solar-energy projects with the objective of providing 3,000 megawatts (MW) of solar capacity by 2016. In December 2011, the CPUC increased the CSI budget by \$200 million in order to cover a budget shortfall. The action implements Senate Bill (SB) 585 signed by Governor Jerry Brown on Sept. 22, 2011. The CSI program is administered by PG&E, SCE, and CCSE for the SDG&E territory. CSI is comprised of five rebate programs: the general CSI Program of solar rebates for existing homes, new/existing commercial, agricultural, and public agencies; the CSI-Thermal Program for solar hot water rebates for homes and businesses; the Single-family Affordable Solar Homes program for low-income residents that own their own single-family home and meet a variety of income and housing eligibility criteria; the Multifamily Affordable Solar Housing program for multifamily affordable housing; and the CSI RD&D (research, development, demonstration, and deployment) Program. See <http://energycenter.org/csi>.

General Comments

Smart Growth Opportunity Areas

A key goal of the RCP is to focus growth in Smart Growth Opportunity Areas. There are a total of eight Smart Growth Planning Area place types located within the City of Escondido, and as you know, SANDAG has recently updated the Smart Growth Concept Map. We appreciate the help we received from your staff on these updates, and the incorporation of Smart Growth principles in Escondido's planning documents.

Multimodal Transportation Analysis

The 2050 RTP sets forth a multimodal approach to meeting the region's transportation needs. As such, we recommend that the traffic analysis for the Draft EIR strive to balance the needs of motorists, transit riders, pedestrians, and bicyclists. The Regional Multimodal Transportation Analysis, adopted by the SANDAG Board on October 14, 2011, is another tool that may be used to enhance traffic impact analysis of development projects where use by transit, bicycle, and/or pedestrians is anticipated. This new tool is available online at www.sandag.org/igr.

We request that you coordinate the Draft EIR's development with the 2050 RTP and its Sustainable Communities Strategies as well as the recently approved Regional Housing Needs Assessment.

Transit and Highways

Please evaluate the consistency of the Draft EIR and the City of Escondido's General Plan Update, Downtown Specific Plan Update, and Climate Action Plan with the 2050 RTP goals as they relate to specific transit projects.

Transportation Demand Management

Please consider developing a TDM plan that outlines your strategy(ies) for providing and promoting transportation alternatives to driving alone during peak periods such as carpooling, vanpooling, bicycling, telecommuting, and flexible work hours for employees, to help mitigate regional transportation impacts. Carpooling and vanpooling could be promoted by providing priority reserved and/or free parking for high-occupancy vehicles. We recommend contacting the SANDAG iCommute team to explore TDM options.

Consult with North County Transit District and Caltrans

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

Natural Environment

A key RCP objective is to preserve and maintain natural areas in urban neighborhoods, such as canyons and creeks, and provide access for the enjoyment of the region's residents. Please consider this criteria, if applicable, to your project.

Other Considerations

Please consider the following State of California laws and Executive Order when developing the DEIR: Assembly Bill 32 (Nunez, 2006) (AB 32); Senate Bill 375 (Steinberg, 2008) (SB 375); SB 97 (Dutton, 2007); and Executive Order S-13-08, which call for analysis of GHG emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy that promote the reduction of energy demand and water consumption.

We appreciate the opportunity to comment on the Draft EIR for the City of Escondido's General Plan Update, Downtown Specific Plan Update and Climate Action Plan. We encourage the City of Escondido, where appropriate, to evaluate these plans based on the following SANDAG publications: (1) Designing for Smart Growth, Creating Great Places in the San Diego Region; (2) Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region; (3) Trip Generation for Smart Growth; and (4) Parking Strategies for Smart Growth. These publications can be found on our Web site at www.sandag.org/igr.

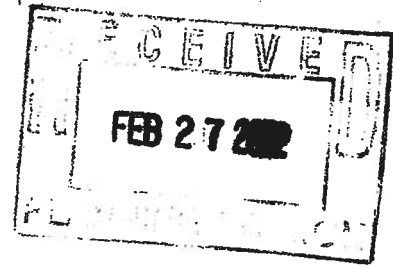
If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or sba@sandag.org.

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

SBA/RSA/dsn



ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/dplu

February 24, 2012

Jay Petrek, AICP, Principal Planner
City of Escondido Planning Division
201 North Broadway
Escondido, California 92025

Transmitted via email to: jpetrek@escondido.org

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT, GENERAL PLAN UPDATE, DOWNTOWN SPECIFIC PLAN UPDATE, AND CLIMATE ACTION PLAN

Dear Mr. Petrek:

The County of San Diego (County) has received and reviewed the City of Escondido's (City) Draft Environmental Impact Report (DEIR), General Plan Update, Downtown Specific Plan Update, and Climate Action Plan dated January 13, 2012 and appreciates this opportunity to comment. In response to the documents, the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an effect on the unincorporated lands of San Diego County. In addition, the comments may identify reasonable alternatives and mitigation measures that the County will need to have explored in the environmental document.

County Department of Planning and Land Use (DPLU), Department of Parks and Recreation (DPR), and Department of Public Works (DPW) have completed their review and have the following comments regarding the content of the above documents:

GENERAL COMMENTS

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing

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ON 2/27/12

potentially significant impacts in the unincorporated portions of the County of San Diego. Project impacts that could have potentially significant adverse effects to the unincorporated County or County facilities should evaluate and mitigate environmental impacts using these guidelines, available online at: <http://www.sdcounty.ca.gov/dplu/procguid.html#guide>.

FLOOD CONTROL

2. Potential future developments in accordance with the proposed changes to the General Plan may have impacts to existing County flood control facilities, which is acknowledged in the DEIR in Section 4.9.3.5.

As previously noted in the County's NOP comment letter dated August 30, 2010, policies related to coordination of flood control facilities managed by other jurisdictions and policies that recognize the potential need for additional hydraulic studies are not included in the draft General Plan Update and should be added.

If you have questions on these comments from DPW Flood Control Engineering, please contact Sara Agahi at (858) 694-2665 or by email at Sara.Agahi@sdcounty.ca.gov.

LAND USE

3. As previously noted in the County's NOP comment letter dated August 30, 2010, the City's General Plan Update boundaries extend beyond both the City's boundaries as well as the Sphere of Influence (SOI) boundaries. Per the 2003 State General Plan Guidelines, the planning area boundary encompasses areas "bearing a relation to the city's planning." The Guidelines also state that cities and counties should work together to delineate planning areas. County staff has identified three areas where the draft Escondido General Plan extends beyond the Escondido SOI (see areas A, B and C on attached Figure-1). As such, the County's land use comments below refer only to those areas within the proposed Escondido General Plan Area, but outside of the SOI.
 - a. Plan Area A - Located along the eastern boundary of the City, this area is designated Rural Lands 40 under the County General Plan (see Areas A-1 and A-2 on attached Figure-1). These areas are sparsely populated, located outside of the County Water Authority boundary, and contain steep slopes greater than 25 percent. The County General Plan's Guiding Principle 5 emphasizes that development must account for the physical constraints and natural hazards of the land. A discussion of how the existing land use plan for this area compares to the draft Escondido General Plan is provided below.

- **Area A-1:** Based on the draft Escondido General Plan, Area A-1 contains most of Valley View Specific Plan Area (SPA) #4, excepting the part of the SPA that is within City limits (see Figure 1). The draft Plan indicates that although the portion of the SPA within the City limits has been developed with 80 units on 133 acres of the 1,590-acre SPA, the City intends for the remainder of the SPA to yield 720 additional units in the portion located within the unincorporated area. This correlates to a density of approximately one dwelling unit per two acres.

It should be noted that although the property owner requested a corresponding density increase as part of the County's General Plan Update (request NC13), the request included in the approved General Plan and the density remains at one dwelling unit per 40 acres. Moreover, previous attempts to annex into the City of Escondido were not successful.

- **Area A-2:** The draft Escondido General Plan assigns a Rural I designation to Area A-2. While this is the City's least intensive land use designation, it will still potentially result in a tenfold increase in permitted density when compared to the adopted County General Plan. While the Escondido Rural I designation would allow a density as high as one dwelling unit per four acres, the adopted County Plan's RL-40 designation only allows a maximum of one dwelling unit per 40 acres. Therefore, the Rural I designation is not consistent with the County's General Plan.
- b. **Plan Area B** - This area, located north of Lake Wohlford and along the northern boundary of the Escondido SOI, is assigned a Rural I designation in the draft Escondido General Plan (see Figure-1). In some cases that designation matches the County's General Plan for Semi-Rural 4 (one dwelling unit per four acres). However, in other areas (B-2 and B-3) the Rural I designation is inconsistent with the County's designation of RL-40 or RL-20 (one dwelling unit per 40 or 20 acres, respectively). Since the draft Escondido General Plan contains no designation that is consistent with the County's Rural Lands category, the County is opposed to the inclusion of these areas within the draft Escondido General Plan unless a new category of land use designations is created to address the planning goals of these sparsely populated areas. A more detailed discussion of how the existing land use plan for this area compares to the draft Escondido General Plan is provided below.
- **Area B-1:** The draft Escondido General Plan assigns a Rural I designation; however, the adopted County General Plan assigns the Open

Space Conservation designation since these areas are part of an existing open space preserve.

- **Area B-2:** The draft Escondido General Plan assigns a Rural I designation, which would result in a tenfold density increase over the adopted County General Plan (one dwelling unit per four acres vs. one dwelling unit per 40 acres). Most of Area B-2 is characterized by steep slopes and sensitive natural resources. Moreover, this area provides a buffer between Escondido and Valley Center.
 - **Area B-3:** The draft Escondido General Plan assigns a Rural I designation, while the County Plan's designation for this area is RL-20. The area is located along Lake Wohlford Road, which gives it greater accessibility than the neighboring lands designated RL-40 and RL-80. The RL-20 designation is consistent with the County's Community Development Model to assign Rural Lands designations on the periphery of communities (Valley Center) and create a buffer with adjacent communities (Escondido).
- c. **Plan Area C** - This area is located near the unincorporated communities of Harmony Grove and Elfin Forest. The County Plan identifies an approved Specific Plan in the area and has designated many of the surrounding parcels (between the SPA and the City of Escondido) as one dwelling unit per 10 or 20 acres, or as open space. The draft Escondido General Plan assigns a range of higher density designations between Rural I and Estate II. The County's General Plan emphasizes the importance of maintaining the individual character of a community through appropriate buffers between communities; an objective that is supported by the County's lower semi-rural and rural designations. Consequently, there are numerous individual differences between the County's and City's general plans in this area.
4. Due to the significant differences between the two plans, County staff is interested in better understanding the City of Escondido's intentions to annex these regions in the future. Past discussions with City staff seem to indicate that the City may have no intention of annexing some areas shown within the proposed Planning Area Boundary of the draft General Plan. If there is no foreseeable expectation that such lands will be annexed, then it would be appropriate to remove them from the Escondido General Plan planning area, since in many instances there is no comparable designation to the designation assigned by the County Plan. Alternatively, the County recommends that Escondido create a land use designation that matches the County's definition of

Rural Lands to more appropriately characterize the existing land uses and preserve the rural character of outlying lands in these areas.

If you have questions on these comments from DPLU General Plan staff, please contact Bob Citrano at (858) 694-3229 or Robert.Citrano@sdcounty.ca.gov.

MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP)

5. Planning Areas A and B as identified on the Attached Figure-1 and discussed under the Land Use section above have the potential to impact existing Pre-Approved Mitigation Area (PAMA) in the County's MSCP South County Subarea as well as potential future PAMA in the County's proposed North County MSCP. While the DEIR discusses the need to comply with habitat conservation plans, it does not adequately analyze or disclose how the proposed land uses and densities could be accomplished without substantially affecting PAMA. Therefore, and for reasons noted above, the County requests that these areas within the unincorporated lands but outside of the SOI be removed from the City's planning documents.
6. Please note that throughout the DEIR the County of San Diego Draft North County MSCP is incorrectly referred to as a Subarea. It is proposed as a stand-alone habitat conservation plan.

If you have questions on these comments from DPLU Multiple Species Conservation Program staff, please contact Bobbie Stephenson at (858) 694-3680 or Bobbie.Stephenson@sdcounty.ca.gov.

PARKS AND RECREATION

7. All Land Use maps incorrectly designate Assessor's Parcel Numbers (APNs) 238-021-07 and 238-010-57 as "Residential". These parcels were acquired by the County for inclusion in the Del Dios Highlands Preserve and Escondido Creek Preserve, respectively, and should be designated "Public Land/Open Space".
8. **Page 4.15-1, Existing Parks** – The last sentence of this paragraph indicates that, with the exception of Felicita Park, all parks within the project area (as identified in Figure 4.15-1) are operated by the City. However, this section should be revised to clarify that the City also does not operate the San Diego County Open Space areas identified in Figure 4.15-1 (#28).
9. **Figure 4.15-1 Park and Recreational Facilities** –

- a. This figure should be revised to include APNs 238-021-07, and 238-010-57 as San Diego County Open Space.
 - b. The San Diego County Open Space Areas should be called out by name (i.e., Escondido Creek Preserve and Del Dios Highlands Preserve).
10. **Table 4.15-1 Escondido Park Facilities** – This table should be revised to include Escondido Creek Preserve and Del Dios Highlands Preserve under Regional Open Space Parks.
11. **Page 4.15-8, Trails** – The last sentence inaccurately states that all trails within the proposed project area (as identified in Figure 4.15-2) are owned and operated by the City. However, the spur trail depicted in the figure from Del Dios Highway to Harmony Grove Road crosses through the County's Del Dios Highlands Preserve. There is an existing rural trail within the Preserve that connects to the Elfin Forest Recreational Reserve property trail system and Harmony Grove Road to the west; however, these trails are not owned or operated by the City. Therefore, it is recommended that the last sentence be deleted to avoid confusion.

If you have questions on these comments from DPR staff, please contact Trish Boaz at (858) 966-1370 or Trish.Boaz@sdcounty.ca.gov.

TRAFFIC / TRANSPORTATION

12. **Roadways Not Assessed** - There are various roadways within Escondido's General Plan Boundary/Sphere of Influence that are within the current unincorporated area of San Diego County. These roadways, which are on the County of San Diego's General Plan Mobility Element Network, are adjacent to and/or affected by traffic from the City of Escondido. The DEIR and Traffic Impact Analysis (TIA) should assess any direct and cumulative impacts and identify appropriate mitigation for these roadways which were not assessed in the DEIR:
- Deer Springs Road
 - Lake Wohlford Road
 - Harmony Grove Road
13. **Mobility Element / Circulation Inconsistencies** – There are several major inconsistencies for roadway classifications within the unincorporated area between the City of Escondido's Draft General Plan Update Mobility and Infrastructure Element-Circulation System and the County's General Plan Mobility Element Network. The DEIR should identify the discrepancies in

proposed roadway classifications or update the classifications in the City's Draft General Plan Update to reflect the County's adopted General Plan Mobility Element. The roadway classification inconsistencies are identified below:

Roadway	Escondido GP Update	County of San Diego GP
Broadway (DEIR-Pg.4.16-30) <ul style="list-style-type: none"> Mtn Meadow Rd to North Av 	4-lane: Collector	2-lane: 2.1D Community Collector
Valley Center Road (Pg.4.16-31) <ul style="list-style-type: none"> North of Lake Wohlford Rd 	8-lane: Prime Arterial	4-lane: 4.1A Major Road
Del Dios Highway (Pg.4.16-32) <ul style="list-style-type: none"> Via Rancho Pkwy to Mt Israel Rd 	6-lane: Super Major	2-lane: 2.1D Community Collector
Bear Valley Parkway (Pg.4.16-34) <ul style="list-style-type: none"> Mary Ln to Sunset Dr Sunset Dr to San Pasqual Vly Rd 	8-lane Prime Arterial 6-lane: Super Major	4-lane: 4.1A Major Road
Lake Wohlford Road (DEIR-Fig.3-6) <ul style="list-style-type: none"> North of Guejito Rd 	4-lane: Collector	2-lane: 2.2F Light Collector

Link to the County's General Plan and Mobility Element Network maps:
<http://www.sdcounty.ca.gov/dplu/generalplan.html>

14. **County Guidelines** - The DEIR/TIA should reference and use the County's Guidelines for Determining Significance (modified February 19, 2010) for any traffic analysis of direct and cumulative impacts on roadway segments and intersections within the County's jurisdiction.

Link to the County's Traffic Guidelines:
http://www.sdcounty.ca.gov/dplu/docs/Traffic_Guidelines.pdf

15. **Level of Service** - Page 4.16-2 notes that Level of Service (LOS) is based upon the City's Roadway Classification, Level of Service, and Average Daily Trip (ADT) Table (Table 4.16-1). The County requests that any LOS assessment for roadways within the County's jurisdiction utilize the County's LOS thresholds and road classifications per the County's Public Road Standards (Table 1).

Link to the County's Public Road Standards:
<http://www.sdcounty.ca.gov/dpw/docs/pbrdstds.pdf>

16. **Traffic Impacts to Unincorporated Area** - The General Plan and DEIR should note that future development projects within the City of Escondido should also propose mitigation for significant traffic impacts to roadway facilities within the unincorporated area. Potential mitigation measures for significant traffic impacts can include traffic signal improvements, physical road improvements, street re-

striping and parking prohibitions, fair share contributions toward identified, funded and scheduled projects, and transportation demand management programs. Fairshare contributions to the County's Transportation Impact Fee (TIF) program should be considered to mitigate cumulative traffic impacts. The fairshare contributions should be based upon the amount of project trips that will be distributed onto County roadways.

17. **County Roadways** - Tables in the DEIR and TIA (e.g., DEIR-4.16-2) should note which roadways are within the County's jurisdiction.
18. **Figure 3-6 / Circulation System Inconsistencies** – Figure 3-6 is missing the Super Major classification. In addition, there are various discrepancies between Figure 3-6 and tables within the DEIR. Examples of discrepancies include:
 - Via Rancho Parkway is shown as a Major Road in Figure 3-6 while in Table 3-6 it is proposed as a Collector
 - Bear Valley Parkway is shown as a Major Road in Figure 3:6, while in Table 3-6 it is proposed as a Prime
 - Del Dios Highway appears to be Major Road in Figure 3-6, but is designated as a 6-lane Super Major in Table 4.16-2
19. **“Circulation Element”** – All incidental references to the “Circulation Element” should be corrected to “Mobility and Infrastructure Element” in the text, table, and figures. (e.g., Pg.3-29, Section 3.4.1.4, first paragraph; Table 3-6, title; Figure 3-6, legend; etc.)

If you have questions on these comments from DPW Traffic/Transportation Planning staff, please contact Richard Chin at (858) 874-4203 or Richard.Chin@sdcounty.ca.gov.

WASTEWATER

20. As identified in the NOP comments provided by the County and in comments from DPLU above, the City of Escondido's General Plan boundary includes areas within the unincorporated County. Within the southwestern portion of the boundary is the Harmony Grove Sewer Maintenance District operated by the County of San Diego. The DEIR should acknowledge the existence of a County sanitation/sewer district within the City's proposed general plan boundaries that will be providing service by means of an on-site sewer treatment plant.

Mr. Petrek
February 24, 2012
Page 9 of 9

If you have any questions on these comments from the DPW Wastewater Management Section, please contact Jeff Bosvay at (858) 694-2711, or by email at Jeff.Bosvay@sdcounty.ca.gov.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any general questions regarding these comments, please contact Mindy Fogg, Land Use Environmental Planner at (858) 694-3831 or email mindy.fogg@sdcounty.ca.gov.

Sincerely,



ERIC GIBSON, Director
Department of Planning and Land Use

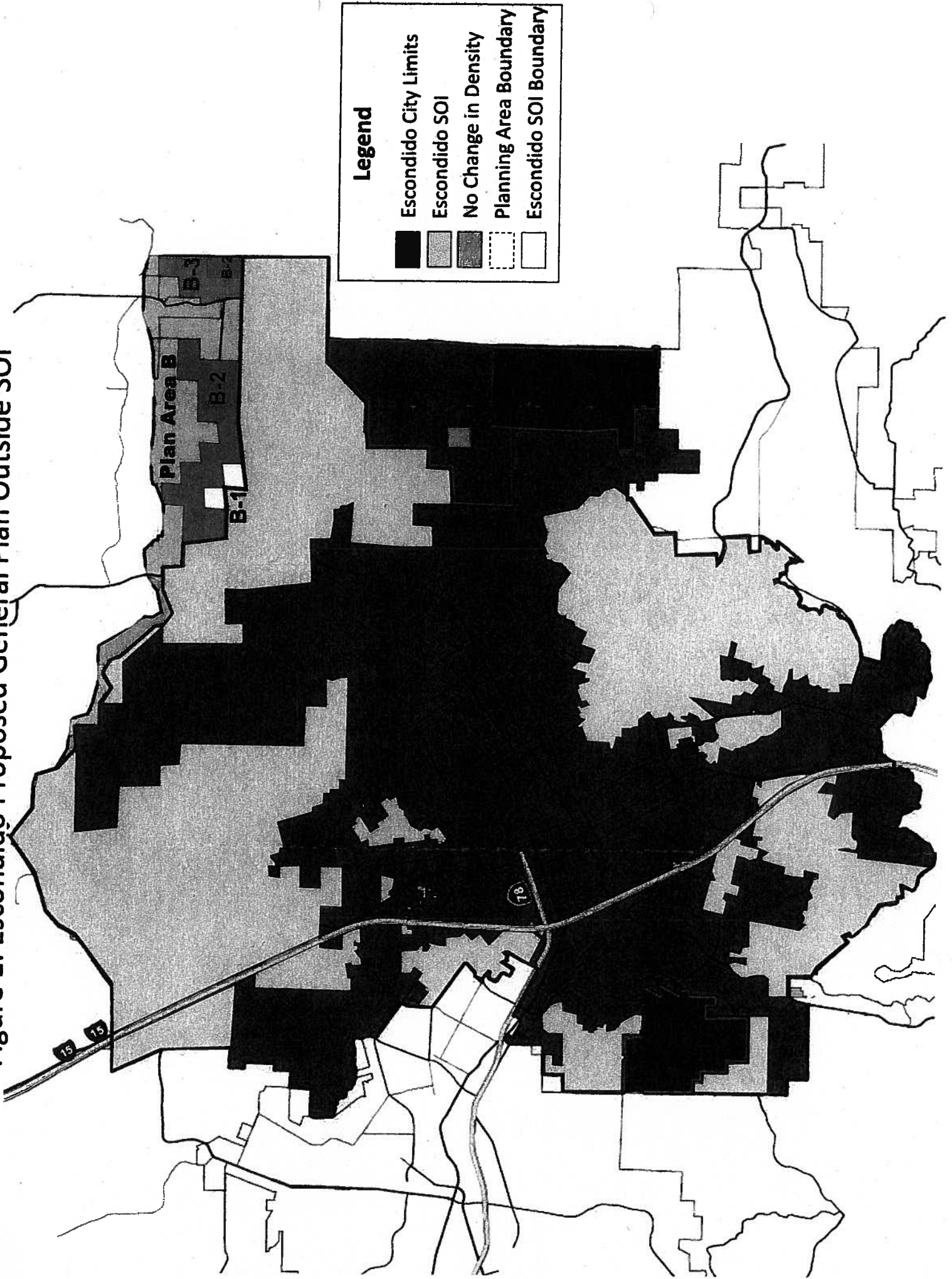
Attachments:

Figure 1: Escondido Proposed General Plan Outside SOI
County of San Diego NOP Comment Letter dated August 30, 2010

e-mail cc:

Sachiko Kohatsu, Policy Advisor, Board of Supervisors, District 3
Dustin Steiner, Deputy Chief of Staff, District 5
Megan Jones, Land Use Environment Group Program Manager, DCAO
Trish Boaz, Chief, County Department of Parks and Recreation
Richard Chin, Associate Transportation Specialist, Department of Public Works
Jeff Bosvay, Unit Manager, Department of Public Works
Sara Agahi, Senior Civil Engineer, Department of Public Works
Robert Citrano, Planning Manager, Department of Planning and Land Use
Bobbie Stephenson, Land Use Environmental Planner, Department of Planning and Land Use
Hidden Meadows Community Sponsor Group
San Dieguito Community Planning Group
Valley Center Community Planning Group
Twin Oaks Community Sponsor Group
Mindy Fogg, Land Use Environmental Planner, Department of Planning and Land Use
Priscilla Jazskowiak, Administrative Secretary, Department of Planning and Land Use

Figure 1: Escondido Proposed General Plan Outside SOI





ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
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August 30, 2010

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

Transmitted via email to: jpetrek@escondido.org

COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE ESCONDIDO GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN

The County of San Diego has received and reviewed the Notice of preparation of a program environmental impact report (PEIR) for a general plan update and climate action plan and appreciates this opportunity to comment. In response to the document the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County that the County will need to have explored in the environmental document.

Department of Planning and Land Use (DPLU), Department of Public Works (DPW), and Department of Parks and Recreation (DPR) staff have completed their review and have the following comments regarding the content of the above documents:

GENERAL COMMENTS

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used as guidance for determining the significance of environmental impacts in the unincorporated portions of the County of San Diego. Projects that could have potentially significant adverse effects to the unincorporated County should evaluate impacts using the guidance described in these guidelines, available online at: <http://www.sdcounty.ca.gov/dplu/procguid.html#guide>.

2. The NOP and attached maps all refer to General Plan Designations and zones using acronyms. Descriptions of the land use designations, both density and intensity, and the proposed zones are needed in order for the reader to understand what the project is proposing.

FLOOD CONTROL

3. Flood Control Engineering has reviewed the City of Escondido's General Plan Update NOP. Potential future developments in accordance with the proposed changes to the General Plan may have impacts to existing County flood control facilities that may be located downstream. Please include a policy in the General Plan that requires coordination of flood control facilities managed by other jurisdictions and recognizes that additional hydraulic studies may be needed when the proposed developments are further refined.

LAND USE

4. The City of Escondido's General Plan Update boundaries extend beyond both the City's boundaries and its Sphere of Influence (SOI) boundaries. Per the 2003 State General Plan Guidelines, the planning area boundary encompasses areas "bearing a relation to the city's planning". The Guidelines also state that cities and counties should work together to delineate planning areas. There are areas where the draft Escondido Land Use Map is different from the County General Plan Update Land Use Map, which is the result of a twelve-year public planning process. The County General Plan is tentatively scheduled to be considered for adoption by the Board of Supervisors on October 20, 2010, which, if adopted, will result in significant land use changes when compared to the existing General Plan. Outside its SOI, the Escondido General Plan Update is proposing significantly different land use and residential densities than those proposed by the County's General Plan Update. The Escondido General Plan appears that it would return the densities to these areas between the two communities that the County General Plan is seeking to avoid. A copy of this Land Use Map that the County staff will present to the County Board of Supervisors for adoption on October 20th is available on the County General Plan Update web site at: <http://www.sdcounty.ca.gov/dplu/gpupdate/docs/pcrec/ncmetro.pdf>
5. The County is interested in the City of Escondido's intentions to annex these areas in the future. Past discussions with city staff seem to indicate that the City may have no intention of ever annexing some areas shown within the General Plan planning area or SOI. If there is no intention of annexing these areas, then it would seem the land use designations for those areas should either reflect the County General Plan Update Land Use Map or more preferably be removed from the Escondido General Plan planning area. County Department of Planning and Land Use staff would like to meet with City of Escondido staff to discuss further. Please contact Bob Citrano at 858-694-3229 or Robert.Citrano@sdcounty.ca.gov if you would like to schedule a meeting.

6. Several specific plan areas are shown on the Escondido draft General Plan Land Use Map outside the SOI; however, a description of planned uses is not included in Attachment 3 of the NOP. A breakdown of uses should be provided, along with an analysis for whether these areas are different from the County General Plan Update Land Use Map and Community Development Model (see Guiding Principle 2 in the draft County General Plan at the following link: http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/ch2_vision_2010.pdf)

MOBILITY

7. Similar to the Escondido General Plan Update, the County General Plan Update Mobility Element is recommending reduced classifications on many roadways through physically constrained areas. The PEIR should identify any discrepancies in proposed roadway classifications between the Escondido General Plan Update and the County General Plan Update Mobility Element. The County draft Mobility Element road network is available at: http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/m-appendix_2010.pdf

MULTIPLE SPECIES CONSERVATION PROGRAM

8. The EIR must analyze how the Escondido General Plan Update and Climate Action Plan will impact the County of San Diego Multiple Species Conservation Program (MSCP), Draft North County Plan which can be found at the following link: <http://www.sdcounty.ca.gov/dplu/mscp/nc.html>
9. Many of the areas within the sphere of influence and within planning area (which extends beyond both the sphere of influence and the city boundaries) are considered to be focal areas for conservation under the North County Plan. These areas are identified in the North County Plan as Pre-Approved Mitigation Areas (PAMA). According to the North County Plan, 75% of these PAMA lands will ultimately be conserved as biological open space.
10. Of particular concern are SPA's 2, 3, and 4 (shown on the Land Use Map; NOP Attachment 3) in the unincorporated areas of the county. These SPAs are either wholly or mostly within PAMA areas. No explanation is provided as to what uses are expected within these SPAs. The North County Plan requires that annexations of land by jurisdictions adjacent to the within the plan area be in a manner consistent with the goals and requirements of the plan. These requirements includes specific project review standards and approval processes. If development is proposed within the annexed areas, the conservation goals for the North County Plan must not be compromised. The EIR should analyze how these SPAs and other areas of PAMA with the scope of the update will be maintained in a manner consistent with the North County Plan.

PARKS AND RECREATION

11. The General Plan boundary includes lands owned and managed by DPR including the Del Dios Highlands Preserve and Felicita County Park. The location of these parks can be viewed at www.sdparcs.org. These lands appear to be designated R1 or R2 in Attachment 2. County DPR owned lands should be included in the "Corrective/Clean-Up Amendment Areas" and/or Public Land Classifications and be designated as open space and/or public lands.
12. When planning for growth management, the General Plan Update and Climate Action Plan should avoid impacting existing DPR parks and preserves or existing or planned trails to the maximum extent feasible. Additionally, adjacent land use designations should complement existing open space/preserve land use designations (such as DPR parks and preserves). If impacts are unavoidable, coordination with DPR to determine appropriate mitigation measures is requested.

DPR appreciates the opportunity to participate in the review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions or comments please contact Megan Hamilton, Group Program Manager at (858) 966-1377 or e-mail Megan.Hamilton@sdcounty.ca.gov

TRAFFIC/TRANSPORATION

13. There are numerous roadways within Escondido's General Plan Boundary that are within the current unincorporated area of San Diego County. The PEIR should assess direct and cumulative impacts and identify appropriate mitigation for all roadways located on the County of San Diego's Circulation Element network, in particular:
 - Deer Springs Road
 - North Centre City Parkway
 - Mountain Meadow Road
 - Valley Center Road
 - Lake Wohlford Road
 - Country Club Drive
 - Harmony Grove Road
 - Citricado Parkway/Gamble Lane
 - Del Dios Highway
 - Via Rancho Parkway
 - Bear Valley Parkway
 - San Pasqual Valley Road
 - Mary Lane/Summit Drive
 - San Pasqual Road

14. For all potential cumulative impacts to facilities located within the unincorporated area of San Diego County, fairshare contributions to the County's Transportation Impact Fee (TIF) program should be considered to mitigate the cumulative traffic impacts. The fairshare contributions should be based upon the amount of project trips that will be distributed onto the County roadways.
15. The PEIR should reference and use the County's Guidelines for Determining Significance (modified February 19, 2010) for any traffic analysis of direct and cumulative impacts on roadway segments and intersections within the County's jurisdiction.
16. The PEIR should coordinate with County staff on the list of near-term / cumulative proposed / pending projects for the analysis of cumulative traffic conditions.
17. The PEIR should identify any discrepancies in proposed roadway classifications between Escondido's GP Update and the County's GP Update Mobility Element.

If you have any questions on the comments from DPW Traffic/Transportation Planning section, please contact Bob Goralka, DPW Program Manager, at (858) 874-4202, or by email at Robert.Goralka@sdcounty.ca.gov.

WASTEWATER

18. Escondido's general plan boundary includes areas of unincorporated County. Within the southwestern portion of the boundary is the Harmony Grove Sewer Maintenance District. We would request that the EIR show the boundaries of the Harmony Grove SMD and acknowledge the recorded map, and future on-site sewage treatment facility and agreement with Rincon Water to received reclaimed water from the development. Attached are maps that might be useful.

If you have any questions on the comments from the DPW Wastewater Management Section, please contact Jeff Bosvay, Unit Manager, at (858) 694-2711, or by email at Jeff.Bosvay@sdcounty.ca.gov.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact LeAnn Carmichael at (858) 694-3739 or email at leann.carmichael@sdcounty.ca.gov.

Sincerely,



 ERIC GIBSON, Director
Department of Planning and Land Use

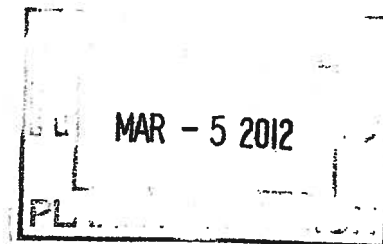
Attachments

cc: Sachiko Kohatsu, Policy Advisor, Board of Supervisors, District 3 (via email)
Dustin Steiner, Policy Advisor, Board of Supervisors, District 5, (via email)
Megan Jones, CAO Staff Officer, DCAO, (via email)
Michael Ott, Executive Officer, LAFCO, (via email)
Trish Boaz, Chief, County Department of Parks and Recreation, (via email)
Nael Areigat, Project Manager, Department of Public Works, (via email)
Kenneth Brazell, Project Manager, Department of Public Works, (via email)
Bob Goralka, Department of Public Works, Transportation Division, (via email)
Hidden Meadows Community Sponsor Group
Valley Center Community Planning Group
Twin Oaks Community Sponsor Group
Elfin Forest Town Council
LeAnn Carmichael, Land Use/Environmental Planning Manager, Department of
Planning and Land Use (via email)
Priscilla Jaszkwiaak, Administrative Secretary, Department of Planning and
Land Use, (via email)



THE CITY OF SAN DIEGO

February 27, 2012



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

Dear Mr. Petrek:

Subject: Draft EIR for the Escondido General Plan Update, Downtown Specific Plan, and Climate Action Plan (Case Nos. PHG 09-0020 and 10-0016); SCH No. 2010071064

The City of San Diego Public Utilities Department has reviewed the Draft Environmental Impact Report (DEIR) dated January 12, 2012. In a letter responding to the Notice of Preparation dated August 30, 2010 Public Utilities explained potential issues needing environmental assessment. While the DEIR generally addresses these, there remain several key issues of concern for Public Utilities.

Summary

The City of San Diego shares municipal boundaries with the City of Escondido. The Public Utilities Department (Public Utilities) owns and manages 9,800 acres of land at Hodges Reservoir and the San Pasqual Valley (Map 1). Hodges Reservoir is a drinking source water reservoir connected to the regional aqueduct system. Water from the reservoir is supplied directly to the Santa Fe Irrigation District and San Dieguito Water District, and indirectly to the City of San Diego and to water agencies across the southern half of San Diego county. Groundwater in San Pasqual Valley is a potential source of regional water supply.

City owned land at Hodges Reservoir and in San Pasqual Valley are designated Cornerstone Land preserves in the City's Multiple Species Conservation Program (Map 2).

We disagree with the conclusion of the DEIR that impacts to water quality will be less than significant. The General Plan Update covers land areas in the catchment of Hodges Reservoir and the San Pasqual Groundwater Basin. Land uses within the catchment directly affect water quality. Regional stormwater regulations do not address salt and nutrient loading at the level needed to fully protect drinking water impounded in reservoirs or captured in groundwater basins. The DEIR should evaluate the effects of land use changes on the drinking source waters

TRANSMITTED TO CONSULTANT

ON 2/27/12

Public Utilities Department

600 B Street, Suite 600, MS 906 • San Diego, CA 92101

Tel (619) 533-7595 Fax (619) 533-5325



DIVERSITY
BRINGS US ALL TOGETHER

downstream. Hodges Reservoir and the San Pasqual Groundwater Basin should be thoroughly discussed, and they should be shown on the project maps.

Managing pollutant loading in the catchment is key to protecting water quality in the reservoir and the groundwater basin. Land use modification and human activities can significantly alter stream function, disturb critical habitat, and contribute to non point source pollution. It is important that the DEIR discuss and disclose how implementation of the General Plan, including future annexations in Citrus Valley and Lake Hodges neighborhoods, will affect water quality in the catchments of Hodges Reservoir and the San Pasqual Groundwater Basin.

Specific Comments

Chapter 4 Environmental Analysis

Table 4.0-2: Regional Plans that Provide the Foundation for Cumulative Analysis

COMMENT:

Please include the City of San Diego's Multiple Species Conservation Program and associated MSCP Subarea Plan.

4.4 Biological Resources

Section 4.4.1, Existing Conditions

Page 4.4-1: Please add the following to the first sentence: "...adopted in 2003 (SANDAG 2003), and adjacent to the City of San Diego's MSCP Cornerstone Land at Hodges Reservoir and San Pasqual Valley."

Figure 4.4-1, Page 4.4-3: Please show the City of San Diego's Hodges Reservoir and San Pasqual Valley Cornerstone Lands.

4.4.1.1, Page 4.4-5: Second paragraph: Add to the sentence, "The portion of San Pasqual Valley in the planning area is located north of the San Dieguito River Valley Regional Open Space Park, also known as the San Dieguito River Park, in the City of San Diego, and occurs on land owned and managed by the Public Utilities Department."

4.4.1.1, Page 4.4-6: Second paragraph: Change the sentence, "The areas surrounding Lake Hodges Reservoir and along the southern boundary ...are identified as *Cornerstone Lands*, a core biological area protected in perpetuity (City of San Diego, 1997)."

4.4.2.3, Page 4.4-18: Include a discussion about the City of San Diego's MSCP Cornerstone Lands, similar to the discussion about the County's MSCP.

4.4.3 Analysis of Project Impacts and Determination of Significance

The land surrounding Hodges Reservoir and much of the land in the San Pasqual Valley is part of the City of San Diego MSCP Cornerstone Lands¹. As the foundation of the MSCP these lands support extremely valuable habitat and species dependent on those habitats. The DEIR should address the potential impacts to Cornerstone Lands adjacent to the City of Escondido's boundary.

4.9 Hydrology and Water Quality

Overall, this section provides a general description and analysis of water quality issues and regulations, but falls short in addressing the potential effects on the adjacent Hodges Reservoir and San Pasqual Groundwater Basin from implementation of the project. This section needs to fully describe the regional importance of the reservoir and groundwater basin.

The City of San Diego has an approved Groundwater Management Plan (GMP) for the San Pasqual Groundwater Basin. This should also be discussed in the DEIR. The General Plan Update should embrace the intent of the GMP and coordinate with the City on protection and enhancement of the basin. The GMP can be viewed at: <http://www.sandiego.gov/water/gen-info/watersupply.shtml>.

The City of San Diego is presently assessing all potential local sources of water, including the development of groundwater. While the City has no immediate plans to develop or extract groundwater from the San Pasqual Groundwater Basin, it does figure prominently as a future source of water supply. Therefore, activities within Escondido's jurisdiction that would jeopardize these water resources, including activities that would degrade water quality, should be carefully assessed.

The State Water Resources Control Board adopted a Recycled Water Policy (Resolution No. 2009-0011) to increase sustainable local water supplies by increasing the acceptance and use of recycled water to recharge local groundwater basins. This Policy requires the development of salt and nutrient management plans for groundwater basins. The San Pasqual Basin is the first area the City of San Diego will be evaluating to comply with this Policy. We will be collaborating with surrounding jurisdictions, including the City of Escondido, and request this Recycled Water Policy be disclosed in the DEIR.

Section 4.9.1.1 Groundwater Hydrology

COMMENT:

Please show the San Pasqual Valley Groundwater Basin on Figure 4.9-1. *Section 4.10 Land Use*

¹ City of San Diego, March 1997. Multiple Species Conservation Program, City of San Diego MSCP Subarea Plan; City of San Diego, California Department of Fish and Game, US Fish and Wildlife Service. July 15, 1997. Cornerstone Lands Conservation Bank Agreement; US Fish and Wildlife Service, California Department of Fish & Game, City of San Diego. July 16, 1997. Implementing Agreement to Establish a Multiple Species Conservation Program ("MSCP") for the Conservation of Threatened, Endangered, and Other Species in the Vicinity of San Diego, California

4.9.3 Analysis of Project Impacts and Determination of Significance

We disagree that impacts to water quality will be less than significant. The land uses in the project area that are within the catchments will directly affect water quality. Nonpoint source pollution and sedimentation are of particular concern for water quality.

The Environmental Protection Agency identifies non point source pollution as the nation's largest water quality problem². Nonpoint source pollution is more difficult to regulate since the sources spread out over large areas and discharge rates and quantities are unpredictable. Pollutants of particular concern for Hodges Reservoir and the San Pasqual Groundwater Basin are nutrients [nitrogen and phosphorus in their various forms], salts [aka TDS], and total organic carbon. All these can be expected to be present in runoff from residential and commercial development in the area of the General Plan Update.

Three streams tributary to Hodges Reservoir are in areas identified for potential annexation by the City of Escondido. Water quality in Hodges Reservoir has been degraded by non point source pollution. Additional pollutant and nutrient loading would further degraded water quality. Development of land under one acre will not require a NPDES permit and regional stormwater regulations do not address salt and nutrient loading at the level needed to fully protect drinking water source reservoirs. The DERI should clarify how land use changes in the catchment could affect water quality. It should analyze the salt and nutrient loading potential to Hodges Reservoirs and the San Pasqual Groundwater Basin resulting from the proposed project.

4.10 Land Use

4.10.2.2, Page 4.10-17: To fully understand the surrounding land uses and provide a comprehensive disclosure of potential impacts, it is recommended that a few paragraphs be added discussing pertinent City of San Diego's plans, programs, policies, and regulations that will be affected (or not) by the General Plan Update. The City of San Diego's jurisdiction is adjacent to the City of Escondido. Potential issues affecting natural resources and water resources in this bordering area should be discussed.

4.15 Recreation

This section should include an expanded discussion about the San Dieguito River Park Joint Powers Authority and potential impacts to San Diego's MSCP land because of increased recreation. Trails of the River Park traverse Public Utilities land at Hodges Reservoir and in San Pasqual Valley. Growth in Escondido will lead to a greater pressure for recreation on River Park trails. Growth in Escondido will also lead, inexorably, to more unauthorized access to Public Utilities lands. The Public Utilities Department has a long history of managing public recreation and unauthorized access, especially at Hodges Reservoir and in San Pasqual Valley. Our experience has made it clear that development close to undeveloped rural reservoir properties greatly increases the scope and severity of problems such as trespass, off road vehicles use, degradation of vegetation and soil, trash and hazardous material dumping, and a general increase in pollutants. At Hodges Reservoir and in San Pasqual Valley there are already dozens of

² EPA website, February 27, 2012
<http://water.epa.gov/polwaste/nps/outreach/point1.cfm>

Page 5
Mr. Jay Petrek
February 27, 2012

unauthorized access points, miles of "volunteer" trails, and continuing problems with vandalism, poaching, homeless encampments, and serious crime.

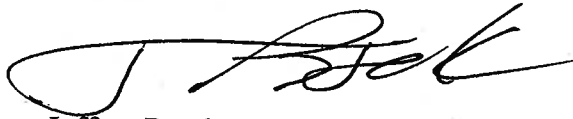
The DEIR should explain how the Trail Network Policies will be implemented by the General Plan to reduce impacts to less than significant.

Chapter 5 Other CEQA Considerations

Section 5.1.2, Page 5-3: Fourth paragraph: Add to this sentence, "Additionally, intensified non-residential land uses proposed ...and the Westfield Shoppingtown Target Area would be located in close proximity to the adjacent jurisdictions (City of San Marcos, *City of San Diego*, and unincorporated San Diego County)."

If you have any questions, please contact me at jpasek@sandiego.gov or at (619) 533-7599.

Sincerely,



Jeffery Pasek
Watershed Manager

JP/tm

- Enclosures:
1. Map 1, Public Utilities Land: Hodges Reservoir and San Pasqual Valley
 2. Map 2, Cornerstone Lands: Hodges Reservoir and San Pasqual Valley

RMU 2.0

Public Utilities Land: Hodges Reservoir and San Pasqual Valley



Watershed and Resource Protection
Image: Google Earth 2012

- Public Utilities
- Escondido
- Potential Escondido Annex
- Streams

City of San Diego
 Public Utilities Department
 Cornerstone Lands:
 Hodges Reservoir
 and San Pasqual Valley

City of Escondido

San Pasqual Valley Agricultural Preserve

Hodges Reservoir

MSCP Cornerstone Land

Public Utilities land in Escondido

Public Utilities

Hodges Catchments

Streams



Map 2

Prepared by:
 City of San Diego Public Utilities
 Watershed and Resource Protection Team

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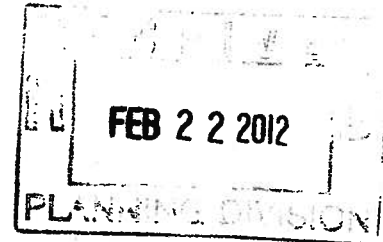
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San Diego County Archaeological Society, Inc.

Environmental Review Committee

20 February 2012



To: Mr. Jay Petrek, AICP, Principal Planner
Planning Division
City of Escondido
201 North Broadway
Escondido, California 92025-2798

Subject: Draft Environmental Impact Report
Escondido General Plan Update, Downtown Specific Plan Update, and
Climate Action Plan
City Project Number PHG 09-0020 and PHG 10-0016

Dear Mr. Petrek:


I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR, we have the following comments:

1. The treatment of cultural resources in the DEIR is very good. Our only addition to the mitigation measures would be to include in Cul-3 the requirement of curation of the collections and associated records, other than cultural material subject to repatriation under state and federal law.
2. We suggest adding to the list of historic properties in or adjacent to the City two properties in the unincorporated area which have been landmarked by the County's Historic Site Board:
 - a. King Ranch House, 1445 Navel Place, Escondido 92027
 - b. Jessie C. Holmes Lemon Ranch Residence, 1106 Birch Avenue, Escondido 92027Both have also been granted Mills Act participation.
3. As an editorial comment, we note that San Pasqual Road is mislabeled San Pasqual Valley Road on the maps in the DEIR, such as Figures 4.5-1 and 4.5-2.

We appreciate being included in the public review of this DEIR.

Sincerely,


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

cc: SDCAS President
File

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ON 2/22/12

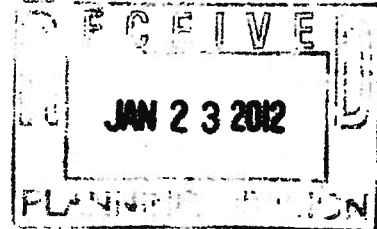
**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 19, 2012

Jay Petrek
City of Escondido
201 North Broadway
Escondido, Ca 92025



Re: Escondido GPU, Downtown SPU & Climate Action Plan

Dear Mr. Petrek,

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

A handwritten signature in cursive script, reading "Shasta C. Gaughen", is located below the "Sincerely," text.

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

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ON 1/31/12



20223 Elfin Forest Road
Elfin Forest, CA 92029

2011 Board Members:
Jacqueline Arsivaud-Benjamin, Chair
Bonnie Baumgartner, Vice-Chair
May Meintjes, Treasurer
Amy Molenaar, Secretary
Melanie Fallon
Nancy Goodrich
Minoosohacy
Gordon Taggart
Sandra Bartsch, At-Large Member
Mid Hoppenrath, At-Large Member

Jay Petrek, Principal Planner

February 2, 2012

Escondido City Hall Planning Division
201 N. Broadway
Escondido, CA 92025

SUBJECT: City Case Numbers : PHG 09-0020, PHG 10-0016

Dear Mr. Petrek,

The Elfin Forest Harmony Grove Town Council appreciates the opportunity to comment on the GENERAL PLAN UPDATE AND CLIMATE ACTION PLAN, City Case Numbers : PHG 09-0020, PHG 10-0016, in particular, regarding policies concerning unincorporated Harmony Grove (underlining added for emphasis):

Page II-53

SPA 8 - "Increased building heights and intensities shall be focused along Citracado Parkway and in areas more distanced from residential uses to ensure compatibility. Primary access to non-residential areas within the Specific Plan Area south of Andreason Street shall be from Citracado Parkway and Lariat Drive. Vehicular access to nonresidential land uses from Harmony Grove Road west of Citracado Parkway shall be prohibited. Attention shall be given to buffer the semi-rural residential areas along "edges" near Harmony Grove Road (west of Citracado Parkway). Kauana Loa Drive and in the Eden Valley area by incorporating land uses, building heights, architectural materials, building orientations, setbacks, colors, screening, lighting and signage that are harmonious with adjacent lower intensity land uses."

"The drainage areas running north and south through the center of this Specific Planning Area, as well as Escondido Creek, represent a desirable visual amenity. The Specific Plan shall include provisions for the enhancement of riparian areas and for the incorporation of the Escondido Creek Trail into the ultimate development plans while minimizing impacts to these resources."

Page II-81 to 84

1. Eden Valley and Harmony Grove Neighborhoods

Location / General Description: The Eden Valley and Harmony Grove neighborhoods are located in a rural valley along the western portion of Escondido, generally bounded by Hill Valley Road to the north, Escondido's General Plan boundary to the west, Escondido Creek Conservancy natural open space to the south, and Country Club Road, Kauana Loa Drive and portions of Harmony Grove Road to the east. The area generally north of Mount Whitney Road forms the boundary between the Eden Valley and Harmony Grove neighborhoods. The area includes single family residential on one-acre

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ON 2/2/12

and larger lots, a concrete pipe manufacturing company, agricultural uses, a historic spiritualist retreat center, and vacant property.

The Harmony Grove neighborhood is included in the County's adopted Elfin Forest and Harmony Grove San Dieguito Community Plan; a policy document created to address the issues, characteristics and vision of the two communities. Future development within Harmony Grove includes a 468-acre Specific Plan approved by the County that will involve a mixed-use rural residential village consisting of commercial uses, a fire station, open space, equestrian facilities and up to 742 units.

Page II-95

Community Character Policy 1.15

Recognize Community Plans approved by the Board of Supervisors within Escondido's General Planning Area and coordinate land use and design guidelines to minimize impacts in areas where city/county lands transition. Collaborate with annexing property owners to retain desired components of their Community Plans by considering appropriate zoning overlay designations in the event of annexation.

Community Character Policy 1.16

Notify and coordinate with surrounding property owners and resident groups when conducting land use studies affecting residents of unincorporated communities to include property owners, resident groups, homeowner's associations, and / or planning advisory groups that make their presence known to the City. Utilize Neighborhood meetings to notify interested parties to gather information and solicit input for recommendation to various decision-makers.

We approve of these additions to Escondido's General Plan, and in particular the underlined portions, which recognize the concerns of the local resident groups and planning advisory groups and also the County-approved Community Plan for this rural residential valley. We hope that Escondido would realize the benefit of having an attractive neighboring rural equestrian area and will act upon these policies in a manner that will safeguard the continued existence of these historic and environmentally sensitive communities.

Toward that end, we ask that Escondido institute a durable agricultural/equestrian overlay zoning plan based on the approved Elfin Forest Harmony Grove Community Plan as part of this General Plan Update, and not wait until an individual property is proposed for annexation to "consider" this, as is stated in the draft ***Community Character Policy 1.15.***

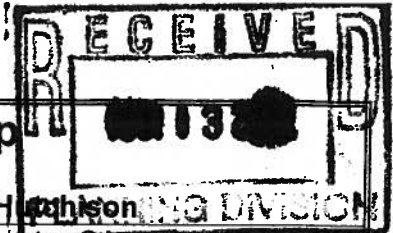
We look forward to collaboration with the City of Escondido towards limiting urban sprawl and "industrial creep" by creating effective buffer zones between future industrial/commercial uses and rural residential areas in the Harmony Grove Community.

Sincerely,



Jacqueline Arsivaud-Benjamin
Chair, Elfin Forest/Harmony Grove Town Council Board

Cc: San Diego Board of Supervisors
San Dieguito Planning Group



Valley Center Community Planning Group

Preliminary Minutes of the March 12, 2012 Meeting

Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchinson

7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082

A=Absent/Abstain A/I=Agenda Item BOS=Board of Supervisors DPLU=Department of Planning and Land Use IAW=In Accordance With N=Nay
P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 13 March 2012

Approved:

1. Call to Order and Roll Call by Seat #: 7:08 PM														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ANDERSON	HUTCHINSON	HOFER	GLAVINIC	BRITTSCH	FRANCK	QUINLEY	VICK	LEWIS	NJOORHWNOSOODN	SMITH	JACKSON	RUDOLF	DAVIS	BACHMAN
P	P	P	P	A	P	P	P	A	P	P	P	P	A	P

Notes: Lewis, Davis excused

Quorum Established: 12 present

Pledge of Allegiance

2. Approval of Minutes: February 13, 2012

Motion: Move to approve Minutes of February 13, 2012, as corrected

Maker/Second: Quinley/Glavinic

Carries/Fails 12-0-0 (Y-N-A): Voice

5.d.

Discussion and possible vote on the Escondido General Plan Update, EIR, Downtown Specific Plan Update, and Climate Action Plan as those plans impact Valley Center. Comments have been submitted in advance of the meeting by the VCCPG Chair and will be subject to a ratification vote. (Smith)

Discussion: Smith addresses development along Valley Center Rd. [Valley Pkwy in Escondido] that will likely impact traffic on Valley Center grade. Another area along I-15 was designated for commercial development that seemed misplaced. Smith sent an email to the City of Escondido objecting to plans for those two areas. Rudolf clarifies some technicalities in the plan, and notes the fuzziness of the boundaries of areas in question. He describes an annexation proposal that may lead to further development of land along the Valley Center grade in what is now designated open space. Glavinic addresses Sager Ranch development and suggests it should be subjected to much higher traffic impact fees [TIF] than what are now required. Rudolf says TIF only applies in County. Glavinic says an equivalent fee should be applied by City of Escondido. Smith says Mirar de Valle would have to be improved to provide second exit. Rudolf says there is no proposal to annex north of Daley Ranch.

Motion: Move to Ratify comments sent previously by the chair to County and include VCCPG's strenuous opposition to any proposed annexation by the City of Escondido east of Daley Ranch including anything east of Valley Center Road.

Maker/Second: Rudolf/Hofer

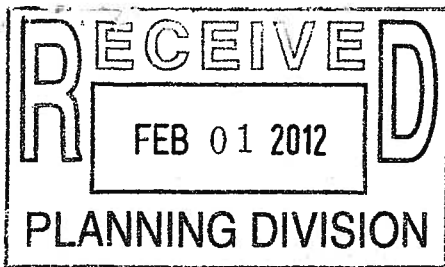
Carries/Fails 12-0-0 (Y-N-A): Voice

5.e

Discussion and vote on Property Specific requests including comments on Special Study Area 3. These items were considered at the February 23rd meeting of the General Plan Update Subcommittee. (Rudolf)

Discussion: Rudolf presents a review of property specific requests including the process history of some of the properties. He says all requests can be located on a map posted on the wall in the meeting room. Rudolf and Smith received two calls regarding particular requests, but no property owners attended the meeting of General Plan Update [GPU] SC on this topic and none are present tonight. Smith notes that he spoke to another property owner, advising him of opportunities to speak at this meeting and to other officials. The principal concern among requestors was downzoning to allow fewer dwellings per acre. However, no property owners are present to speak to this issue at this meeting. Rudolf reviews some history of the GPU process and why these requests would defeat the purpose and goals of the General Plan Update. Rudolf specifically

TRANSMITTED TO CONSULTANT
ON 3/13/12 (portion of VCCPG minutes)



Questions re the Escondido General Plan Update, 2012
- Prepared by the Escondido Chamber of Citizens (ECOC) -

1. A build-out figure is not mentioned in the body of the General Plan Update. However, at the staff presentation to the Planning Commission on January 24, 2012, Jay Petrik stated that it would be about 205,000.
The General Plan Update Matrix – a “side-by-side” comparison of the current and the proposed General Plan Goals and Policies – states that “Updated policies are based on attaining a vision for the future prescribed in the General Plan rather than by population.”(p. 158, Population Policy F1.1 comment) That statement is completely contrary to the intent and letter of the Growth Management and Neighborhood Protection Act (“Prop.S”).
2. If the City moves from a General Law city to a Charter city, how will that affect the proposed General Plan Update?
3. The Minority Report written by two members of the G.P. Issues Committee – Pam Stahl and Lisa Prazeau – relates to certain Quality of Life standards, to annexation and to clustering. This report is very helpful in analyzing the proposed changes to our city’s General Plan. Have you received your copies of that Minority Report?
4. It appears that there is an effort to overturn the Growth Management and Neighborhood Protection Act, passed overwhelmingly by Escondido voters in 1998. Are we mis-reading any of the policy statements? We have been unable to find any of the protections which the people of Escondido wrote into their General Plan.
5. Issues Committee member Stahl asked for policies included in the General Plan Update relating to standards for smart growth areas (open space, recreational amenities, playgrounds for children, desirable landscaping, setbacks, et cetera). However, the committee turned down this request. We do see that there are some guidelines for the downtown area, but nothing for other smart growth areas. If not in General Plan policies, where will there be clear and *required* standards?
6. Does this General Plan assure that no new construction is permitted that will impede our fire department doing its job? (Remember the 2009 fire in the newly constructed condominiums at Escondido Blvd. and Woodward?)
7. Why were the Planning Commissioners not made aware of the Side-by-Side Comparison of Existing (adopted) and Draft (proposed) General Plan Goals and Policies – known as the Matrix?
8. The ECOC (Escondido Chamber of Citizens) will comment on the make-up of the General Plan Issues Committee.

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ON 2/2/12

9. The entire General Plan Update is not readily available to the general public: several computer-savvy residents have reported great difficulty in downloading the documents; when the hard copies were requested at the Main Library yesterday, the Librarian could not find them. (She located them later that day.) Of course, with the closure of the East Valley Library, neither computers nor hard copies of those documents are available there to that large part of our population. Also, although the General Plan Update documents are available to the in hard copy at the Planning Department at City Hall, a very large number of our working residents do not get off work until after 5 or 6p.m and so cannot consult those documents if the on-line option is inaccessible. (They could be purchased, we are told; however the cost of those weighty volumes could have been shared by neighborhoods if such a people-friendly plan had been co-ordinated through our neighborhoods.)

Secondly, on January 12th, our city Planning Department announced that the Draft Environmental Impact Report – which assesses the General Plan Update, the Downtown Specific Plan Update and the Climate Action Plan - was starting a 45-day public review period, to end on February 27th. In light of the accessibility realities, the public needs formal assurances *today* that public input will continue to be received and considered for changes in the Draft Update well after that February 27th date.

Finally, as we all know, if a community's General Plan is to actually and effectively guide its future, then, its council, staff, and residents must be committed to the thorough study, review, discussion and commentary which alone can result in a plan that protects and improves the quality of its residents lives – that is to say “the best interest of its public.”

Right now, this General Plan is slated to go on the November ballot. Perhaps, if future public workshops over the next six months are held at times and places accessible to the working public ; if the documents are readily available to them; and if the staff continues to receive, respond to and consider the public input toward possible changes to the Draft, perhaps our city's Plan could be ready for the November ballot. Sliding through or rushing or avoiding the give-and-take of genuine and thorough community-wide discussion and decision- making will only degrade the liveability of our city for decades to come.

February 27, 2012

Patricia Borchmann
1141 Carrotwood Glen
Escondido, Ca 92026
760 580-7046

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

**RE: Public Comments on General Plan/Downtown Specific Plan Update – Draft EIR –
(SCH SCH 201 007 1064)**

Dear Jay,

Thank you for opportunity to participate in process with public comments on the draft EIR prepared for the General Plan, and Downtown Specific Plan update.

1. Visual Resources, Community Character, Historic Resources

The impact analysis of the Downtown SPA indicates development under the proposed Downtown SPA **would not** have potentially significant impacts to existing **visual resources, community character, and historic resources**. As an observant concerned citizen, I disagree with that conclusion because it appears to **understate**, or underestimate the actual extent of visual impact which proposed changes will likely cause, based on the proposed drastic increase in building height (up to 85'), producing a high-rise urban profile, and extreme density increases in the retail core area of Downtown's Specific Plan Area..

In Section 4.1.3.3., Issue : Visual Character or Quality, Community Character: The draft General Plan update reflects: "the implementation of the proposed General Plan update would have the potential to change **but would not substantially degrade the existing visual character or quality in the General Plan update area**. The City has existing regulations in place, and the General Plan update and Downtown Specific Plan update propose new policies to ensure future projects would be cohesive, high quality development that would not degrade existing visual character or quality."

The analysis seems to fail to fully recognize the actual extent of disparity and contrast which will result between the size, scale and mass of an existing 1-2 story building profile currently predominant in the Downtown Retail Core/Historical Downtown District, with the dramatically more massive size, scale and mass of a more high-rise urban profile, resulting from the proposed land use, building height changes and density increases proposed under the General Plan/Downtown SPA update. The analysis fails to fully recognize that the existing 1-2 story buildings (many of which are historically significant), will become dwarfed, diminished, overpowered, and sometimes shadowed in darkness, in contrast to new oversized high rise structures in close proximity .

As understood, high-rise residential buildings up to 85' high, (w/100 du/acre density) may be located in a peripheral area surrounding the existing 1-2 story buildings in the retail core, with little transitional, or

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ON 2/27/12

intermediate treatment. In the Downtown Retail Core Area/Historic Downtown District, high rise buildings up to 75', (w/75.du/acre density) are proposed.

The analysis seems to overly minimize the extent of actual change in the character of this area ,and falsely leads one to believe the proposed building height increase is relatively minor. In the Downtown Specific Plan's retail core, there are only two existing high rise buildings (AT&T/Pac Bell facility, and Palomar Hospital). Otherwise, the typical existing building profile is low-rise (1-2 story building streetscape) in Escondido's Downtown Retail Core/Historic District.

Based on the extent of change from an existing predominantly low-rise urban profile to a high-rise urban profile, I strongly feel the Visual Character or Quality **will be significantly changed**, and that the changes could degrade the existing visual character or historic quality in the Historic Downtown District. That is why I think a reasonable person might **disagree with consultant's conclusions that changes are not expected to "substantially degrade the existing visual character or quality in the General Plan update area"**. I also feel the **consultant's analysis of the area's existing community character fails to reflect the extremely high intrinsic value which surveyed residents and downtown merchants place on the City's existing historic resources.**

In a quantitative analysis prepared in 2011 for "Escondido's Future", the value of Escondido's historic resources in Downtown and Old Escondido Neighborhood were identified by residents who were surveyed, as one of the top three (3) existing amenities in the City, which are considered 'Escondido's treasures'. (1)

In 2011, streets in a segment of the Historic Downtown District were closed, so the area could be used for film production purposes, because Escondido was specifically chosen by film-makers because of the existing unique ambience and historic charm. In 2011, another area in Old Escondido Neighborhood was specifically chosen in a nation-wide search, to be photographed for an automobile commercial, because of the unique charm and historical authenticity unfound elsewhere for winter photos on a residential street shaded by large trees. The visual value of historic resources are an irreplaceable existing amenity, which draws the film industry, and advertisers marketing products with commercial photography in prime locations with desirable backgrounds. This is an asset which deserves more emphasis and importance.

It is an understood, and supported premise that the basis of the General Plan update follows strategies promoting "smart growth" and higher densities in the urban core, and discourages urban sprawl into rural peripheral areas. It is an unfair assessment however, to conclude the proposed General Plan update's impacts on visual resources and community character will not be degraded. I think it might be appropriate to more fully reassess the General Plan updates' actual impacts on Visual Resources and Community Character (and Historic Resources). If necessary, potentially significant impacts could be overridden by Findings of Overriding Considerations, but that process would provide a more authentic impact analysis, and a more authentic effort to determine if additional mitigation measures are feasible. Possible mitigation measures might include **additional** design standards to provide transitional treatments, graduated roof height levels, variation in wall planes and materials to avoid a monotonous

wall plane or surfaces. Encouragement of roof terraces, large balconies, and opportunities for open community garden spaces on roof surfaces, and specific design standards to promote solar energy in urban high rise buildings are also suggested.

2. Population

During Council's discussion on Population, Jay you indicated how the City's most recent data on unit occupancy increased from the former rate of 2.44 persons per unit to over 3 persons per unit. Your discussion indicated how the forecast changes population, and will affect targets for affordable housing and other components most linked to Housing Element. It was noted that any negative impacts resulting from increased unit occupancy rates could be overridden by Findings by Council, that Overriding Considerations would Outweigh certain negative impacts. I suggest that the applicable draft EIR sections be reevaluated and possibly revised to reflect these findings.

Although it may be true that Findings of Overriding Considerations may allow Council to approve the EIR despite negative impacts, this issue made me wonder about how this specific increased occupancy rate was evaluated in the assessment of other important sections of the EIR analyses. This would likely be relevant in assessment of impacts on traffic generation rates, demand for all public services and infrastructure (public services from schools, to increased service demand for police, fire and emergency service, to other major infrastructure systems). Unless the same increased unit occupancy rate (over 3.0 persons per unit) were applied in the impact analysis in other sections of the EIR, such analysis would result in an underestimated project impact from development under the General Plan. How was this increased unit occupancy treated by consultants in the various impact analyses prepared for this General Plan update? If not already fully assessed, a reassessment is recommended for purposes of accuracy in various technical studies, by reflecting the current occupancy rates.

3. Traffic

Although the draft General Plan EIR recognizes that during peak hours, projected service levels will be reduced to Levels C, D, and E in the Urban Core, the extent of negative impacts on traffic patterns caused by the increased densities and an urban high-rise profile seems to have been overly minimized in the analysis. **By emphasizing these degraded service levels are only projected during peak hours, the limited occurrences supposedly indicates that negative impacts are otherwise acceptable? I assert that that the anticipated reduction in service levels during peak hours is an unacceptable significant negative impact, and should be treated as such.**

One could reasonably expect that degraded service levels during peak hour in the urban core would likely also cause other offsite impacts, and cause increased congestion and traffic impacts on other peripheral transportation routes. Drivers will likely seek alternative ways to travel more quickly across town, or to-from freeway interchanges on I-15 and SR 78. Therefore, I believe actual development under the General Plan update may cause a greater traffic impact than the extent specifically evaluated in this draft EIR traffic analysis. If not already fully addressed, the full traffic impact analysis in the General Plan update should be undertaken, including offsite impacts.

Additionally, the issue of increased traffic congestion and reduced service levels Downtown are likely to create a more negative impression of the City. This is critical especially for visitors, or potential customers trying to travel to the City using various freeway interchanges, to destinations, or for businesses with anyone touring the City as a potential employer. Actual Service levels during peak hour conditions often play an important, and major role in the image projected by the City, and may have an adverse effect on any type of an improved future employment base the City tries to form.

5. Grading, Landform Alteration

The draft General Plan EIR reflects a series of policies which, with adherence, appear to form the basis of mitigation measures to assure potentially significant impacts would be averted. While the collective intent of conformance with these policies 'sounds good' on a macro-level, at a micro-level, this alone is an ineffective method. As explained subsequently in further detail, some of the policies are internally inconsistent, which often makes policy implementation overly confusing, difficult, and overly complex.

For instance, policies in the General Plan's new Prosperity Element promote processes which are business-, and user-friendly, simple to apply without 'hidden requirements' or surprises. This observation is not presented as a criticism of the draft EIR prepared for the General Plan Update. Instead, this observation is presented to indicate the current complexity which exists, because development standards, guidelines and policies controlling property development are currently not cohesively described in a single, stand-alone document, or in a single handout for use by the public, or use by consultants.

Instead, for instance, the requirements for property development are described **in multiple** sections of the underlying zone in the Zoning Ordinance, or grading standards which are described in the Grading Ordinance. Beyond those, the General Plan's policies for Resource Conservation (Chapter 6), are treated separately, as are Guidelines for Hillside Development, ridgeline protection, scenic vistas, view corridors (I-15), or sensitive habitats (such as wetlands, streamcourses, sensitive habitat, steep slopes).

Because these extremely important supplemental policies and guidelines seem to be treated almost as if they are 'afterthoughts', separate, or subordinate to explicit standards defined in the Zoning Ordinance or Grading Ordinance, they are often overlooked, often misunderstood, or are unclear as to whether standards are absolute, mandatory, optional, required, or recommended. As often as this Council directs staff to 'simplify' processes, a more thorough method to develop a stand-alone comprehensive hand-out document is highly recommended. This effort would provide a major benefit by avoiding instances where user's don't inadvertently overlook important development constraints which otherwise often become surprise obstacles at later stages in the development process. I would expect this type of effort would hopefully occur in the not-so-distant future, perhaps concurrently with the City's subsequent comprehensive update of the Zoning Ordinance. Until a more comprehensive method to implement General Plan policies with a subsequent, more comprehensive single- source handout to fully describe development standards is prepared, the need for, the intent, and commitment for follow-up actions would at least be appropriate to explain in this Draft EIR for the General Plan Update.

6. Environmental Review

The General Plan Update's Section 18 identifies a series of Goals pertaining to Environmental Review Policies 18.1 – 18.4. Under Policy 18.1, the draft EIR indicates the requirement to maintain Environmental Quality Regulations (EQR) in accordance with the California Environmental Quality Act (CEQA).

Since the City routinely utilizes federal funds under Community Development Block Grants on an annual basis, (sometimes for City-projects, or to subsidize valuable services performed by local non-profit organizations), or possibly other federal grant sources, it is suggested this section of the General Plan Update EIR be expanded, to also include requirements to maintain EQR in conformance with National Environmental Policy Act (NEPA), when necessary.

It seems the section 18 pertaining to Environmental Review would be an ideal location to reflect the intent of CEQA's mandate, to promote development which reflects efforts to first avoid, or minimize project-related impacts to the maximum extent feasible, and provide full mitigation to offset negative impacts to valuable natural resources and amenities, when impacts cannot be avoided.

In separate sections of the General Plan Update EIR, there are numerous examples where the text describes processes, with language which would probably be appropriate in a summary under the Environmental Review section 18. For instance, under the Mobility and Infrastructure Element's policies require use of best practices to maintain the highest possible energy efficiencies in water treatment system and infrastructure system to reduce costs and greenhouse emissions (Policy 12.9). Or, for example, Policy 14.6 requires new development to minimize alterations to natural landforms and the amount of impervious surfaces to minimize erosion while encouraging implementation of low impact development measures, and maximum use of natural drainage ways consistent w/sound engineering and best management practices.

On page 4.4-30, under Federal, State, and Local Requirements, the draft EIR refers to the City's Environmental Quality Regulations (EQR), as follows:

"Additionally, the City's EQR require reporting programs to ensure that all required mitigation measures for development projects are properly and fully implemented with regards to impacts to biological resources, including habitat fragmentation and habitat that supports sensitive species."

This level of detail, and type of description also belongs in the draft EIR Section pertaining to Environmental Review in Section 18.

7. Description of Environmental Setting

Under Section 3.3, the general description for Environmental Setting describes:

"The City's geographic setting is characterized by hills, and mountains surrounding an open valley bisected by Escondido Creek.....".

I feel this general description should be expanded to **also specifically identify the existence of Reidy Creek under the Description of Environmental Setting**. Reidy Creek is another important drainage feature which is recognized in other sections of the Draft EIR prepared for the General Plan Update, and was identified in the Notice of Preparation, and Notice of Completion. Reidy Creek is partially a natural drainage channel in it's upper reaches (approximately 3 miles in length?) adjacent to Broadway flowing from a north to south direction, until the creek reaches the channelized segment (approximately 2 miles? In length). From there, the channelized portion of Reidy Creek combines with Escondido Creek channel at Mission Avenue between Centre City Parkway and Quince Street.?

An expanded description for "Environmental Setting" to include Reidy Creek would be consistent with the description of Riparian Vegetation (page 4.4-9) under Biological Resources, and the Riparian Forest category displayed on the Vegetation Classes (Figure 4.4.2). Due to the relative rareness, sensitivity, and high level of biological habitat value usually associated with rural segments of natural drainage channels supporting riparian vegetation, the current superficial description under the draft EIR's summary of the Existing Setting on page 3.3 seems incomplete, and overlooks an important element.

It is hoped that at some future point in time, it may become possible to perhaps assemble a series of parcel acquisitions for purposes of forming a linear park, or a contiguous open space system adjacent to Reidy Creek Golf Course, when undeveloped portions of Reidy Creek are developed. Or a preserve system could be assembled to function as a mitigation bank area. In order to protect that option to possibly preserve and protect portions of Reidy Creek's unchannelized section in the future, it is important to identify this natural streamcourse as a feature under the description of the City's Environmental Setting.

8. Escondido Creek Master Plan

Since the City Council recently adopted the final Escondido Creek Master Plan (January 25, 2012), it may be suitable to more extensively reflect components of this adopted Master Plan in the draft EIR and General Plan, than is currently described in the document(s).

I was extremely glad to see that the draft General Plan/Downtown Specific Plan Update **generally** reflects the City's "vision" for Escondido Creek. On page 1-11, the Draft General Plan Update (Section 5) for Parks, Trails and Open Space, (paragraph 2), states:

"Escondido Creek is enhanced as a shaded rail system that connects to other regional trails and open space systems, and includes recreational improvements with exercise stations, seating areas, and mini-playgrounds."

It seems that the discussion about the Escondido Creek Master Plan should be expanded, to more comprehensively describe specific elements of the adopted Master Plan. For instance, it should more fully reflect excerpts from the actual Master Plan recently adopted for Escondido Creek, to function as a Class II bikepath/pedestrian path. The current document could easily be expanded to further reflect a future Zoning Overlay district for Escondido Creek, and specify design standards for shade structures,

furniture features, fencing design guidelines, identify themes, various design elements and signage, street crossings, security and safety features which will be constructed in future phases.

Since the draft General Plan Update EIR and Downtown Specific Plan are still at a point where minor revisions are still possible, it seems this might prove to be a worthwhile and valuable undertaking. If the General Plan Update and EIR were expanded at this point to more consistently and comprehensively reflect subsequent plans for phased construction for the Escondido Creek Master Plan, **the undertaking would greatly simplify subsequent efforts to obtain grant funding from various sources if the General Plan were structured in such a way.**

At the recent Strategy Session meeting (February 21, 2012), there was discussion among members of The Escondido Creek Conservancy (TECC) and Reveal the Creek (REC) groups to explore the possibility that future portions for phased improvements in the Escondido Creek Master Plan area might be suitable for use as an off-site mitigation bank area for other important projects proposed in other areas of the City, (such as off-site mitigation for extension of Citracado Parkway for instance). **These options would be easier to implement in the future, if such possibilities were specifically anticipated and generally described in the draft EIR prepared for the General Plan Update.**

As an interested citizen/unaffiliated member of Reveal Escondido Creek , I think there would be distinct advantages for the City to reflect possible opportunities to focus on future construction phases for segments of the Escondido Creek Master Plan. The draft General Plan EIR could also reflect the **possibility to utilize portions of the Escondido Creek Master Plan as an Overlay area, as a potential off-site mitigation bank area, to offset future impacts of City projects, or street extensions pursuant to the Circulation Element, or street widening .** Use of this method for future mitigation banking opportunities would simultaneously accelerate, simplify, and speed-up the ultimate construction of Escondido Creek Master Plan's features, so the City's residents, citizens, students, bicycling enthusiasts, recreational users, members of the public and visitors could more immediately begin to enjoy the multiple benefits resulting from the implementation of the Escondido Creek Master Plan.

Thank you for your patience, and that of your consultants, in evaluating public comments on the Draft EIR prepared for the General Plan and Downtown Specific Plan Update. It is an exciting process, to play a small but active part as a member of the public, in the development of the City's future, and master plans for future development in Escondido until 2035.

I was impressed the Climate Action Plan was made part of the General Plan update, and that the Plan reflects some of the previous public comments generated during earlier public outreach efforts.

Respectfully,

Patricia Borchmann

Footnote:

(1) Escondido's Future – Survey 2011 Results Summary – source – Mel Takahara

Jay Petrek

From: Christine Nava <christinenava@hotmail.com>
Sent: Monday, February 27, 2012 4:03 PM
To: Jay Petrek
Subject: DEIR comments

Dear Mr. Petrek –

I am just under the deadline for DEIR comments (I went out-of-town right after the workshop) and this is my first opportunity to follow up on a couple of issues I raised at the workshop. First let me thank you, your staff and all who worked on this plan. It shows a tremendous amount of work and your efforts to draw the public into the discussion is greatly appreciated.

Regarding the DEIR section entitled “significant and unavoidable impacts”, I notice that a number of factors are not included:

1. Ground wind effect when tall buildings are clustered.
2. Shading effects especially for other buildings.
3. “Canyon effects” –trapping pollutants, thus reducing air quality at the street level
4. Effects on light from obstruction of sun

Other comments that refer in a general way to the downtown clustering:

1. I am very concerned that apartments/condos planned in the higher density targeted areas will, in the long run, result in the creation of ghettos. I do not believe that these planned structures will draw the “high tech” or higher income level workers/families to residency to these apartments.
2. I am concerned about the social impact for both pedestrians and nearby residents.

Thank you for the opportunity to comment. I may have others as I continue to study the documents.

Sincerely,

Chris Nava
(760)735-9802

TRANSMITTED TO CONSULTANT
ON 2/27/12

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

February 27, 2012

RE: GENERAL PLAN UPDATE AND C.A.P. DRAFT EIR PHG 09-0020, PHG 10-0016, SCH #2010071064

Thank you for the opportunity to comment on this Draft EIR for the City's General Plan Update and Climate Action Plan. Eden Valley has recently been granted the opportunity to be represented by the San Dieguito Planning Boards, due to the actions of a core group of active community members who have worked hard with the County of San Diego to develop a vision for our community as part of the San Diego County General Plan Update.

In particular we have comments on General Plan Area EL-5 (Eden Valley) and the proposal to replan and rezone a portion of this area to Industrial Office (IO) with GP Policy to establish a Medical Overlay Area Plan in the proposed Escondido General Plan Update. Specifically the portion of EL-5, which does NOT lie within the City Limits, and is currently zoned Rural and Agricultural in nature.

Eden Valley Community Character: Located in unincorporated Escondido, Eden Valley is rural in nature, extremely quiet, peaceful, and generally remains in its natural state. The area is single-family rural residential and agricultural in usage, with large lots, residential livestock keeping; equestrian trails, and the dark night sky is an important aesthetic resource. There is one main roadway in Eden Valley: Country Club Drive, which is a 2-lane, tree-lined residential street with commercial weight limits and is designated as a traffic calming area. The roadside is often used as a multi-use equestrian trail by the residents. There is no commercial development; no sewer, no street lights, no traffic lights, no lighted signs, no traffic signals, no curbs, no sidewalks, no extractive land uses, and no commercial or non-agricultural industry in Eden Valley. Residents here value open space, quiet, dark nighttime skies, low traffic volume, equestrian trails and access to the abundant wildlife that flourishes in this beautiful rural environment.

We ask that the Escondido General Plan Update and EIR remove any County land within the area of EL-5 from the planning area. Should the City of Escondido choose to move forward with including current County land within the area of EL-5, we ask that the General Plan EIR's detail how increasing residential densities and intensities in "Smart Growth" areas such as EL-5 which are in close proximity to transit, will not compromise the character of adjacent single family neighborhoods such as Eden Valley. An alternative may be to purchase mitigation lands within Eden Valley as a permanent Open-Space Reserve to offset the losses. This may also be in keeping with the General Plan's goal of establishing "Smart Growth" and "Healthy Community Concepts" which enhance accessibility to recreational and open space opportunities.

Furthermore, since most of the EL-5 area is within the City limits, we ask the City of Escondido to create a buffer zone and graduate the FAR with lower intensities adjacent to the existing County areas, while increasing the FAR intensities to the North and East areas of EL-5. This project does NOT blend with our existing community character and will have an adverse visual and environment impact on all of Eden Valley by sitting buildings that may project above the ridge line and resulting in a scale of development that is incompatible with the existing setting.

We ask that the Escondido General Plan Update and EIR recognize and support the proposed planning for all of Eden Valley, which is currently with the County of San Diego's General Plan Update. The City of Escondido new General Plan should accept and adopt all of the provisions which exist in the Eden Valley Community Plan. This should include an agricultural/equestrian district overlay that would allow durable special animal and livestock keeping and breeding, a trail system suitable for equestrian use, and low density zoning to encourage small family-owned organic farms.

As neighbors, we hope that the City of Escondido will continue to help keep our rural community true to it's name sake of Eden Valley

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

cc:
San Dieguito Planning Group
Elfin Forest/Harmony Grove Town Council
Residents of the Eden Valley Bugle
Devon Muto, County of San Diego DPLU

TRANSMITTED TO CONSULTANT
ON 2/27/12

Jay Petrek

From: Mark Rodriguez <marknrodriguez@cox.net>
Sent: Monday, February 27, 2012 5:05 PM
To: Jay Petrek; Sam Abed; Marie Waldron; Olga Diaz; Ed Gallo
Subject: Re: City Council General Plan Update Workshop

Jay,

I hope that the General Plan Update addresses issues with fire protection/services especially when dealing with the Palomar Energy Center. The transformer fire identified that there was lack of proper fire suppression services not only on the facility but with the fire department. The fact is that we were very lucky and if it had spread there would have been nothing that we could have done leaving many questions unanswered. Documentation I have obtained indicates that without the proper equipment that the temperature of the fire became too critical and prevented anyone from extinguishing the fire quickly if it had become critical.

Also of notice is the very poor level of circulation that will still be in place even with the Nordahl expansion and 78 widening. At some point some will die as a result and city continues to use excuses rather than addressing the problems. With Palomar West becoming a critical factor in the development of Escondido the continued failure to address existing infrastructure problems will only put another black eye in this cities attempt to change their image.

Mark

On Jan 26, 2012, at 5:12 PM, Jay Petrek wrote:

Greetings-

Escondido's Draft General Plan Update, Downtown Specific Plan Update, and Climate Action Plan are available for public review and comment. The Draft Environmental Impact Report that assesses these documents is complete, and its 45-day public review / comment period extends from January 13 – February 27, 2012.

A CITY COUNCIL WORKSHOP HAS BEEN SCHEDULED FOR WEDNESDAY, FEBRUARY 1, 2012. The workshop will be held at 4:30 P.M. in the City Council Chambers, 201 N. Broadway, Escondido CA. The workshop is open to the public. No decisions will be made at the workshop, the intent is to provide information, and receive input and direction.

The City Council staff report can be found at the following link:

<http://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUUpdate/020112CityCouncilWorkshop.pdf>
All General Plan-related materials are available to review / purchase at the City Hall Planning Division (201 N. Broadway, Escondido, CA 92025), and documents are filed at the Public Library Reference Desk (239 S. Kalmia Street, Escondido). Electronic copies have been uploaded to the City's General Plan Web Page at the following link: <http://www.escondido.org/general-plan-update.aspx>

Additional General Plan public meetings are anticipated during the spring and summer of 2012 and will be separately announced.

TRANSMITTED TO CONSULTANT
ON 2/27/12

Question and Concern to City Council & Staff re the Proposed General Plan Update
(Please enter into the Record of this 2/16/2012 GPU Workshop)
Submitted by M. A. Mareck, 1439 Leland Way, Escondido, Ca. 92026

The first part of my question: Where is the list of the land-use changes which are made in the General Plan Update?

Secondly: my concern: At the Planning Commission General Plan Update workshop on January 24th, the Planning Commissioners had not been given the Side-by-Side Comparison of the Proposed Update and the Current General Plan, a document which could have greatly helped their preparation for the workshop. The lack of information on the part of the Commissioners was very evident, and raised much concern in those attending the workshop. Following that workshop, the concluding recommendations in the staff overview for the February 1st workshop listed: "Forward documents to Planning Commission for their final recommendation." My understanding is that this "final recommendation" by the Planning Commissioners will be to our City Council in regard to the Council's deciding vote on the content of our General Plan Update, which is slated to be on the November ballot.

Many of Escondido's current voters are also those who voted for the Growth Management and Neighborhood Protection Act. That Act was the result of a grassroots response to repeated abuses of the city's voter-approved General Plan by its city councils. The Act requires a vote of the people for changes to residential densities, changes to land use categories, and changes from residential designations to commercial or industrial designations. It also re-adopted specific related policies from the General Plan and stated that changes to those policies in future could only be authorized by a vote of the people at an election.

Those voters – and all of Escondido's voters – need to be sure that our commissioners have all the information they need about how the proposed General Plan does or does not honor the voters' intent when they passed the Growth Management and Neighborhood Protection Act. And the voters themselves need that information – in a clear, accurate, and concise form, widely available, and in time to permit study and discussion.

TRANSMITTED TO CONSULTANT
ON 2/27/12

Jay Petrek

From: Jay Petrek
Sent: Monday, February 27, 2012 1:48 PM
To: 'William'
Subject: RE: USGBC: LEED for Neighborhood Development

Hi William-

I may have misunderstood your question to me regarding LEED Design and Development Standards being included in the General Plan and I apologize. Because the General Plan is long range and somewhat fluid, it is not typical for agencies to reference specific programs, such as LEED, in order to not prejudice one approach or technology over another. However, there are policies in the Draft General Plan's Resource Conservation Element pertaining to Air Quality and Climate Protection, as well as in the Mobility and Infrastructure Element pertaining to Energy that call for energy efficient construction, lowering energy demands, and reducing the community's carbon footprint.

The city is very aware of the benefits of energy efficient construction and is active applying such technology in both new construction and retrofitted facilities. Just a few recent examples include:

- 1) Construction of the city's Police/Fire facility followed LEED principles.
- 2) Solar arrays on several city facilities that will, combined, generate almost 1 megawatt of power.
- 3) Escondido as the first city in California to convert raw sewage gas into renewable natural gas at the Hale Avenue Resource Recovery Facility (HARRF, city's sewer treatment plant).
- 4) Retrofitted electric operated water circulation pumps at Lakes Dixon and Wohlford to solar energy.
- 5) White roof technology installed on several city facilities, including City Hall.
- 6) City Hall and Centre for the Arts' heating and air conditioning equipment replacement with a cleaner-operating central plant facility that saves over \$250,000 annually in heating / cooling costs.
- 7) Traffic signals around town on a LED replacement program.

More energy saving features are in the works for municipal facilities. In addition, the requirement for all development to comply with Assembly Bill 32 mandating that greenhouse gas emissions be lowered to 1990 levels by 2020 will further accelerate energy efficient measures. I've attached links to the Draft Resource Conservation, and Mobility and Infrastructure General Plan Elements. Policies pertaining to Air Quality and Climate Protection are on pages VII-29 and VII-30. Policies pertaining to Energy are on page III-48 and III-49. These policies apply to both city and municipal operations. Let me know if this addresses your questions.

Respectfully,
Jay Petrek

<http://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUpdate/DraftGeneralPlanChapterIII.pdf>
<http://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUpdate/DraftGeneralPlanChapterVII.pdf>

-----Original Message-----

From: William [mailto:w.w.stephenson@gmail.com]
Sent: Thursday, February 23, 2012 2:50 PM
To: Jay Petrek
Subject: USGBC: LEED for Neighborhood Development

Mr. Petrek,

TRANSMITTED TO CONSULTANT
ON 2/27/12

I attended the recent community workshop on the Escondido general plan update (given in the Mitchell Room) and I briefly spoke with you afterwards regarding the complete absence of any mention of LEED design and development standards being applied to Escondido's GPU process, which you confirmed as true, which I feel is a stunning over-site by our city council.

Is there any way I can help you bring to the City Councils attention the importance and many benefits to our community if our city integrated the LEED for Neighborhood Development (LRRD-ND) principles into our GPU.

Please check out the link provided below for more information on the LEED-ND Rating System.

I was informed by Dolly Mc Quiston, President of the Escondido Chamber of Citizens (ECOC) that you will be our guest speaker next Tuesday evening, Feb 28. at Jerry Harmons home. I would like you to include the LEED for Neighborhood Development in your presentation because of the public's general lack of awareness of these entities, programs and standards. I look forward to your visit.

<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>

Jay Petrek

From: Kevin Johnson <kevin@johnsonlawaplc.com>
Sent: Monday, February 27, 2012 10:26 AM
To: Jay Petrek
Subject: General Plan Update EIR--Comments

Importance: High

Hi Jay:

I have been asked by the Escondido Chamber of Citizens to review and comment upon the General Plan Update Draft Environmental Impact Report. Following are a number of comments addressing issues related to Proposition "S".

- 1) The DEIR fails to fully and clearly inform the public as to what specific zoning amendments and GP policy text amendments will need to be voted upon under Proposition "S".
- 2) The criteria for deciding what amendments will require a public vote should be specifically explained and expressly applied to each amendment. Are there for example any "close cases" where a vote may or may not be required? If so, why?
- 3) A map of the properties to be rezoned should be provided and a standard figure/chart listing the properties in one place with a brief explanation about why or why not a public vote will be needed should be provided.
- 4) There should be clear explanation of how the vote on the properties will be handled. Proposition "S" requires separate votes on each property, not a vote on a block of several properties. The City has stated it has not decided whether there will be individual property votes or a block vote. The decision should however be made now and not sometime in the future otherwise the DEIR fails as an informational document. The decision factors in this regard need to be detailed in the FEIR.
- 5) The issue of GP inconsistency should be addressed in the context of potential "no" votes on the subject properties. What amendments to the rest of the GP update will be required if certain zoning changes are not approved by the voters? What will be the ripple effect on the balance of the GP of various combinations of no votes?
- 6) There needs to be a clear statement that the proposed update will not change or alter any part of Proposition "S"--other than specifically identified GP policy provisions to be amended-- and how it has been applied since 1998.

Thank you for your attention to these matters and please confirm receipt of this e-mail.

Very Truly Yours,

Kevin

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TRANSMITTED TO CONSULTANT
ON 2/27/12

Jay Petrek

From: Jay Petrek
Sent: Monday, February 27, 2012 8:23 AM
To: 'bill-osborn@sbcglobal.net'
Subject: RE: [Comment on General Plan Update]: North East portion of Eden Valley

Bill-

Thanks for your comments. I'll be forwarding yours and others to the City Council.

Also, to add a bit of clarification, the North East corner of Eden Valley that you refer to is not proposed for annexation at this time. The Draft General Plan proposes to change the land use designation to allow office / medical / research & development employment uses in this location, but if approved the area would need to go through the annexation process through a separate application. Currently there are no proposals to annexation the area at this time. The reason for the proposed General Plan re-designation is due to the area's proximity to the new hospital, Nordahl Transit Station, existing employment land, and Highway 78. It is anticipated that most traffic that is generated by future employment land uses would be accessed from the north (Highway 78) rather than from the Eden Valley Area. However, any future development proposals would require traffic studies to mitigate their impacts.

Regarding your comment on building compatibility, the draft General Plan contains language: "Development adjacent to single-family zoning located to the southwest shall be of compatible height and scale with buffers included that enhance the transition of land uses." And: "Increased building heights and intensities are appropriate closer to the Nordahl Transit Station and along Auto Park Way that are distanced from lower density residential areas to ensure compatibility." This language was placed in the Draft General Plan in response to earlier Draft General Plan public workshops held by the City where residents from your area raised similar concerns.

Regarding your comment on mitigation land, if the property in the north east corner of Eden Valley requires mitigation for sensitive species, and if those impacts can be mitigated off site, the wildlife agencies will require that such mitigation occur in a pre-approved mitigation bank and that the type(s) of habitat be comparable. If the area at the end of Surry Lane is a pre-approved mitigation bank with similar habitat types it may be an appropriate location for off-site mitigation.

The speed limits for County Club Road are determined by the County. For information regarding speed limits on County designated roads I've researched the Traffic Advisory Committee phone number: (858) 874-4030

Thank you again for your comments. If you have others please feel free to write, or call me at (760) 839-4556.

Respectfully,
Jay Petrek, AICP

From: noreply_www@escondido.org [mailto:noreply_www@escondido.org]
Sent: Sunday, February 26, 2012 4:36 PM
To: Jay Petrek
Subject: [Comment on General Plan Update]: North East portion of Eden Valley

Bill Osborn
bill-osborn@sbcglobal.net

TRANSMITTED TO CONSULTANT
ON 2/27/12

My understanding is that a portion in the North East corner of Eden Valley is to be annexed into Escondido as part of the GP update. The land is to be used for potential hospital infrastructure such as Dr. Offices or retirement communities.

Our rural valley has already had an 11 story hospital forced upon us in an area that was promised to be maximum two story buildings hidden by an earthen berm. I fear that adding additional infrastructure on the fringes of our valley will be detrimental to our rural lifestyle and we do not want to see increased density here. Why is it that more density is not being placed on the freeway corridors and near the Malls where it makes more sense?

I also fear that the any new office space on that property will increase the traffic. The Eden Valley residents are already feeling the effects of new development which is making it more and more difficult to exit our driveways. I would like to ask that the annexation of the land be mitigated with the purchase and protection of the 30+ acres that is found at the end of Surrey Lane. This property has already been determined to be of ecological importance. In addition, I would like to ask that the speed limit on Country Club drive be reduced from its current 45MPH down to 35MPH or less.

Lastly, I respectfully request that any buildings built on that property (North East corner of Eden Valley North of the hospital) should not be visible from our valley and that all lighting be kept to a minimum to protect our dark skies.

Regards,

Bill Osborn

2952 Milpas Drive

760-739-1963

HTTP_USER_AGENT: Mozilla/5.0 (Windows NT 6.1; WOW64) AppleWebKit/535.7 (KHTML, like Gecko)
Chrome/16.0.912.77 Safari/535.7
REMOTE_HOST: 71.136.32.116
REMOTE_ADDR: 71.136.32.116
LOCAL_ADDR: 10.255.2.55

2-16-12

The "Growth Mgmt & Neighborhood Protection Act", better known as Prop "S", was voted in by over 60% of resident voters as you all know.

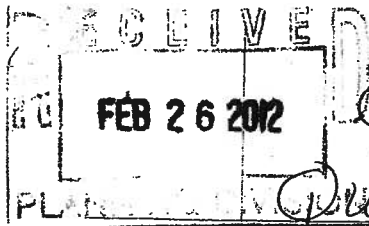
Prop "S" states: "General Plan Amendments or Specific Plans cannot be adopted without a vote of the people, if the changes increase residential density, changes the General Plans' residential land use categories or changes certain residential designations to a commercial designation".

My question is to the city attorney: " If these proposed changes are made, will it still require a vote of the people, as Prop "S" now requires?



Mr. Gerald Lenhard
955 Howard Ave. Spc 23
Escondido, CA 92029-2034

760-745-3734



Jay Petred

1 of 3

and statements

Questions from Pamela Stahl

at the Public Workshop on the
General Plan Update 2/16/12

1) In going through the "Side By Side" Comparison of Existing (adopted) and Draft (proposed) General Plan Goals & Policies (The matrix), I note at least 17 policies in the Growth Management and Neighborhood Protection act (Proposition 5) where the word "shall" is deleted in the proposed policy for the General Plan Update. I would like to know from the City attorney if removing "shall" weakens the policy. I list those policies here with page numbers:

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ON 3/1/12

- Land Use Policy A1.1 pg. 6
- Land Use Policy A1.3 pg. 6

Land Use Policy B1.3 pg. 9
Land Use Policy B1.7 pg. 10
Residential Policy B2.1 pg. 16
Residential Policy B2.5 pg. 18
P.D. Zoning Policy C3.1 pg. 144
P.D. Zoning Policy C3.2 pg. 144
SPA Policy C3.4 pg. 145
SPA Policy C4.2 pg. 146
SPA Policy C4.3 pg. 146
SPA Policy C4.4 pg. 146
Cluster Policy D1.3 pg. 149
Cluster Policy D1.4 pg. 149
Cluster Policy D1.8 pg. 150
Cluster Policy D1.9 pg. 150
Cluster Policy D1.10 pg. 150

2) In reviewing the same matrix referred to above in question number 1, I see approximately 40 policies that are in the Growth Management and Neighborhood Protection Act and which are either deleted or changed in the General Plan Update. Proposition S was approved in 1998 by a significant majority of Escondido

voters. How does the city intend to educate the voters on the changes to Proposition 5?

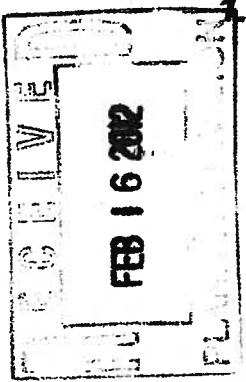
3) I am submitting tonight the minority reports issued by Pamela Stahl and Lisa Prazean, members of the General Plan Update Issues Committee. These reports refer to Quality of Life Issues, Annexation Policy and Clustering Policy.

4) I am submitting copies of my questions/statements for each city council member, the mayor, the city clerk & Jay Petrek. I have extra copies for the press and for interested people in the audience.

THE FOLLOWING MINORITY REPORTS
ARE BEING SUBMITTED BY PAMELA
STAHL AND LISA PRAZEAU, MEMBERS OF
THE CITY COUNCIL APPOINTED CITIZEN'S
COMMITTEE

1

Jay Petreb



1. Circulation Q of L

Lisa & Rick Paul dissented. Pam was absent for vote but also opposed.

- Allowing lower than level "C" not acceptable.
- Congestion (idling traffic) increases greenhouse gas emissions.
- Idea of getting people out of their cars is not working (article in NCT 9/21/09 by Dave Downey). Article attached.
- Increasing density at same time as allowing more congestion decreases quality of life for all residents and only benefits developers.

2. School Q of L

Vote was to maintain current language.

Pam was not present for vote, but she dissents.

- "Both school districts cite concerns regarding their ability to accommodate future growth" -quoted from staff report.
- Concern regarding development of high density in downtown and impacts to Central School.
- Portable classrooms is way of life in Escondido schools and should not continue.

3. Water Q of L

Pam was not present, but dissents.

Modify GP Q of L reducing 600 gallons per day to 540 gallons per day.

- Conservation is needed, but not if there is not a corresponding reduction in building permits when there ^{are} mandatory reductions imposed on residents.
- This modification penalizes existing residents while promoting developers' interest.

4. A subsequent vote on water was to include in the G P regulating issuance of residual *building* permits during times of water shortage that is determined to mean when conservation is mandated for existing residents (i.e. level 2 drought conditions).

Vote 5-6 Motion failed. Lisa & Pam were among those voting for the motion. Minutes are not clear who the other 3 were.

NOTE:
8/30/10

Turned into City Hall at approx. 12:25 PM,
(due by 5 PM).

TRANSMITTED TO CONSULTANT
ON 3/1/12

- 2
- Existing residents of Escondido & San Diego County are continually voicing their sense of unfairness & outrage at the same time that developers continue building at will.

^ with being forced to reduce water usage

5. Water

Motion – “To plan for the community’s water needs based on the desired vision for build out, incorporate appropriate water conservation & not an artificial cap”.

Pam dissents.

- Along with mandatory water conservation, there should be restrictions on building permits.
- Ultimate build out should not exceed 165,000.

6. Park/Open Space Q of L

Pam was not present for vote; vote was unanimous.

According to the staff report, Lisa expressed concerns re: lack of open space in recent downtown residential projects.

According to Jerry Lenhard’s notes of the December 17th meeting, (taken at request of Pam) Lisa stated many projects have no amenities. We need to provide by law x number of acres per x number of residents. Who pays for all of this. Jon Brindle says now projects must provide space.

7. SPAs 2nd and 4th (Daley Ranch and Valley View) should be examined for reduction in density. Motioned failed. Lisa, Pam & Rick Paul voting for.

- Proposition S intensity should hold.

8. Smart Growth Areas should be evaluated for feasible & desirable density increases without regard to any density reductions elsewhere in G P.

Vote 7-4 (Lisa, Pam, Elmer & Paul no).

- Leads to build out figure where deficiencies reduce quality of life for existing residents.

- Leads to existing residents (taxpayers) subsidizing increased infrastructure needs of high build out figure.

9. Annexation Policy – “retain current G P policy” Vote 1-10. Pam voting yes.

- Because property taxes paid by annexed property owners are not sufficient for infrastructure expenses, existing residents pay for this development.
- Property taxes paid for by owners of annexed properties does not offset cost of providing services.

~~10. Annexation Policy~~

11. Annexation Policies – “Consider proactive G P policies for annexation throughout community”.

Vote 9-2 (Lisa & Pam voting No).

- Property taxes paid by annexed property owners does not offset cost of infrastructure.
- Existing residents (taxpayers) *subsidize cost of* pay for infrastructure for annexed properties.

12. Annexation Policy – “Consider proactive annexation policies that may include provisions of municipal services in deficiency areas without requiring property owners to finance improvements in areas that address city goals & visions”.

Vote 9-2 (Pam & Lisa voting No).

- Existing residents (taxpayers) end up paying for services to annexed areas.
- Q of L is reduced for existing residents.

13. Annexation Policy – “Revisit annexation fees to determine their appropriateness for accommodating G P’s goals & visions”.

Vote 9-2 (Pam & Lisa voted No).

- Annexation fees should not be reduced, thus increasing costs to existing residents.
- Deficiencies should be paid for by those being counted as new city residents.

14. Clustering Policy - "Retain current language (Clustering is not intended to maximize the density on yield or to circumvent the existing zoning)".

Vote 3-8 Motion failed. (Lisa and Pam voting in favor).

- Retaining this policy gives a heads up to developers about intent to preserve open space & not to develop the most possible number of lots.
- Current language in G P provides advance notice to developers that current provisions may not result in the maximum number of units.
- Danger in watering down current language because of abuses of clustering (examples given at the meeting).
- If as some on committee say that clustering does not result in maximum density of yield, why remove this from the policy?

15. Pam asked for policies in G P relating to standards for Smart Growth areas (open space, recreational amenities, playgrounds for children, desirable landscaping, setbacks, etc, guidelines for downtown area, but nothing for other SGA's.

re are some

yes

Vote 1-1-8. (Pam voting No, Lisa abstaining).

- Design in SGA's other than downtown are not addressed in G P. Staff say it will be addressed by design guidelines & specific project conditions. Thus far, the many
- Many of these developments already built do not have open space or amenities. They consist of buildings & cement. They will be tomorrow's blighted areas.

Jay Petrek

From: noreply_www@escondido.org
Sent: Monday, February 20, 2012 9:25 AM
To: Jay Petrek
Subject: [Comment on General Plan Update]: Thoughts on Escondido

Christie
christie.obrien@gmail.com

Hello, these are just a few thoughts I've had. I'm sorry I don't have the time to compose this in a professional or very organized letter, but I want to get this out in time for your review.

1. San Diego County is missing a "Craft Beer City." Think about what wine has done for Temecula, pies for Julian, Mexican food for Old Town. Lets capitalize on having Stone here and encourage other small brewers to set up camp, or at least tasting rooms. All kinds of businesses could flourish along with this, restaurants that offer pairings, limi services that do beer tasting tours, hotels offering a beer tasting package.

2. Let corporate in. When you look at pictures of bustling downtown streets, they have corporate stores. I know, we would all LOVE to have all small, family owned businesses flourish here, but it's not happening and we have to get real. Fill those empty storefronts.

3. I live in Old E and I never get any deals that bring me downtown. I should have fliers in my mailbox and emails in my inbox giving me incentive to come downtown to shop, eat, drink, and play. I get nothing. This is a coupon economy, give us residents a deal!

4. So many new families are moving to North County because it's affordable. I myself am a first time Mom to a little 11 month old. Esco currently does not offer a lot of places for me to take her other than the library, parks, museum, and rec center. Take notes from Playwerx and Kidsville. A place for Moms and Playgroups to take kids, have a coffee, and relax would be very welcomed. Family friendly venues in general are needed.

5. I love the "Old California" feel of Esco. Lets capitalize on it. Why don't we have our own "Old Town" historic trolley tours, or area specifically dedicated to Mexican or Native American heritage, filled with aromas of delicious food and sounds of authentic music?

So many more possibilities are out there. We need to look at what makes other cities so successful. A chocolate festival doesn't cut it. Especially when it's \$20! Let's make Esco KNOWN for something. Put us on the "must do/see" map for tourists and make us a frequent day trip for SD locals.

TRANSMITTED TO CONSULTANT
ON 2/22/12

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REMOTE_HOST: 98.176.126.108

Jay Petrek

From: Mark Rodriguez <marknrodriguez@cox.net>
Sent: Sunday, January 22, 2012 10:35 PM
To: Dgarrick@Nctimes. Com; Jay Petrek
Cc: Darol Caster
Subject: Escondido Research Technology Center (SPA #8) - Planning Commission Workshop
Attachments: PastedGraphic-4.tiff; ATT00001.txt

Although the January 2012 DRAFT Escondido General Plan Land Use and Community Form indicates (Harmony Grove) the northern part of SPA #8 has a drastic impact on Country Club and the Escondido Residents living west of the ERTC. The SPA 8 Guiding Principles are the same stated in the original ERTC Specific Plan yet those principles have not always been implemented.

"Specific Plan(s) shall include attractive design standards, landscape features, integrated recreation, and compatible land uses. General guidance for these development standards may be similar to and derived from the ERTC and Harmony Grove Specific Plans."

"Attention shall be given to buffer the semi-rural residential areas along "edges" near Harmony Grove Road (west of Citracado Parkway), Kauna Loa Drive and the Eden Valley area by incorporating land uses, building heights, architectural materials, building orientations, setbacks, colors, screening, lighting and signage that are harmonious with adjacent lower intensity land uses."

Attention to those standards have since been changed heavily impacting building heights, noise and lighting that are not harmonious with adjacent lower intensity land uses and were unanimously rejected by the Planning Commission, but were adopted anyway to allow the Palomar West facility to proceed due to political pressure. Other standards such as architectural materials, colors and screening were not followed with the development of the Stone Brewery with attempts to get them addressed on expansions made after the fact. One of those was the color and architectural materials used on the rear of the building with the expansion of the garden area. The owner agreed to stain the rear of the building, but it did not take and only lasted a few months while large outside equipment areas had gone unscreened for noise. No further attempt has been made by the city or owner to address this issue. The future expansion of the Stone Brewery production area to double production needs to take into account these impacts and must be addressed not only for the expansion but what has been done in the past.

While I know there is very little that can be done to address the hospital, I hope that any consideration used for expansion of the ERTC area are deeply considered and held to those standards. I also hope that the same developer is not involved with the northern expansion because of his known lack of cooperation even with the city staff and the violations that have cost millions.

Regards,
Mark Rodriguez
(8580312-2696)

TRANSMITTED TO CONSULTANT
ON 1/31/12

SPECIAL REPORT

Published By American Policy Center

Sustainable Development

TEA Parties and "End the Fed" Protests Cannot Win Back the Republic Without this Information!

Many Americans appear to be awakening from their slumber of apathy as government forces are making their move for total control of our lives. Massive TEA Party protests across the country show a growing movement of concerned, dedicated Americans. But there is a major component missing from those protests. There is a nearly universal lack of understanding of the issue of Sustainable Development and the dangers it poses to our liberty. Consequently, that issue is being left out of the protests.

Meanwhile, as thousands attend the TEA Parties and protest the Federal Reserve, taxes, and out of control federal government, inside their local city halls, international forces are busy turning the communities into little soviet.

I have been traveling the nation sounding the alarm that we cannot win this battle to restore our Republic if we don't understand that what we face is not a bunch of random issues – but a complete agenda of control – Sustainable Development. Cap N Trade, global warming, population control, gun control, open borders and illegal immigration, higher taxes, higher gas prices, refusal to drill American oil, education restructuring, international IDs, natural health supplement control, food control, farming "reform," control of private property, NAIS and UN Global Governance are all part of the Sustainable Development/Agenda 21 blueprint.

To that end, I am providing this Special Report on Sustainable Development to give activists all the ammunition they need to fight back. I am also including a list of more than 500 cities that are currently enacting Sustainable Development policies. If this is happening in your town (and it is), I urge you to challenge your local city council and mayor to stop these policies. The battles now must be fought on the local level. Remove Sustainable Development from every community and policies out of the federal government will be neutralized. And only then can we be on our way to restoring the American Republic. ----- Tom DeWeese

Sustainable Development: The Root of All Our Problems

In his book, *Earth in the Balance*, Al Gore warned that a "wrenching transformation must take place to lead America away from the "horrors of the Industrial Revolution." The process to do that is called Sustainable Development and it's roots can be traced back to a UN policy document called Agenda 21, adopted at the UN's Earth Summit in 1992.

Sustainable Development calls for changing the very infrastructure of the nation, away from private ownership and control of property to nothing short of central planning of the entire economy – often referred

to as top-down control. Truly, Sustainable Development is designed to change our way of life.

In short, it's all about wealth redistribution. Your wealth into a green rat hole.

During the Cold War, communists tried to get us to surrender our liberties and way of life for the wisdom of Karl Marx. Americans didn't buy it.

But now, they have taken the same clap trap and wrapped it all in a nice green blanket, scaring us with horror stories about the human destruction of the environment – and so we are now throwing our

liberties on the bonfire like a good old fashioned book burning – all in the name of protecting the planet.

It sounds so friendly. So meaningful. So urgent. But, the devastation to our liberty and way of life is the same as if Lenin ordered it.

We now have a new language invading our government at all levels. Old words with new meanings fill government policy papers. The typical city council meeting discusses "community development," "historic preservation," and "partnerships" between the city and private business.

Civicleadersorganizecommunity

meetings run by "facilitators," as they outline a "vision" for the town, enforced by "consensus." No need for debate when you have consensus! People of great importance testify before congressional committees of the dire need for "social justice."

Free trade, social justice, consensus, global truth, partnerships, preservation, stakeholders, land use, environmental protection, development, diversity, visioning, open space, heritage, comprehensive planning, critical thinking, and community service are all part of our new language.

What are they really talking about? What mental pictures come to mind when those words are used? George Orwell realized that those who control language and manipulate key phrases can control policy.

The language is being changed and manipulated to quietly implement a very destructive policy. Whenever you see or hear these words, know that, in every case, they are defining one thing - the implementation of Sustainable Development.

Rather than good management of resources, Sustainable Development has come to mean denied use and resources locked away from human hands. In short, it has become a code word for an entire economic and social agenda.

I have spent most of the past 12 years studying every facet of this new political agenda which is fast becoming a revolution -- touching every aspect of our businesses, our public education system, our private property, our families and our individual lives.

Interestingly, it is not a Republican or Democrat issue. It's not Liberal or Conservative. It is being implemented on a purely bipartisan basis. It is now the official policy of the United States, put in force by literally every

department of the government. It is the official policy of every state government, and nearly every city, town and county in the nation.

But, I warn you, accepting the perception that Sustainable Development is simply good environmental stewardship is a serious and dangerous mistake.

So what is Sustainable Development? The Sustainablists insist that society be transformed into feudal-like governance by making *nature* the central organizing principle for our economy and society.

To achieve this, Sustainablist policy focuses on three components; global land use, global education, and global population control.

Keep in mind that America is the only country in the world based on the ideals of private property. But, private property is incompatible with the collectivist premise of Sustainable Development.

If you doubt that, then consider this quote from the report of the 1976 UN's Habitat I conference which said: "*Land ...cannot be treated as an ordinary asset, controlled by individuals and subject to the pressures and inefficiencies of the market. Private land ownership is also a principle instrument of accumulation and concentration of wealth, therefore, contributes to social injustice.*"

According to the Sustainablist doctrine, it is a social injustice for some to have prosperity if others do not. It is a social injustice to keep our borders closed. It is a social injustice for some to be bosses and others to be merely workers.

Social justice is a major premise of Sustainable Development. Another word for social justice, by the way, is Socialism. Karl Marx was the first to coin the phrase "social justice."

Some officials try to pretend that Sustainable Development is just a local effort to protect the environment -- just your local leaders putting together a local vision for the community. Then ask your local officials how it is possible that the exact language and tactics for implementation of Sustainable Development are being used in nearly every city around the globe from Lewiston, Maine to Singapore. Local indeed.

Sustainable Development is the process by which America is being reorganized around a central principle of state collectivism using the environment as bait.

The best way to understand what Sustainable Development actually is can be found by discovering what is NOT sustainable.

According to the UN's Biodiversity Assessment Report, items for our everyday lives that are NOT sustainable include: *Ski runs, grazing of livestock, plowing of soil, building fences, industry, single family homes, paved and tarred roads, logging activities, dams and reservoirs, power line construction, and economic systems that fail to set proper value on the environment (capitalism, free markets).*

Maurice Strong, Secretary General of the UN's Rio Earth Summit in 1992 said, "*...Current lifestyles and consumption patterns of the affluent middle class -- involving high meat intake, use of fossil fuels, appliances, home and work air-conditioning, and suburban housing are not sustainable.*"

Are you starting to see the pattern behind Cap N Trade, the Clean Air Act, the Clean Water Act, and all of those commercials you're forced to watch about the righteousness of "Going Green?" They are all part of the enforcement

✠ Sustainable Development.

And one of the most destructive tools they use to force it on us is something called the "precautionary principle." That means that any activities that *might* threaten human health or the environment should be stopped -- even if no clear cause and effect relationship has been established -- and even if the potential threat is largely theoretical.

That makes it easy for any activist group to issue warnings by news release or questionable report and have those warnings quickly turned into public policy -- just in case.

Many are now finding non-elected regional governments and governing councils enforcing policy and regulations. As these policies are implemented, locally-elected officials are actually losing power and decision-making ability in their own communities. Most decisions are now being made behind the scenes in non-elected "sustainability councils" armed with truckloads of federal regulations, guidelines, and grant money.

THE THREE ES

According to its authors, the objective of Sustainable Development is to integrate economic, social, and environmental policies in order to achieve reduced consumption, social equity, and the preservation and restoration of biodiversity.

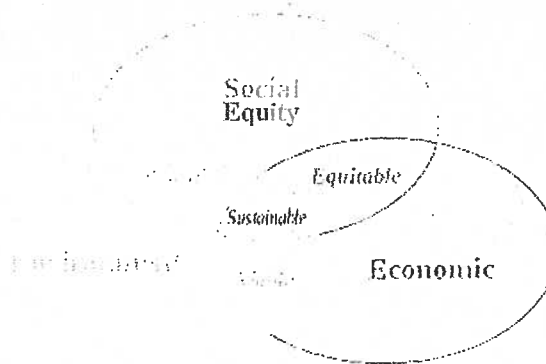
The Sustainabalists insist that society be transformed into feudal-like governance by making *Nature* the central organizing principle for our economy and society. As such, every societal decision would first be questioned as to how it might effect the environment. To achieve this, Sustainablism policy focuses on three components; land use, education, and population control/reduction.

The Sustainable Development logo

used in most literature on the subject contains three connecting circles labeled **Social Equity; Economic Prosperity; and Ecological Integrity** (known commonly as the 3 Es).

SOCIAL EQUITY

As stated, Sustainable Development's Social Equity plank is based on a demand for "social justice." Today, the phrase is used throughout Sustainablism literature. The Sustainablism system is based on the principle that individuals must give up selfish wants for the needs of the common good, or the "community." How does this differ from Communism?



This is the same policy behind the push to eliminate our nation's borders to allow the "migration" of those from other nations into the United States to share our individually-created wealth and our taxpayers-paid government social programs. Say the Sustainablismists, "Justice and efficiency go hand in hand." "Borders," they say, "are unjust."

Under the Sustainablism system, private property is an evil that is used simply to create wealth for a few. So too, is business ownership. Instead, "every worker/person will be a direct capital owner." Property and businesses are to be kept in the name of the owner, keeping them responsible for taxes and other expenses, however control is in the hands of the "community." That policy is right out of the Socialist handbook.

ECONOMIC PROSPERITY

Sustainable Development's economic policy is based on one

overriding premise: that the wealth of the world was made at the expense of the poor. It dictates that, if the conditions of the poor are to be improved, wealth must first be taken from the rich. Consequently, Sustainable Development's economic policy is based not on private enterprise but on public/private partnerships.

In order to give themselves an advantage over competition, some businesses -- particularly large corporations -- now find a great advantage in dealing directly with government, actively lobbying for legislation that will inundate smaller companies with regulations that they cannot possibly comply with or even keep up with. This government/big corporation back-scratching has always been a dangerous practice because economic power should be a positive check on government power, and *vice versa*. If the two should ever become combined, control of such massive power can lead only to tyranny. One of the best examples of this was the Italian model in the first half of the Twentieth Century under Mussolini's Fascism.

Together, select business leaders who have agreed to help government impose Sustainablism green positions in their business policies, and officials at all levels of government are indeed merging the power of the economy with the force of government in Public/Private Partnerships on the local, state and federal levels.

As a result, Sustainable Development policy is redefining free trade to mean centralized global trade "freely" crossing (or eliminating) national borders. It definitely does not mean people and companies trading freely with each other. Its real effect is to redistribute American manufacturing, wealth, and jobs out of our borders and to lock away American natural resources. After the regulations have been put in place, literally

prices go up. That means populations will have to be controlled, because now there is a shortage of land.

Cities are now passing "green" regulations, forcing homeowners to meet strict guidelines for making their homes environmentally compliant, using specific building materials, forcing roof replacements, demanding replacement of appliances, and more. In Oakland, California, such restrictions with compliance demanded in just a matter of a few years will cost each homeowner an estimated \$36,000. The Cap-N-Trade bill contains a whole section on such restrictions for the nation.

Third, inside the human habitat areas, government is controlled by an elite ruling class called stake holder councils.

These are mostly non-governmental organizations, or NGOs, who, like thieves in the night, just show up to stake their claim to enforce their own private agendas. The function of legitimate government within the system will be simply to enforce the dictates of the councils.

The councils are unelected, but all powerful. They are controlled by a small minority in the community, but they are all powerful. They will make you ask permission (usually denied) for anything necessary to live in the community.

They destroy business. They dictate the number of outlets a business may have in a community, no matter what the population demands. For example, in San Francisco there can only be seven McDonalds. Period.

They can dictate the kind of building materials you can use in your home – or whether you can build

on your property at all. Then, if they do grant a permit for building, they might not decide to let you acquire water and electricity for your new home – and they may or may not give you a reason for being turned down.

They can dictate that you get the proper exercise – as determined by the government. Again, San Francisco is building a new federal building – the greenest ever built. The elevators will only stop on every third floor so riders are forced to use stairs – for their own health, of course.

These councils fit almost perfectly the definition of a State Soviet; a system of councils that report to an apex council and then implement a predetermined outcome. Soviets are the operating mechanism of a government-controlled economy.

The **fourth** path is Public/Private Partnerships. Today, many freedom organizations are presenting PPPs as free enterprise and a private answer for keeping taxes down by using business to make a better society.

In truth, many PPPs are nothing more than government-sanctioned monopolies in which a few businesses are granted special favors like tax breaks, the power of eminent domain, non-compete clauses and specific guarantees for return on their investments.

That means they can charge what they want and they can use the power of government to put competition out of business. That is not free enterprise. And it is these global corporations that are pushing the green agenda.

For example, using government to ban its own product, General Electric is forcing the mercury-laden green light bulb on you, costing 5 times the price of incandescent bulbs. Such is

the reality of green industry.

PPPs are building the Trans Texas Corridor, using eminent domain to take more than 580,000 acres of private land - sanctioned by the partnership with the Texas government. And PPPs are taking over highways and local water treatment plants in communities across the nation. PPPs controlling the water can control water consumption – a major part of the Sustainable Development blueprint.

The North American Free Trade Agreement (NAFTA) is the root of the "Free Trade" process and the fuel for PPPs between international corporations and government, thereby creating an "elite" class of "connected" businesses – or what Ayn Rand called "the power of pull." Success in the PPP world is not based on quality of product and service, but on who you know in high places. To play ball in the PPP game means accepting the mantra of Sustainable Development and helping to implement it, even if it means going against your own product. That's why Home Depot uses its commercials to oppose cutting down trees and British Petroleum advocates reducing the use of oil.

It is not free enterprise, but a Mussolini-type fascism that will only lead to tyranny. And it's all driven by the Agenda 21 blueprint of Sustainable Development. **\$**

The Four Part Process Leading to Sustainable Development

So how is this wrenching transformation being put into place? There are four very specific routes being used.

In the rural areas it's called the Wildlands Project. In the cities it's called smart growth. In business it's called Public/Private Partnerships. And in government it's called stakeholder councils and non-elected boards and regional government.

The Wildlands Project was the brainchild of Earth First's Dave Foreman and it literally calls for the "re-wilding" of 50% of all the land in every state – back to the way it was before Christopher Columbus set foot on this land.

It is a diabolical plan to herd humans off the rural lands and into human settlements. Crazy you say! Yes. Impossible? Not so fast.

From the demented mind of Foreman, the plan became the blueprint for the UN's Biodiversity Treaty. So now the scheme is international in scope.

But how do you remove people from the land? One step at a time. Let's begin with a biosphere reserve. A national park will do. A huge place where there is no human activity. How about Yellowstone National Park? Then you establish a buffer zone around the reserve. Inside the buffer only limited human activity is allowed. Slowly, you squeeze until you squash that human activity.

Once accomplished, you extend the area of the biosphere to the limits of the former buffer area – and then you create a new buffer zone around the now larger biosphere and start the

process over again. In that way, the Biosphere Reserve acts like a cancer cell, ever expanding, until all human activity is stopped.

And there are many tools in place to stop human activity and grow the reserve.

Push back livestock's access to riverbanks on ranches; 300 feet ought to do it. When the cattle can't reach the stream, the rancher can't water them -- he goes out of business. Lock away natural resources by creating national parks. It shuts down the mines -- and they go out of business. Invent a Spotted Owl shortage and pretend it can't live in a forest where timber is cut. Shut off the forest. Then, when no trees are cut, there's nothing to feed the mills and then there are no jobs, and -- they go out of business.

Locking away land cuts the tax base. Eventually the town dies. Keep it up and there is nothing to keep the people on the land – so they head to the cities. The wilderness grows – just like Dave Foreman planned.

It comes in many names and many programs. Heritage areas, land management, wolf and bear reintroduction, rails to trails, conservation easements, open space, and many more. Each of these programs is designed to make it just a little harder to live on the land – a little more expensive – a little more hopeless. Now tell me how they can deny that the process is herding people into human habitat areas?

In the West, where vast areas of open space make it easy to impose such policies there are several

programs underway to remove humans from the land. Today, there are at least 31 Wildlands projects underway, locking away more than 40 percent of the nation's land. The Alaska Wildlands Project seeks to lock away and control almost the entire state. In Washington State, Oregon, Idaho, Montana, parts of North and South Dakota, parts of California, Arizona, Nevada, New Mexico, Wyoming, Texas, Utah, and more there are at least 22 Wildlands Projects underway. For example, one project called Yukon to Yellowstone (Y2Y) – creates a 2000 mile no-man's land corridor from the Arctic to Yellowstone.

East of the Mississippi, there are at least nine Wildlands projects, covering Maine, Pennsylvania, New York, West Virginia, Ohio, Virginia, Tennessee, North and South Carolina, Georgia and Florida. Watch for names of Wildlands Projects like Chesapeake Bay Watershed, Appalachian Restoration Project and Piedmont Wildlands Project.

The **second** path is called Smart Growth. After they herd you into the city, they have more plans for you in regimented and dense urban communities.

They put a line around the city and tell you no growth can take place outside that line. Urban sprawl, they say disdainfully. They refuse to build more roads as a ploy to get you out of your car into public transportation, restricting mobility.

Because there is a restriction on space inside the controlled city limits there is a shortage of houses, so

destroying whole industries, new "green" industries created with federal grants bring newfound wealth to the "partners." This is what Sustainablists refer to as economic prosperity.

ECOLOGICAL INTEGRITY

"Nature has an integral set of different values (cultural, spiritual and material) where humans are one strand in nature's web and all living creatures are considered equal. Therefore the natural way is the right way and human activities should be molded along nature's rhythms." from the UN's Biodiversity Treaty presented at the 1992 UN Earth Summit.

This quote lays down the ground rules for the entire Sustainable Development agenda. It says humans are nothing special – just one strand in the nature of things or, put another way, humans are simply biological resources. Sustainablism policy is to oversee any issue in which man interacts with nature - which, of

course, is literally everything. And because the environment always comes first, there must be great restrictions over private property ownership and control. This is necessary, Sustainablists say, because humans only defile nature.

Under Sustainable Development there can be no concern over individual rights – as we must all sacrifice for the sake of the environment. Individual human wants, needs, and desires are to be conformed to the views and dictates of social planners. The UN's Commission on Global Governance said in its 1995 report: *"Human activity... combined with unprecedented increases in human numbers... are impinging on the planet's basic life support system. Action must be taken now to control the human activities that produce these risks"*

Under Sustainable Development there can be no limited government, as advocated by our Founding

Fathers, because, we are told, the real or perceived environmental crisis is too great. Maurice Strong, Chairman of the 1992 UN Earth Summit said: *"A shift is necessary toward lifestyles less geared to environmentally-damaging consumption patterns. The shift will require a vast strengthening of the multilateral system, including the United Nations."*

The politically based environmental movement provides Sustainablism camouflage as they work to transform the American systems of government, justice, and economics. It is a masterful mixture of socialism (with its top down control of the tools of the economy) and fascism (where property is owned in name only – with no control). Sustainable Development is the worst of both the left and the right. It is not liberal, nor is it conservative. It is a new kind of tyranny that, if not stopped, will surely lead us to a new Dark Ages of pain and misery yet unknown to mankind. ☹

Remove ICLEI - Restore the Republic!

Many Americans ask how dangerous international policies can suddenly turn up in state and local government, all seemingly uniform to those in communities across the nation and around the globe.

The answer – meet ICLEI, a non-profit, private foundation, dedicated to helping your mayor implement all of his promises. Originally known as the International Council for Local Environmental Initiatives (ICLEI), today the group simply calls itself *"ICLEI – Local Governments for Sustainability."*

In 1992, ICLEI was one of the groups instrumental in creating Agenda 21. The group's mission is to push local communities to regulate the environment – and it's having tremendous success.

I have included a list of 544 American cities in which ICLEI is being paid with tax dollars from city councils to implement and enforce Sustainable Development. ICLEI is there to assure that the mayors keep their promises and meet their goals. Climate change, of course, is the ICLEI mantra.

Here's just some of the programs ICLEI provides cities and towns, in order to spread their own particular political agenda in the name of "community services"

and environmental protection, they include:

- *Software programs* to help set the goals for community development – which leads to taking control of your private property;
- *Access to a network of "Green" experts, newsletters, conferences and workshops* – to assure the indoctrination of city employees is complete;
- *Toolkits, online resources, case studies, fact sheets, policy and practice manuals, and blueprints* used by other communities – so you know you are not alone;
- *Training workshops for staff and elected officials* on how to develop and implement the programs -- wanna bet they never seem to mention that thousands of scientists around the world now say man-made global warming is a myth and none of these programs are necessary? Probably doesn't make it into the workshop;
- And, of course, there's *Notification of relevant grant opportunities* – this is the important one – money – with severe strings attached.

ICLEI recommends that the community hire a full

time “sustainability manager,” who, even in small towns, can devote 100% of his time to assure that every nook and corner of the government is on message and under control.

As I said, it’s not about protecting the environment; it’s about reinventing government with a specific political agenda. ICLEI and others are dedicated to controlling your locally elected public officials to quietly implement an all encompassing tyranny over every community in the nation.

Like a disease, ICLEI (or others of its kind) is entrenched in most American cities, dictating policy to your locally elected officials, controlling policy and making sure they do not listen to your protests. To truly

see tyranny in action, one only needs to go to a city council meeting and attempt to ask questions or discuss a sustainable development program. Most who have tried it have been literally physically removed from the chamber.

It’s time to remove ICLEI. Look at this list of communities where they currently hide behind the curtain -- and take action to remove them. Now, before your community is run like a soviet, where there is no debate, no regard for constitutionally-guaranteed rights, no property rights, no free markets, no alternative thought. Through ICLEI there is only top-down control – just like a soviet. Remove ICLEI - Restore the Republic!

ACTION TO TAKE:

ICLEI is one of the most dangerous forces in the nation, particularly because so few people know of their existence. But your mayor and city council know. They are in regular meetings with them. They get memos on policy. They are told what to support and who to silence. What they fear most is exposure. Now, we can turn the tables on ICLEI by shining a bright spotlight on their activities in your community.

FIRST, go to a city council meeting and listen to the discussion. Are they talking about land use, water control, development control? Are they using the language I have described in this issue? If so, Sustainable Development is ruling your community.

SECOND, begin to ask questions. You may have to do it after the meeting, but if you can, ask during... Ask where these policies they are discussing come from. Ask if your community is now paying dues to a group called the International Council for Local Environmental Initiatives (ICLEI). Once you have determined that ICLEI is truly in your community, then the battle can begin. Remember, the list of ICLEI cities on this page came directly from the ICLEI web page – so you already know they are there.

THIRD, our opposition to Sustainable Development is not opposition to Environmental Protection. We oppose the process which replaces locally-elected representation with all-powerful non-elected boards, councils and regional governments. That process eliminates input, discussion and debate from community citizens.

FOURTH, demand that your locally-elected representatives stop paying dues to ICLEI and remove the organization from making policy.



ICLEI Cities Across the Country

Anchorage, AK	Arcata, CA	Davis, CA	Hillsborough, CA	Milpitas, CA	Petaluma, CA	San Bruno, CA
Fairbanks, AK	Atherton, CA	Dublin, CA	Humboldt, CA	Monte Sereno, CA	Piedmont, CA	San Carlos, CA
Homer, AK	Belmont, CA	East Palo Alto, CA	Irvine, CA	Monterey Park, CA	Pinole, CA	San Diego, CA
Juneau, AK	Belvedere, CA	El Cerrito, CA	Lafayette, CA	Monterey, CA	Pittsburg, CA	San Francisco, CA
Kodiak, AK	Benicia, CA	El Paso de Robles, CA	Lakewood, CA	Moorpark, CA	Pleasanton, CA	San Joaquin County, CA
Sitka, AK	Berkeley, CA	El Segundo, CA	Larkspur, CA	Moraga, CA	Point Arena, CA	San Jose, CA
Calhoun, AL	Brisbane, CA	Emeryville, CA	Livermore, CA	Morgan Hill, CA	Portola Valley, CA	San Leandro, CA
Fayetteville, AR	Burlingame, CA	Eureka, CA	Lomita, CA	Morro Bay, CA	Rancho Palos Verdes, CA	San Luis Obispo, CA
North Little Rock, AR	Calistoga, CA	Fairfax, CA	Los Altos Hills, CA	Napa County, CA	Redondo Beach, CA	San Mateo, CA
Buckeye, AZ	Carson, CA	Fort Bragg, CA	Los Altos, CA	Napa, CA	Redwood, CA	San Rafael, CA
Chandler, AZ	Chico, CA	Foster City, CA	Los Angeles, CA	Nevada City, CA	Richmond, CA	San Ramon, CA
Flagstaff, AZ	Chula Vista, CA	Fremont, CA	Los Gatos, CA	Newark, CA	Riverside, CA	Santa Barbara, CA
Goodyear, AZ	Cloverdale, CA	Gardena, CA	Manhattan Beach, CA	Novato, CA	Rohnert Park, CA	Santa Clara
Phoenix, AZ	Colma, CA	Gilroy, CA	Marin County, CA	Oakland, CA	Rolling Hills Estates, CA	County, CA
Alameda County, CA	Contra Costa, CA	Half Moon Bay, CA	Martinez, CA	Oakley, CA	Ross, CA	Santa Clara, CA
Alameda, CA	Corte Madera, CA	Hawthorne, CA	Mendocino	Orinda, CA	Sacramento County, CA	Santa Cruz
Albany, CA	Culver, CA	Hayward, CA	County, CA	Pacific Grove, CA	Sacramento, CA	County, CA
Amador County, CA	Cupertino, CA	Healdsburg, CA	Menlo Park, CA	Pacificca, CA	Saint Helena, CA	Santa Cruz, CA
American Canyon, CA	Daly City, CA	Hercules, CA	Mill Valley, CA	Palo Alto, CA	Salinas, CA	Santa Monica, CA
Antioch, CA	Danville, CA	Hermosa Beach, CA	Millbrae, CA	Palos Verdes, CA	San Anselmo, CA	Santa Rosa, CA

3-6-12

PUBLIC NOTICE

THE PROBLEMS

- Rising food prices
- Rising electricity rates
- Radical rise in home foreclosures
- Rise in homelessness
- Riots around the globe
- Threats of global economic meltdown
- Promises to "wipe Israel off the map"
- Muslim "honor killings" in America
- National parkland off limits to members of the public
- Water shut off to the "Breadbasket of the World" in California
- 800+ Dams destroyed by government order flooding mass areas of farmland in Mississippi & Louisiana
- Massive government spending and the printing of trillions of dollars not backed by gold
- Repeated efforts to remove only one God from the public square
- Etcetera

- Rising gas prices
- Rising water rates
- Forced closing of oil rigs
- Massive unemployment
- Spiraling national debt
- Threats of a nuclear Iran
- Rise in violent crime
- Rising suicide rates

THE REASON

One monolithic piece of international legislation named "**Sustainable Development Agenda 21.**" The 2,000+ page plan was presented at the Earth Summit held by the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992 where it was adopted by 178 nations. Its radical goal is to transform our nation - and our world. George H. W. Bush pledged the support of America. On June 29, 1993 Bill Clinton issued Executive Order 12852 creating the President's Council on Sustainable Development to begin implementation of the United Nations' Plan. Agenda 21 is the United Nations' Blueprint for living in the 21st Century hence the name "Agenda 21." The wealth of the greatest country on earth is being redistributed to "equalize" the standard of living around the globe: "social justice." Some standards will rise and others (ours) will fall. None will grant happiness. None will allow the ownership of private property.

Agenda 21 is being implemented in progressive steps. It is a comprehensive plan to "change human behavior" and "RE-develop the world." In his book, *Earth in the Balance*, Al Gore called for a "wrenching transformation of society on a global scale" and A-21 is the grand scheme behind it all. Once you understand Sustainable Development Agenda 21, all the things in the news that have bothered you will suddenly make sense.

The document articulating *the guiding principles behind Agenda 21* is **The Earth Charter** written by Stephen Rockefeller, Canadian Oil Magnate and first Secretary General of the United Nations Environmental Program (UNEP) Maurice Strong, and former Soviet Russia Dictator Mikhail Gorbachev. You may read the Earth Charter at earthcharterinaction.org. This document will immediately explain to you that a human, a fish and a rock are all equal in the eyes of the United Nations and their elite *unelected* planners.

We all see America changing. We see the world changing. We know that something is wrong. We just couldn't put a finger on it - **UNTIL NOW!**

THE SOLUTION

Become informed. Knowledge is power. The following educational sources explain the plan, how it is being implemented and how to become involved in healing our nation and our world.

www.freedomadvocates.org; Michael Shaw videos on youtube.com: "The Ultimate War: Globalism vs. America" (Shaw is an attorney and the author of *Understanding Sustainable Development - Agenda 21*); Rosa Koire - *www.democratsagainstunagenda21.com*; Henry Lamb author of *Sustainable Development or Sustainable Freedom*; *www.freedom21.org*; Kevin Eggers *EXPOSINGAGENDA21.COM* Michael Coffman, *ENVIRONMENTAL PERSPECTIVES*; *AmericanPolicy.org*; *AugustReview.com*; and the San Diego based group *TUES. IN* AmericansProtectingPropertyRights.com

"The hottest place in Hell must be reserved for those who remain neutral in times of great moral conflict."
Martin Luther King Jr.