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July 28, 2014

File Number 3330300

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

Dear Mr. Slovick:

SUBJECT: SANDAG Comments on Lilac Hills Ranch Revised Environmental Impact Report

Thank you for the opportunity to comment on the Lilac Hills Ranch project. SANDAG previously provided a comment letter dated August 19, 2013, on the Lilac Hills Ranch Master Planned Community Specific Plan, Draft Environmental Impact Report, and General Plan Amendment for this project. **Please note that the comments herein have not changed substantially since then, and express largely the same concerns and recommendations.**

Our comments are based on policies included in the Regional Comprehensive Plan (RCP), and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS), and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP/SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the project consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program.

SANDAG has the following comments regarding the Lilac Hills Ranch Lilac Hills Ranch Revised Environmental Impact Report (REIR):

Please take into consideration consistency with guiding plans for the region. In 2011, SANDAG supported the vision and goals of the San Diego County General Plan Update, which shifted "20 percent of future growth from eastern backcountry areas to western communities...reflect[ing] the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting natural resources and protection of existing community character in its extensive rural and semi-rural communities."

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SANDAG supports the goals and objectives that are currently laid out in the 2011 San Diego County General Plan, as it encourages smart, sustainable growth and reinforces the principles set forth in the Regional Comprehensive Plan (RCP). In evaluating the environmental impacts of the Lilac Hill Ranch project, please consider whether this project is consistent with the goals of the San Diego County General Plan and of the RCP.

The County of San Diego has not identified this area on the SANDAG Smart Growth Concept Map (SGCM) as an opportunity area for smart growth. Although the County of San Diego has identified a number of smart growth opportunity areas on the Smart Growth Concept Map (mostly Rural Villages with an average density of 10.9 du/ac) in the unincorporated area, the Lilac Hills Ranch project proposes to add density in an area not currently on the SGCM. Smart growth opportunity areas are identified by County planning staff as areas that have either existing or future plans to accommodate additional growth, and help to guide an overall strategy for sustainable development in our region by supporting the goals of the RCP and encouraging growth to occur compactly in areas where there is existing and planned transportation infrastructure and other public services. Please make sure to coordinate with SANDAG on future updates of the SGCM to ensure that the map accurately reflects the County's vision for future growth.

The density proposed in this project was not included in the Series 13 Growth Forecast prepared for San Diego Forward: The Regional Plan. The growth forecast is used to project where growth will occur in the region from the present to 2050, and helps guide the development of the regional transportation network. Since the land use inputs for the forecast are based on local planning documents, the current growth forecast (Series 13) is reflective of the land uses laid out by the 2011 adopted County General Plan, which did not account for the proposed project. Please coordinate with SANDAG on the next Regional Growth Forecast to support the continuing development of our region's transportation network.

Please consider how the proposed project will connect to the regional transit network and nearby communities, especially for the expected senior residents. Currently, there are no planned transit services identified in the adopted 2050 RTP/SCS for the proposed project area. Since the project includes senior housing and assisted living (including facilities for memory-impaired patients), it is important to ensure that these residents (many of whom may not have access to private vehicles) will have access to transit. While paratransit services can often help alleviate transit needs in areas not served by local buses, ADA paratransit pick-up locations are required to be within a ¾-mile distance from a transit stop or station. The proposed project is currently outside of the ¾-mile Americans with Disabilities Act (ADA) paratransit boundary and may be ineligible for such services.

Please consider strategies to provide Senior and ADA mobility options to potential future residents. SANDAG transit planning staff is available as a resource to learn more about paratransit programs in the region. SANDAG also encourages coordination with North County Transit District (NCTD), Riverside County Transportation Commission (RCTC), and Riverside Transit Authority (RTA) regarding existing and planned transit service.

Please consider TDM strategies to address cumulative impacts to local roads and freeway facilities. Due to the size of this project, please consider developing a TDM plan. Although efforts have been made to create a pedestrian friendly and mixed-use environment to reduce the need for auto travel within the development, motorized travel will still be heavily relied upon to reach

destinations beyond village boundaries. Additionally, the commercial uses identified in the REIR are not proposed until Phase 2 of the development, which will require residents to travel off-site for all services with no options other than auto travel. TDM measures to consider for the development include:

- Subsidized transit passes for tenants
- Shuttle service to commercial areas and to the Escondido transit center
- Promotion of iCommute services (Ridematching, Vanpool Program, Guaranteed Road Home, SchoolPool, etc.) for tenants

The SANDAG iCommute program can provide input on the development and implementation of a TDM plan that can assist future residents and employees with reducing both commute and non-commute single occupancy vehicle trips.

Although bicycle and pedestrian facilities have been included in the project, bicycle parking and other supportive amenities can further support multi-modal transportation.

The number of parking spaces available suggests that the development will be auto-oriented. Please consider parking strategies that can reduce auto travel demand. Please refer to the SANDAG publication Parking Strategies for Smart Growth.

SANDAG also advises coordination with the RCTC and RTA to determine whether inter-regional transportation solutions and/or services may be available.

Existing transit services and TDM facilities that may provide opportunities for coordination include:

- RTA Route 217 commuter express service between Hemet, Temecula and Escondido
- RTA Route 202 commuter express service between Temecula and the Oceanside Transit Center, existing Interstate 15 (I-15) at State Route 76 (SR 76); Route 202 makes a stop at the Park and Ride Lot located at the Nessie's Burgers
- The Caltrans operated Park and Ride located at I-15 and Gopher Canyon Road

Traffic Impact Study

Section 1, Figure 1-2: The project location is not within a designated Smart Growth Opportunity Area and needs to strongly consider alternatives to vehicular travel; otherwise, the project will significantly impact the transportation network. Please coordinate efforts with NCTD and Metropolitan Transit System regarding potential transit/shuttle services. The Route 610 peak period service is phased for the year 2018 within the 2050 RTP/SCS; coordination with this service should be considered.

Section 2 Analysis Methodology, 2.7 Ramp Metering Analysis, Page 22: The San Diego region opted out of the California state Congestion Management Program in October 2009. Please refer to Technical Appendix 20 of the 2050 RTP which provides the federal Congestion Management Process; and please refer to the Regional Transportation Multimodal Analysis and update all components of the Traffic Impact Study (TIS) accordingly.

All intersection and facility impacts to SR 76 and I-15 should be coordinated with Caltrans District 11, including fair share contributions. Please also coordinate with the RCTC as necessary on significant and unmitigable impacts that cross the Riverside County boundary.

Natural Environment and Resources

Please coordinate with SANDAG on any adjacent land acquired through the Environmental Mitigation Program. SANDAG recorded a conservation easement over 902-acres of land as part of an open space preserve near the proposed project (see Road 3 of the TIS), and should be consulted appropriately regarding impacts to this property.

Lastly, please provide the timing of the five phases of development. SANDAG would appreciate a description of the intended timing for each phase of the proposed development, to the extent feasible.

Again, we appreciate the opportunity to comment on the REIR for the proposed Lilac Hills Ranch project. We encourage the County of San Diego, where appropriate, to consider the following tools in evaluating this update based on the following SANDAG publications, which can be found on our website at www.sandag.org/igr.

- (1) Designing for Smart Growth, Creating Great Places in the San Diego Region
- (2) Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
- (3) Trip Generation for Smart Growth
- (4) Parking Strategies for Smart Growth
- (5) Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in EIRs
- (6) Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities
- (7) Riding to 2050, the San Diego Regional Bike Plan

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

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

SBA/SST/fwe