



July 28, 2014

Mr. Mark Slovick
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2012-3300-12-005 (MUP), PDS2012-3500-12-018 (STP), HLP XX-XXX
LOG NO. 3910 12-02-003 (ER);
SCH NO. 2012061100 Response to the Lilac Hills Ranch Revised Draft EIR

Dear Mr. Slovick:

Although the City of San Marcos was not directly noticed of the Revised Draft EIR for the above listed project, the City requests consideration of the following comments in response to the Revised Draft Environmental Impact Report (RDEIR).

Traffic:

- The RDEIR traffic analysis considers project impacts to the Interstate 15 (I-15) corridor down to Bernardo Center Drive including the segments from El Norte Parkway to State Route 78 (SR-78). The analysis, however, does not distribute any project traffic to the eastbound and westbound off-ramps at Deer Springs Road, an often used cut through road for vehicles traveling southbound from the I-15, which will operate at Level of Service F at the existing plus project plus cumulative condition from Riverside County. The City anticipates that the project will generate traffic trips to and from Twin Oaks Valley Road via Deer Springs Road traveling to reach major destinations such as California State University, San Marcos, and Palomar College. The City therefore, respectfully requests that the traffic analysis consider project impacts (existing plus project, existing plus project plus cumulative, and existing plus project plus cumulative in the horizon year) to the westbound on-ramps/off-ramps to both Deer Springs Road and SR-78 from the I-15.

The City of San Marcos requests that the County ensure that the Project provide for full mitigation of any additional traffic trips that the projects adds to the intersections of the westbound I-15/Deer Springs Road off-ramps/on-ramps, the westbound I-15/SR-78 off-ramps/on-ramps, and the intersection of Deer Springs Road/Twin Oaks Valley Road. The City has a project proposed for the ultimate intersections improvements at Twin Oaks Valley Road and Deer Springs Road. Project impacts to this intersection, directly, or cumulatively, should include mitigation involving a fair-share contribution to future City intersection improvements.

- The RDEIR analysis determined that the project will generate cumulative significant unmitigable impacts to the I-15 corridor. The basis for this finding is that Caltrans does

not have a plan or program in place into which the project could pay its fair-share for impacts. The City requests that the applicant work with County staff to facilitate a planning effort with Caltrans to develop program and fund improvements that would mitigate the cumulative and horizon year significant impacts of the project.

Thank you in advance for your consideration of this request. If you have any further questions regarding this letter, please feel free to contact Susan Vandrew Rodriguez at (760) 744-1050, extension 3237 or svandrew@san-marcos.net. The City requests review of the responses to these comments prior to adoption of the Revised Draft EIR. The City also requests notification of when action will be taken on the Final REIR.

Sincerely,



Jerry Backoff
Planning Division Director



Mike Edwards
City Engineer/Public Works Director

cc: Lydia Romero, Deputy City Manager
Matt Little, Deputy City Engineer
Peter Kuey, Principal Engineer, Land Development
Omar Dayani, Principal Civic Engineer, Traffic
Susan Vandrew Rodriguez, Associate Planner