



Letter A6

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.

A6-1

A6-2

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.

A6-3

A6-4

- 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

A6-1

The comment states that the FEIR traffic analysis 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 on I-15. Preliminarily, the project's traffic impacts were modeled using the SANDAG Series 12 Transportation Model, a regional transportation model used to forecast traffic volumes and distribution patterns on area freeways and roadways. The model utilizes the County and City general plans as the basis for the land use and roadway network assumptions, and, as part of the select zone and trip distribution analyses, takes into consideration existing travel patterns. (See Lilac Hills Ranch Traffic Impact Study (June 3, 2014) (LHR TIS), Appendix K.)

It is correct that motorists use Deer Springs Road (and other County roadways) to avoid congestion on I-15 and SR-78. However, the SANDAG model fully accounts for the congestion delay on I-15 during its trip assignment process. Therefore, the analysis presented in the FEIR accounts for the fact that some current and future traffic will utilize Deer Springs Road as a "cut through" route and the traffic study did distribute traffic to the I-15/Deer Springs Road interchange.

Specific to project traffic, based upon the SANDAG Model Select Zone Assignment conducted for the project, the project would contribute only 18 peak hour directional trips (2 percent of the total project traffic) to the I-15/Deer Springs Road interchange. (LHR TIS, Appendix K.) As the interchange is a Caltrans facility, under the Caltrans Guide for The Preparation of Traffic Impact Studies (December 2002), analysis of state facilities is required only for those projects that contribute 50 or more peak hour trips in either direction. Because the project would not add 50 peak hour trips to the interchange, nor the connecting roadway, it was not necessary to include the interchange as part of the project's traffic analysis study area. Please see responses to comments B2-21 through B2-24 to Letter B2, Latham & Watkins (July 23, 2014), for additional information responsive to this comment.

A6-2

The comment states that the City anticipates that the project will generate trips to and from Twin Oaks Valley Road via Deer Springs Road and, therefore, requests that the traffic analysis consider project impacts to the westbound on-ramps/off-ramps to both Deer Springs Road and SR-78 from I-15. Please see response to comment number 1 above in regard to the inclusion of the I-15/Deer Springs Road interchange in the traffic impact analysis.

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RESPONSE

	<p>A6-2 (cont.)</p> <p>In regards to the analysis of Deer Spring Road and Twin Oaks Valley Road, the City of San Marcos utilizes the SANTEC/ITE Guidelines for Traffic Impact Studies (TIS) in the San Diego Region (March 2000) to determine when a traffic impact study is required, the roadway facilities that require analysis, and the thresholds for when a traffic-related impact occurs. Based on the study area thresholds provided on Page 4 and 5 of the SANTEC/ITE Guidelines, a project should “study all roadway segments (including all state surface routes), intersections, and mainline freeway locations where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic.”</p> <p>Based upon the SANDAG Series 12 Transportation Model Select Zone Assignment conducted for the proposed Lilac Hills Ranch project, which takes into consideration existing travel patterns (including cut through traffic), and the attached Chen Ryan Memorandum, Deer Springs Road, October 9, 2014, the project would contribute less than 50 peak hour trips to Deer Springs Road and Twin Oaks Valley Road. Therefore, neither roadway meets the threshold to be included in the project's traffic analysis study area, and, therefore, neither road was analyzed. Please see responses to comments B2-21 through B2-24 to Letter B2, Latham & Watkins (July 23, 2014), for additional information responsive to this comment.</p> <p>A6-3</p> <p>The comment states that the City requests the County to ensure full mitigation for the additional project trips added to the Deer Springs Road related facilities discussed above in comments A6-1 and A6-2. However, as discussed in the preceding comments, the project would not add the requisite number of trips to even include the facilities within the traffic analysis study area. As the project would not cause or contribute to a significant impact, no mitigation is required. Please also see responses to comments B2-21 through B2-24 to Letter B2, Latham & Watkins (July 23, 2014), for additional information responsive to this comment.</p> <p>A6-4</p> <p>The comment states that the City has intersection improvements planned for the Twin Oaks Valley Road intersection and the project should pay a fair-share towards the improvements. However, because the project would not result in a significant impact to either Twin Oaks Valley Road or Deer Springs Road, no mitigation is required.</p>
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LETTER

RESPONSE

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.

A6-4
cont.

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.

A6-5

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

A6-4 (cont.)

The comment further requests that the applicant and County staff facilitate a planning effort with Caltrans to address the project's identified significant cumulative impacts to I-15. The comment expresses the opinion of the City. It will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, planning efforts to provide additional travel lanes to I-15, which is the mitigation necessary to reduce the identified impacts, lie principally with Caltrans and SANDAG, the owner and Regional Planning Agency with jurisdiction, control, and funding for regional facilities such as I-15. Please see Global Response: Significant and Unavoidable Impacts to I-15, for additional information responsive to this comment.

A6-5

The comment is a conclusion to the preceding comments. No further response is required.

MEMORANDUM

TO: Mr. Jon Rilling, Accretive Investments, LLC
FROM: Monique Chen, PE
Phuong Nguyen, PE
DATE: October 9, 2014
RE: **Lilac Hills Development Project** - Deer Springs Road

This memorandum was prepared in response to comments received on the Lilac Hills Ranch Draft REIR and explains the basis for the determination not to include Deer Springs Road in the *Lilac Hills Ranch Traffic Impact Study* (June 3, 2014) (Revised TIS) as a study area roadway.

County's Guideline

Guidelines for determination of the project study area is provided in the *County of San Diego Transportation and Traffic Report Format and Content Requirements*:

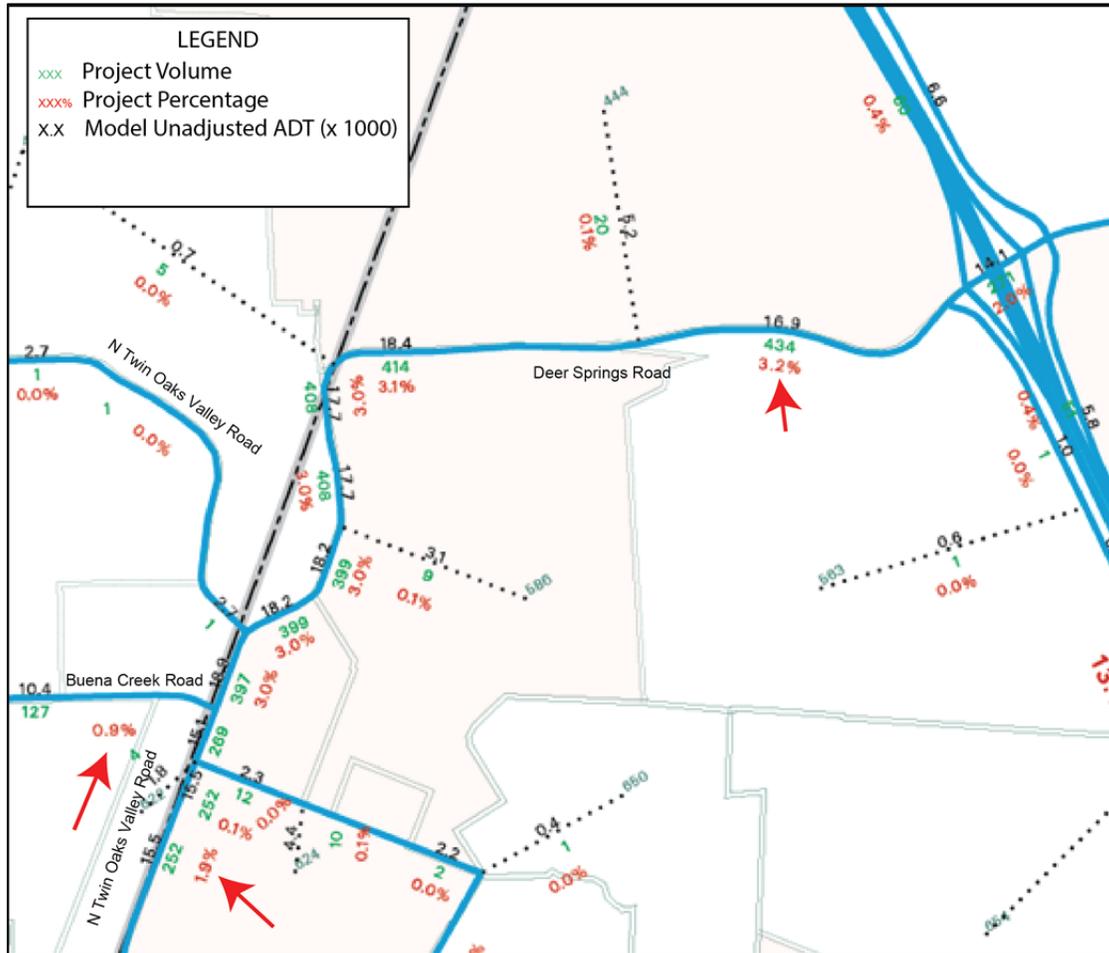
"A Full TIS shall be prepared for all discretionary projects that generate 1,000 or more total average daily trips (ADT) or 100 or more peak-hour trips. The scope of the full direct and cumulative traffic assessment shall include those roads and intersections that will receive 25 peak hour trips (2-way peak hour total)."

Project Trips Distribution

The distribution of the external project trips under existing conditions was based on computer generated "Select Zone" assignments utilizing the Series 12 Year 2008 SANDAG Transportation Model. The "Select Zone" assignments are provided in Appendix K (the base year model was utilized) of the Revised TIS. A screen shot of the project trip distribution at Deer Springs Road is provided in **Figure 1** below.

As shown in Figure 1, based on the model's trip distribution and assignment, 3.2% of Lilac Hills Ranch project trips would travel on Deer Springs Road, with 0.9% of the project traffic using Buena Creek Road traveling toward the City of Vista (Buena Creek Transit Station area), 1.9% of the project traffic traveling on Twin Oaks Valley Road towards the City of San Marcos and Palomar College (1.2% travel directly to Palomar College and the remaining 0.7% travel to land uses around Palomar College). The remaining 0.4% of the project traffic is distributed to land uses along Deer Springs Road. However, a closer examination of the project trip distribution near Deer Springs Road showed that the model assumed that all of the project trips traveling to the City of Vista (Buena Creek Transit Station area) and San Marcos would use Deer Springs Road, with 0% of the project traffic using I-15 and SR-78.

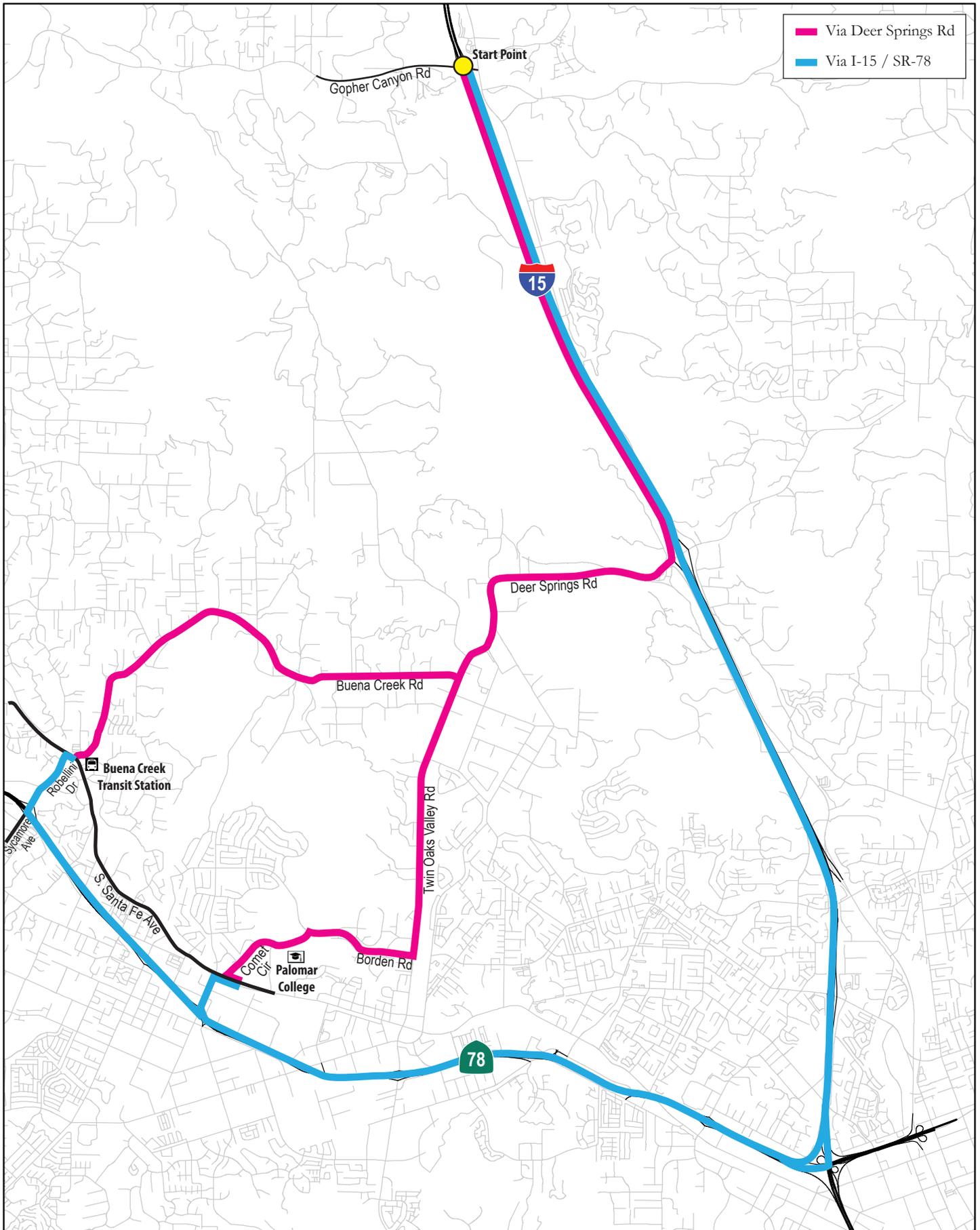
**FIGURE 1
PROJECT TRIP DISTRIBUTION (SANDAG SERIES 12 SELECT ZONE MODEL)
BASE YEAR 2008**



Source: SANDAG, July 2012

Travel Time Study

Based on the project team’s knowledge of the area and field observations, it was determined that it is unlikely that all of the project traffic traveling to the City of Vista, San Marcos and Palomar College would utilize Deer Springs Road; professional engineering judgment is typically applied when reviewing a SANDAG Select Zone Assignment for accuracy. Therefore, a travel time study was conducted to compare the Deer Springs Road route and I-15/SR-78 route to two destinations: Palomar College and Buena Creek Transit Station. The I-15 SB On-Ramp @ Gopher Canyon Road interchange was chosen as the common starting point for both routes. **Figure 2** displays the project study area including the routes selected for the travel time study. A total of 12 runs were conducted (4 during the AM peak hours and 8 during the PM peak hours). Travel time results are provided in **Table 1**.



Lilac Hills Ranch
 Project Trips Distribution & Travel Time Survey

Figure 2
 Study Area

TABLE 1
TRAVEL TIME STUDY RESULTS
October 6, 2014

Run	From	To	Start Time	End Time	Travel Time	Note
Palomar College via Deer Springs Road						
1	Gopher Canyon Rd	Palomar College	8:36 AM	8:55 AM	18 minutes 47 seconds	-
2	Gopher Canyon Rd	Palomar College	5:02 PM	5:21 PM	18 minutes 27 seconds	-
3	Palomar College	Gopher Canyon Rd	5:24 PM	5:47 PM	22 minutes 16 seconds	-
Average Travel Time					19 minutes 50 seconds	-
Palomar College via I-15 / SR-78						
4	Gopher Canyon Rd	Palomar College	8:18 AM	8:38 AM	19 minutes 34 seconds	-
5	Gopher Canyon Rd	Palomar College	5:00 PM	5:20 PM	19 minutes 54 seconds	-
6	Palomar College	Gopher Canyon Rd	5:36 PM	5:55 PM	19 minutes 0 seconds	-
Average Travel Time					19 minutes 29 seconds	-
Buena Creek Transit Station via Deer Springs Road						
7	Gopher Canyon Rd	Buena Creek Transit Station	7:36 AM	8:01 AM	24 minutes 53 seconds	-
8	Gopher Canyon Rd	Buena Creek Transit Station	4:00 PM	4:16 PM	15 minutes 29 seconds	-
9	Buena Creek Transit Station	Gopher Canyon Rd	4:39 PM	4:57 PM	18 minutes 0 seconds	-
Average Travel Time					19 minutes 27 seconds	-
Buena Creek Transit Station via I-15 / SR-78						
10	Gopher Canyon Rd	Buena Creek Transit Station	7:36 AM	8:01 AM	24 minutes 41 seconds	-
11	Gopher Canyon Rd	Buena Creek Transit Station	4:00 PM	4:26 PM	25 minutes 42 seconds	Data was not accepted due to accident
12	Buena Creek Transit Station	Gopher Canyon Rd	4:31 PM	4:53 PM	21 minutes 55 seconds	-
Average Travel Time					21 minutes 51 seconds	-

Source: Chen Ryan Associates, October 2014

As shown in Table 1 above, the average travel time to the Buena Creek Transit Station via Deer Springs Road is lower (faster) than via the I-15 / SR-78 route. However, the average travel time to Palomar College via the I-15 / SR-78 route is comparable and actually lower (faster) than those via Deer Springs Road. Overall, the travel times are similar.

Conclusion

Based on the data provided above which shows similar travel times and field experience, it was reasonable to assume that approximately 50% of the project traffic would choose to use the I-15/SR-78 route rather than the Deer Springs route. Therefore, 1.6% of the project trips on Deer Springs Road were shifted to the I-15 / SR-78 route.

The number of trips associated with the remaining project trip distribution on Deer Springs Road (1.6% of the total external project traffic) was then calculated to determine whether Deer Springs Road should be included as part of the project study area. Based on the trip generation provided in Table 4.8 of the

Revised TIS, the project would contribute 19 trips during the AM peak hour and 23 trips during the PM peak hour to Deer Springs Road. Since the project contribution to Deer Springs Road is less than 25 peak hour trips, it was determined that Deer Springs Road as well as N. Twin Oaks Valley Road and Buena Creek Road (which would carry less traffic than Deer Springs Road) should not be included as part of the project study area.