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April 15, 2017

Jason Han
New Urban West, Inc.
16935 W. Bernardo Drive, Ste. 260
San Diego, CA 92127

RE: Proposed Villages Specific Plan – SUB 16-0009

Dear Mr. Han:

The Planning Division has reviewed the information you provided in your resubmittal and the following items must be submitted to expand or clarify your request or to provide information necessary to analyze the impacts of the proposed project. Please contact the Planning Division to determine which items are necessary for the application to be determined complete.

A. General Comments

1. City staff is in receipt of various technical reports and additional technical studies are still needed. The acceptability of these environmental technical studies will be discussed in greater detail as the project progresses.
2. It was previously requested that an Integrated Agricultural Operations Plan, or similar program that addresses the imposition of conditions and/or safeguards of the ag-site, be included with the application. Staff feels that it is necessary to have the right controls in place to protect the health and safety of surrounding residents. The proposed specific plan document must do one of the following:
 - 1) Make reference to an Agricultural Operations Plan or similar program and state when it will be prepared as part of the plan's implementation; or
 - 2) Document the process for application, review and administration of interim or recurring special uses, and the process to suspend authority to operate.
3. The proposed improvements to Country Club Lane (i.e. Country Club Lane SAP) and an overall project landscape concept plan must be reviewed as part of this application. This was identified in the City's first comment letter, dated November 30, 2016. Therefore, many of this issues and concerns that were identified during the course of

reviewing the first submittal remain open and active – and are hereby incorporated herein by this reference.

4. As noted previously in the November 30, 2016 comment letter, Zoning laws or standards define how a property may be used and developed. It regulates where a building may be placed on a lot, building size and height, performance standards, wall signage standards, etc. A lot of new information has been added to the proposed specific plan document to address size, use, context and architecture; however, a stronger regulatory framework still needs to be added in key areas to help carry out the plan and guide future development.

B. Tentative Map (TM)

1. The TM should indicate 30' radius curb returns for all intersecting corners. R/W radius should be 20'. That includes upgrading existing corners along project frontages.
2. Sidewalks should be shown on the TM.
3. TM should include any offsite improvements required for mitigation. It is acknowledged that these improvements will be determined after finalizing the study and review of Traffic Impact Assessment.
4. The Traffic Impact Assessment was not provided with this resubmittal. Additional comments may result after a review of this study.
5. The SAP for Country Club should be included with TM in the next submittal.

C. Drainage Report

1. The Drainage Report lacks a comprehensive map summarizing hydrology and hydraulics data spread throughout the report. The map should identify all flows (historic and post project) entering and existing the site at discharge point of every drainage course.
2. The report shall also include a hydraulics map indicating and identifying the size and type of existing facilities to determine downstream capacity of the existing system.

3. All drainage channels and peak flow detention basins should be designed for 100 year storm with minimum one foot of freeboard. The report should include hydraulic system design to maintain historic flow conditions.
4. Basins proposed for treatment /hydromod/detention should have details in the report.
5. Hydraulic and energy grade lines should be shown for the entire drainage system plans and shall be included in the report.
6. Design of vegetated open channels should consider a conservative n value for future vegetation growth. In addition a channel profile will indicate any areas of concern with establishing positive flows and avoid water ponding.
7. The proposed bio channel has side slopes of 2:1, which is not common for natural channel.
8. The mechanism for maintenance of the drainage facilities should be outlined and funded by the project.

D. SWQMP

1. There lacks a comprehensive map identifying all DMA's, Areas, required treatment and hydromod areas and volumes, provided treatment and hydromod in a table summarizing the report's technical data.
2. The map should include any proposed Green Streets and structural BMP's proposed for the project.
3. The report should include all worksheets for all DMA's and simulation run results.
4. The spreadsheet calculation methodology is not clear. It is not clear how the retention volume or HMP volume requirements are being met. If it is desired to use a SWMM model, this information should be included in the SWQMP.
5. Our review of SWQMP indicates that the report should be revised to include a more complete with comprehensive technical data with the exhibits and appendices that makes the report complete and reviewable. Several of the required checklists are incomplete or missing, including the infiltration feasibility and geotechnical testing data.

6. A modular wetland facility is mentioned in the report, but no information on the proposed system, area or treatment efficiency has been provided.
7. The mechanism for maintenance of the BMPs should be outlined and funded by the project.

E. Utilities

1. Comments from the Utilities Department are provided in Attachment 1.

F. Fire

1. Emergency access roadways shall be a minimum of 24' in width, paved. The TM shows it as 20' in width.
2. Removable bollards will not be accepted in lieu of emergency access gates.
3. Emergency access gate that are automatic shall have Knox Switches and Opticom Receivers. Manual gates shall have either a Knox padlock or Knox Box. To demonstrate compliance with this requirement, a note can be added to the TM.
4. Fire hydrants shall be spaced every 500'. It appears that a few hydrants may be missing or spaced incorrectly on some streets.

Sincerely,



Mike Strong
Assistant Planning Director
City of Escondido

ATTACHMENT 1: Utilities Department comments

CC: Project file