

Letter B2

Christopher W. Garrett
Telephone: +1.858.523.5400
christopher.garrett@lw.com

12670 High Bluff Drive
San Diego, California 92130
Tel: +1.858.523.5400 Fax: +1.858.523.5450
www.lw.com

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File No. 025388-0011

July 23, 2014

VIA EMAIL AND U.S. MAIL

Mark Wardlaw, Director
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

Re: Draft Revised Environmental Impact Report for the Lilac Hills Ranch Project

Dear Mr. Wardlaw:

Latham & Watkins LLP represents the Golden Door Properties LLC (the "Golden Door") on land use and environmental matters. The Golden Door is an award-winning spa and resort that opened in 1958. This historic haven is situated on approximately 600 acres on the south side of Deer Springs Road in northern San Diego County ("North County"). The Golden Door focuses on the health and fitness of its guests, and its property encompasses a peaceful array of hiking trails, luxurious spa amenities, tranquil Japanese gardens, and a bamboo forest. Agricultural cultivation on the property includes fresh vegetable gardens as well as citrus and olive trees.

B2-1

B2-1 This comment is an introduction to comments that follow. No further response is required.

The Golden Door is devoted to the holistic of health of not only its guests, but its community in the Bonsall and Twin Oaks areas, throughout the Interstate 15 corridor in North County, and across San Diego County (the "County"). In addition, the Golden Door is concerned about the impacts of climate change and is supportive of California's efforts to curb greenhouse gas ("GHG") emissions through the requirements of AB 32 and the smart planning principles of SB 375.

B2-2

B2-2 The comment expresses the opinions of the commentator. The comment 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, because the comment does not raise an issue regarding the analysis presented in the FEIR, no further response is required.

The Golden Door is concerned about: (1) the Lilac Hills Ranch project's (the "Project") impacts to Interstate 15 and Deer Springs Road, (2) the piecemeal precedent it sets for County consideration of the conversion of rural land to new urban uses in the Interstate 15 North corridor, and (3) the accuracy of the cumulative impact traffic information in the EIR for the Project concerning the revived Merriam Mountains Project, another new urban project proposed for this corridor.

B2-3

B2-3 The comment is a general introduction to specific comments that follow and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see the specific comments that follow and the corresponding responses.

The Golden Door is largely dependent on Interstate 15 for its guests' and employees' transportation. In addition, Deer Springs Road often functions as a regional cut-through from Interstate 15 to SR-78 causing increased traffic on surface streets due to congestion on the

B2-4

B2-4 The comment is a general introduction to specific comments that follow and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see the specific comments that follow and the corresponding responses.

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freeways. The Golden Door considers mitigation of cumulative impacts to Interstate 15 to be integral to regional vibrancy and believes regional transportation planning should seek to eliminate cut-through traffic on Deer Springs Road by keeping freeway-to-freeway trips on the freeways.

B2-4
cont.

Unfortunately, the County, Caltrans, and SANDAG do not appear to be considering the cumulative impact of all the newly proposed development projects on these transportation facilities. In fact, each agency appears to be proceeding in its own separate direction in planning for cumulative development (apparently based on the erroneous belief that the County intended to follow its adopted General Plan), and the only opportunity for formal public comment appears to be this Draft Revised Environmental Impact Report (“EIR”) prepared by the County which examines “cumulative impacts.” The County staff’s approach thus far in this Draft Revised EIR appears to be that individual developments can or should go forward without any defined contribution to cumulative transportation impacts on the Interstate 15 corridor and surface streets which will suffer from “cut-through traffic” from motorist fleeing the Level of Service “F” congestion the County is now planning for this freeway.

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The Golden Door takes no position on the Project, other than to request that the County ensure that the Project provide for full mitigation of any additional traffic the Project adds to Interstate 15 at Deer Springs Road, given the County’s prediction of Level of Service “F” at this location. Our comments are also based on the Golden Door’s position of responsible corporate citizenship and its commitment to sustainable development. It may very well be that the Lilac Hills Ranch project can provide the missing full mitigation for its contribution to traffic impacts described in the Draft Revised EIR, either by some combination of defined and funded expanded transit services to link to the SANDAG system, expansion of the freeway mainline, construction of expanded bus rapid transit (“BRT”) lanes, or expanded park and ride facilities. It will be important to revise the Draft Revised EIR to provide for full funding of these improvements in advance by the agencies or the developers, and to ensure that the improvements are in place before development occurs.

B2-6

This Draft Revised EIR indicates that the County staff have apparently elected to proceed with planning for urban development along the Interstate 15 corridor in North County on a project-by-project basis, rather than as a regional amendment to the General Plan or SANDAG’s Regional Transportation Plan (“RTP”) and Sustainable Communities Strategy (“SCS”) for all of the planned projects. As a result, this single project EIR provides the public with the public’s first and only look at cumulative traffic for this region. This includes the cumulative traffic from the Newland Real Estate Group, LLC’s (“Newland”) revived Merriam Mountains Project, whose impacts are “buried” in the Project’s Draft Revised EIR and traffic study. (While Newland has not filed a formal application with the County, we are concerned that this traffic information in the County’s EIR may not include all of Newland’s announced plans for urban development of its property, including a new regional commercial center, school, and other uses as detailed in the attached Union Tribune article of July 20, 2014.) Thus, rather than being able to comment on a proposed regional General Plan amendment, or proposed amendment to the RTP or the SCS, the Golden Door has been forced to provide these comments now, before the expiration of what may be the only public comment period on these cumulative impact issues.

B2-7

B2-5 As discussed in detail in the responses that follow, the FEIR properly determined that mitigation to reduce the identified impacts is infeasible and, therefore, such impacts would remain significant and unavoidable, consistent with CEQA’s requirements. As also explained in the responses that follow, the FEIR traffic impact analysis properly accounted for the referenced cut-through traffic in identifying the project’s impacts.

B2-6 The comment requests that the project provide for “full mitigation” of any additional traffic the project adds to Interstate 15 at Deer Springs Road. The project does not have a significant direct impact to I-15 and therefore providing mitigation such as expanded transit services, expansion of the I-15 mainline, construction of bus rapid transit lanes or expanding the I-15/Deer Springs Road Park-N-Ride is not warranted. The subject of mitigation relative to the project’s significant cumulative impacts on Interstate 15 is addressed in detail in Global Response: Significant and Unavoidable Impacts to I-15.

B2-7 The Lilac Hills Ranch traffic impact study (TIS) identified the Merriam Mountains project as one of the cumulative projects considered within the impact analysis, and included the most up-to-date information available regarding the project. (See TIS Section 6.0, Cumulative Traffic Conditions, pp. 229 and 238.)

The cumulative project data used in the project TIS was gathered from multiple sources, including the County’s Property Specific Requests General Plan Amendment and the County’s Accela Citizen Access, which the County maintains to provide the most recent cumulative project data throughout the County of San Diego. The data included the most recent information submitted to the County at the time (in 2013) regarding cumulative projects, and it included 1,162 dwelling units for the proposed Newland Sierra (previously Merriam Mountains) project based on the Property Specific Referrals at the time. As of June 12, 2014, the Newland Sierra project had not submitted a General Plan Amendment application (or any other application associated with the project) to the County; however, in August 2014, in anticipation of the Newland Sierra project moving forward, the traffic engineers preparing the Lilac Hills Ranch TIS determined they would utilize 2,100 dwelling units for the Newland Sierra project. The TIS also includes additional vehicle trips equivalent to a small amount of commercial uses (approximately 50,000 sq. ft.) that together with the residential uses

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	<p>B2-7 (cont.)</p> <p>would generate a total of approximately 22,000 external average daily trips (ADT). As a result, the most up to date information available at the time the traffic impact study was prepared was utilized, in compliance with the County of San Diego Traffic Impact Study Guidelines. Following preparation of the Lilac Hills Ranch TIS and circulation of the FEIR, the applicant for the Newland Sierra project submitted a Major Pre-Application (MPA) to the County dated October 22, 2014. Based on the MPA, the Newland Sierra project would include 2,135 dwelling units, 81,000 square feet of commercial space, a 6-acre school site, parks and open space. Based on the MPA submittal, the Lilac Hills Ranch TIS includes a comparable amount of land uses and corresponding ADT relative to the Newland Sierra project currently proposed and the revised project would not result in any new impacts. The traffic difference between the Newland project that was assumed in the traffic study and the now proposed Newland project is not considered to be significant. The number of now proposed units is less than 2 percent greater than what was assumed in the Lilac traffic study. As to the now proposed greater amount of commercial, the type of commercial proposed is intended to serve the local residents and therefore the greater amount of commercial will serve to capture a greater amount of local residential trips and therefore would not generate a significant amount of additional traffic as compared to what was analyzed in the Lilac Hills Ranch traffic study. Therefore, no new significant cumulative impacts would occur.</p>
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While these comments are grounded in issues identified in the Project’s Draft Revised EIR, we intend for them to apply more broadly to development on rural County land along the Interstate 15 corridor in North County, such as the revived Merriam Mountains project. We encourage the County to consider these comments before taking additional action on the Project and in its general planning activities. The following discussion addresses the Golden Door’s concerns.

A. If the General Plan Is to Be Changed in this Region, the County Must Provide for Full Mitigation of Cumulative Impacts to Interstate 15 Causing or Contributing to the Predicted Level of Service “F” from SR-78 to Riverside County

The Draft Revised EIR’s cumulative impacts analysis for traffic is based on SANDAG’s Series 12 Year 2020 Transportation Model and evaluates the impacts from projects within a seven-mile radius. This analysis demonstrates cumulative impacts creating a Level of Service “F” on Interstate 15 from SR-78 all the way to Riverside County. The Project’s Draft Revised EIR discloses that both the Project and the planned revived Merriam Mountains Project will add an additional approximately 10 percent to the segment of Interstate 15 south of Deer Springs Road, which is projected to be at Level of Service “F” during peak hour when traffic from these two projects (plus other cumulative projects) is added. The Draft Revised EIR, however, states that the significant cumulative impacts to this stretch of Interstate 15 are unavoidable and no mitigation is available because of the lack of a Caltrans project into which the County could pay fair share fees. Moreover, commuters from Riverside County threaten to add even more trips to this stretch of Interstate 15, which may not be encompassed by the seven-mile radius for analysis.

In its discussion of mitigation, the Draft Revised EIR fails to consider how interchange improvements, freeway mainline widening, expansion of SANDAG’s BRT service further north on the Interstate 15 corridor, or fully and permanently funded frequent transit service by this development project could mitigate these impacts. In situations where a developer is adding substantially to significant adverse impacts, it is appropriate under the California Environmental Quality Act (“CEQA”) to consider whether the developer could or should finance all of the improvements to mitigate that impact, or whether there are County or regional funds available to build these mitigation improvements before the development is allowed to go forward. Simply considering a single “fair share” payment that will not actually build facilities, and then rejecting it due to the institutional inability of one agency to hold the funds for a period of time, does not appear to be an adequate discussion of mitigation under CEQA. For example, why can’t the County or SANDAG hold developer funds and ensure that needed Interstate 15 transportation improvements are built, before the County goes forward with allowing additional development?

Recent improvements to Interstate 15 include a BRT system, direct access ramps, improved transit centers, and new express lanes. These improvements, however, do not extend north of SR-78. The revenue constrained scenario of SANDAG’s RTP notes that a project for peak hour BRT from Temecula to downtown San Diego, connecting through Escondido, is scheduled for 2018. Moreover, the constrained scenario of the RTP indicates plans for four toll lanes extending north of SR-78 on Interstate 15 by 2050. In addition, the North County Transit

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B2-8 This comment is an introduction to the comments that follow. No further response is required.

B2-9 The traffic cumulative impact analysis is based on SANDAG’s Series 12 Year 2020 Transportation Model, which includes traffic from all cumulative projects identified in the County database and located within a seven-mile radius of the project site (an area covering Valley Center proper in the east to the City of Vista in the West). The model also includes additional ambient regional traffic growth, and inter-regional growth from adjacent counties including Riverside and Orange County.

Therefore, the 10 percent increase in traffic along I-15 referenced in the comment actually includes traffic from all of these land uses/regional growth; the comment is incorrect in stating that the proposed Lilac Hills Ranch project and the Newland Sierra project are solely responsible for the projected 10 percent increase in traffic on I-15 south of Deer Springs Road.

In fact, specific to the proposed Lilac Hills Ranch project, based on the project trip assignment, as documented in the select zone analysis included in Appendix K of the TIS, the Lilac Hills Ranch project is projected to contribute 4,052 ADT out of the total of 166,530 ADT, or 2.4 percent of the overall growth on I-15 south of Deer Springs Road.

As to the significant and unavoidable cumulative impacts to I-15 identified in the FEIR, please see Global Response: Significant and Unavoidable Impacts to I-15, for information responsive to the comment.

B2-10 Preliminarily, as noted in the prior response, project traffic would comprise approximately 2.4 percent of the overall growth on I-15 south of Deer Springs Road. Therefore, it is not accurate to state that the project is adding “substantially” to significant adverse impacts. Additionally, consistent with principles of “proportionality” and “nexus,” under a cumulative impact scenario, a project is responsible for only a fair-share towards the necessary mitigation. Please see Global Response: Significant and Unavoidable Impacts to I-15 for further information responsive to the comment.

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District's ("NCTD") existing bus route 388/389 and Riverside Transit Agency's ("RTA") existing bus route 217 run along the Interstate 15 corridor in North County but do not include stops between SR-78 and SR-76. Unfortunately, none of these improvements appear to provide for "stops" or "access" to the Project.

If the County were to decide that new urban development along the Interstate 15 corridor in North County is appropriate, the County should work with SANDAG, Caltrans, NCTD, RTA, and the San Diego Metropolitan Transit System to amend their transportation and growth management plans to ensure such new development contributes to expanded BRT options and additional managed lanes, transit centers, bus stops, and improved park and ride facilities to mitigate cumulative traffic impacts. The County should also consider whether amendments are needed to its Transportation Impact Fee program before it makes these changes to its General Plan.

If the County were to change its regional growth planning and convert rural land to additional urban development in this corridor, the County should encourage SANDAG and Caltrans to accelerate and expand planned projects on Interstate 15 in North County before new development, (such as the Lilac Hills Ranch project and the newly revived Merriam Mountains Project now included in the County's latest EIR, both of which increase density above levels contemplated in the SANDAG RTP) are allowed to proceed. With the impacts of the Project, the revived Merriam Mountains Project, and other cumulative projects, the traffic situation on Interstate 15 in North County will devolve into an unmanageable situation with Level of Service "F" as the County's EIR predicts.

Having this major freeway corridor at gridlock due to new development which would prevent fire evacuations along this key north south corridor should be completely unacceptable to everyone. Before making the decision regarding whether to amend regional growth and transportation plans, the County, SANDAG, and Caltrans should use the opportunity to determine whether they can provide transportation facilities to provide this crucial health and safety protection. Unfortunately, the Lilac Hills Ranch EIR prepared by the County simply predicts this dangerous situation of Level of Service "F," and then "throws up its hands" and does not even consider requiring developers adding trips to the freeway from their projects to provide facilities to prevent this predicted dangerous gridlock.

B. The Project Must Comply with Applicable Planning Documents

The RTP is a regional blueprint for a transportation system that meets the State's sustainable development planning priorities through 2050. It allocates funding across transportation priorities, including transit, highway improvements (consisting largely of HOV lane additions), and local roads. SB 375, which went into effect in 2009, requires that a SCS be prepared as part of the RTP to integrate land use and transportation planning in an effort to curb vehicle miles traveled and associated GHG emissions. SANDAG published its RTP/SCS in October 2011. SANDAG's SCS notes the following:

The path toward living more sustainably is clear: focus housing and job growth in urbanized areas where there is existing and

B2-11
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B2-12

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B2-11 The comment states that if the County were to decide that new urban development along the I-15 corridor is appropriate, the County should work with the regional transportation agencies to amend the related growth management plans to ensure new development contributes to related transportation improvements. The comment expresses the opinions of the commentator and 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, because the comment does not raise an issue specific to the analysis presented in the FEIR, no further response is required.

B2-12 The comment that the County should encourage SANDAG and Caltrans to accelerate and expand planned projects on I-15 expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see Global Response: Significant and Unavoidable Impacts to I-15 for additional information responsive to this comment.

B2-13 The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. As to the comment regarding the County "throwing up its hands," please see Global Response: Significant and Unavoidable Impacts to I-15 for information responsive to this comment.

B2-14 The comment is an introduction to comments that follow. No further response is required.

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planned transportation infrastructure, protect sensitive habitat and open space, invest in a transportation network that provides residents and workers with transportation options that reduce GHG emissions, and implement the plan through incentives and collaboration.

B2-14
cont.

SANDAG 2050 Regional Transportation Plan (Oct. 2011) at 3-2. It is important that new development along the Interstate 15 corridor in North County adhere to these smart growth principles and comply with the RTP/SCS. Because the Interstate 15 corridor in North County is not urbanized and lacks existing transit infrastructure, new development should consist of “transit-first” or even “transit-obligate” communities that make significant contributions to accelerating and expanding planned transit facilities and to creating a robust network of new transit opportunities.

B2-15

The RTP/SCS is based on SANDAG’s 2050 Regional Growth Forecast which bases its growth forecast through 2030 on adopted land use plans. *Id.* at 3-8 to 3-9. The County’s recently updated General Plan designates much of the land along the Interstate 15 corridor in North County as rural or semi-rural, including a semi-rural designation for the Project site.

B2-16

In addition, local planning documents emphasize the need for smart growth to reduce the GHG emissions associated with single-occupancy automobile-dependent development. The County General Plan embraces smart-growth communities and a multi-modal mass transit system, stating that “[t]he General Plan will reduce GHG emissions primarily through minimizing vehicle trips and approving land use patterns that support increased density in areas where there is infrastructure to support it, increased opportunities for transit, pedestrians, and bicycles, and through green building and land development conservation initiatives.” San Diego County General Plan at 1-16 (Aug. 2011).

B2-17

The Draft Revised EIR states that the Project would not conflict with the RTP/SCS. Appendix O at 83. Appendix O notes that the Project is located one-quarter mile from Interstate 15, which is a designated transit corridor. It does not, however, disclose information regarding access to transit on Interstate 15, including the location of any existing or planned transit stations. The Draft Revised EIR should specifically describe access to transit and transit corridors in detailing its RTP/SCS compliance. The Draft Revised EIR should further note what portion of the Project site is located within one-quarter mile of the Interstate 15 transit corridor and the distance to existing and planned transit facilities.

B2-18

The Draft Revised EIR notes the inclusion of interim private transit service and planned mass transit to the Project as well as the location of a park and ride facility at Gopher Canyon Road and Old Highway 395. The Draft Revised EIR should provide additional information describing the timeline for implementing mass transit and installing a transit stop and details regarding any efforts to improve or add park and ride facilities. For example, the Draft Revised EIR does not contain any details about how the developer will fund this “private transit” on a permanent basis, whether the transit service will be operating at the same time that new units are occupied, the frequency of service of this transit, the destination of this transit, or whether any consultant actually predicts that residents of the new development will use this transit service,

B2-15 The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Additional information was added to subchapter 3.1.4.1 of the Final EIR, to include a project consistency analysis with relevant policies of SANDAG’s Regional Transportation Plan (RTP) and its Sustainable Community Strategy (SCS). Information was also added to subchapter 3.1.4.1 pertaining to the Regional Comprehensive Plan (RCP) adopted by the SANDAG Board of Directors in 2004, which serves as a blueprint for the region’s future growth and development. SANDAG is currently working on an effort to merge the RCP with the 2050 RTP and the SCS. This effort is known as San Diego Forward: The Regional Plan and is scheduled for adoption in 2015. As explained in subchapter 3.1.4.1, the project would not be in conflict with the objectives of the 2050 RTP/SCS and RCP. Potential impacts associated with plans or policies would thus be less than significant. Please see response to comment B2-19 below for additional information specific to the project’s consistency with the RTP/SCS.

B2-16 The comment provides factual background information, but does not raise an environmental issue within the meaning of CEQA. The comment 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, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.

B2-17 As noted above in comment #11, the North County Transit District’s (“NCTD”) existing bus route 388/389 and Riverside Transit Agency’s (“RTA”) existing bus route 217 run along the I-15 corridor in North County. NCTD route 388/389 includes a stop at the SR-76 Park and Ride location.

Additionally, existing transit services and transportation demand management (TDM) facilities along the I-15 corridor that may provide opportunities for coordination include: RTA Route 217 commuter express between Hemet, Temecula, and Escondido; RTA Route 202 commuter express between Temecula and the Oceanside Transit Center, with a stop at the Park and Ride lot at I-15/SR-76; and the Caltrans operated Park and Ride located at I-15 and Gopher Canyon Road. (SANDAG Comments, p. 3.) Additionally, NCTD/MTS Route 610 peak period service is phased for year 2018 within the 2050 RTP/SCS. (As referenced in SANDAG comment letter dated July 28, 2014, p. 3.)

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given frequency of service, accessibility, and travel times. For example, will the private transit connect with SANDAG’s transit centers in Escondido and Sabre Springs which allow connections to other services in the SANDAG transit system? In addition, the Draft Revised EIR should analyze any improvements at the park and ride planned by the developer, as well as whether there is sufficient parking capacity now or in the future at this location.

B2-18
cont.

Finally, the Draft Revised EIR notes that the mitigated Project would achieve vehicle emissions reductions of 14.8 percent in 2020 and 14.6 percent in 2035 when compared to the unmitigated project. It does not, however, account for the density increase over the land use plans on which SANDAG based its RTP/SCS forecasts. The Draft Revised EIR states that “vehicle emissions were modeled in CalEEMod for the proposed projects land uses and include the same vehicles classes as those used in the SCS and to derive the SB 375 targets.” Appendix O at 83. By basing this analysis on the “proposed projects land uses,” the Draft Revised EIR presumes a higher density than that used for the RTP/SCS forecasts. It is unclear, then, how the measurement of vehicle emissions reductions for an increased density project is not inconsistent with the RTP/SCS, which was based on lower density development in the area. Consequently, further analysis is required to determine RTP/SCS compliance.

B2-19

From our conversations with SANDAG staff, we believe that a key assumption of the adopted RTP/SCS for the San Diego Region was that there would not be expanded urban development up and down the Interstate 15 corridor in North County. As a result, they did not provide for the extension of BRT or other transit service to this area. We ask that the County consult with SANDAG staff prior to reaching any conclusion of “consistency” with SANDAG’s adopted plans, which were based on the existing rural development along Interstate 15 in North County and did not consider all the newly proposed urban projects on this corridor.

B2-20

C. The County Should Analyze the Project’s Traffic Impacts to Deer Springs Road

As noted above, the Golden Door is particularly concerned with cut-through traffic on Deer Springs Road traveling between Interstate 15 and SR-78 that seeks to find a way through San Marcos’ limited surface streets to avoid, at peak hour, the gridlocked Interstate 15/SR-78 Interchange and congested SR-78 headed west bound. At the present time, the Golden Door believes the large majority of traffic on Deer Springs Road are drivers from out of the area seeking a faster or shorter way around the congested Interstate 15/SR-78 interchange.

B2-21

With the County’s projection in its Draft Revised EIR that Interstate 15 will reach Level of Service “F” and be extremely congested for many hours of the day, (and with the Lilac Hills Ranch and revived Merriam Mountains Project contributing approximately 10 percent of the additional traffic to Interstate 15 at Deer Spring Road), many more motorists will be encouraged to “flee the freeway” and find any surface street that can provide an alternative. (We believe that Newland is studying the existing Deer Springs Road cut-through traffic at this time for its revived Merriam Mountains project, and may have more information to provide to the County on this point.) Simply put, this County EIR’s prediction for the future seems to be recipe for driving a high volume of traffic off the 15 to cut through Deer Springs Road and the City of San

B2-22

B2-17 (cont.)

Portions of the project site would be located less than one-half mile from the I-15 corridor. To facilitate resident access to I-15 transit services and TDM facilities, the project would provide project residents with a private on-demand transit service to nearby transit hubs. (See Lilac Hills Ranch Specific Plan (June 2014) Section III, Development Standards and Regulations (Specific Plan), pp. III-11 to III-12.) This privately operated transit service would be funded through homeowner association (HOA) fees, would be available to all project residents, and would provide residents with a connection between the project site and nearby transit hubs, such as those planned near the I-15/Gopher Canyon Road interchange or I-15/SR-76 interchange.

Please see response to comment B2-19 below for additional information specific to the project's consistency with the RTP/SCS.

B2-18

The private transit service referenced in the comment, and described in the preceding response, would be part of the project, as described in the Lilac Hills Ranch Specific Plan, Development Standards and Regulations. (See Specific Plan, Section III, “Transportation Demand Management”) The project would provide the interim private transit service in order to facilitate transit use by connecting residents to nearby regional transit hubs. The private transit service would be available to project residents and would provide a connection between the project site and nearby transit hubs, such as those located at the I-15/SR-76 interchange. Connections to the transit centers in Escondido and Sabre Springs referenced in the comment also could be provided depending on demand.

The privately operated transit service would be funded through HOA fees, with rides subsidized on commercially available services, such as taxis and/or shuttle vans. The service would operate on an as-needed basis, with pick-ups and drop-offs scheduled at a central location within the project site. The service would be provided upon build-out of the community and would terminate when transit service is provided by the local transit district.

The service could be supplemented by providing subsidized transit passes, and/or providing coordination/support of a car-sharing system or shuttle services with volunteer drivers similar to the designated drivers sponsored by the Independent Transportation Network.

	<p>B2-19 The project's consistency with SB 375 and SANDAG's 2050 RTP/SCS is addressed in subchapter 3.1.2, Greenhouse Gas Emissions, of the FEIR. Several qualitative and quantitative factors inform the FEIR's conclusion that the project is consistent with that legislative framework and the regional implementing plan:</p> <ul style="list-style-type: none"> • The project is consistent with the applicable goals and policies of SANDAG's 2050 RTP/SCS; • The project locates a range of housing types, services and jobs in a compact pattern of development located within a half-mile from diverse neighborhood assets, thereby: <ul style="list-style-type: none"> ○ Encouraging non-vehicular travel, including pedestrian and bicycle movement, ○ Reducing the size of required infrastructure improvements, ○ Capturing 22 percent of all daily vehicle trips, keeping them internal to the project site, and ○ Reducing vehicle miles traveled by approximately 5.9 percent. • The project's trip lengths would be shorter than the existing trip lengths identified for the Valley Center Community by the County's General Plan and SANDAG's 2050 RTP/SCS; • The project site is located one mile from I-15, which is identified by SANDAG's 2050 RTP/SCS as a High Quality Transit Corridor in 2050; and • The project would achieve a 20.7 percent reduction in vehicle emissions in 2020, and a 35.5 percent reduction in 2030, and a 39.6 percent reduction in 2050 under the County's methodology for quantifying and assessing GHG emissions. <p>Also, although the project site is not identified by SANDAG in the 2050 RTP/SCS (see Figures 3.2 and 3.3) as a location for suburban development during the 2020 and 2035 horizon years, the project site is identified by the 2050 RTP/SCS (see Figure 3.4) for single-family residential development in the 2050 horizon year; however, the density is based on the existing General Plan designations. The exclusion of the project site from the 2020 and 2035 forecasted land use development patterns contained in the 2050 RTP/SCS is not dispositive of the project's consistency with SB 375, particularly as the Government Code explicitly provides that sustainable communities strategies do not control or regulate the use of land. Rather, as provided in the FEIR and summarized above, it is appropriate and reasonable to consider the</p>
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	<p>B2-19 (cont.) project’s consistency with policies set forth in SB 375 and the 2050 RTP/SCS, as well as the project’s relationship to the reduction targets identified by CARB for the region.</p> <p>B2-20 While SANDAG’s forecasted development pattern may not include development on the project site at the density proposed in 2020 or 2035, as discussed above in response to comment B2-19, SANDAG’s RTP/SCS does not regulate the use of land. Further, as also addressed in the prior response and subchapter 3.1.2 of the FEIR, the CEQA analysis for the project demonstrates that – even though the project is not included in SANDAG’s forecasted development pattern – the project is consistent with the GHG reduction policy goals, objectives and targets established for the region pursuant to SB 375 by CARB and SANDAG.</p> <p>Nonetheless, as requested by SANDAG in its comments submitted on the project, the County has coordinated and will continue to coordinate with SANDAG on future updates of the Smart Growth Concept Map to ensure that the map accurately reflects the County’s vision for future growth. (See SANDAG Comments, July 28, 2014, Comment Number 4.)</p> <p>B2-21 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, which takes into consideration existing travel patterns. (See TIS Appendix K.)</p> <p>It is correct that motorists use Deer Springs Road (and other County roadways) to avoid congestion on I-15 and SR 78. However, during its trip assignment process, the SANDAG model accounts for the congestion delay on I-15. Therefore, the analysis presented in the FEIR accounts for the fact that some current and future traffic would utilize Deer Springs Road as a “cut through” route.</p> <p>B2-22 Preliminarily, there is no evidence that I-15 will be for many hours of the day” as stated in the comment. Consistent with Caltrans guidelines, the TIS analysis of the project’s potential impacts to I-15 was conducted as a peak hour analysis, which focuses on the limited AM (7:00 to 9:00) and PM (4:00-6:00) peak hour levels of service, typically the most congested hours of the day. (See TIS, p. 21.) Therefore, the LOS F</p>
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Marcos, since at LOS "F," Interstate 15 will be impassable under the County's projections for traffic.

B2-22
cont.

The Project's Traffic Impact Study's ("TIS") analysis methodology states that it analyzes all roadway segments for which the Project adds 50 or more peak hour trips, County Mobility Element roadways or intersections for which the Project adds 25 or more peak hour trips, and freeway entrance and exit ramps where the Project will add a significant number of trips or cause traffic queues. Appendix E at 16. The Draft Revised EIR and accompanying TIS do not evaluate traffic impacts to Deer Springs Road or impacts at the Deer Springs Road/Interstate 15 interchange, even though this will probably be a significant additional traffic impact. We believe that the County has mistakenly concluded that the Project will contribute less than 50 peak hour trips to Deer Springs Road, and less than 25 peak hour trips to Deer Springs Road/Mesa Rock Road and other intersections by failing to consider this "cut-through" traffic and model traffic on a regional basis under LOS "F" conditions. Before proceeding further with this Draft Revised EIR, the TIS study area should be expanded to consider these impacts on Deer Springs Road as an alternate "desperation" route caused by increased congestion on Interstate 15. There are a variety of traffic methodologies available for this type of analysis, and our own traffic consultants can provide them to County staff if necessary.

B2-23

Because of the complex relationship of Deer Springs Road to impacted traffic on Interstate 15, the Draft Revised EIR should evaluate impacts on Deer Springs Road or explain how it was determined that the Project would not add 25 or more peak hour trips to Deer Springs Road or its intersections and how it was determined that the Project would not cause a significant number of trips or cause traffic queues at the Deer Springs Road/Interstate 15 interchange. The County's TIS should clearly account for both Project and cumulative cut-through traffic between Interstate 15 and SR-78 using Deer Springs Road in its analysis, since this seems to be the only means by which the County can assess these regional and cumulative effects as it proceeds to consider major revisions to its General Plan for the extension of multiple urban developments in the Interstate 15 corridor in North County on a project-by-project basis.

B2-24

D. The Draft Revised EIR Should Describe the Data and Methodology Used to Analyze Cumulative Traffic Impacts from the Revived Merriam Mountains Project

The TIS evaluates the "Sierra" Project as a 2,100 residential unit project with a small amount of commercial development. Appendix E at 229. The "Sierra" Project by Newland is a revival of the Merriam Mountains Project that was rejected by the County Board of Supervisors in 2010. Because the renewed Merriam Mountains Project would be located just across Deer Springs Road, the Golden Door has been following it closely. We are not sure what, if anything, has been changed to address the concerns of the Supervisors who voted to reject the project. The Golden Door opposed the original Merriam Mountains Project, and to date we have seen nothing from Newland that corrects or improves that proposed project; consequently, the Golden Door continues to oppose it.

B2-25

It is our understanding that Newland has yet to file an application for the project, though it has chosen to hold public meetings this week to present its project to the community as

B2-26

B2-22 (cont.)

conditions identified in the TIS on the I-15 under future long-term conditions is limited to the daily peak hours. The Lilac Hills Ranch project, would add only approximately 2.4 percent of the overall growth on I-15 south of Deer Springs Road. The Merriam Mountains project is a separate project that was considered as part of the cumulative analysis and will, if it goes forward, be the subject of a separate traffic impact analysis for public review and County consideration.

As to the matter of "cut through" traffic referenced in the comment, please see the response to comment B2-21 above.

The Newland Sierra project traffic study is still in draft form and has not been accepted by Planning & Development Services.

B2-23 The I-15/Deer Springs Road interchange is a Caltrans controlled facility. Based on the *Caltrans Guide for the Preparation of Traffic Impact Studies*, all state facilities in which a project contributes 50 or more peak hour trips in either direction should be included as a part of the project study area. However, based upon the select zone analysis conducted using the SANDAG Series 12 Transportation Model, which, as noted in response to comment B2-21, takes into consideration existing travel patterns including cut through traffic, under a worst case scenario, the project would contribute approximately 2 percent (or 18 peak hour trips) in the eastbound (EB) direction at the I-15/Deer Springs Road interchange. Thus, this interchange, does not meet the Caltrans criteria to be included as part of the project study area. (The City of San Marcos also utilizes a 50 peak hour trip threshold for study area inclusion.) In light of the limited number of trips the project would add to the interchange, there is no evidence that the project would "probably" result in a significant impact at the interchange as the comment states.

As to Deer Springs Road, and the Deer Springs Road/Mesa Rock intersection, Deer Springs Road was not included within the TIS study area because the proposed project would add less than 25 peak hour trips to the roadway; 25 trips is the County's threshold for inclusion in the study area. See Attachment to this letter, Chen Ryan Memorandum, Deer Springs Road. . In other words, the project would not contribute a sufficient number of vehicle trips to Deer Springs Road to warrant inclusion of Deer Springs Road in the analysis study area. Please also see response to comment A6-2, City of San Marcos letter (July 28, 2014), for additional information responsive to this comment.

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	<p>B2-23 (cont.) Thus, based on standard engineering practices utilized by traffic engineers throughout San Diego County, the project would not add a sufficient amount of traffic to these other locations to warrant expansion of the study area.</p> <p>B2-24 Please see response to comments B2-21 through B2-23 above for information responsive to the comment.</p> <p>B2-25 The commentator's opposition to the Merriam Mountains project is noted. The comment will be included in the record and made available to the decision makers prior to a decision on the proposed Lilac Hills Ranch project.</p> <p>As to the TIS inclusion of the Merriam Mountains project as a cumulative project, please see response to comment B2-7 above.</p> <p>B2-26 As explained above in response to comment B2-7, the cumulative project data used in the project TIS was gathered from the San Diego County Public Information database, which includes the most recent information submitted to the County of San Diego regarding the proposed Merriam Mountains project. (https://publicservices.sdcounty.ca.gov/citizenaccess/)</p>
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described in the attached Union Tribune news article. Unfortunately, while Newland has announced that it has revived the Merriam Mountains Project, it has not provided any traffic information to the public to confirm whether or not the traffic data given to the County for the County's Lilac Hills Ranch Draft Revised EIR matches the newly revived Merriam Mountains Project now announced to the public.

B2-26
cont.

The County's TIS included in this Draft Revised EIR should describe the traffic data and methodology used by County staff to analyze cumulative impacts from the revived Merriam Mountains/"Sierra" Project. The TIS should also account for any regional trips to any retail stores, schools, or other amenities that would be included as part of the revived Merriam Mountains/"Sierra" Project, not just trips from the planned 2,100 housing units. As described in the attached news article, Newland appears to be planning a regional shopping center to serve the Twin Oaks area and the broader Interstate 15 corridor in North County as part of its project.

B2-27

In conclusion, we encourage the County to consider each of the above-stated concerns in conducting environmental review of this Project. Unfortunately, this seems to be the only method available for the County to consider the cumulative impact of multiple amendments to its General Plan to allow this Project and the revived Merriam Mountains Project to convert rural land to expanded urban development up and down the Interstate 15 corridor in North County, in conflict with SANDAG's adopted RTP and SCS plans.

B2-28

Sincerely,

Christopher Garrett

Christopher W. Garrett
of LATHAM & WATKINS LLP

Enclosure

cc: Kathy Van Ness, Golden Door
Jeff Dawson, Golden Door
Stephanie Saathoff, Clay Co.
Maddy Kilkenny, Clay Co.
Mark Slovick, County of San Diego
Jacob Armstrong, Caltrans
Michael Pickford, Caltrans
Charles "Muggs" Stoll, SANDAG
Elisa Arias, SANDAG

B-27 As noted in the previous response, information regarding the Merriam Mountains project that was included in the cumulative impact analysis is based on the most recent information submitted to the County of San Diego. Please see response to comment B2-7 for additional information responsive to this comment.

B2-28 The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Each of the referenced concerns have been addressed in the preceding responses and no further response is required.

DEER SPRINGS AREA AGAIN SITE FOR LARGE PROPOSED DEVELOPMENT

Merriam Mountains plan in same spot rejected in 2010; workshops set for this week

By Teri Figueroa (/staff/teri-figueroa/) 5:05 a.m. July 20, 2014

More than four years after the county narrowly rejected the proposed Merriam Mountains master-planned community north of San Marcos, a different developer is introducing a slimmed-down plan to build more than 2,100 homes at the rural site.

The new proposal would have 20 percent fewer homes than the earlier version, but will likely face the same opposition from residents concerned about traffic, fire protection, water and the impact on the rural character of the area.

The developer, San Diego-based Newland Real Estate Group, is holding two public workshops this week — one Tuesday and a repeat on Wednesday — in San Marcos to reach out to the community about the project.

"We are very excited to share our plan with the public and get their input," Newland Senior Vice President Rita Brandin said Friday.

Brandin said the proposed project "protects the rural character of the area," but will also provide needed amenities — including a school and grocery store — and feature one of the largest privately created preserves in the county.

The new master-planned project is unnamed; the working title is Newland Sierra. It's at the same spot as the huge Merriam Mountains proposal that was derailed in early 2010 when the county board of supervisors rejected it, 3-2.

The Newland plan is still in the early stages — nothing is on file with the county planners yet. It differs from the Merriam Mountains plan in several ways:

- The old project pitched about 2,630 residences; the new one envisions about 2,135 homes.
- The old plan called for about 110,000 square feet of commercial uses and a fire station. The new project sets aside 81,000 square feet for commercial uses, such as a grocery store, and swaps out the fire station for a school.
- Both projects included about 1,200 acres for a preserve. That's about the footprint of Balboa Park, including the zoo.
- The Merriam Mountains plan encompassed more than 2,300 acres. The new version is about 1,983 acres, and only 380 acres would be developed. That land is all on the south side of the project; the northern end would be set aside as the preserve.

Newland's project would include about 6.5 miles of trails and eight parks, including one that's about 6 acres.

About 64 percent of the houses would be single-family homes; the rest would be townhomes. There are no apartments or condos in the project.

The developer has already reached out to some people who opposed the Merriam Mountains project, and has encountered much of the same reaction.

"I frankly don't know anyone who is happy," said 85-year-old Joan Van Ingen, a Champagne Village resident.

A former board member of the Deer Springs Fire Protection District, Van Ingen said her neighbors fear the impact on traffic in case a wildfire forces evacuations in the area.

On the south side of Deer Springs Road sits the Golden Door resort and spa, which lobbied against the Merriam Mountains project. Chief Operating Officer Kathy Van Ness said in an email Friday that the company is committed to the preservation and sustainability of its property, and "will continue to be vigilant about anything that is proposed."

"We are very concerned about what thousands of new residents in this area would mean to the unique community character here, as well as the impacts on resources," Van Ness said.

Not everyone is against the project. Longtime North County resident Kelly Crews said she would welcome the development — and the grocery store it could bring.

<http://www.utsandiego.com/news/2014/jul/20/tp-deer-springs-area-again-site-for-large/all/?print>

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"I understand that there is going to be impact, and I want that stuff to be addressed, but I am looking forward to it," said Crews, who has lived on the north end of Twin Oaks Valley Road for about five years.

Brandin said the company is addressing the concerns head-on, working with fire, water and transportation officials.

She also noted that the project includes large swaths of cleared defensible space surrounding each community.

There are also talks tackling traffic congestion, and discussions about improvements to streets in the area, including those leading toward the project.

Newland Real Estate Group acquired the property in 2011, along with North America Sekisui House, or NASH, a subsidiary of Japan's largest homebuilder. The land was part of a portfolio of 28 master-planned communities in 15 markets in 11 states that the two entities acquired. Newland's 4S Ranch and Torrey Hills in Carmel Valley were also part of the purchase.

Although no formal application is filed with the county yet, a county spokesman said planners have met with the developer to discuss general issues that could come up for review.

Brandin said the soonest Newland will file a formal application is January, with a slim chance that the project could come before the board of supervisors at the end of 2016. The soonest the first home would go up would be 2020.

The rural Interstate 15 corridor north of Escondido is looking at another large development, this one proposed on the east side of the freeway. The Lilac Hills Ranch project would see more than 1,700 homes built in a 608-acre project in the westernmost portion of Valley Center, about two miles east of Interstate 15 and Old Highway 395.

Brandin is hoping people will look anew at the Newland proposal, and not think of it as a sort of Merriam Mountains 2.0.

"That was a different time," Brandin said, "and a different plan."

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MEMORANDUM

TO: Mr. Jon Rilling, Accretive Investments, LLC
FROM: Monique Chen, PE
Phuong Nguyen, PE
DATE: November 21, 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 are 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 of the Revised TIS.

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 to SR-78.

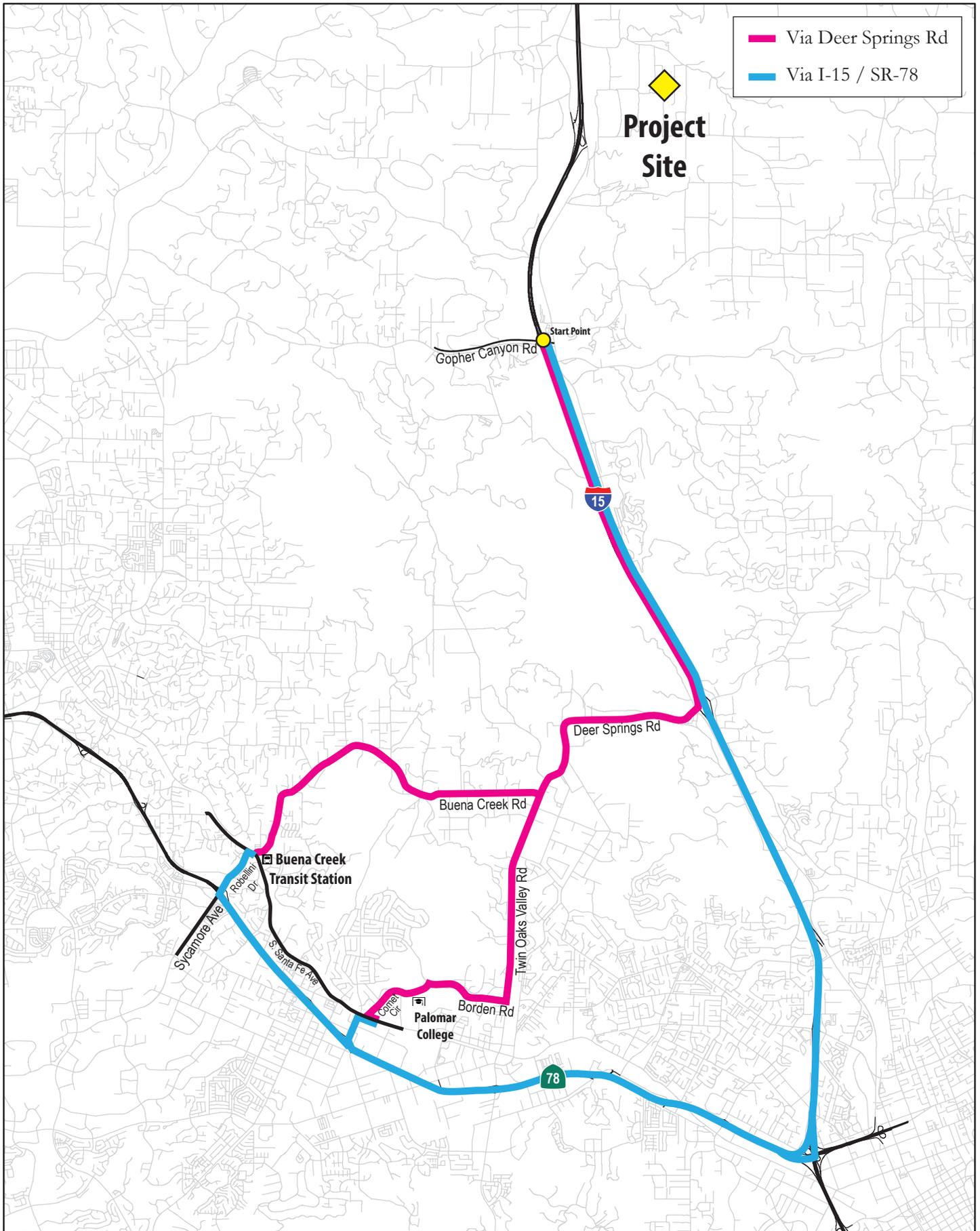
Travel Time Study

Based on the project traffic engineering 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, City of San Marcos and Palomar College would utilize Deer Springs Road and not I-15 to SR 78. Because professional engineering judgment is typically applied when reviewing a SANDAG Select Zone Assignment for accuracy, 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 to determine the likely percentage of project trips that would use the Deer Springs Road route as compared to the I-15/SR-78 route. The I-15 SB On-Ramp @ Gopher Canyon Road interchange was chosen as the common starting point for both routes. **Figure 1** displays the project study area including the routes selected for the travel time study. A total of 50 runs were conducted between October 6, 2014 and October 15, 2015 (23 during the AM peak hours and 27 during the PM peak hours). Travel time results are provided in **Table 1**.

As shown in Table 1, the average travel time to/from the Buena Creek Transit Station via Deer Springs Road is about 10% lower (faster) than via the I-15 / SR-78 route. However, the average travel time to/from Palomar College via Deer Springs Road is actually about 18% higher (slower) than via the I-15 / SR-78 route. Overall, the travel times are similar.

Based on the data provided in Table 1, 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 Road route. Therefore, 1.6% of the project trips on Deer Springs Road (50% of 3.2%) were shifted to the I-15 / SR-78 route.

The number of peak hour project trips 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. **Figure 2** displays the project trip distribution and peak hour trips assignment along Deer Springs Road. As shown on Figure 2, 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. These numbers were calculated by multiplying the total number of project external AM peak hour trips (1,171) by 1.6%, which equals 19; and, multiplying the total number of project external PM peak hour trips (1,433) by 1.6%, which equals 23.



**TABLE 1
TRAVEL TIME STUDY RESULTS**

Run	Date	From	To	Start Time	End Time	Travel Time	Note
Palomar College via Deer Springs Road							
1	10/6/2014	Gopher Canyon Rd	Palomar College	8:36 AM	8:55 AM	18 minutes 47 seconds	-
2	10/6/2014	Gopher Canyon Rd	Palomar College	5:02 PM	5:21 PM	18 minutes 27 seconds	-
3	10/6/2014	Palomar College	Gopher Canyon Rd	5:24 PM	5:47 PM	22 minutes 16 seconds	-
4	10/14/2014	Gopher Canyon Rd	Palomar College	8:34 AM	8:57 AM	23 minutes 58 seconds	-
5	10/14/2014	Palomar College	Gopher Canyon Rd	9:00 AM	9:19 AM	19 minutes 6 seconds	Data was not accepted due to construction
6	10/14/2014	Gopher Canyon Rd	Palomar College	4:00 PM	4:19 PM	19 minutes 9 seconds	-
7	10/14/2014	Palomar College	Gopher Canyon Rd	4:27 PM	4:58 PM	31 minutes 44 seconds	-
8	10/15/2014	Gopher Canyon Rd	Palomar College	7:42 AM	8:11 AM	29 minutes 0 second	-
9	10/15/2014	Palomar College	Gopher Canyon Rd	8:26 AM	8:46 AM	20 minutes 21 seconds	-
10	10/15/2014	Gopher Canyon Rd	Palomar College	8:48 AM	9:06 AM	18 minutes 32 seconds	-
11	10/15/2014	Gopher Canyon Rd	Palomar College	4:46 PM	5:04 PM	18 minutes 30 seconds	-
12	10/15/2014	Palomar College	Gopher Canyon Rd	5:06 PM	5:31 PM	25 minutes 40 seconds	-
13	10/15/2014	Gopher Canyon Rd	Palomar College	5:33 PM	6:01 PM	28 minutes 5 seconds	-
Average Travel Time						22 minutes 52 seconds	-
Palomar College via I-15 / SR-78							
14	10/6/2014	Gopher Canyon Rd	Palomar College	8:18 AM	8:38 AM	19 minutes 34 seconds	-
15	10/6/2014	Gopher Canyon Rd	Palomar College	5:00 PM	5:20 PM	19 minutes 54 seconds	-
16	10/6/2014	Palomar College	Gopher Canyon Rd	5:36 PM	5:55 PM	19 minutes 0 seconds	-
17	10/14/2014	Gopher Canyon Rd	Palomar College	8:30 AM	8:48 AM	18 minutes 56 seconds	-
18	10/14/2014	Palomar College	Gopher Canyon Rd	8:50 AM	9:08 AM	18 minutes 22 seconds	-
19	10/14/2014	Gopher Canyon Rd	Palomar College	4:00 PM	4:19 PM	19 minutes 51 seconds	-
20	10/14/2014	Palomar College	Gopher Canyon Rd	4:20 PM	4:44 PM	24 minutes 31 seconds	Data was not accepted due to accident
21	10/15/2014	Gopher Canyon Rd	Palomar College	7:43 AM	8:03 AM	20 minutes 32 seconds	-
22	10/15/2014	Palomar College	Gopher Canyon Rd	8:05 AM	8:23 AM	17 minutes 51 seconds	-

**TABLE 1
TRAVEL TIME STUDY RESULTS**

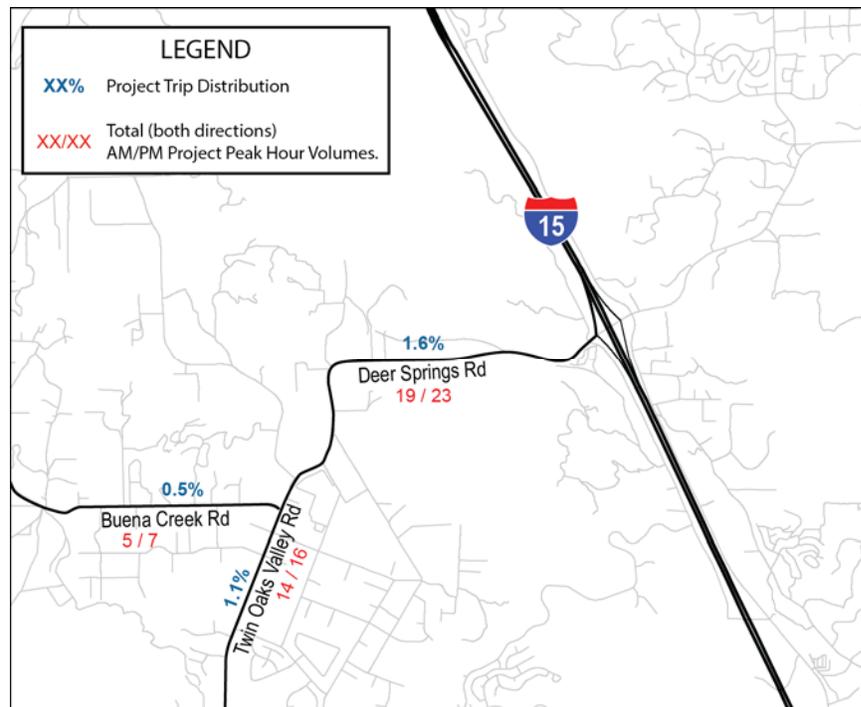
Run	Date	From	To	Start Time	End Time	Travel Time	Note
23	10/15/2014	Gopher Canyon Rd	Palomar College	8:24 AM	8:43 AM	18 minutes 58 seconds	-
24	10/15/2014	Palomar College	Gopher Canyon Rd	8:45 AM	9:04 AM	19 minutes 28 seconds	-
25	10/15/2014	Gopher Canyon Rd	Palomar College	4:57 PM	5:15 PM	18 minutes 20 seconds	-
26	10/15/2014	Palomar College	Gopher Canyon Rd	5:26 PM	5:43 PM	17 minutes 30 seconds	-
Average Travel Time						19 minutes 1 second	-
Buena Creek Transit Station via Deer Springs Road							
27	10/6/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:36 AM	8:01 AM	24 minutes 53 seconds	-
28	10/6/2014	Gopher Canyon Rd	Buena Creek Transit Station	4:00 PM	4:16 PM	15 minutes 29 seconds	-
29	10/6/2014	Buena Creek Transit Station	Gopher Canyon Rd	4:39 PM	4:57 PM	18 minutes 0 seconds	-
30	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:40 AM	8:02 AM	22 minutes 49 seconds	-
31	10/14/2014	Buena Creek Transit Station	Gopher Canyon Rd	8:12 AM	8:27 AM	15 minutes 23 seconds	-
32	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	5:00 PM	5:16 PM	16 minutes 38 seconds	-
33	10/14/2014	Buena Creek Transit Station	Gopher Canyon Rd	5:20 PM	5:48 PM	28 minutes 41 seconds	-
34	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	5:50 PM	6:04 PM	14 minutes 9 seconds	-
35	10/15/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:02 AM	7:19 AM	22 minutes 49 seconds	-
36	10/15/2014	Buena Creek Transit Station	Gopher Canyon Rd	7:22 AM	7:37 AM	15 minutes 18 seconds	-
37	10/15/2014	Gopher Canyon Rd	Buena Creek Transit Station	4:01 PM	4:17 PM	16 minutes 17 seconds	-
38	10/15/2014	Buena Creek Transit Station	Gopher Canyon Rd	4:21 PM	4:44 PM	23 minutes 15 seconds	-
Average Travel Time						19 minutes 28 seconds	-
Buena Creek Transit Station via I-15 / SR-78							
39	10/4/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:36 AM	8:01 AM	24 minutes 41 seconds	-
40	10/4/2014	Gopher Canyon Rd	Buena Creek Transit Station	4:00 PM	4:26 PM	25 minutes 42 seconds	Data was not accepted due to accident

**TABLE 1
TRAVEL TIME STUDY RESULTS**

Run	Date	From	To	Start Time	End Time	Travel Time	Note
41	10/4/2014	Buena Creek Transit Station	Gopher Canyon Rd	4:31 PM	4:53 PM	21 minutes 55 seconds	-
42	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:42 AM	8:06 AM	24 minutes 2 seconds	-
43	10/14/2014	Buena Creek Transit Station	Gopher Canyon Rd	8:10 AM	8:28 AM	18 minutes 2 seconds	-
44	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	4:47 PM	5:08 PM	21 minutes 18 seconds	-
45	10/14/2014	Buena Creek Transit Station	Gopher Canyon Rd	5:09 PM	5:47 PM	37 minutes 34 seconds	Data was not accepted due to accident
46	10/14/2014	Gopher Canyon Rd	Buena Creek Transit Station	5:52 PM	6:15 PM	22 minutes 37 seconds	-
47	10/15/2014	Gopher Canyon Rd	Buena Creek Transit Station	7:00 AM	7:18 AM	18 minutes 30 seconds	-
48	10/15/2014	Buena Creek Transit Station	Gopher Canyon Rd	7:19 AM	7:38 AM	19 minutes 24 seconds	-
49	10/15/2014	Gopher Canyon Rd	Buena Creek Transit Station	4:00 PM	4:18 PM	18 minutes 46 seconds	-
50	10/15/2014	Buena Creek Transit Station	Gopher Canyon Rd	4:25 PM	4:51 PM	26 minutes 53 seconds	Data was not accepted due to accident
Average Travel Time						21 minutes 37 seconds	-

Source: Chen Ryan Associates, October 2014

FIGURE 2
PROJECT TRIP DISTRIBUTION & ASSIGNMENT



Source: Chen Ryan Associates, November 2014

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 project traffic than Deer Springs Road), should not be included as part of the project study area.

Lastly, while the travel times presented in this memorandum are based on current conditions, it is reasonable to expect that comparable conditions would exist at project buildout. This is due in part to the fact that the project would add only about 4,000 additional ADT to the I-15, an increase of approximately 3% over today's traffic levels. As such, the addition of project traffic is not expected to greatly affect travel times on the freeway. Relatedly, traffic volumes on Deer Springs Road, like I-15, are expected to increase over time. Thus, a new equilibrium would be reached between the two roads such that it is likely that the same, or similar, 50/50 project traffic split would continue into the future.