

APPENDIX A

NOP Comment Letters



San Diego County Archaeological Society, Inc.

Environmental Review Committee

8 May 2019



To: Ms. Kristin Blackson
Planning Division
City of Escondido
201 North Broadway
Escondido, California 92025

Subject: Notice of Preparation of a Draft Environmental Impact Report
Palomar Heights Project
ENV 18-0009, SUB 18-0011, PHG 18-0049

Dear Ms. Blackson:

Thank you for the Notice of Preparation for the subject project, which was received by this Society last week.

We previously responded, in a letter dated 14 January 2019 to Mr. Adam Finestone, to a request for comments on this proposed project. In that letter, we noted that the site was significantly disturbed by the construction and operation of the Palomar Hospital, but that relatively intact areas may remain such as under streets and sidewalks. We would add that there may be such relatively intact areas under landscaping and under areas where the original ground surface was elevated by installation of fill. Initial ground-disturbing activities in those areas, including those where the history of previous disturbances is unknown, should be monitored by a qualified archaeologist and a Native American monitor. Monitoring of geotechnical testing, if any, would also be appropriate.

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,


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

cc: SDCAS President
File

May 20, 2019

Patricia Borchmann
1141 Carrotwood Glen
Escondido, CA 92026

Kristen Blackson
kblackson@escondido.org

Re: Notice of Preparation NOP for Palomar Heights EIR (ENV 18-0009)

As a starting point please note I concur with NOP comments prepared by Sierra Club North County Group, which are incorporated by reference. These should be analyzed in their entirety by consultant(s) retained to prepare EIR for Palomar Heights (ENV 18-0009).

The remainder of my comments identify additional issues which should be analyzed, and impacts that deserve more than superficial analysis in EIR for Palomar Heights.

- . Site-specific analysis is necessary to identify how impacts from Palomar Heights will affect quality of life issues for residents in Escondido, as defined in Escondido General Plan (updated 2012).
- . Infrastructure Deficiencies – Escondido General Plan Section VIII contains Growth Management Element (VIII-1 – VIII-10) which indicates: “A goal of Growth Management Element is to phase capital improvements with population growth so new development does not compound existing shortfalls, or result in critical infrastructure deficiencies”. Page VIII-9 contains relevant Public Facility Deficiencies Policy 5.2 which requires analysis to “Monitor and periodically report the performance of development activity and its conformance with Quality of Life Standards”, and also identify areas where there are critical deficiencies and establish criteria for implementation of moratoria or other strategies to address shortfalls. In Escondido, I am unaware any such comprehensive Report has been performed since General Plan update was adopted in 2012 to conform to that formal Policy requirement. In absence of such Report, many consider it appropriate to apply requirement to analyze critical infrastructure deficiencies at this time by analyzing the proportional share of infrastructure needs from Palomar Heights to demonstrate this new development does not compound existing shortfalls or result in critical infrastructure deficiencies.
- . Traffic Congestion – During recent City Council public hearing May 1, 2019 for Density Transfer Program and Amendment to Downtown Specific Plan (PHG 17-0004), it was noted the program level EIR Addendum update did not analyze potential traffic impacts, based on premise that traffic impacts, existing traffic congestion, prolonged travel time and parking deficiencies Downtown Escondido would be analyzed during subsequent project-level environmental review stages when project developments are proposed. Therefore public asserts necessity for in-depth traffic analysis be applied in scope of work for Palomar Heights EIR, that should also include assessment of traffic levels of service at freeway interchanges at I-15 and Hwy 78, and identify mitigation measures to minimize adverse impacts.
- . Cumulative Impacts – In earlier written comments to Escondido Planning Commission on April 9, 2019 on recent Density Transfer Program (PHG 17-0004), it was noted the EIR Addendum update did not analyze cumulative impacts of development in Escondido, combined with cumulative development in the region as required under CEQA Section 15130. Since Palomar Heights project proposes development at this time, public asserts necessity for cumulative impacts analysis be applied in scope of work for EIR for this large residential project.

. Community Benefit - In the past many project approvals were commonly based on vague assurances that projects would generate certain community benefits that often never materialized, or were never linked to project descriptions or defined as requirements of development applied during implementation phase. Therefore public asserts there is necessity to apply a more rigorous development approval process to ensure beneficial outcomes are generated by projects which identify specific tangible community benefits in project description, which will be carried through during implementation phase of project development. Public wants to see terms of projects produce results that benefit the community, so benefits are not limited only developers and their consultants, and will be controlled by City so community benefits are not missing, reduced, waived or eliminated. If desired, examples of tangible community benefits (besides affordable housing) can be provided at the NOP public meeting. Public wants to see community benefits that can be counted, and apply a system that can be counted on.

Thank you for consideration.

Patricia Borchmann

Cc: Mayor and City Council

Bill Martin, Community Development Director

Laura Hunter, North County Group Sierra Club

R. L. Miller, Sierra Club San Diego Chapter

May 20, 2019

Patricia Borchmann
1141 Carrotwood Glen
Escondido, CA 92026

Kristen Blackson

kblackson@escondido.org

Re: Notice of Preparation NOP for Palomar Heights EIR (ENV 18-0009)

As a starting point please note I concur with NOP comments prepared by Sierra Club North County Group, which are incorporated by reference. These should be analyzed in their entirety by consultant(s) retained to prepare EIR for Palomar Heights (ENV 18-0009).

The remainder of my comments identify additional issues which should be analyzed, and impacts that deserve more than superficial analysis in EIR for Palomar Heights.

- . Site-specific analysis is necessary to identify how impacts from Palomar Heights will affect quality of life issues for residents in Escondido, as defined in Escondido General Plan (updated 2012).
- . Infrastructure Deficiencies – Escondido General Plan Section VIII contains Growth Management Element (VIII-1 – VIII-10) which indicates: “A goal of Growth Management Element is to phase capital improvements with population growth so new development does not compound existing shortfalls, or result in critical infrastructure deficiencies”. Page VIII-9 contains relevant Public Facility Deficiencies Policy 5.2 which requires analysis to “Monitor and periodically report the performance of development activity and its conformance with Quality of Life Standards”, and also identify areas where there are critical deficiencies and establish criteria for implementation of moratoria or other strategies to address shortfalls. In Escondido, I am unaware any such comprehensive Report has been performed since General Plan update was adopted in 2012 to conform to that formal Policy requirement. In absence of such Report, many consider it appropriate to apply requirement to analyze critical infrastructure deficiencies at this time by analyzing the proportional share of infrastructure needs from Palomar Heights to demonstrate this new development does not compound existing shortfalls or result in critical infrastructure deficiencies.
- . Traffic Congestion – During recent City Council public hearing May 1, 2019 for Density Transfer Program and Amendment to Downtown Specific Plan (PHG 17-0004), it was noted the program level EIR Addendum update did not analyze potential traffic impacts, based on premise that traffic impacts, existing traffic congestion, prolonged travel time and parking deficiencies Downtown Escondido would be analyzed during subsequent project-level environmental review stages when project developments are proposed. Therefore public asserts necessity for in-depth traffic analysis be applied in scope of work for Palomar Heights EIR, that should also include assessment of traffic levels of service at freeway interchanges at I-15 and Hwy 78, and identify mitigation measures to minimize adverse impacts.
- . Cumulative Impacts – In earlier written comments to Escondido Planning Commission on April 9, 2019 on recent Density Transfer Program (PHG 17-0004), it was noted the EIR Addendum update did not analyze cumulative impacts of development in Escondido, combined with cumulative development in the region as required under CEQA Section 15130. Since Palomar Heights project proposes development at this time, public asserts necessity for cumulative impacts analysis be applied in scope of work for EIR for this large residential project.

. Community Benefit - In the past many project approvals were commonly based on vague assurances that projects would generate certain community benefits that often never materialized, or were never linked to project descriptions or defined as requirements of development applied during implementation phase. Therefore public asserts there is necessity to apply a more rigorous development approval process to ensure beneficial outcomes are generated by projects which identify specific tangible community benefits in project description, which will be carried through during implementation phase of project development. Public wants to see terms of projects produce results that benefit the community, so benefits are not limited only developers and their consultants, and will be controlled by City so community benefits are not missing, reduced, waived or eliminated. If desired, examples of tangible community benefits (besides affordable housing) can be provided at the NOP public meeting. Public wants to see community benefits that can be counted, and apply a system that can be counted on.

Thank you for consideration.

Patricia Borchmann

Cc: Mayor and City Council

Bill Martin, Community Development Director

Laura Hunter, North County Group Sierra Club

R. L. Miller, Sierra Club San Diego Chapter

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

PHONE (619) 688-6075

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

May 31, 2019

11-SD-78

PM 18.562

Palomar Heights

NOP/SCH # 2019059013

Mr. Adam Finestone
City of Escondido
201 North Broadway
Escondido, CA 92025

Dear Mr. Finestone:

Thank you for including the California Department of Transportation (Caltrans) in the review for Notice of Preparation (NOP) for the draft Environmental Impact Report (EIR) (SCH# 2019059013) for the Palomar Heights project located on Valley Blvd. and E. Grand Avenue near State Route 78 (SR-78) in the city of Escondido. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.

Mr. Adam Finestone
May 31, 2019
Page 2

- In addition, the TIS could also consider implementing vehicles miles traveled (VMT) analysis into their modeling projections.
- Any increase in goods movement operations and its impacts to State highway facilities should be addressed in the TIS.
- The data used in the TIS should not be more than 2 years old.
- Please provide Synchro Version 10 files.
- Early coordination is recommended.

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Melina Pereira". The signature is fluid and cursive, with a period at the end.

MELINA PEREIRA, Acting Branch Chief
Local Development and Intergovernmental Review Branch

Palomar Heights Project - NOP and Notice of Scoping Meeting

Mccumsey, Mark@DOT <mark.mccumsey@dot.ca.gov>

Wed 5/29/2019 11:16 AM

Inbox

To: Kristin Blackson <kblackson@escondido.org>;

Hi Kristin,

We are currently reviewing the Notice of Preparation of the Palomar Heights project on the former Palomar Hospital site. It's difficult to determine what number of trips would be generated from the new residential and retail development and what the former hospital trips generated to figure out the net trips. Therefore, We are determining if a new traffic study should be requested for Caltrans to review. Any thoughts?

Let me know if that question has been asked at the Notice of Scoping meeting.

Thanks,

Mark McCumsey
Associate Transportation Planner
CA Dept. of Transportation, District 11 Planning
4050 Taylor Street MS-240
San Diego, CA 92110
Phone # (619) 688-6802
Cell # (805) 264-7574

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

PHONE (619) 688-6075

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

May 31, 2019

11-SD-78

PM 18.562

Palomar Heights

NOP/SCH # 2019059013

Mr. Adam Finestone
City of Escondido
201 North Broadway
Escondido, CA 92025

Dear Mr. Finestone:

Thank you for including the California Department of Transportation (Caltrans) in the review for Notice of Preparation (NOP) for the draft Environmental Impact Report (EIR) (SCH# 2019059013) for the Palomar Heights project located on Valley Blvd. and E. Grand Avenue near State Route 78 (SR-78) in the city of Escondido. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.

Mr. Adam Finestone
May 31, 2019
Page 2

- In addition, the TIS could also consider implementing vehicles miles traveled (VMT) analysis into their modeling projections.
- Any increase in goods movement operations and its impacts to State highway facilities should be addressed in the TIS.
- The data used in the TIS should not be more than 2 years old.
- Please provide Synchro Version 10 files.
- Early coordination is recommended.

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Melina Pereira". The signature is fluid and cursive, with a small dot at the end.

MELINA PEREIRA, Acting Branch Chief
Local Development and Intergovernmental Review Branch

Palomar Heights Project
Case No. ENV 18-0009, SUB 18-0011, and PHG 18-0049
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
May 3, 2019 through June 3, 2019

PUBLIC SCOPING MEETING COMMENT SHEET

Monday, May 20, 2019
CITY OF ESCONDIDO
ESCONDIDO PLANNING DIVISION
201 N. BROADWAY
ESCONDIDO, CA 92025

WRITTEN COMMENT FORM

I am concerned about traffic flow at Hickory + Valley Pkwy.

I am concerned about dust, esp. asbestos airborne - I live
2 blocks away.

What hours will be used 8-5? longer? weekends? nights?

What noise control during demolition? (Certain vibrations
or noises set off car alarms in our complex)

(Attach additional pages as needed)

MAIL or E-MAIL FORMS TO:

Kristin Blackson, Contract Planner
City of Escondido
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
E-mail: kblackson@escondido.org

Karen Campbell 5-20-19
Signature Date

Karen Campbell
Print Name

425 N. Hickory St #B107
Address

Escondido, CA 92025
City State Zip Code

207-650-6370
Phone Number

COMMENTS MUST BE RECEIVED BY 5:00 PM, JUNE 3, 2019



June 03, 2019

Mayor McNamara and Council
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Comment on Palomar Heights Redevelopment

Dear Mayor McNamara and Council:

Climate Action Campaign is a nonprofit organization with one mission: stop the climate crisis. We have played a leading role advocating for bold climate policy and equitable implementation in the region since 2015, including in the areas of land use, transportation and housing.

We are disappointed the currently proposed Palomar Heights redevelopment fails to take full advantage of the potential emissions reductions, housing opportunities, and quality of life improvements long envisioned for Downtown Escondido, one of the region's key Transit Priority Areas. The proposal at 510 homes, on a site that could hold 1,350 or more, is unacceptable.

There are a number of reasons why Palomar Heights must maximize the density allowed on the site

- More housing near transit helps reduce Vehicle Miles Traveled (VMT), which in turn cuts transportation emissions the largest source of greenhouse gas emissions in the region and state;
- Denser communities support healthy and sustainable mobility options such as walking, biking, and transit;
- Developing within the existing urban footprint preserves natural resources and saves sensitive habitats from destruction;
- Building more homes on existing infrastructure saves taxpayers from costly and needless expansions of sewers, roads, fire, and other public services; and
- We are in a housing crisis displacing community members and increasing their commutes and VMT, or forcing them to relocate to states with weaker climate policy and environmental protections.

We hope to see Escondido emerge as a leader on climate-friendly land use and housing policy and recommend the city continue to work with the developer to maximize the density of Palomar Heights, or formally request a new developer who can help revitalize Downtown Escondido and support the city's Climate Action Plan targets.

We also recommend the city include an inclusionary housing requirement for the project and eventually develop a city-wide inclusionary housing ordinance to create more on-site affordable homes, which prevents displacement, fosters inclusivity, and promotes upward mobility and opportunity.

Please do not hesitate to reach out to us as a resource. Thank you for the opportunity to weigh in on this critical redevelopment project.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ch' or 'Ch' with a flourish.

Matthew Vasilakis
Climate Justice Advocate & Organizer
Climate Action Campaign



June 03, 2019

Mayor McNamara and Council
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Comment on Palomar Heights Redevelopment

Dear Mayor McNamara and Council:

Climate Action Campaign is a nonprofit organization with one mission: stop the climate crisis. We have played a leading role advocating for bold climate policy and equitable implementation in the region since 2015, including in the areas of land use, transportation and housing.

We are disappointed the currently proposed Palomar Heights redevelopment fails to take full advantage of the potential emissions reductions, housing opportunities, and quality of life improvements long envisioned for Downtown Escondido, one of the region's key Transit Priority Areas. The proposal at 510 homes, on a site that could hold 1,350 or more, is unacceptable.

There are a number of reasons why Palomar Heights must maximize the density allowed on the site

- More housing near transit helps reduce Vehicle Miles Traveled (VMT), which in turn cuts transportation emissions the largest source of greenhouse gas emissions in the region and state;
- Denser communities support healthy and sustainable mobility options such as walking, biking, and transit;
- Developing within the existing urban footprint preserves natural resources and saves sensitive habitats from destruction;
- Building more homes on existing infrastructure saves taxpayers from costly and needless expansions of sewers, roads, fire, and other public services; and
- We are in a housing crisis displacing community members and increasing their commutes and VMT, or forcing them to relocate to states with weaker climate policy and environmental protections.

We hope to see Escondido emerge as a leader on climate-friendly land use and housing policy and recommend the city continue to work with the developer to maximize the density of Palomar Heights, or formally request a new developer who can help revitalize Downtown Escondido and support the city's Climate Action Plan targets.

We also recommend the city include an inclusionary housing requirement for the project and eventually develop a city-wide inclusionary housing ordinance to create more on-site affordable homes, which prevents displacement, fosters inclusivity, and promotes upward mobility and opportunity.

Please do not hesitate to reach out to us as a resource. Thank you for the opportunity to weigh in on this critical redevelopment project.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Vasilakis', with a stylized, cursive script.

Matthew Vasilakis
Climate Justice Advocate & Organizer
Climate Action Campaign

Comment on Palomar Heights Project

Kcueva1 <kcueva1@aol.com>

Tue 5/28/2019 9:06 PM

To: Kristin Blackson <kblackson@escondido.org>;

I am an advocate for any revitalization project using a higher density housing population, leaving open spaces open for all to enjoy. I would however also stress the need for many incorporated esthetically pleasing green areas to also be within the boundaries of this proposed high density housing project. I, as well as everyone, would prefer to look out upon from my home window onto something "pretty" rather than just cement, a wall or someone else's closed curtain windows. Otherwise I would strive to move out of these prison type mass housing areas and outbound to the suburbs to enjoy my own green yard. The apartment/condo developments off of Center City Parkway are horrid and destined to become run down ugly "project" style housing solutions.

Sent from my iPad

Green high density housing

Kcueva1 <kcueva1@aol.com>

Tue 5/28/2019 9:29 PM

Palomar NOP Comment Letters

To: Kristin Blackson <kblackson@escondido.org>;





Sent from my iPad

Palomar Heights Project
Case No. ENV 18-0009, SUB 18-0011, and PHG 18-0049
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
May 3, 2019 through June 3, 2019

PUBLIC SCOPING MEETING COMMENT SHEET

Monday, May 20, 2019
CITY OF ESCONDIDO
ESCONDIDO PLANNING DIVISION
201 N. BROADWAY
ESCONDIDO, CA 92025

WRITTEN COMMENT FORM

What is the amount money the developer is paying to Palomar Health for this building and the right to demolish it. If it is less than a fair market value (~ \$24M) for this iconic, still state-of-the-art, campus that can be repurposed for scientific research aggregates as is planned for San Diego's Horton Plaza; We can do something better than continuing the blight of all too many apartment projects over the past 50 years in Escondido. The landlords of Grand Avenue will continue to suffer as we all do from the gridlock of high density planning in downtown.

Compare this to the meaningless demolition of the Monticello like Carnegie Library in 1955 and replaced by the relatively mediocre "Pioneer Room" building in it's place. Was that anything but a tragic mistake and total waste of precious resources when hindsight is considered?

MAIL or E-MAIL FORMS TO:

Kristin Blackson, Contract Planner
City of Escondido
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
E-mail: kblackson@escondido.org

Arthur J. Devine
Signature Date
Arthur J. Devine 6/3/2019
Print Name
1543 Nob Hill Dr
Address
Escondido CA 92026
City State Zip Code
760 743-0234
Phone Number

COMMENTS MUST BE RECEIVED BY 5:00 PM, JUNE 3, 2019



Palomar Heights Project
Case No. ENV 18-0009, SUB 18-0011, and PHG 18-0049
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
May 3, 2019 through June 3, 2019

PUBLIC SCOPING MEETING COMMENT SHEET

Monday, May 20, 2019
CITY OF ESCONDIDO
ESCONDIDO PLANNING DIVISION
201 N. BROADWAY
ESCONDIDO, CA 92025

WRITTEN COMMENT FORM

What is the amount money the developer is paying to Palomar Health for this building and the right to demolish it. If it is less than a fair market value (~ \$24M) for this iconic, still state-of-the-art, campus that can be repurposed for scientific research aggregates as is planned for San Diego's Horton Plaza; We can do something better than continuing the blight of all too many apartment projects over the past 50 years in Escondido. The landlords of Grand Avenue will continue to suffer as we all do from the gridlock of high density planning in downtown.

Compare this to the meaningless demolition of the Monticello like Carnegie Library in 1955 and replaced by the relatively mediocre "Pioneer Room" building in it's place. Was that anything but a tragic mistake and total waste of precious resources when hindsight is considered?

MAIL or E-MAIL FORMS TO:

Kristin Blackson, Contract Planner
City of Escondido
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
E-mail: kblackson@escondido.org

Arthur J. Devine
Signature Date
Arthur J. Devine 6/3/2019
Print Name
1543 Nob Hill Dr
Address
Escondido CA 92026
City State Zip Code
760 743-0234
Phone Number

COMMENTS MUST BE RECEIVED BY 5:00 PM, JUNE 3, 2019





Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
5796 Corporate Avenue
Cypress, California 90630



Gavin Newsom
Governor

June 3, 2019

Ms. Kristin Blackson
City of Escondido
Planning Division
201 North Broadway
Escondido, California 92025
kblackson@escondido.org

NOTICE OF PREPARATION FOR DRAFT ENVIRONMENTAL IMPACT REPORT, PALOMAR HEIGHTS, ESCONDIDO (SCH# 2019059013)

Dear Ms. Blackson:

The Department of Toxic Substances Control (DTSC) has received your submitted document for the above-mentioned project. The project proposes development of a 13.8-acre site for both residential and commercial uses. Based on the review of the submitted document DTSC has the following comments:

1. The Environmental Impact Report (EIR) should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances.
2. The EIR should identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment.
3. The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the

potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.

4. All environmental investigations, sampling and/or remediation for the site should be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.
5. Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
6. If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
7. If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at:

<https://www.dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>.

Ms. Kristin Blackson
June 3, 2019
Page 3

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chia Rin Yen", followed by a horizontal line.

Chia Rin Yen
Environmental Scientist
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

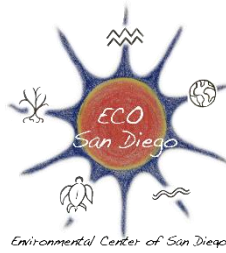
mv/cy/yg

cc: (via e-mail)

Governor's Office of Planning and Research
State Clearinghouse
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Ms. Yolanda Garza
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program
Yolanda.Garza@dtsc.ca.gov



May 28, 2019

Ms. Kristin Blackson
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
Via Email to kblackson@escondido.org

RE: Environmental Center of San Diego Comments for Palomar Heights (ENV: 18-0009)

Dear Ms. Blackson,

The Environmental Center of San Diego supports the Sierra Club's North County Group concerns that: "this project poses important and unique opportunities and is significant both locally and regionally. We understand that the current proposer has an option on the property and is proposing the 510 dwelling units (DU) in spite of the fact that the site is zoned for 1,350 DU and is located in the urban core and on a transit route".

Further, we agree that: "The true housing shortage in our region is not for high-income market rate homes. We need to expand and diversify our housing options to create more local affordability and stop building the luxury units, in sprawl land use footprints. We need subsidized affordable housing and market rate housing affordable to our professional families, teachers, public safety, health care, construction and other working families."

We reinforce the following goals laid out by the Sierra Club:

The environmental review process should be delayed until a plan that meets the needs of the city and the zoning is proposed.

If the city continues to process this project, a full analysis of high-density projects must be done in the EIR.

Requirement that affordable housing, net-zero energy, and other community benefits should be included in the project.

Project goals established in the EIR should reflect real goals of the city and not the goals of the developer.

We ask that you amend the development plan to require much higher density (900, 1100 to 1300 units) than what the developer has proposed. Please require a comprehensive analysis of alternatives that equal the preferred project. You must insist on affordable units. A diverse mix of tenants will offer economic help for the downtown area.

Unlike the Safari Highlands project, the Palomar Heights project is the right location for housing and will offer opportunities for the type of housing Escondido residents need.

Thank you for your time and attention to making Escondido a robust and model community.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Heatherington".

Pamela Heatherington
Environmental Center of San Diego
Board of Directors

Comment on Palomar Heights Project

Dan Silver <dsilverla@me.com>

Mon 6/3/2019 11:54 AM

To: Kristin Blackson <kblackson@escondido.org>;

Dear Ms Blackson:

Endangered Habitats League endorses the comments of North County Group, Sierra Club in regard to this project. It should be built at its full density according to existing zoning. As such, it can help address low and moderate income housing shortfalls in a way that makes transportation sense. The City should plan this project according to its own housing needs, not according to the preferences of a particular landowner, and the EIR should be structured accordingly.

Thank you and best regards,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

Palomar Heights

Palomar Health Downtown Campus
EIR Comments & Questions

June 3, 2019

Mr. Adam Finestone
Principal Planner
City of Escondido

Adam,

After reviewing the Palomar Heights documents posted on the City's website and the Downtown Specific Plan, I offer the following observations and comments:

Land Use & Planning

With the proposed grading and site planning – driven by the suburban type residential product – the project design ignores site topography and the surrounding context. On the three primary adjacent streets, the grading design employs the combination of slope banks and retaining walls resulting in the project being isolated both physically and visually from the surrounding neighborhoods. The slope banks and retaining walls (some reaching heights of 10' to 22') along street edges and adjacent to sidewalks, will not provide the pedestrian experience envisioned in the Downtown Specific Plan. For City Planning staff and the public to accurately review and assess the proposed project and how it relates to the existing fabric and character of the Downtown, and the goals and visions stated in the DTSP, the following exhibits should be provided:

- Site sections: At a minimum, four accurate and detailed site sections should be provided. They need to show building profiles with heights noted, retaining walls, slope banks and streets. Two in the north-south direction, two in the east-west direction. This is a normal project requirement before the EIR review phase.
- A grading plan that reflects the current architectural site plan
- Parking: The numbers noted are for what has been provided, required parking space count should be included as well
- Open Space: The numbers noted are for what has been provided, required area should be included as well

Specific to the DTSP Visions and Goals

- Most buildings adjacent to E. Valley Parkway and Grand Ave. have their ground floors either above or below the street/sidewalk level.
- Most apartment buildings adjacent to Grand Ave. and Fig Street are oriented with their building fronts away from adjacent streets.

These are in conflict with the goals of entry points being visible, majority of building walls along the street being in close proximity to the street edge to provide street-level and human-scale, activate the street and sidewalks that prioritize the pedestrian experience.

- Without elevations, the architecture, goals and vision of the DTSP cannot be evaluated for the two four-story buildings on Valley Blvd.

Aesthetics

In general, based on what is available for review, the proposed architecture is more likely to be found in a suburban setting than at this site and does not meet the vision of the DTSP.

For City Planning staff and the public to accurately review and assess the proposed project's architecture and how it relates to the surrounding context, goals and vision stated in the DTSP, the following exhibits should be provided:

- Street building elevations along Grand Ave, Valley Blvd, East Valley Parkway and Fig Street need to be provided. Without these, it is difficult, if not impossible to understand the building's relationship to the street and sidewalk. Where building pads are above the street, the elevations need to include the street level, slope banks and retaining walls.

Like other Escondido residents, I am in favor this site being redeveloped. It is a "once-in-a-generation" opportunity and this site and the residents of Escondido deserve and expect a site-specific design solution.

Having been one of several members on the Downtown Revitalization Committee that spent two plus years discussing, debating and envisioning what Downtown should be, this proposal falls short of the goals and vision of the DTSP and is, in fact, the opposite of what was envisioned.

If built as proposed, the project will feel very much like a suburban vehicle-oriented development dropped into an area that is transitioning to a walkable, active urban environment.

Respectfully,
Ken Erickson, Architect



Palomar Heights

Palomar Health Downtown Campus
EIR Comments & Questions

June 3, 2019

Mr. Adam Finestone
Principal Planner
City of Escondido

Adam,

After reviewing the Palomar Heights documents posted on the City's website and the Downtown Specific Plan, I offer the following observations and comments:

Land Use & Planning

With the proposed grading and site planning – driven by the suburban type residential product – the project design ignores site topography and the surrounding context. On the three primary adjacent streets, the grading design employs the combination of slope banks and retaining walls resulting in the project being isolated both physically and visually from the surrounding neighborhoods. The slope banks and retaining walls (some reaching heights of 10' to 22') along street edges and adjacent to sidewalks, will not provide the pedestrian experience envisioned in the Downtown Specific Plan. For City Planning staff and the public to accurately review and assess the proposed project and how it relates to the existing fabric and character of the Downtown, and the goals and visions stated in the DTSP, the following exhibits should be provided:

- Site sections: At a minimum, four accurate and detailed site sections should be provided. They need to show building profiles with heights noted, retaining walls, slope banks and streets. Two in the north-south direction, two in the east-west direction. This is a normal project requirement before the EIR review phase.
- A grading plan that reflects the current architectural site plan
- Parking: The numbers noted are for what has been provided, required parking space count should be included as well
- Open Space: The numbers noted are for what has been provided, required area should be included as well

Specific to the DTSP Visions and Goals

- Most buildings adjacent to E. Valley Parkway and Grand Ave. have their ground floors either above or below the street/sidewalk level.
- Most apartment buildings adjacent to Grand Ave. and Fig Street are oriented with their building fronts away from adjacent streets.

These are in conflict with the goals of entry points being visible, majority of building walls along the street being in close proximity to the street edge to provide street-level and human-scale, activate the street and sidewalks that prioritize the pedestrian experience.

- Without elevations, the architecture, goals and vision of the DTSP cannot be evaluated for the two four-story buildings on Valley Blvd.

Aesthetics

In general, based on what is available for review, the proposed architecture is more likely to be found in a suburban setting than at this site and does not meet the vision of the DTSP.

For City Planning staff and the public to accurately review and assess the proposed project's architecture and how it relates to the surrounding context, goals and vision stated in the DTSP, the following exhibits should be provided:

- Street building elevations along Grand Ave, Valley Blvd, East Valley Parkway and Fig Street need to be provided. Without these, it is difficult, if not impossible to understand the building's relationship to the street and sidewalk. Where building pads are above the street, the elevations need to include the street level, slope banks and retaining walls.

Like other Escondido residents, I am in favor this site being redeveloped. It is a "once-in-a-generation" opportunity and this site and the residents of Escondido deserve and expect a site-specific design solution.

Having been one of several members on the Downtown Revitalization Committee that spent two plus years discussing, debating and envisioning what Downtown should be, this proposal falls short of the goals and vision of the DTSP and is, in fact, the opposite of what was envisioned.

If built as proposed, the project will feel very much like a suburban vehicle-oriented development dropped into an area that is transitioning to a walkable, active urban environment.

Respectfully,
Ken Erickson, Architect



Comment on Palomar Heights Project

Lisa King <lisaking53@sbcglobal.net>

Tue 5/28/2019 2:27 PM

To: Kristin Blackson <kblackson@escondido.org>;

Dear Ms. Blackson,

I am a 65-year-old city resident who grew up in Escondido, and I vote in every election. I am writing concerning the Palomar Heights housing project. I encourage the city to ask for a redesign that includes more units. The site is zoned for 1,350 units, yet there are only 510 planned. In this location, near transit and the downtown, infilling is appropriate to help meet the housing demand here. San Diego County is having a housing crisis. I recently moved to an apartment downtown, and finding a suitable place within my price range was very difficult. Escondido should not miss the opportunity to provide additional units.

Sincerely,

Lisa King
949-547-7020

Comment on Palomar Heights Project

Brenda Koenig <bkoenig321@gmail.com>

Tue 5/28/2019 9:08 PM

Palomar NOP Comment Letters

To: Kristin Blackson <kblackson@escondido.org>;

Regarding the Palomar Heights project,

I would like to see this prime location used to its full potential, as well as designed attractively. Knowing how many hospital rooms fit into this space as well as seeing more attractive buildings near by, I cannot help but wonder how Escondido can let this opportunity pass us by. It is convenient to shops and transit, and should be a landmark construction project.

Thank you!

Brenda Koenig

760-703-0009

May 20, 2019

Honorable Members of the Escondido City Council,

As a long time resident and business owner in Escondido, I would like to weigh in on the issue of the proposed "Palomar Heights" project.

I do understand the importance of building up the area around Grand Avenue and Valley Parkway. I have seen the City Council and Downtown Businessman's Association work to improve the down town area for years, and to make Historic Escondido a place that attracts locals as well as those from out of town to enjoy our city. At the same time, I have seen more and more vacant buildings and restaurants and businesses that come and go. We somehow need to attract and maintain quality establishments in our community, and I agree we need upgraded housing.

I fear, however, that we are looking past the mark. Up and down East Valley Parkway, Washington Boulevard, and other areas we have many high-density apartments, low income housing complexes, etc. They are in terrible repair and "slum-lord" is the term used by the residents, to refer to their complex owners. If we want to really improve this community, we need to look at a plan for the entire community, razing and building the complexes that we currently have to attract business owners, as well as laborers to our community. In speaking with a manager of a local complex last week, the comment was made, "I hope they don't fix up our complex. That means that the rent will go up and poor people won't be able to live here." I asked about the condition of the complex, as I have several friends who live in the run down apartments. I was told, "we have learned to live with the leaking roofs, the mold in the carpet, etc., so that we can have cheap rent." Is this really what we want for a portion of our residents? I don't. Just drive down Mission Avenue or Washington, look at the physical condition of the complexes. As a past School Board Member of the Escondido Elementary School District, I might add, look at the number of residents and families co-habiting in each of those apartments. There is a great impact on our schools, and community infrastructures in general.

If Integral Communities wants to upgrade our community and provide "saleable and marketable" complexes, I think they need to start with upgrading the current condition of our city. A splash in the pan, as other parts of the city deteriorate, will not upgrade the rest of the city, or bring the clientele we wish to our community. They also need to include parking for 2 spaces for each resident and then have the CCRs limit the families to 2 cars, with no on-street parking. Our public thorough-fares are not meant to be parking garages for residents, but areas of parking for those frequenting the downtown businesses.

I have watched as family after family, of wonderful, hard working people have left Escondido for Valley Center, Fallbrook, Vista, and Rancho Bernardo in the last three years. Others are leaving California entirely, but that is another subject for another time. Revitalization of what we have is imperative, before we worry about what is needed at the Valley Parkway, Grand Avenue junction. Let's clean up what we have and make our community a place worth coming home to, and more inviting to those looking for a great community to live in. We don't need more, we need to improve what we have first.

Thank you for your time and consideration in this matter.

Sincerely,

Kathryn A Marler

2326 Citron Pl.

Escondido, CA 92027

760-803-1809

STEVENELSON

LAWYER

Via email to: kblackson@escondido.org

June 3, 2019

227 s. maple street
escondido, california
92025

760.805.8299
stevenjnelson@me.com

Kristin Blackson
Contract Planner
City of Escondido Planning Division
201 N. Broadway
Escondido, CA 92025

Re: Comments re: Notice of Preparation and Public Scoping Meeting for the Palomar Heights Project (City Case Numbers: ENV 18-0009, SUB 18-0011, and PHG 18-0049)

Dear Ms. Blackson:

I have several clients who have asked me to submit comments regarding the Palomar Heights Project for today's NOP deadline. All of them have a personal and vested interest in the future of Downtown Escondido, and in its growth and redevelopment into a downtown that we can all celebrate.

The following comments provide additional items that should be considered for the Notice of Preparation:

- I believe there are portions of the FEIR for the Palomar West project at ERTC that reference the MOU, Development Agreement, and environmental review for future projects at the downtown hospital site. This Palomar West FEIR should be included in the review process for any project at the downtown site.
- The project definition for the downtown hospital site included environmental impacts that affected the "existing and cumulative" review sections of subsequent CEQA documents for other projects adjacent to the downtown (including the promised closure of Valley Boulevard). These other documents (for projects that have received CEQA review but have not been completed) should be considered in the review of the Palomar Heights site. These will survive the February 2020 expiration of the Development Agreement and MOU.
- The City Council, as lead agency for the downtown hospital redevelopment project, should enforce its legal commitments under not only the MOU and Development Agreement, but also the the approved Downtown Specific Plan, *viz.*, 1) references in the DTSP to the MOU (DTSP page V-5) that outline major renovations for the downtown hospital involving the construction of interim housing, support medical, office, and related uses; and 2) to the following: "City shall rezone the land and provide other planning and discretionary approvals, to the extent necessary and reasonable, and consistent with applicable law, to effectuate the goals and purposes of this MOU. City shall use best efforts to effectuate the goals and purposes of this MOU during CEQA and other administrative proceedings, regardless of whether City is an interested person, a responsible agency, or the decision-making body." (MOU p. 12 (emphasis added))
- The APCD should be included in the list of agencies providing comment on this initial document, relating to regional air quality during demolition (if not already included).

Thank you for your consideration of my comments.

Very Truly Yours,



Steve Nelson, Esq.

Kristin Blackson, Contract Planner
Escondido Planning Department
201 N. Broadway
Escondido, CA 92025



June 3, 2019

Re: Notice of Preparation Comments/Palomar Heights.

My comments are categorized according to several "EIR Environmental Topics" as depicted on the display boards at the May 20, 2019 "scoping meeting" held at Escondido City Hall.

Aesthetics: No information was available at the meeting regarding the appearance of the project, so I'm unable to provide any input, although this is a significant concern. The buildings within the development should have the classic appeal of City Hall, the Center for the Arts, and other attractive downtown buildings, but should be carefully reviewed for appropriateness.

Cultural Resources: I have concerns that excavation and other processes have potential to damage nearby historical buildings and hope that they will be mitigated.

Land Use & Planning: The project conflicts with the Downtown Specific Plan and Zoning Code in that it is almost entirely residential, a neighborhood about to be inserted into the middle of a commercial zone. The commercial potential for downtown should be expanded rather than restricted, extending the downtown as a larger and more vibrant area to attract potential customers for the entire downtown area. This area could be a feature for downtown, creating an exciting destination that would extend eastward from the proposed arch at Centre City Parkway up Grand to a dynamic development with additional dining and entertainment options on the hill. Residential units could be built on upper floors for a pleasant mix. If the target of more than 5,000 residential units is ever reached in the Downtown Specific Plan, additional shops, restaurants, pharmacies, and grocery stores will be needed to service the additional ten thousand residents who will otherwise have to leave the area, most likely in their cars, to avoid overcrowded restaurants already seen during Cruisin' Grand and other events. Additional commercial will also bring potential customers to existing downtown businesses.

Transportation: Valley Parkway and 2nd Avenue already experience heavy traffic; an increase in residential units will further impact both streets, particularly during rush hour.

Utilities and Service Systems: Adding thousands of residential units to this area will create a demand on water, electricity, and sewer, as well as other services. Existing population is already asked to/required to reduce electrical and water use.

Sincerely,

Carol Rea
420 E. 7th Avenue
Escondido, CA 92025

Kristin Blackson, Contract Planner
Escondido Planning Department
201 N. Broadway
Escondido, CA 92025

June 3, 2019

Re: Notice of Preparation Comments/Palomar Heights.

My comments are categorized according to several "EIR Environmental Topics" as depicted on the display boards at the May 20, 2019 "scoping meeting" held at Escondido City Hall.

Aesthetics: No information was available at the meeting regarding the appearance of the project, so I'm unable to provide any input, although this is a significant concern. The buildings within the development should have the classic appeal of City Hall, the Center for the Arts, and other attractive downtown buildings.

Cultural Resources: I have concerns that excavation and other processes have potential to damage nearby historical buildings and hope that they will be mitigated.

Land Use & Planning: The project conflicts with the Downtown Specific Plan and Zoning Code in that it is almost entirely residential, a neighborhood about to be inserted into the middle of a commercial zone. The commercial potential for downtown should be expanded rather than restricted, extending the downtown as a larger and more vibrant area to attract potential customers for the entire downtown area. This area could be a feature for downtown, creating an exciting downtown that would extend eastward from the proposed arch at Centre City Parkway up Grand to a dynamic development with entertainment options on the hill. Residential units could be built on upper floors for a pleasant mix. If the target of more than 5,000 residential units is ever reached in the Downtown Specific Plan, additional shops, restaurants, pharmacies, and grocery stores will be needed to service the additional ten thousand residents who will otherwise have to leave the area to avoid overcrowded restaurants already occurring during Cruisin' Grand and other events. Additional commercial will also bring potential customers to existing downtown businesses.

Transportation: Valley Parkway and 2nd Avenue already experience heavy traffic; an increase in residential units will further impact both streets, particularly during rush hour.

Utilities and Service Systems: Adding thousands of residential units to this area will create a demand on water, electricity, and sewer, as well as other services. Existing population is already asked to/required to reduce electrical and water use.

Sincerely,



Carol Rea
420 E. 7th Avenue
Escondido, CA 92025

Kristin Blackson, Contract Planner
Escondido Planning Department
201 N. Broadway
Escondido, CA 92025



June 3, 2019

Re: Notice of Preparation Comments/Palomar Heights.

My comments are categorized according to several "EIR Environmental Topics" as depicted on the display boards at the May 20, 2019 "scoping meeting" held at Escondido City Hall.

Aesthetics: No information was available at the meeting regarding the appearance of the project, so I'm unable to provide any input, although this is a significant concern. The buildings within the development should have the classic appeal of City Hall, the Center for the Arts, and other attractive downtown buildings, but should be carefully reviewed for appropriateness.

Cultural Resources: I have concerns that excavation and other processes have potential to damage nearby historical buildings and hope that they will be mitigated.

Land Use & Planning: The project conflicts with the Downtown Specific Plan and Zoning Code in that it is almost entirely residential, a neighborhood about to be inserted into the middle of a commercial zone. The commercial potential for downtown should be expanded rather than restricted, extending the downtown as a larger and more vibrant area to attract potential customers for the entire downtown area. This area could be a feature for downtown, creating an exciting destination that would extend eastward from the proposed arch at Centre City Parkway up Grand to a dynamic development with additional dining and entertainment options on the hill. Residential units could be built on upper floors for a pleasant mix. If the target of more than 5,000 residential units is ever reached in the Downtown Specific Plan, additional shops, restaurants, pharmacies, and grocery stores will be needed to service the additional ten thousand residents who will otherwise have to leave the area, most likely in their cars, to avoid overcrowded restaurants already seen during Cruisin' Grand and other events. Additional commercial will also bring potential customers to existing downtown businesses.

Transportation: Valley Parkway and 2nd Avenue already experience heavy traffic; an increase in residential units will further impact both streets, particularly during rush hour.

Utilities and Service Systems: Adding thousands of residential units to this area will create a demand on water, electricity, and sewer, as well as other services. Existing population is already asked to/required to reduce electrical and water use.

Sincerely,

Carol Rea
420 E. 7th Avenue
Escondido, CA 92025

Kristin Blackson, Contract Planner
Escondido Planning Department
201 N. Broadway
Escondido, CA 92025

June 3, 2019

Re: Notice of Preparation Comments/Palomar Heights.

My comments are categorized according to several "EIR Environmental Topics" as depicted on the display boards at the May 20, 2019 "scoping meeting" held at Escondido City Hall.

Aesthetics: No information was available at the meeting regarding the appearance of the project, so I'm unable to provide any input, although this is a significant concern. The buildings within the development should have the classic appeal of City Hall, the Center for the Arts, and other attractive downtown buildings, but should be carefully reviewed for appropriateness.

Cultural Resources: I have concerns that excavation and other processes have potential to damage nearby historical buildings and hope that they will be mitigated.

Land Use & Planning: The project conflicts with the Downtown Specific Plan and Zoning Code in that it is almost entirely residential, a neighborhood about to be inserted into the middle of a commercial zone. The commercial potential for downtown should be expanded rather than restricted, extending the downtown as a larger and more vibrant area to attract potential customers for the entire downtown area. This area could be a feature for downtown, creating an exciting destination that would extend eastward from the proposed arch at Centre City Parkway up Grand to a dynamic development with additional dining and entertainment options on the hill. Residential units could be built on upper floors for a pleasant mix. If the target of more than 5,000 residential units is ever reached in the Downtown Specific Plan, additional shops, restaurants, pharmacies, and grocery stores will be needed to service the additional ten thousand residents who will otherwise have to leave the area, most likely in their cars, to avoid overcrowded restaurants already seen during Cruisin' Grand and other events. Additional commercial will also bring potential customers to existing downtown businesses.

Transportation: Valley Parkway and 2nd Avenue already experience heavy traffic; an increase in residential units will further impact both streets, particularly during rush hour.

Utilities and Service Systems: Adding thousands of residential units to this area will create a demand on water, electricity, and sewer, as well as other services. Existing population is already asked to/required to reduce electrical and water use.

Sincerely,



Carol Rea
420 E. 7th Avenue
Escondido, CA 92025

Comment on Palomar Heights Project

Doreen Reagle <dreagl@gmail.com>

Sun 6/2/2019 4:16 PM

To: Kristin Blackson <kblackson@escondido.org>;

Dear Ms. Blackson,

Please consider a more dense plan for this redevelopment parcel. Because of the development location within the city, close to transportation and the mature and dense development near the project, a more dense development makes sense.

The design, floor plans, renderings and exterior materials are very pleasing.

Regards,

Doreen Reagle
760-532-9919

Palomar Heights Project

Destiny Colocho <DColocho@rincon-nsn.gov>

Mon 6/3/2019 4:37 PM

To: Kristin Blackson <kblackson@escondido.org>;

Cc: Deneen Pelton <DPelton@rincon-nsn.gov>;

Dear Ms. Blackson,

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your notification regarding the above referenced project and we thank you for the opportunity to consult. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

Embedded in the Luiseño territory are Rincon's history, culture and identity. Rincon has knowledge of one Luiseño Traditional Cultural Place (TCP), *Chaymay*, within a one mile radius of the project site. We request AB52 Consultation at this time in order to learn more about the project and any potential impacts to cultural resources. In addition, we recommend that an archaeological record search be conducted and ask that a copy of the results be provided to the Rincon Band.

If you have additional questions or concerns please do not hesitate to contact our office at your convenience at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho, RPA

Cultural Resource Manager and Tribal Historic Preservation Officer

Cultural Resource Department

Rincon Band of Luiseño Indians

1 West Tribal Road | Valley Center, CA 92082

Office: 760-297-2635 | Cell: 760-705-7171

Fax: 760-692-1498

Email: dcolocho@rincon-nsn.gov



This message is intended only for the use of the individual or entity to which it is addressed. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the sender of this E-Mail by return E-Mail or by telephone. In accordance with Internal Revenue Service Circular 230, we advise you that if this email contains any tax advice, such tax advice was not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of avoiding penalties that may be imposed on the taxpayer.



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

May 31, 2019

File Number 3300300

Ms. Kristin Blackson
City of Escondido – Planning Division
201 N. Broadway
Escondido, CA 92025
kblackson@escondido.org

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS

Imperial County
California Department
of Transportation

Metropolitan
Transit System

North County
Transit District

United States
Department of Defense

San Diego
Unified Port District

San Diego County
Water Authority

Southern California
Tribal Chairmen's Association

Mexico

Dear Ms. Blackson:

Subject: Palomar Heights Notice of Preparation

Thank you for the opportunity to comment on the City of Escondido's Palomar Heights Notice of Preparation (NOP). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Smart Growth

This project is located in two Smart Growth Opportunity Areas (SGOAs) identified on the Smart Growth Concept Map: an Existing/Planned Town Center (ES-1) and an Existing/Planned Mixed Use Transit Corridor (ES-3). SANDAG appreciates that the City of Escondido has prioritized transit-oriented development and land use changes that support the Smart Growth Concept Map and 2015 Regional Plan. A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Please facilitate access to existing and future transit routes and services within the project area.

Transportation Demand Management

Please consider the following transportation demand management (TDM) measures for the Palomar Heights Project to complement the proposed pedestrian and bicycle enhancements and to decrease dependency on the private automobile:

- Preferred parking for carpools and vanpools
- Provide on-site shared mobility services (e.g., carsharing, bikesharing, neighborhood electric vehicles) to enhance connections to the downtown area and local transit

- Implement wayfinding to direct residents, employees, and visitors to nearby transit
- Provide enhanced amenities, such as showers, lockers, secure and convenient bicycle parking, and bike repair stands
- Given the central location of the site, availability of nearby transit services, and access to the Escondido Transit Center, consider reducing the number of proposed parking spots. Smart parking technologies can help manage changing parking demands and facilitate parking reservations.

Please consider partnering with the SANDAG TDM program, iCommute, to take advantage of regional TDM programs and services. This includes the SANDAG Vanpool Program, Guaranteed Ride Home service, support for carpool and transit, and bike encouragement programs. More information on available regional TDM programs can be accessed through icommutesd.com.

Electric Vehicle and Climate Planning

Please consider incorporating robust electric vehicle (EV) charging infrastructure into the Palomar Heights Project and Draft Environmental Impact Report (EIR) to help mitigate greenhouse gas emissions impacts, while also supporting goals of the 2015 Regional Plan and the State of California for EV deployment and uptake. Electric, shared mobility services require fast charging points to support operations; consider siting future EV charging stations at community destinations. SANDAG also encourages the City to utilize resources from the Plug-in San Diego program, which implements recommendations from the San Diego Regional Plug-in Electric Vehicle Readiness Plan.

In addition, SANDAG supports the climate planning goals outlined in the City's Climate Action Plan (CAP), adopted in 2013. When developing the Palomar Heights Project and Draft EIR, please continue to ensure consistency with the strategies identified in the CAP.

Other Considerations

SANDAG has a number of resources that can be used for additional information or clarification on topics discussed in this letter. These can be found on our website at sandag.org:

- Integrating Transportation Demand Management into the Planning and Development Process
- SANDAG Regional Parking Management Toolbox
- San Diego Regional Plug-In Electric Vehicle Readiness Plan
- Designing for Smart Growth: Creating Great Places in the San Diego Region
- Parking Strategies for Smart Growth
- Trip Generation for Smart Growth
- Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region
- Riding to 2050: The San Diego Regional Bike Plan

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the Palomar Heights NOP. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Seth Litchney', is written over the printed name.

SETH LITCHNEY
Senior Regional Planner

SLI/KHE/nye



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

May 21, 2019

Ms. Kristin Blackson
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
Via Email to kblackson@escondido.org

RE: Sierra Club North County Group Notice of Preparation comments for Palomar Heights (ENV: 18-0009)

Dear Ms. Blackson,

Sierra Club North County Group (NCG) would like to provide the following comment on the Palomar Heights Notice of Preparation (NOP). Sierra Club believes this project poses important and unique opportunities and is significant both locally and regionally. We understand that the current proposer has an option on the property and is proposing the 510 dwelling units (DU) in spite of the fact that the site is zoned for 1,350 DU and is located in the urban core and on a transit route.

The City of Escondido's latest Regional Housing Needs Assessment (RHNA)¹ annual progress report (through 2017) shows that the City is meeting its pro-rated RHNA goal in the "Above-Moderate" income category (housing affordable to 120% or higher of Area Median Income²). The City has produced 1,133 units which is about 97% of the pro-rated RHNA requirement of 1,170. The City's production of "Moderate," "Low" and "Very Low" income housing, on the other hand, has been extremely lacking (2%, 12% and 15% respectively).

In that context, the city's biggest concern is fulfilling its housing obligation in the Moderate, Low and Very Low income housing segments. This project has an opportunity to fulfill both above moderate (market rate) and lower income categories needs by leveraging as much of the current density and taking advantage of incentives such as the state's density bonus program (up to 35% additional density and other incentives if there is provision of deed-restricted affordable units). This could yield upwards of 1800 units with 180 affordable units, in a perfect world.

¹ Communities use the Regional Housing Needs Assessment (RHNA) in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA allows communities to anticipate growth, so that collectively the region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.

² The 2019 AMI for San Diego is \$86,300. See attached

The true housing shortage in our region is not for high-income market rate homes. We need to expand and diversify our housing options to create more local affordability and stop building the luxury units, in sprawl land use footprints. We need subsidized affordable housing and market rate housing affordable to our professional families, teachers, public safety, health care, construction and other working families.

In addition, to meet climate goals, new housing must be concentrated near transportation corridors. In addition to major environmental benefits, locating housing closer to jobs also lowers the transportation burden for households. In [Escondido](#), transportation costs range from 22% of the household budget. The current proposal is only proposing a small number of the units (510) it is zoned for.

1. The environmental review process should be delayed until a plan that meets the needs of the city and the zoning is proposed.

Sierra Club believes it is premature to be moving on the environmental process with a project that falls so short of meeting the needs of our city. We recommend this project must be rethought and redesigned to be more in alignment with the type and location of housing needed in the region, specifically affordable and middle-income housing stock and climate protection goals. We urge the city to stop the environmental review process until a project that more closely meets the needs and demands of the city and region is proposed. This action would save money and time for all involved and would result in the project we need.

In addition, this project does not meet the obligations of the Hospital Board to the city outlined in the MOU in 2006. While we agree that the current needs of the city have changed and it is time for a new plan that serves the city's current needs, this plan neither meets the 2006 obligations or the needs of the city in 2019. A new process and plan should be pursued in partnership with the Hospital Board.

In this light, we request that the city and the Hospital Board join forces and issue a Request for Proposals or other approach to solicit other, more appropriate, concepts from the development community prior to beginning the environmental review process.

2. If the city continues to process this project, a full analysis of high-density projects must be done in the EIR.

Every possible signal has been given that we must grow and develop our region quite differently than has been done in the past. Urban infill, increased density in transportation corridors, and more affordable housing options are critical for residents of the region. Because this site is located near downtown, is infill, will not exacerbate gentrification, and is on a transit corridor, density should be maximized.

Further, greater density would also serve the city council's own interest in helping revitalize Escondido's downtown by providing much more foot traffic for our shops and restaurants. This is our biggest opportunity to achieve economic revitalized in this prime location should not be wasted on relatively low-density housing.

In fact, this may be a case where additional city investment may result in many more housing units at a diversity of costs. Such a development would result in additional housing we need, address climate and transportation issues, and improve the downtown economy for our city. For these

reasons, Sierra Club urges and supports analysis of the maximum density of a range of housing stock at this site for climate, housing, equity, economic, and environmental reasons.

In most EIRs, the project that receives the most complete analysis is the 'preferred' project. However, in this case, the EIR must evaluate several alternatives completely so that the Council could, if they wish, select one of these projects for approval. Since we do not support the current proposal, we request that the following preferred project and alternatives be fully analyzed.

- Preferred alternative should include at least 1,100 units
 - Lower density alternative of 900 DU
 - General Plan build out alternative of 1,350 units
 - Density Bonus alternative of 1,800 units
- 3. Requirement that affordable housing, net-zero energy, and other community benefits should be included in the project.**

Sierra Club strongly supports more affordable housing in our region. The Palomar Heights Redevelopment site is a perfect location to include affordable housing. A minimum of 15% of units should be made available as affordable housing. As the site is located midway on the Grand/Valley Parkway transportation corridor, a shuttle stop and other transit center facilities should be included in the design. All electric and net-zero project must also be part of the proposal.

- 4. Project goals established in the EIR should reflect real goals of the city and not the goals of the developer.**

Sierra Club has a long history and experience with environmental impacts and the CEQA process. One area that is important to get right in the EIR is that of the 'Project Goals'. These must be true goals for the city and not, as is too often the case, goals designed to meet the desires and bottom-line of the developer. The goals here should include meeting the affordable and middle-income housing needs, economic support for downtown Escondido businesses, net-zero energy use construction, increasing housing near transit and transportation corridors, compliance with the climate and planning policies of the city and region, maximizing density in areas where infrastructure exists as examples.

Thank you for the opportunity to comment on this important matter,

Suzi Sandore, Chair
NCG Executive Committee

Laura Hunter, Chair
NCG Conservation Committee

cc.
Mayor and City Council
Mr. Jeff Epp
Mr. Jay Petrek
Mr. Bill Martin

Attch: San Diego 2019 AMI

INFORMATION

San Diego County Area Median Income (AMI) and Income Limits

2019 Area Median Income (AMI)
for San Diego County is

\$86,300

San Diego County Income Limits Effective April 24, 2019			
FAMILY SIZE	80% of AMI Low Income	50% of AMI Very Low Income	Extremely Low Income
1	59,950	37,450	22,500
2	68,500	42,800	25,700
3	77,050	48,150	28,900
4	85,600	53,500	32,100
5	92,450	57,800	34,700
6	99,300	62,100	37,250
7	106,150	66,350	39,850
8	113,000	70,650	43,430



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation



May 3, 2019

To: Reviewing Agencies

Re: Palomar Heights (SUB 18-0011, ENV 18-0009, PHG 18-0049)
SCH# 2019059013

Attached for your review and comment is the Notice of Preparation (NOP) for the Palomar Heights (SUB 18-0011, ENV 18-0009, PHG 18-0049) draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Adam Finestone
Escondido, City of
201 N. Broadway
Escondido, CA 92025

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019059013/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency



CITY OF ESCONDIDO
Planning Division
201 North Broadway
Escondido, CA 92025-2798
(760) 741-4671

See NOTE below

2019059013
SCH#

Notice of Completion

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: Palomar Heights (SUB 18-0011, ENV 18-0009, PHG 18-0049)

Lead Agency: City of Escondido

Contact Person: Adam Finestone, Principal Planner

Street Address: 201 N. Broadway

Phone: (760) 839-6203

City Escondido, CA

Zip: 92025

County: San Diego

Project Location

County: San Diego

City/Nearest Community: City of Escondido

Cross Streets: Valley Blvd, E. Valley Pkwy, and E. Grand Ave

Zip Code: 92025

Total Acres: 13.8

Assessor's Parcel No.: 229-450-05-00,
229-450-06-00,
230-163-05-00,
230-163-03-00,
230-162-02-00,
230-163-01-00,
229-442-01-00,
229-442-02-00,
229-442-03-00,
229-442-04-00,
229-442-18-00,
230-163-04-00

Section:

Twp.:

Range:

Base:

Severino's Office of Planning & Research

MAY 03 2019

STATE CLEARINGHOUSE

Within 2 Miles: State Hwy #: I-15 and SR 78

Waterways: N/A

Airports: NA

Railways: N/A

Schools: N/A

Document Type

CEQA: ☒ NOP

☐ Supplement/Subsequent

NEPA: ☐ NOI

Other: ☐ Joint Document

☐ Early Cons

☐ EIR (Prior SCH No.)

☐ EA

☐ Final Document

☐ Neg Dec

☐ Other

☐ Draft EIS

☐ Other

☐ Draft EIR

☐ FONSI

Local Action Type

☐ General Plan Update

☒ Specific Plan

☐ Rezone

☐ Annexation

☐ General Plan Amendment

☒ Master Plan

☐ Prezone

☒ Redevelopment

☐ General Plan Element

☐ Planned Unit Development

☐ Use Permit

☐ Coastal Permit

☐ Community Plan

☐ Site Plan

☒ Land Division (Subdivision,
Parcel Map, Tract Map, etc.)

☐ Other

Development Type

☒ Residential: Units 510 Acres 13.8

☐ Water Facilities: Type MGD

☐ Office: Sq.ft. Acres Employees

☐ Transportation: Type

☒ Commercial: Sq.ft. 12,000 Acres 13.8 Employees

☐ Mining: Mineral

☐ Industrial: Sq.ft. Acres Employees

☐ Power: Type Watts

☐ Educational

☐ Waste Treatment: Type

☒ Recreational

☐ Hazardous Waste: Type

☒ Other: Mixed-use project; Residential and commercial
components comprise 13.8 acres total.

Project Issues Discussed in Document

☒ Aesthetic/Visual

☐ Flood Plain/Flooding

☒ Schools/Universities

☒ Water Quality

☐ Agricultural Land

☐ Forest Land/Fire Hazard

☐ Septic Systems

☒ Water Supply/Groundwater

☒ Air Quality

☒ Geologic/Seismic

☒ Sewer Capacity

☐ Wetland/Riparian

☒ Archeological/Historical

☐ Minerals

☒ Soil Erosion/Compaction/Grading

☐ Wildlife

☐ Coastal Zone

☒ Noise

☒ Solid Waste

☒ Growth Inducing

☒ Drainage/Absorption

☒ Population/Housing Balance

☒ Toxic/Hazardous

☒ Landuse

☒ Economic/Jobs

☒ Public Services/Facilities

☒ Traffic/Circulation

☒ Cumulative Effects

Resources Agency

- ☒ **Resources Agency**
Nadell Gayou
- ☐ **Dept. of Boating & Waterways**
Denise Peterson
- ☐ **California Coastal Commission**
Allyson Hitt
- ☐ **Colorado River Board**
Elsa Contreras
- ☐ **Dept. of Conservation**
Crina Chan
- ☐ **Cal Fire**
Dan Foster
- ☐ **Central Valley Flood Protection Board**
James Herota
- ☐ **Office of Historic Preservation**
Ron Parsons
- ☒ **Dept of Parks & Recreation**
Environmental Stewardship Section
- ☐ **S.F. Bay Conservation & Dev't. Comm.**
Steve Goldbeck
- ☒ **Dept. of Water Resources**
Resources Agency
Nadell Gayou

Fish and Wildlife

- ☐ **Depart. of Fish & Wildlife**
Scott Flint
Environmental Services Division
- ☐ **Fish & Wildlife Region 1**
Curt Babcock
- ☐ **Fish & Wildlife Region 1E**
Laurie Harnsberger
- ☐ **Fish & Wildlife Region 2**
Jeff Drongesen
- ☐ **Fish & Wildlife Region 3**
Craig Weightman

- ☐ **Fish & Wildlife Region 4**
Julie Vance
- ☒ **Fish & Wildlife Region 5**
Leslie Newton-Reed
Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6**
Tiffany Ellis
Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6 I/M**
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- ☐ **Dept. of Fish & Wildlife M**
William Paznokas
Marine Region

Other Departments

- ☐ **California Department of Education**
Lesley Taylor
- ☐ **OES (Office of Emergency Services)**
Monique Wilber
- ☐ **Food & Agriculture**
Sandra Schubert
Dept. of Food and Agriculture
- ☐ **Dept. of General Services**
Cathy Buck
Environmental Services Section
- ☒ **Housing & Comm. Dev.**
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

- ☐ **Delta Protection Commission**
Erik Vink
- ☐ **Delta Stewardship Council**
Anthony Navasero
- ☐ **California Energy Commission**
Eric Knight

- ☒ **Native American Heritage Comm.**
Debbie Treadway
- ☒ **Public Utilities Commission**
Supervisor
- ☐ **Santa Monica Bay Restoration**
Guangyu Wang
- ☐ **State Lands Commission**
Jennifer Deleong
- ☐ **Tahoe Regional Planning Agency (TRPA)**
Cherry Jacques

Cal State Transportation Agency CalSTA

- ☐ **Caltrans - Division of Aeronautics**
Philip Crimmins
- ☐ **Caltrans - Planning HQ LD-IGR**
Christian Bushong
- ☒ **California Highway Patrol**
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

- ☐ **Caltrans, District 1**
Rex Jackman
- ☐ **Caltrans, District 2**
Marcelino Gonzalez
- ☐ **Caltrans, District 3**
Susan Zanchi
- ☐ **Caltrans, District 4**
Patricia Maurice
- ☐ **Caltrans, District 5**
Larry Newland
- ☐ **Caltrans, District 6**
Michael Navarro
- ☐ **Caltrans, District 7**
Dianna Watson
- ☐ **Caltrans, District 8**
Mark Roberts

- ☐ **Caltrans, District 9**
Gayle Rosander
- ☐ **Caltrans, District 10**
Tom Dumas
- ☒ **Caltrans, District 11**
Jacob Armstrong
- ☐ **Caltrans, District 12**
Maureen El Harake

Cal EPAAir Resources Board

- ☐ **Airport & Freight**
Jack Wursten
- ☐ **Transportation Projects**
Nesamani Kalandiyur
- ☐ **Industrial/Energy Projects**
Mike Tollstrup
- ☐ **California Department of Resources, Recycling & Recovery**
Kevin Taylor/Jeff Esquivel
- ☐ **State Water Resources Control Board**
Regional Programs Unit
Division of Financial Assistance
- ☐ **State Water Resources Control Board**
Cindy Forbes – Asst Deputy
Division of Drinking Water
- ☐ **State Water Resources Control Board**
Div. Drinking Water # _____
- ☐ **State Water Resources Control Board**
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- ☐ **State Water Resources Control Board**
Phil Crader
Division of Water Rights
- ☒ **Dept. of Toxic Substances Control Reg. # _____**
CEQA Tracking Center
- ☐ **Department of Pesticide Regulation**
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- ☐ **RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- ☐ **RWQCB 2**
Environmental Document Coordinator
San Francisco Bay Region (2)
- ☐ **RWQCB 3**
Central Coast Region (3)
- ☐ **RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- ☐ **RWQCB 5S**
Central Valley Region (5)
- ☐ **RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- ☐ **RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- ☐ **RWQCB 6**
Lahontan Region (6)
- ☐ **RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- ☐ **RWQCB 7**
Colorado River Basin Region (7)
- ☐ **RWQCB 8**
Santa Ana Region (8)
- ☒ **RWQCB 9**
San Diego Region (9)

- ☐ **Other** _____

☐ _____
Conservancy

Palomar Heights Project
Case No. ENV 18-0009, SUB 18-0011, and PHG 18-0049
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
May 3, 2019 through June 3, 2019

PUBLIC SCOPING MEETING COMMENT SHEET

Monday, May 20, 2019
CITY OF ESCONDIDO
ESCONDIDO PLANNING DIVISION
201 N. BROADWAY
ESCONDIDO, CA 92025

WRITTEN COMMENT FORM

City needs to designate a percentage for low income minimum 10% for each project. Presently Escondido has no requirement-Why? Add more Green space that is usable not just landscaping ~~more underground parking~~ - too much of the site used for parking - 510 seems like good density. 3 story villas and row houses too many steps for young families or older couples

(Attach additional pages as needed)

Hope solar panels will be installed and rain catchment.

MAIL or E-MAIL FORMS TO:

Kristin Blackson, Contract Planner
City of Escondido
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
E-mail: kblackson@escondido.org

Verna Sundquist 5/20/19
Signature Date
VERNA SUNDQUIST
Print Name
1820 Loreto Glen
Address
Escondido 92027
City State Zip Code
760-522 2751
Phone Number

COMMENTS MUST BE RECEIVED BY 5:00 PM, JUNE 3, 2019

Palomar Heights name is already taken

Barbara Takahara <batakahara@yahoo.com>

Mon 5/27/2019 9:00 AM

Palomar NOP Comment Letters

To: Kristin Blackson <kblackson@escondido.org>; Paul McNamara <pmcnamara@escondido.org>; Michael Morasco <Mmorasco@escondido.org>; John Masson <jmasson@escondido.org>; Olga Diaz <Odiaz@escondido.org>; Consuelo Martinez <cmartinez@escondido.org>;

Dear City Officials,

The name "Palomar Heights" is intrinsically linked with the rehab on Ohio. Some people may still say "Hilltop", but that was a while ago.

I spent 20 years working in skilled nursing and home health in Escondido. "Palomar Heights" is linked with skilled nursing and rehab. One hears that someone is at Palomar Heights and you hope the best for them.

Please do not confuse people by naming the housing project "Palomar Heights".

Sincerely,
Barbara Takahara
batakahara@yahoo.com
© 760.877.7492

Sent from [Mail](#) for Windows 10

Comment on Palomar Heights Project

Nick Tsoulos <ntsoulos@cox.net>

Thu 5/30/2019 2:30 PM

To: Kristin Blackson <kblackson@escondido.org>;

As a resident of Escondido since 1971, and where I worked from 1973 to 2012, I feel that the Palomar Heights Project should be limited to about 500 units. This represents at least 1000, and probably many more new citizens.

This not only will increase the transportation load, it also will increase the already overcrowded parks in Escondido. Many high density housing units have recently been completed or are currently under construction on south Escondido Blvd, on north Centre City Pkwy, and west Valley Pkwy at the site of the old Police Dept building. These represent an increase in population with no increase in green space or parks.

Kit Carson, Grape Day, Washington Park and Felicita Park are already overcrowded on weekends.

The highly touted Daily Ranch is advertised as a City park available to residents, yet it remains remote and inaccessible due to parking limitations that require a long hike up a hill before reaching its entrance.

These housing developments are without parks or yards, and for quality of life, some attention to green space should be heeded.

Nick Tsoulos

Palomar Heights

Ken Warsh <kwarsh@outlook.com>

Thu 5/23/2019 3:08 PM

To: Kristin Blackson <kblackson@escondido.org>;

This is an insane density which will cause horrible traffic problems.

Make the units larger with half the people and half the cars.

Kenneth Warsh

Palomar Heights Project
Case No. ENV 18-0009, SUB 18-0011, and PHG 18-0049
NOTICE OF PREPARATION PUBLIC REVIEW PERIOD
May 3, 2019 through June 3, 2019

PUBLIC SCOPING MEETING COMMENT SHEET

Monday, May 20, 2019
CITY OF ESCONDIDO
ESCONDIDO PLANNING DIVISION
201 N. BROADWAY
ESCONDIDO, CA 92025

WRITTEN COMMENT FORM

I'd like to suggest you build a pedestrian walkway bridge over the road at the junction of Grand Ave and Valley Boulevard in order for residents to gain easy and safe access to Grand Ave from the new Palomar Heights project. The bridge could be a similar design to the metal arch at Grand and Maple.

(Attach additional pages as needed)

MAIL or E-MAIL FORMS TO:

Kristin Blackson, Contract Planner
City of Escondido
Escondido Planning Division
201 N. Broadway
Escondido, CA 92025
E-mail: kblackson@escondido.org

Carolyn West 6/2/19
Signature Date
CAROLYN WEST
Print Name
1244 WHISPERING HIGHLANDS PK
Address
ESCONDIDO CA 92027
City State Zip Code
760 715 7014
Phone Number

COMMENTS MUST BE RECEIVED BY 5:00 PM, JUNE 3, 2019