



**Bill Martin, AICP**  
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April 3, 2018

James E. Whalen  
President  
J. Whalen Associates, Inc.  
1660 Hotel Circle North, Suite 725  
San Diego, CA 92108

RE: PHG 18-0005 / SUB 18-0002 / ENV 18-0001 - Daley/Sager Ranch Resort Specific Plan

Dear Mr. Whalen:

The Planning Division has reviewed the information you provided in your submitted application and have determined the application to be incomplete. This comment letter, dated April 3, 2018, identifies city-related review concerns and/or items that must be submitted to expand/clarify your request and/or provide information necessary to analyze the impacts of the proposed project. Because the comments provided herein provide varying levels of concern or types or review-related issues, some of which will be more thoroughly addressed during the course of project processing, it will be important to contact the Planning Division to determine which items are necessary for the application to be determined complete.

## **A. General Comments on the Project**

1. Daley Ranch is a well-known open space preserve owned and managed by the City of Escondido. The City is not the project proponent of PHG 18-0005 / SUB 18-0002 / ENV 18-0001. The City has been merely asked to review and consider a land use development application for property adjacent to the Daley Ranch open space preserve. Therefore, City staff respectfully requests the name "Daley Ranch" be deleted from the name of the proposed development and other project-related material. Hereafter, the project and all project-related material shall refer to some other project-based nomenclature, such as "Sager Ranch" or "Sager Ranch Resort," etc.
2. Submit a General Plan Amendment (GPA) exhibit and proposed revised text for the GPA. Provide discussion, separately, as a written exhibit that can be used to demonstrate land use consistency throughout the remainder of the process that narrates the project's conformance with GP/SPA 2 density language with expanded project type for maximum density. Discuss the relationship of this maximum density to clustering policies of the GP, which regulate minimum lot size. Editorialize how no

- increase in density is achieved, especially as it relates to a transfer of development rights from land outside of the City's jurisdiction and Dr SOI. The forgoing may be combined as a response into the material requested under comment no. A11.
3. Submit an Initial Study to initiate the environmental review and consideration of the environmental topic areas that the project may likely have one or more significant effects upon the environment, to help enumerate all locally-required studies or reports, and distinguish varied levels of documentation and public review required based on the project's anticipated level of impact on the environment.
  4. Submit a Municipal Service Review to determine the adequacy of governmental services being provided by agencies under LAFCO jurisdiction. A joint meeting between responsible agencies may be necessary to complete this task and ensure early consultation between key agencies included in the entitlement and permitting process. Please note that LAFCO will determine the priority, schedule, procedure, and content for service reviews, in accordance with Government Code Section 56430.
  5. Provide a list of anticipated responsible agencies and indicate how they should best be consulted and when (such as through roundtable meetings for pre-filing resubmittals or other applications) and define the role of that agency's review in terms of project management – to be expedient and efficient with multi-agency coordination (i.e. who does what, how responses to comment are filed, when does staff review the work, and when agreements need to be reached).
  6. Submit a Fiscal Impact Analysis (inclusive of tax sharing approach and phasing). The Fiscal Impact Analysis should be prepared only when the scope of the project is fully defined, to the satisfaction of the Director of Community Development, and prepared in coordination with other responsible agencies.
  7. Submit a list of proposed terms associated with any proposed development agreement. Please note that basic terms of any development agreement would need to be analyzed as part of the project description and applied under CEQA review.
  8. Provide 10 additional sets of the TM, Specific Plan, and grading plans to complete the distribution to outside agencies. Submit digital copies of all submittal items.
  9. Provide a phasing plan that lists the anticipated completion and occupancy of the resort and completion of all public amenities, such as trail connections and trail head/vista points.
  10. Provide site plan exhibits with residential footprints for all common (multi-family) residential lots. Include representative architecture for Planning Areas 3 and 4.
  11. Provide a full and complete General Plan consistency matrix to be utilized throughout the course of reviewing the project and, for later, during any potential decision-making process. Such documentation would be utilized to determine compliance

- with Government Code Section 65454 and other project-related findings, for CEQA land use analysis, and to satisfy basic evidence standards that may be used elsewhere in city or responsible agency review. For example, this document can help explain/show how the project is addressing policies associated with steep slopes, clustering, land use compatibility, etc.
12. Explain the water feature at the resort and clarify to what degree water near the resort would be available.
  13. The number assignment of the General Plan land use designation (i.e. the Specific Plan identifier) must be discussed with the Planning Division.

## **B. Comments on Specific Plan (2/2018)**

1. Appendix A - General Plan Consistency Analysis is not included in the Specific Plan. In accordance with Government Code Section 65464, no Specific Plan may be adopted unless the proposed plan is consistent with the General Plan. Said requisite analysis shall be complementary to, and not necessarily as inclusive as the analysis provided therein as an adequate response to comment no. A11.
2. Page 1, Section/Executive Summary. Include more information about the open space acreage that would be rezoned/placed into permanent open space. Subtracting 207.6 acres (SP acreage) from the SPA #14 acreage (1,783 acres) is 1,575.4 acres. SP includes 142.4 acres of open space which when added to 1,575.4 is 1,717.8 acres of open space acreage that would be rezoned/placed into permanent open space. Confirm this is accurate and incorporate this type of discussion/breakdown in the SP.
3. Page 2, Section 1.0/Introduction. The reference to 97% open space is not consistent with the reference to open space on page 45, Section 3.2.6.1/Natural Open Space. Clarify.
4. Page 14, Section 2.1/Local Context. Add the City's boundary, SOI boundary.
5. Page 23, Section 2.5/Annexation. Describe Interland SPA #14 in text and figure.
6. Page 23/24, Section 2.5/Annexation states that "...The site is within the San Diego County Local Agency Formation Commission (LAFCO) designated Sphere of Influence (SOI) for the City as depicted on Figure 5..." However, parcels #2 (APN: 190-010-44) and #4 (APN: 190-021-02) are depicted as City owned parcels located outside of the SOI that could be potentially annexed. Clarify and justify the extent of the site's annexation area. If the site includes annexation of areas outside of the City's SOI, clarify and justify that as well.
7. Page 30, Section 3.2/Land Use Concept. Density of "...1.02 dwelling units per acre..." is different than the .98 DU/AC shown on Figure 6.

8. Page 35, Section 3.2.1/Planning Area 1. Clarify if Table 2 “Floors” column be revised to “Maximum Floors.” The Specific Plan will ultimately be used as an implementation tool, over the life of the project. Please refer to comment no. B41.
9. Page 35, Section 3.2.2/Planning Area 2. Does Table 2 pertain to Planning Area 2 or just Planning Area 1? Clarify.
10. Page 41, Section 3.2.3/Planning Area 3. Clarify the range in size so that there is consistency with Should Table 3. Should Table 3’s “Floors” column be revised to “Maximum Floors?” A similar comment has been provided in comment no. B8.
11. Page 45, Section 3.2.5/Planning Area 5. It states that “....Residents....will be allowed to utilize the facilities at the resort...” Clarify to what extent? Will there be fees for residents to use the resort facilities? Will the public be able to park at the resort to access public trail heads? Consider a centralized and “marketed” location for the public, which can be enhanced with wayfinding, and discourages neighborhood loitering from visitors. Differentiate areas of controlled access and how this would be enforced (e.g. public vs. semi-public vs. private use of space). The content of the Specific Plan should also include a list of financing measures necessary to carry out the extent of the uses of land, such as maintenance of trail and trail amenities.
12. Figure 13 – should there be “Space” added to “Community Park Open” in the legend.
13. Page 53, Section 3.3/Transfer of Development Rights. Further describe/clarify the TDR in text and a graphic. Consider incorporating Section 3.3 into or shortly after Section 2.5/Annexation. Discuss City and County policies regarding TDRs and how they will function with this project. Please refer to section B and D of this comment letter.
14. Page 57, Section 3.4.1/Circulation. Make a reference to Section 5.0/Circulation Plan and information in that section.
15. Page 58, Section 3.4.2/Water. Further discuss needs vs. capacity. The proposed extent of essential facilities proposed to be located within or serve the area covered by the plan need to support the land uses described in the plan. Also refer to comment no. A4.
16. Page 58, Section 3.4.3/Sewer. Further discuss needs vs. capacity.
17. Page 58, Section 3.4.4/Drainage. What drainage basin incorporates the “....easterly area drains town Valley Center Road...?”
18. Figure 15. Spell out abbreviations.
19. Page 65, Sections 3.4.5-3.4.7. Further discuss needs vs. capacity.
20. Page 67, Section 4.0/Development Regulations. Include a discussion of how the project relates to the City of Escondido’s General Plan and any other relevant City planning document.

21. Page 67, Section 4.0/Development Regulations. Include a discussion of how the project relates to the County of San Diego regulations such as County's General Plan (and community plan(s)) and zoning and any other relevant County planning document/policy.
22. Page 92. Figure 22 referenced but not included in the Specific Plan. Include the figure.
23. Page 113. Steep sloped area may not be appropriate for soft surface trails. This needs to be investigated to help characterize the proposed use of space, identify potential design alternatives that would be acceptable from an engineering and aesthetics standpoint, and to help understand any propensity for "wash-out", which would result in unrefined conditions, public nuisance, and costly HOA maintenance issues.
24. Page 127. Fences. See comment L1. Also, fences within different setback areas shall be limited in height, unless entrance arbors or sound walls are proposed. Food fencing material may be limited in high fire hazard areas, as so designated by the Fire Department. Tubular steel design alternatives to resemble wood construct slatting may provide a suitable alternative. This section should provide more defined standards.
25. Page 141, Section 5.1.2/Planning Area Access. This section needs clarification. It may be helpful to first define and illustrate each/all roadway types on the circulation plan. Then, reference how they provide circulation within each Planning Area. Ensure consistency between the textual definitions and the corresponding cross sections.
26. Figure 32. What are the public access options for the trail head located in the resort area/planning area 5? What is the street label for the street between "S" Street and "A" Street? Add the fire access to this figure.
27. Page 141, Section 5.1.2/Planning Area Access. Include a discussion as to the SP circulation plan level of consistency with the City of Escondido's plans/policies and the County of San Diego's plans/policies.
28. Page 141, Section 5.1.2/Planning Area Access. Streets "S" and "T" have a 40' ROW but aren't listed in the second paragraph. Figures 36 and 37 both reference Street "B" but are different. Clarify.
29. Page 141, Section 5.1.3.1/Planning Area 1. Roadway definition isn't consistent with Street B/Figure 36. Clarify.
30. Page 151, Section 5.1.3.3/Planning Area Access 3. There are appears to be definitions for two types of roadways (24' private roadway easement vs. 40' wide private roadway easement) but just one reference to a figure/cross section. Clarify.
31. Page 151, Section 5.1.3.4/Planning Area Access 4. It references a 24' roadway easement and but Figure 40 shows a 32' ROW. Clarify.

32. Figure 38. Does Street “E” also pertain to this figure? Clarify.
33. Page 159, Section 5.1.4/Planning Area 5 – Resort Access. Figure 41’s sidewalk and parkway aren’t consistent with this section.
34. Page 159, Section 5.1.5/Recreational Access. Figure 42 ROW isn’t consistent with this section. Clarify if Cross Section V/Figure 42 is supposed to be located at the western most portion of the circulation plan vs Street “B.”
35. Page 159, Section 5.1.6/Emergency Access. Figure 43 ROW isn’t consistent with this section.
36. Page 176, Section 5.3/Pedestrian Circulation. Clarify where the neighborhood paseos and resort paseos/walkways are located.
37. Page 177, Section 6.1.1.1/ Annexation. See comment above (i.e. comment no. B6). Section 2.5/Annexation states that “...The site is within the San Diego County Local Agency Formation Commission (LAFCO) designated Sphere of Influence (SOI) for the City as depicted on Figure 5...” However, parcels #2 (APN: 190-010-44) and #4 (APN: 190-021-02) are depicted as City owned parcels located outside of the SOI that could be potentially annexed. If the site includes annexation of areas outside of the City’s SOI, clarify this here as well.
38. General comment: Add dark skies programs and planned implementation throughout the document to address community character context.
39. General comment: Add single-story elements throughout the plan and address to the extent policy 3.10 of the LU Element portion of the GP can be applied throughout building design of the various Planning Areas.
40. General comment: Please provide trail head, vista point, and internal/external access point development standards for implementing these improvements over time.
41. General comment: In accordance with Government Code Section 65451, the proposed plan shall include any and all relevant standards and criteria in which development shall proceed. Therefore, the proposed Specific Plan should be defined in a way that provides clear guidance and direction for the public and staff and minimizes the need for interpretation or continuous public review, over the life of the project. Provide a complete zoning and development standards section for future implementation of each planning area (e.g. list of primary permitted uses, accessory uses permitted in combination with primary uses, temporary uses, conditional uses, and prohibited uses.), and also delineate pertinent use/development regulations. Describe the criteria by which a future decision-maker will utilize the plan to authorize improvements and/or identify the roles of staff and the developer/property owner/HOA will have in subsequent review for permit issuance.
42. General comment: Provide more detail in regards to open space areas, public wayfinding programs, vista point and trail head amenities, trails, open spaces, etc. The proposed plan shall include a discussion of the location and extent of all land

use inclusive of open space, which will necessitate the development of adequate standards, criteria, financing, and programs for the conservation, passive/active development, and utilization of natural resources.

43. Provide a public participation plan to demonstrate how the public will be involved throughout the course of city review. Public participation will play an important role in the preparation of the Specific Plan and help to build support for making a finding that the project is consistent with Government Code Sections 65351 and 65453, the latter of which states that “A specific plan shall be prepared, adopted and amended in the same manner as a general plan...”

## **C. Transfer of Development Rights Program**

1. Provide a Transfer of Development Rights Program for review prior to incorporation into the Specific Plan. Submit a description or break down of transferred sites/parcels and density calculations. Provide a slope analysis and associated yield calculation for all properties within the Specific Plan area from which density is proposed to be transferred to the project. In these calculations, distinguish between City and County land use and zoning regulations. Also, discuss any encumbrances (i.e., Williamson Act etc) and provide a copy of all title reports for all parcels.
2. Explain the options considered/considering and funding mechanisms for which would be applied for parcels from which density is transferred to register and record loss of development potential, a zero development conservation easement, or other type of land use activity restriction.
3. Consider including the parcels from which density is transferred as a 6<sup>th</sup> planning area within the Specific Plan. See comment nos. B37 and B42.

## **D. Annexation**

1. Provide 10 full-size copies of the annexation exhibit. Show the location of SP, City lands, the City’s Sphere of Influence (SOI), County lands, private lands, and any other areas to be annexed. Also include the boundaries of the NC MSCP. Include a table depicting the length and existing improvement width for all County road segments anticipated to be annexed into Escondido.
2. Submit documentation justifying the inclusion of the County “Interland” properties into the annexation when a substantial amount of additional City land is available within the annexation area to provide the same TDR benefit to the project.

3. Submit the applicant's annexation survey discussed in the SP. Include all responses from the private landowners within the annexation area.
4. The proposed distribution, location, and extent of major components of public transportation, sewer, and other public works projects should be annotated, with ownership or maintenance assignments. What options are there other than assuming the City would assume jurisdiction for a portion of the Valley Center roadway or other roadways segments that have not been in the city's jurisdiction.

## **E. Comments from Engineering Department**

1. Provide acceleration/deceleration lanes on Valley Center Road per City and AASHTO Standards.
2. As of this writing, and in consideration of the project materials, without the benefit of a Fiscal Impact Analysis, the City does not support annexation or maintenance responsibility of Valley Center Road.
3. Provide more detail of Street "A" profile grade at Valley Center Road to demonstrate compliance with City design standards. Furthermore, additional speed deflections may be needed for existing motorists as they approach the Valley Center Road intersection.
4. The width of Street "A" should be a minimum of 36' to allow parking for emergencies.
5. Additional storm drain needs to be added to ensure runoff in gutters is contained through horizontal curves.
6. Streets need to be designed in accordance with City of Escondido standards.
7. Vertical curves shall be designed in accordance with Caltrans Design Standards.
8. Residential streets that serve lots 10,000 square feet or less shall be designed in accordance with the 36-foot wide standard Residential Street. Residential Streets serving lots greater than 10,000 square feet can utilize Rural or Suburban Residential Road standards. Demonstrate how parking requirements for residential streets are achieved.
9. Provide Grading Exemption Exhibit for proposed grading exemptions.
10. Design streets to a maximum profile grade of 19% for the Tentative Map phase to ensure profile grades don't exceed 20% in Final Engineering.
11. It appears the useable space of lots that contain drainage easements and slopes may not be adequate.
12. All existing easements need to be plotted and the general use, grantee, and grantor should be labeled.
13. Provide analysis demonstrating the "pond" on Resort Lot "K" has adequate capacity to retain runoff for flood control flows and for management of hydromodification

- flows. Provide proposed pad and amenity elevations and demonstrate pad elevations won't be inundated.
14. Tentative Map needs to show conceptual grading and street design (including horizontal and vertical design with dimensions and grades).
  15. Use of brow ditches shall be limited to slope protection areas.
  16. Remove parking from roundabouts.
  17. Basin IMP-A (Basin #9) shall be designed for hydromodification management.
  18. What mitigation measures are proposed for Critical Coarse Sediment Yield areas?
  19. Basin numbers on the Grading Plan should match basin numbers in the SWQMP.
  20. Basins need to be accessible for maintenance.

## **F. Fire Department Comments**

1. Fire Protection Plan (FPP) - Executive Summary states "...fuel modification treatments in common areas prior to June 15<sup>th</sup>..." This should include the access roadways and all open space. The start date should be May 1<sup>st</sup>.
2. FPP - Per 1.1.3.4 the most notable fire threat is the firebrands/burning embers from the off-site and on-site highly flammable native & non-native vegetation. Because of this the fuel modification zone shall be increased. Zone 1 shall be 75 ft and zone 2 shall be 75-200 ft. If this cannot be achieved additional mitigation will need to be provided.
3. FPP - Per 1.1.3.7- ... "the applicant owns all property within the proposed development..." Because the access roadways go outside of the applicants owned area access easement rights shall be obtained and approved by the Escondido Fire Department. Who will maintain the roadways? Who maintains Red Iron Bark Drive? Due to the emergency access going thru here there will need to be an agreement with this development and/or HOA for this existing complex as well.
4. Will the fire access point restrict or control access by a gated? What type of gate; electric or manual? Also clarify if the gate will be locked.
5. Red Iron Bark is a couple miles from the main access roadway (which is Valley Center Rd). Valley Center is a 4-lane roadway that can be difficult to cross if wanted to go left. Will everyone then exit turning right (from Mira De Valle) going back down Valley Center Rd. to Escondido?
6. Because the drive thru Red Iron Bark is long and curvy, and 2 additional turns are needed to get to the main roadway, potential for making a wrong turn is great. Signage will be needed throughout the community.
7. FPP - 2.0 Guidelines - Item 2 states that the access roadway and roads throughout shall be built to "county standards." These roads will need to be built to City of Escondido standards.

8. FPP - 2.0 Guidelines - Item 3 - States existing response times can be provided by EFD. Later the report states the response will be provided by Valley Center Fire. Valley Center Fire cannot be your main response if you are within Escondido Fire Department response district. How do you propose to mitigate this?
9. FPP - 4.1 Emergency Services - The closest fire station is a Valley Center Station (11.7 minutes) however this is be proposed to be annexed into Escondido Fire Department response district (15.5 minutes). Although a mutual aid agreement is in place this would not be a mutual aid situation as Valley Center FD would respond to all call here before Escondido Fire could respond. This will need to be addressed.
10. The address listed for Valley Center does not appear to be a Valley Center Fire station. Please clarify.
11. FPP - 4.1 Emergency Services - Clarify the response time for Valley Center Fire is from the main access roadway and not the emergency access roadway? Wording is a bit confusing.
12. FPP - 4.1 Emergency Services - This section references fire sprinklers being installed to mitigate for the long response time. The installation of fire sprinklers is not a mitigation for unlimited or longer response times for several reasons. The main issue is that over 80% of our calls are medical. Additionally, Fire sprinklers are already required to be installed in every new residence and will not protect against a brush fire in the area. A fire station by be required to be provided to meet standard response times.
13. FPP - 4.2 Fire Access - This report should include, Sec 503.2.1 of the 2017 San Diego County Consolidated Fire Code, (F) the standard cross-slope shall be 2%; min cross-slope shall be 1%; max cross- slope shall be 5%.
14. FPP - 4.2 Fire Access - This project shall provide turnouts every 400 ft on the main access roadway to the development and on the emergency access roadway. Turnouts shall meet sec 503.2.8 of the 2017 San Diego County Consolidated Fire code.
15. FPP - 4.2 Fire Access - Speed bumps, humps, etc shall not be installed per City of Escondido Engineering standards. Correct this section.
16. FPP - 4.2 Fire Access - future gates at the entrance of the complex shall be setback at least 100 ft from Valley Center Rd to accommodate more than one vehicle turning in at a time or shall open automatically with the change of light.
17. FPP - 4.4 Fire protection, Report should also include NFPA 13R (apartments) and should include that all sprinkler systems shall be maintained by property owners.
18. FPP - 7.0 Conclusion - references the fire sprinklers being required due to the response times, fire zones, etc however this is untrue. Fire sprinklers are required per the 2016 California Fire codes and 2016 California Residential code.
19. FPP - 7.0 Conclusion - This section also mentions hardened/ additional construction as a mitigation for the high fire area. This is already required per 2016 California Building

Code and not a mitigation for the area. Clarification on what "Additional" means is needed.

20. Will the HOA own the apartment complex? Or a private owner?
21. Provide a complete fire access plan. Include all slopes, cross slopes, turnouts, hammerheads, angle of approach/ departure, etc. Some slopes/ grade are shown however several areas are missing information.
22. Show hydrants on all access roadways spaced every 500 ft. Several hydrants are missing.
23. Fire flow is a minimum of 2500 GPM at 20 PSI however this could change in the resort area. Unable to provide fire flow as no building data was provided.
24. Show proposed fire hydrants and FDC's on your access plan. Note FDC's need to be within 40 ft of a fire hydrant.
25. Provide a clear site plan for the resort. Shall include fire access, turnarounds, fire appliances, fuel mod zones, etc.
26. Lighting, signage, etc. may be required on the access roadway due to steepness and sharp/blind hills and corners.
27. Fire protection plan references a Fuel Treatment Plan. Please provide a full scaled plan for Escondido Fire.
28. A minimum 28 ft inside turning radius is required on all corners. Entrance appears to have an island. A raise island will not be allowed.
29. Street "V" appears to have several sharp curbs with a 20% grade. What is the cross slope? And the slope along the edges? Still at 20%? This will be blind and unsafe for our apparatus to turn. Will need to be straighten out.
30. Template for fire apparatus in variously identified and potential conflict points. Show the turning radius in the staging area. Appears that 28 ft inside is not being meet in parking lot layout.
31. Not enough information is provided for the resort area. Additional comments will be made once more information is provided by the applicant. Please also refer to comment no. B41.
32. This proposed project abuts State and County land which will require comments from those agencies. Please provide Escondido Fire a copy of County Fire Authority and Cal Fire's approval and comment letters.
33. Page 2 of the Specific Plan, Section 1.1.1/Project Location. Is project within the SOI entirely? Clarify/revise as necessary.
34. Page 3 of the Specific Plan, Section 1.1.2/Project Description. The project also includes multi-family. Revise.
35. Page 3 of the Specific Plan, Section 1.1.2/Project Description. Its states 144.4 acres as natural/unimproved open space. The SP on page 1 states 142.4 acres of open space. Revise as appropriate.

36. In general, the FPP should further explain if the project is consistent with the relevant plans, policies, programs, standards etc. referenced. In several instances, the FPP references what a standard is but doesn't clarify if the project is consistent with that standard or not.
37. Page 13, Section 4.2/Fire Access. Second paragraph. Clarify why in some instances there should be compliance with County standards and in other instances the City of Escondido standards. Analysis of both jurisdiction's policies/regulations should be explained and it should be clear how the project relates to both.

## **G. Preliminary Comments on Biological Technical Report (2/9/2018)**

1. Page iii, Summary Abstract. Last paragraph states that the "...proposed Project would be in compliance with all state or federal laws, codes, treaties, and local policies, ordinances, and plans..." Include a discussion of the County of San Diego's policies, ordinances, plans.
2. Page 4, Section 1.2.2/Project Description #1. There are some inconsistencies in residential unit sizes. Revise so that it is consistent with Table 1 – Land Use Summary on page 30 of the SP.
3. Page 4, Section 1.2.2/Project Description #2. Verify acreage outside of SP. See note on the SP above regarding acreage to be rezoned/placed into permanent open space.
4. Page 23, Section 4.0 Regulatory Environment. Include a discussion of the County of San Diego's plans, policies and/or programs that are relevant to this project. Explain how this project addresses or does not address those plans, policies and/or programs.
5. Page 41, Section 6.1/Direct Impacts. Please clarify the wording in the first sentence of Impact BIO 5.

## **H. Comments on Interland SPA #14**

1. Put a cover sheet on this item with the project, date, and preparer information.
2. Revise Figure A or create an additional figure that depicts current property owners.
3. Include figures/discussion that show the existing land use designations/zoning (City and County) and land use yields and the proposed land use designations/zoning and yields.

4. Page 1, Section SPA Guiding Principles. It states "...Private parcels 31-39 (Daley Ranch Resort) shall be developed...". Are parcels 36-39 to be developed? If so, that is inconsistent with the SP. Clarify.
5. Page 1, Section SPA Guiding Principles. It states "...The remaining private parcels shall be developed as residential with the density shown in the General Plan figure II-1...". Clarify how private parcels can be developed if there is also a transfer of development rights. Page 1, Section/Executive Summary of the SP states "...approximately 1,700 acres of open space associated with the Interland SPA#14 density transfer will also be rezoned and placed into permanent Open Space to be enjoyed by the future residents and guests."
6. Page 1, Section SPA Guiding Principles. It states "...the density of the Daily Ranch Resort may be up to 212 units...". The SP includes a total of 203 residences. Clarify.
7. Page 1, Section SPA Guiding Principles. Clarify A.2.

## **I. Preliminary Comments on Transportation Impact Analysis (9/21/2017)**

1. Page 4, Section 2.0/Project Description. Revise the second paragraph (and subsequent bullet points) as necessary so that it is consistent with Table 1 – Land Use Summary on page 30 of the SP.
2. Page 7, Section 3.1.1/San Diego County Street Network. Incorporate one figure that depicts the existing roadways that are within the City's jurisdiction by classification and a definition of those classifications within the study area; also incorporate a figure that depicts the existing conditions for those roadways within the study area. Include the City's boundary, City's SOI boundary, and County's boundary on the figures. Repeat this analysis for roadways outside the City's jurisdiction (i.e., County, State roadways) within the study area.
3. Page 14, Section 4.1/Project Study Area. Study area includes trips from the project into the City. Does this only include the existing City boundary and/or the City's boundary after annexation? Does the study area not include trips from the project into areas outside of the City's existing jurisdiction? Explain and clarify this methodology. Provide a figure that depicts the intersections and segments to be analyzed.
4. Page 17/18, Section 4.4/Street Segments/Table 4-3. Are these existing/adopted LOS standards or proposed LOS standards per the title? Clarify.
5. Page 20. Table 5-1. Are these the existing thresholds or "proposed" thresholds per the title? Clarify.

6. Was Series 12 utilized vs Series 13? Explain the rationale for the model utilized.
7. Page 49, Section 10.1/Long Term Forecast Volumes. It states, "...increase in units is the result of transferring density from the parcel within the City's sphere of influence...". See comments on SP further above. Are all parcels located within the sphere of influence? Clarify.
8. Page 53. Section 11.0/Access. Clarify the second paragraph. How could the northern project be granted day to day access through the SP area and why? What if any issues would come from that scenario? The response to this issue item must be reconciled with comment no. F4 et. seq.

## **J. Preliminary Comments on Cultural Resources Inventory (11/2017)**

1. Page 1-1, Section/Project Location. Is the project located entirely within the City's SOI? See SP comment above regarding this question.
2. Page 1-1, Section/Project Description. Include brief discussion of multi-family units so its consistent with project description.

## **K. Comments on Zone Change/Statement of Facts**

1. Page 1, Section "a." In the third paragraph, clarify which residents could evacuate travelling southbound.
2. Page 1, Section "a." Include a graphic that depicts the conservation easement and parcels. Also, this is inconsistent with the Interland #14 SPA's Page 1, Section SPA Guiding Principles which states "...The remaining private parcels shall be developed as residential with the density shown in the General Plan figure II-1..." Clarify how private parcels can be developed if there is also a transfer of development rights and a conservation easement.
3. Page 2, Section "d." Clarify how the project would reduce GHG emissions through the transfer development rights program, inconsideration of VMT and site/building design.
4. Include a cover page and graphics depicting proposed changes.
5. Include a discussion that describes the area and APNs that are associated with the proposed zone change and what their existing zoning is within the City and the County.
6. Provide a discussion that also explains the change from existing County zoning to the proposed change.

## **L. Comments on Landscape Concept**

1. Fencing and additional trail head information should be provided. Describe controlled access points. Aside from the staging area, is there any public parking for the other public trail heads?
2. Add additional information as to who prepared and date.
3. There are inconsistencies with respect to public/private trail heads when compared to the SP (i.e., Figure 27). Clarify and revise.
4. The symbols for wayfinding signage, public trail heads and private trail heads are too similar. Revise with different symbols for clarity.
5. Explain how the landscape concept is consistent with the Fire Protection Plan (i.e. brush management etc).

## **M. Comments on Tentative Map (1/15/2018)**

1. Show grading and utilities on the tentative map.
2. Add a condo statement to the tentative map.
3. Show on the tentative map the existing access easement through Daley Ranch for Street "A."
4. Some lots may leave little room when slope is factored in. Add grading to the Tentative Map and plot the developable pad area.
5. Include a maximum slope of 19% for private roads (vs. 20%) to allow for flexibility.
6. Show all existing and proposed easements on the Tentative Map.

## **N. Comments on the Grading Plan (1/15/2018)**

1. Provide a Grading Exemption exhibit labeling each proposed exemption and indicating the inclination, slope height and cut or fill status for each exemption.
2. Grading Exceptions/Slopes. Explain/show how the project is addressing policies, regulations, and/or plans etc associated with steep slopes.
3. Design Standard Waivers. Explain what the standards are and how/why waivers are needed.
4. Comments from the Utilities Department:
  - a. COE Sewer Standard 2.A.6 – Horizontal or vertical curves are not allowed, except by specific, prior approval of the Utility Engineer.

- b. COE Sewer Standard 2.B.3 – Sewers within easements should be avoided. Where easements are necessary, the minimum easement width shall be 20 feet, with an all-weather road surface. Easements with grades over 10% shall be paved with concrete. Easement roads shall have a 25 feet minimum inside radius, 5% maximum cross-slope, and a 15% maximum grade. The centerline of the pipe shall be placed at six feet from the north or west easement edge. Dead-end easements shall be provided with an equipment turn-around, designed to the satisfaction of the Utility Engineer.
- c. COE Sewer Standard 2.C – Minimum slopes shall be per Table S-1. Minimum velocity of 2 FPS must be maintained at average flow volume. Pipe sizes cannot be increased solely to reduce minimum slope.
- d. COE Sewer Standard 3.G – Maximum spacing between manholes is per Table S-2.
- e. COE Sewer Standard 5.A – Private lift stations serving multiple lots will not be allowed.
- f. Project proposes approximately 2 miles of 8" sewer to be constructed in Valley Parkway. Show that minimum cleansing velocity of 2 FPS will be achieved.
- g. Project proposed to discharge to MH #17 at the corner of Valley Center and Lake Wohlford Road. This is at the extreme upstream end of the existing gravity sewer system to the HARRF (Hale Avenue Resource Recovery Facility). There is very little flow at this point, so the impact to this existing system is expected to be minimal. Has any analysis been done on how this project will affect the sewer system downstream of this point?
- h. The easterly portion of the proposed sewer system will need to be analyzed.

## **O. Comments on Geotechnical Investigation (6/30/2015)**

1. Page 5, Section 3.2/Proposed Improvements. Figure 2 (Conceptual Plan) is not consistent with the SP project. Revise the Preliminary Geotechnical Investigation as necessary.

## **P. Comments Water Study (15/5/2017)**

1. Page 1-3, Jurisdictional Considerations. Further clarify why the project's water will be provided by Valley Center MWD. Discuss what is required from appropriate agencies/districts (City of Escondido, County of SD, Valley Center MWD etc.)

## **Q. Comments on Sewer Study (1/15/2018)**

1. Page 3, Section 1.0/Introduction. Reference a figure that depicts information in the third paragraph.
2. What are alternatives to pump stations on-site?
3. Comments from Utilities Division:
  - a. Page 5 – Provide PF value
  - b. Page 5 – Move paragraphs 4 & 5 to the introduction. Paragraphs start with “The onsite sewer system consists...” and “The east system consists...”
  - c. Page 6 – Provide footnote indicated on Table 1
  - d. Page 6 – Figure 6-2 is referenced but not included in the report.
  - e. Page 7 – Add “per EDU” to “Average Flow Rate (GPD)” in Table 2
  - f. Page 8 – Strike out “on the following page...” as there is no following page.

## **R. Comments on Preliminary Drainage Report (1/15/2018)**

1. Page 3, Section/Project Description. Project description references fewer residential units and no resort uses. Revise to make consistent with the SP and revise other sections of the drainage report as appropriate.

## **S. Comments on the PDP SWQMP (1/15/2018)**

1. Please use the current PDP SWQMP template (dated October 2016) for submittal.
2. Any worksheets used for BMP sizing should also use current available version. (Current County Automated Worksheet is V1.3; Model BMP Design Manual BMP Sizing Spreadsheet is V2.0 [Project Clean Water]).
3. Basin siting and design must consider ease of access for maintenance and inspection. Reconsider placement of basins down steep slopes or provide stable access.
4. The City has no current Alternative Compliance Program in place.

5. Biofiltration surface ponding depth is  $\geq 6$  inches and  $\leq 12$  inches.
6. Page 3, Section/Form 1-2a is missing an APN.
7. Page 7, Section/Hydromodification Description. Fourth paragraph isn't consistent with the SP. Revise as necessary.
8. Appendix F. Copy of Drainage Report. Project Description isn't consistent with the Specific Plan. Revise as necessary.

Please note that these comments are not exhaustive and additional comments will be generated by subsequent changes and revisions. Comments from outside agencies or community groups is attached. Also note that some other City departments as well as other agencies/jurisdictions have not yet commented, but plan to do so in the near future. The City will share those comments when received.

Any resubmittal made by the applicant or project proponent in response to these comments, which may be supplemented or amended, shall be coordinated in advance for in-take and further processing. To expedite the City's review for responsiveness, the applicant is advised to provide a companion re-submittal letter to organize and track comments and issue responsiveness, section-by-section and item-by-item, if needed.

Sincerely,



Mike Strong  
Assistant Planning Director  
City of Escondido

Danny Serrano  
Contract Extension Staff

**ATTACHMENTS:**

- A. Letter from The Friends of Daley Ranch, January 3, 2018
- B. Letter from the County of San Diego Land and Water Quality Division Department of Environmental Health, March 28, 2018.
- C. Email correspondence from CDFW, April 2, 2018
- D. Email correspondence from FWS, April 3, 2018

CC: Bill Martin, Community Development Director  
Jay Petrek, Assistant City Manager  
Project file



## THE FRIENDS OF DALEY RANCH

April 3, 2018 City Comment Letter  
PHG 18-0005 / SUB 18-0002 / ENV 18-0001  
Attachment A

3 January 2018

Jay Petrek, Assistant City Manager  
City of Escondido  
201 N. Broadway  
Escondido, CA 92025

Dear Mr Petrek:

The Friends of Daley Ranch have learned of the proposed Daley Ranch Resort development and we have concerns that we hope you can address. We understand that a specific plan has yet to be submitted but the City has authorized action towards creating a plan at the developer's expense.

The draft proposal on the City's website seeks to add 189 permanent residences plus a 225-room hotel directly bordering Area 3 of the Daley Ranch. The developer also seeks an entry trail and public parking lot. These intrusions could potentially have a sweeping effect on the health and sustainability of the ranch.

The Friends of Daley Ranch Executive Board believe that this planning process is an excellent opportunity to obtain a comprehensive appraisal of the potential edge effects of such a development. This would allow the City to fulfill its obligations under the Conservation Implementation Agreement signed onto with the wildlife agencies and to ensure continued compliance with the Daley Ranch Master Plan.

The Daley Ranch Conservation Mitigation Bank is a multimillion dollar resource for our City, provided we continue to protect and preserve the integrity of the habitats within it. We urge the City to honor its legal commitment by authorizing a thorough study of the existing biological status of Daley Ranch, along with a complete assessment of all impacts and consequences of the proposed Daley Ranch Resort.

Thank you very much for your consideration of our request.

Sincerely,

Colleen Mackinnon

President, Friends of Daley Ranch  
(760)708-6445



# County of San Diego

**ELISE ROTHSCHILD**  
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
LAND AND WATER QUALITY DIVISION  
P.O. BOX 129261, SAN DIEGO, CA 92112-9261  
Phone: (858) 565-5173 Fax: (858) 694-3670  
[www.sdcdeh.org](http://www.sdcdeh.org)

**AMY HARBERT**  
ASSISTANT DIRECTOR

DATE: March 28, 2018

TO: Mike Strong, Assistant Planning Director  
City of Escondido, Planning Division

FROM: Scott Rosecrans, Environmental Health Specialist III  
Land and Water Quality Division  
Department of Environmental Health

**SUB 18-0002/PHG 18-0005/ENV 18-0001, DALEY RANCH RESORT**  
**APN: 187-080-05, 187-080-07, 187-080-08, 190-080-13**

## SCOPING DISCUSSION

DEH has reviewed the proposed subdivision and resort plan that was received on 3/16/18. The project proposes 203 lots for residential development and a 225 room resort. The entire project is to be served by a public sewer system (City of Escondido). Potable water is to be provided by the Valley Center Municipal Water District. No offsite grading impacts were identified during the review of the proposed project.

## RECOMMENDATIONS

The Department of Environmental Health, Land and Water Quality Division, has no objection to the approval of the proposed project. The following condition of approval applies:

- The applicant shall properly pump, collapse, and backfill any existing septic tanks and/or seepage pits located on the property once they are no longer in use.
- Any wells located on the property must be destroyed under permit and inspection by DEH prior to commencing with grading/clearing operations. Wells that are proposed to be retained must be specified by the applicant and must meet all applicable setbacks set forth in the California Well Standards (Bulletin 74-90 & 74-81). The proposed use for any retained wells must be specified by the applicant on subsequent project submittals.

Should you have any questions, please contact me at (619) 208-0337.

Sincerely,  
Scott Rosecrans  
EHS III, REHS

## Mike Strong

---

**From:** Williams, Carol@Wildlife <Carol.Williams@wildlife.ca.gov>  
**Sent:** Monday, April 02, 2018 2:22 PM  
**To:** Mike Strong  
**Cc:** Mayer, David@Wildlife; Stuckrath, Janet; Zoutendyk, David  
**Subject:** CDFW Preliminary Comments SUB 18-0002/ENV 18-0001/PHG 18-0005 (Sager/Daley Ranch Resort)

Dear Mr. Strong,

The Department has completed a review of the documents provided by mail for SUB 18-0002/ENV 18-0001/PHG 18-0005, as well as documents available on the City's website for the Sager Ranch Resort – Daley Ranch Resort Specific Plan. Below are our initial comments regarding the proposed project. We ask that you please keep in mind this is a preliminary, high-level review of the proposed project and that the below list may not include all of our concerns. Further comments and concerns may arise later in the environmental review process as additional information is provided.

- 1) According to the BTR, biological surveys have only been performed between May 22 to July 15. In order to fully assess species occurrence across the proposed project site, additional surveys would be necessary, particularly during the rainy season (i.e., for amphibians such as western spadefoot toad) and in the spring bird-breeding season.
- 2) According to the BTR, the majority of the intact, undisturbed habitat is located in the southern portion of the proposed project site and the adjacent Daley Ranch Preserve parcel separating the western and eastern sections of the site. Therefore, we would recommend that the southwestern development bubble (the proposed resort site) be moved to the north and clustered more closely with the northern development bubbles, in order to better facilitate east-west wildlife movement and preserve a larger block of habitat adjacent to existing conserved lands in the southern portion of the site.
- 3) Orcutt's brodiaea was recently (2016) observed on the Daley Ranch Preserve parcel adjacent to the proposed project site. We recommend that focused surveys for this species be performed in the early spring, and that impacts be avoided and/or minimized by the project and when siting the main entrance road.
- 4) Aerial images via Google Earth appear to show a number of existing trails/roads on the proposed project site, but it is unclear if any of these pathways were approved as trails by the City or other lead agency under CEQA. Trails associated with, and to be sanctioned by the City as part of the proposed project, should generally occur in existing disturbed areas and avoid sensitive species with appropriately distanced buffers. Based on the number of unauthorized trails, it appears that no new trails would need to be created. As part of approving a trail network, other existing but unauthorized trails should be retired and allowed to naturally recover with native vegetation, or their restoration be incorporated as part of a comprehensive effort. In addition, trails being established as part of the project boundary should only connect into existing, authorized trails in order to avoid creating an attractive nuisance leading to trespass and the creation of unofficial trails.
- 5) All fuel treatment zones should be included in the development footprint and excluded from the designated open space.
- 6) The proposed project site is currently located within draft NC-MSCP PAMA. An analysis of the impact of the proposed annexation on the draft NC-MSCP should be included in the environmental review process.
- 7) As proposed, it appears as though this project is dependent upon the creation of the Interland #14 SPA and the transfer of development rights from those lands; however, very little information regarding the 1,700+ acres to be included in the Interland #14 SPA and the proposed process for the development rights transfer was provided. Therefore, we cannot currently provide specific comments on that aspect of this project. Nonetheless, we can state that we have significant concerns regarding the transfer of development rights from lands

purchased with public funds, lands which are currently designated as open space. We recommend that detailed information regarding Interland #14 SPA, including the proposed environmental review process and its relationship to this project, be provided so that questions and concerns related to Interland #14 SPA can be included in future discussions.

Again, we appreciate being included in this early stage of project development and the ability to provide preliminary comments. We are willing to discuss our comments and concerns in greater detail as the project advances. Please direct questions related to this project to me at [carol.williams@wildlife.ca.gov](mailto:carol.williams@wildlife.ca.gov) or (858) 637-5511.

Regards,  
Carol Williams

*Carol Williams*  
Environmental Scientist  
California Department of Fish and Wildlife  
South Coast Region, Habitat Conservation Planning  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 637-5511

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## Mike Strong

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**From:** Stuckrath, Janet <janet\_stuckrath@fws.gov>  
**Sent:** Tuesday, April 03, 2018 10:12 AM  
**To:** Mike Strong  
**Cc:** Doreen Stadtlander; David Zoutendyk; Williams, Carol@Wildlife  
**Subject:** Fwd: [EXTERNAL] CDFW Preliminary Comments SUB 18-0002/ENV 18-0001/PHG 18-0005 (Sager/Daley Ranch Resort)

Mike,

The Service agrees with the comments provided by Carol Williams at CDFW. We would like to add that, even though the sage scrub is at the margins of known gnatcatcher occupancy, we recommend that protocol level surveys be conducted. Additionally, surveys should be conducted at the appropriate seasons for sensitive plants.

The proposed project and the Interland #14 SPA are located within the Pre-Approved Mitigation Area of the draft North County Multiple Species Conservation Program (NC MSCP). The CEQA environmental review should also include details of the proposed Interland #14 SPA and how removal of these lands will affect the NC MSCP.

The SPA states that a conservation easement will be placed over each of the 30 parcels from which the development rights will be transferred. What happens to the other 23 of the 53 parcels to be annexed? How and by whom will the proposed 1,700 acres of open space associated with the Interland #14 SPA be managed and monitored?

The environmental review should include a discussion on how the proposed project and the Interland #14 SPA will affect the existing Daley Ranch Preserve. No impacts should occur within the existing preserve boundaries, particularly within the mitigation band boundaries.

Thank you for the opportunity to provide preliminary comments on this proposed project. If you have any questions, please contact me at the phone number or email address below.

=^..^= =^..^= =^..^= =^..^=

### Janet Stuckrath

Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, CA 92008  
760-431-9440 ext. 270  
[Janet\\_Stuckrath@fws.gov](mailto:Janet_Stuckrath@fws.gov)

----- Forwarded message -----

**From:** Williams, Carol@Wildlife <[Carol.Williams@wildlife.ca.gov](mailto:Carol.Williams@wildlife.ca.gov)>  
**Date:** Mon, Apr 2, 2018 at 2:21 PM  
**Subject:** [EXTERNAL] CDFW Preliminary Comments SUB 18-0002/ENV 18-0001/PHG 18-0005 (Sager/Daley Ranch Resort)  
**To:** "[mstrong@escondido.org](mailto:mstrong@escondido.org)" <[mstrong@escondido.org](mailto:mstrong@escondido.org)>  
**Cc:** "Mayer, David@Wildlife" <[David.Mayer@wildlife.ca.gov](mailto:David.Mayer@wildlife.ca.gov)>, "Stuckrath, Janet" <[janet\\_stuckrath@fws.gov](mailto:janet_stuckrath@fws.gov)>, "Zoutendyk, David" <[david\\_zoutendyk@fws.gov](mailto:david_zoutendyk@fws.gov)>