

LETTER

RESPONSE

Letter I51n

August 16, 2013

To: Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
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(858) 495-5172

Subject: DEIR Public Comments Regarding Traffic Related Land Use, Safety and Mobility Element General Plan Consistency Comment with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

Please find below the following General Plan Consistency Comments with respect to Traffic related Land Use, Safety and Mobility General Plan Policies.

The verbatim policy is provided in quotations and our comments are the immediately following paragraph.

Comments on Consistency with Traffic, Road Design and Safety Aspects of the San Diego County August 3, 2011 General Plan Policies

Land Use Element Policies

LU-2.9 Maintaining Rural Character:

“Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.”

Consistency Analysis – The proposed Lilac Hills Ranch (LHR) Project is inconsistent with this policy in the following areas. The LHR Project proposes addition of Internal Urban density roads with on-road parking lanes that are inconsistent with maintaining the rural character of surrounding Rural Land Uses

LU-12.2 Maintenance of Adequate Services:

I51n-1

I51n-2

I51n-3

I51n-1 As detailed in the responses to follow, the project is consistent with all applicable General Plan policies.

I51n-2 The project is consistent with Policy LU-2.9 and M-2.1. The project will provide road improvements as outlined in the FEIR subchapter 2.3 and the Traffic Impact Study. The project does not propose on-road parking lanes. The project does not add any travel lanes to a Mobility Element road within the project boundaries or elsewhere. As described in subchapter 1.2.1.4 of the FEIR, the internal roads within the project will be private and will not be maintained by the County. Private roads are not Mobility Element roads. The County General Plan defines Mobility Element roads to be those roads that “are County-maintained roads shown on the Mobility Element map and adopted in the General Plan... The Mobility Element displays these roads showing both the road classification and its general alignment.” (County General Plan, Mobility Element, page 4-5; see County General Plan, Mobility Element Table M-1b.)

While the project will make some improvements to a short segment of Covey Lane, that Lane is not listed as a Mobility Element Road in the General Plan. (See County General Plan Mobility Element Network Appendix – Valley Center Community Planning Area Matrix.) Further, while the project will make some improvements to portions of West Lilac Road, including adding some intermittent turn pockets, that road will remain classified only as a 2-lane Light Collector under the General Plan, and no new travel lanes will be added to the classified road. (See subchapters 1.2.1.4 and 2.3.5.1 of the FEIR.) In addition, the project includes an amendment to the General Plan’s Mobility Element to redesignate West Lilac Road from its existing current classification as a Light Collector with intermittent turn lanes (2.2C) to a Light Collector with reduced shoulder (2.2F) from Main Street to the mapped Road 3. These changes are to address community character considerations. (FEIR subchapter 3.1.4.2.) Accordingly, the project is consistency with Policy M-2.1.

I51n-3 The comment states the project is inconsistent with certain General Plan policies and specifically refers to the project proposal to downgrade W. Lilac Road from the project entrance at Main Street to the planned Road 3 (Running Creek Road) from a 2.2C to a 2.2F road. However, approval of the proposed project would include a General Plan Amendment to the Mobility Element that would correspondingly

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“Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.”

Consistency Analysis – The proposed Lilac Hills Ranch (LHR) Project is TOTALLY inconsistent with this policy in the following areas. *The project proposes to downgrade W. Lilac Road between Main Street and the planned Road 3 from the classified 2.2C to 2.2F.* The LHR Project proposes placing an additional automobile load of 20,000 Average Daily Trips on the surrounding roadways more than the adopted General Plan approved uses.

The LHR Project increases traffic on local Private and Public Roads approximately **15 times** greater than from the traffic generated by the approved General Plan

At build out the LIIR Project Traffic Load exacerbates cumulative road capacity in the surrounding areas with the numerous unmitigated impacts:

2.3.S. 1 Significant Direct Impacts:

The project would have significant direct impacts to each of the road segments listed below. The mitigation for each impact is also listed, as well as the conclusion as to whether the impact would be mitigated.

- Gopher Canyon Road, between E. Vista Way and I-15 SB: No feasible mitigation. Impact would remain significant and unavoidable.
- E. Vista Way, between Gopher Canyon Road and Osborne Street: No feasible mitigation. Impact would remain significant and unavoidable.
- E. Vista Way, between SR-76 and Gopher Canyon Road: No feasible mitigation. Impact would remain significant and unavoidable.
- West Lilac Road, between Old Highway 395 and Main Street: Impact would be mitigated through improvement of the road segment to Mobility Element Road Classification 2.2C, subject to exceptions as approved by the County. Impacts would be reduced to less than significant and the project would have a significant

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I51n-3 (cont.)

downgrade the segment as proposed. Therefore, if the segment is in fact downgraded it would be done consistent with an amended General Plan. Similarly, the comment also states that the proposed project would generate substantially more traffic than contemplated under the current General Plan. However, if the General Plan is amended as proposed by the project, the amount of traffic generated by the project would be consistent with an amended General Plan.

The comment also lists the road segments identified in the Draft EIR (July 2013) at which the project would result in a significant direct impact and for which mitigation was deemed infeasible. However, subsequent to submittal of the comment, a Draft REIR (June 2014) was prepared and circulated for public review. The Draft REIR identified significant direct impacts at four segments and five intersections. For most locations, the EIR reported that impacts would be reduced to less than significant with recommended mitigation. However, as to two intersections – the I-15 Southbound Ramps/Gopher Canyon Road and I-15 Northbound Ramps/Gopher Canyon Road - because the recommended improvements would be located outside of the jurisdiction and control of the County (i.e., within the jurisdiction of Caltrans), the Draft REIR identified the impacts as potentially significant and unavoidable. However, since circulation of the Draft REIR, Caltrans has informed the County that the agency is not opposed to the mitigation to install traffic signals at the intersection as long as appropriate assurances are provided. Based on the Caltrans comments, the applicant will coordinate with Caltrans through the Caltrans encroachment permit process to provide the funding and construction work necessary to install the traffic signals at the two intersections. Therefore, the identified impacts will be mitigated.

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<p>direct impact to each of the roadways listed above. We disagree with Chen Ryan's analysis that states that the direct impact is mitigated to less than significance by addition of traffic lights at these intersections because turn lane are not added at the intersections.</p> <p>2.3.S.2 Significant Cumulative Impacts:</p> <p>The project would have a significant cumulative impact to each of the roadway segments listed below. The magnitude of the impacts below cannot possibly be mitigated by the small amount of LHR project contribution in TIF fees. The impacts will remain as significant unmitigated impacts.</p> <ul style="list-style-type: none"> • Camino Del Rey between Old River Road and West Lilac Road; • Gopher Canyon Road between E. Vista Way and I-15 SB Ramps; • E. Vista Way between SR-76 and Gopher Canyon Road; • E. Vista Way between Gopher Canyon Road and Osborne Street; • Pankey Road between Pala Mesa Drive and SR-76; • Lilac Road between Old Castle Road and Anthony Road; and • Cole Grade Road, between Fruitvale Road and Valley Center Road. <p>The project would have a significant cumulative impact to each of the intersections listed below. The magnitude of the impacts below cannot possibly be mitigated by the nominal of LHR project contribution in TIF fees. The impacts will remain as significant unmitigated impacts.</p> <ul style="list-style-type: none"> • E. Vista Way/Gopher Canyon Road; • SR-76/Old River Road/E. Vista Way; • SR-76/Olive Hill Road/Camino Del Rey; • SR-76/Pankey Road; • Old Highway 395/West Lilac Road; • I-15 SB Ramps/Gopher Canyon Road; • I-15 NB Ramps/Gopher Canyon Road; • Old Highway 395/E. Dulin Road; • Miller Road/Valley Center Road; • SR-76/Old Highway 395; • I-15 SB Ramps/Old Highway 395; and • I-15 SB Ramps/Old Highway 395. <p>The project would have a significant cumulative impact to each of the segments of the I-15 listed below.</p>		<p>151n-4 The comment lists the segments and intersections identified in the Draft EIR (July 2013) at which the project would result in a significant cumulative impact. The recommended mitigation was payment of the County of San Diego's Transportation Impact Fee (TIF), which the comment contends was inadequate to mitigate the identified impacts. However, since the proposed project is seeking an amendment to the County of San Diego's General Plan, the County will be required to update the TIF Program. Through this process, the program fee calculations contained in the TIF program's nexus study will be updated to account for the General Plan land use and roadway network changes proposed by the project. With this required update, the TIF program will then accurately account for the proposed project land uses and identified cumulative transportation-related impacts; hence, the project's cumulative transportation-related impacts would be adequately accounted for and funded by the County of San Diego TIF program.</p> <p>151n-5 This comment refers to intersections identified in subchapter 2.3 and Appendix E of the FEIR as those in which a significant cumulative impact would occur.</p> <p>With respect to the SR-76 and I-15 intersections, because improvements necessary to reduce significant cumulative impacts at these locations are the responsibility of another jurisdiction, and no program is available to which the applicant could contribute, mitigation is infeasible. No other feasible mitigation measures are available to reduce the significant cumulative impacts at these three intersections. These facilities are under the jurisdiction and control of Caltrans. Please see Global Response: Significant and Unavoidable Impacts to I-15. The remainder of the listed intersections would be mitigated through the project's payment into the County's TIF program.</p> <p>The second half of this comment refers to road segments identified in subchapter 2.3 and Appendix E of the FEIR as those in which a significant cumulative impact would occur. While there are plans to widen I-15 between Riverside County and SR-78 that would mitigate cumulative I-15 impacts, there is no secured funding for the improvement and there is no mechanism in place to provide contributions to the improvement. Ultimately, mitigation is infeasible because the I-15 is under Caltrans jurisdiction. Please see Global Response: Significant and Unavoidable Impacts to I-15.</p>
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- Between Riverside County Boundary and Old Highway 395;
- Between Old Highway 395 and SR-76;
- Between SR-76 and Old Highway;
- Between Old Highway 395 and Gopher Canyon Road;
- Between Gopher Canyon Road and Deer Springs Road;
- Between Deer Springs Road and Centre City Parkway;
- Between Centre City Parkway and El Norte Parkway; and
- Between El Norte Parkway and SR-78.

The LHR project proposes doing nothing whatsoever to mitigate its I-15 traffic impacts.

LU-12.4 Planning for Compatibility:

“Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, and LOS D or better may not be achieved.”

Please refer to our comments on LU-12.2 Maintenance of Adequate Services – Converting Rural Circulation Element 2.2 F to traffic signal controlled Urban Gridlock Environments is not compatible with General Plan Land Use design for the Adjacent Areas.

Table M-4 is included for reference:

I51n-5
cont.

I51n-6

I51n-6 The project is consistent with Policy LU 12.4. The comment appears to refer to a segment of West Lilac Road, which is a Mobility Element road. Policy LU 12.4 does not discuss or prohibit the installation of traffic lights on a Mobility Element road. Further, Policy LU 12.4 expressly requires that Mobility Element road design minimize “environmental impacts.” As explained in Subchapters 2.3.2 through 2.3.5 of the FEIR, the project is required to install a handful of traffic signals at various intersections, including at segments of West Lilac Road, to mitigate for potential environmental impacts related to level of service issues. Minimizing these environmental impacts is consistent with Policy LU 12.4.

As to Table M-4, the project does not add any travel lanes to any road segments listed in Table M-4. Also, Table M-4 does not state any recommendation or prohibition against installing traffic lights at an intersection for any road segment listed in Table M-4, nor will the project add traffic lights to an intersection for any road segment listed in Table M-4.

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	Classification	From	To
State Highways^a			
SR 67	4.1B Major Road with Intermittent Turn Lanes	Poway city limits	Scripps Poway Pkwy. (Lakeside)
	4.1A Major Road with Raised Median	Scripps Poway Pkwy. (Lakeside)	Sycamore Park Dr. (Lakeside)
	4.1A Major Road with Raised Median	Johnson Lake Rd. (Lakeside)	Posthill Rd. (Lakeside)
	4.1B Major Road with Intermittent Turn Lanes	11 th Street (Ramona)	Pine Street/SR-78 (Ramona)
SR-78/Pala Rd. ^b	4.1A: 4-Ln Major Road w/ Raised Median	Old Hwy 395 (Fallbrook)	I-15 SB Ramps (Fallbrook)
	2.1D Community Collector w/ Improvement Options	Pala Del Norte Rd. (Pala Pauma)	Sixth St (Pala Pauma)
Main Street/SR-78	4.2B: 4-Ln Boulevard w/ Intermittent Turn Lanes	9th St (Ramona)	Pine St (Ramona)
County Mobility Element Roads			
Alpine Blvd.	2.2A Light Collector w/ Raised Median	Boulder Rd. (Alpine)	Louise Dr. (Alpine)
Bancroft Dr.	2.2D Light Collector w/ Improvement Options	Troy St (Spring Valley)	SR-94 EB Ramps (Spring Valley)
Briarwood Rd.	2.1D Community Collector w/ Improvement Options	SR-54 WB Ramps (Sweetwater)	Robinwood Rd (Sweetwater)
Campo Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Kenwood Dr (Valle de Oro)	Conrad Dr (Valle de Oro)
Central Ave.	2.2B Light Collector w/ Continuous Turn Lane	Sweetwater Rd. (Sweetwater)	Bonita Rd. (Sweetwater)
	2.2C Light Collector w/ Intermittent Turn Lanes	Bonita Rd. (Sweetwater)	Frisbee St. (Sweetwater)

I51n-6 cont.

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	Classification	From	To
De Luz Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Dougherty St. (Fallbrook)	W. Mission Rd. (Fallbrook)
Deer Springs Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-15 NB Ramps (NC Metro)	N Centre City Pkwy (NC Metro)
Del Dios Hwy.	2.1D Community Collector w/ Improvement Options	El Camino Del Norte (San Dieguito)	Via Rancho Pkwy (North County Metro)
E. Mission Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Live Oak Park Rd. (Fallbrook)	I-15 SB Ramps (Fallbrook)
El Apajo.	2.1A Community Collector w/ Raised Median	Villa De La Valle (San Dieguito)	Via De Santa Fe (San Dieguito)
El Camino del Norte	2.2F Light Collector w/ Reduced Shoulder	Aliso Canyon Rd. (San Dieguito)	Del Dios Hwy./Paseo Delicias (San Dieguito)
Fuerte Dr.	2.2E Light Collector	Bancroft Dr. (Valle de Oro)	Avacado Blvd. (Valle de Oro)
Jamacha Rd.	6.2 Prime Arterial	Campo Rd/SR-94 (Valle de Oro)	Fury Ln. (Valle de Oro)
	4.1B Major Road w/ Intermittent Turn Lanes	SR-125 SB Ramps (Spring Valley)	Sweetwater Rd (Spring Valley)
La Bajada/ La Granada	2.2F Light Collector w/ Reduced Shoulder	Rancho Santa Fe Rd. (San Dieguito)	Paseo Delicias (San Dieguito)
Lake Jennings Park Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-8 Business Route (Lakeside)	I-8 WB Off-Ramp (Lakeside)
Lilac Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	New Road 19 (Valley Center)	Valley Center Rd. (Valley Center)
Linea del Cielo	2.2F Light Collector w/ Reduced Shoulder	El Camino Real (San Dieguito)	Rambla de las Flores (San Dieguito)
Los Coches Rd.	2.1D Community Collector w/ Improvement Options	Woodside Ave (Lakeside)	I-8 Business Route (Lakeside)
Lyons Valley Rd.	2.2B Light Collector w/ Continuous Turn Lane	Campo Rd. (Jamul)	Skyline Truck Trail (Jamul)
Maine Ave.	2.2E Light Collector	Mapleview St (Lakeside)	Woodside Ave (Lakeside)
Mapleview St.	4.1A Major Road w/ Raised Median	Maine Ave. (Lakeside)	Ashwood St (Lakeside)
Mountain Meadow Rd./ Mirar de Valle	2.1D Community Collector w/ Improvement Options	North Broadway (NC Metro)	New Road 19 (Valley Center)
New Road 19	4.2B Boulevard w/ Intermittent Turn Lanes	Mirar de Valle Road (Valley Center)	Lilac Road (Valley Center)
Old Hwy 395	2.1D Community Collector w/ Improvement Options	5th St. (Rainbow)	Interstate 15 NB ramp (Fallbrook)
Old Hwy 395	2.1A Community Collector w/ Raised Median	Interstate 15 SB ramp (Fallbrook)	Stewart Canyon Dr. (Fallbrook)

I51n-6 cont.

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified

Road	Classification	From	To
	2.1D Community Collector w/ Improvement Options	Pala Rd. (Fallbrook)	Dublin (W) Rd. (Fallbrook)
Paradise Valley Rd.	4.1B Major Road w/ Intermittent Turn Lanes	Elkleton Blvd (Spring Valley)	Sweetwater Rd (Spring Valley)
Paseo Delicias	2.2A Light Collector w/ Raised Median	Via De La Valle (San Dieguito)	El Camino Del Norte (San Dieguito)
Pomerado Rd.	4.1A Major Road w/ Raised Median	I-15 NB Ramps (County Islands)	Willow Creek Rd. (County Islands)
Rainbow Valley Blvd. West	2.2D Light Collector	I-15 NB Ramps (Rainbow)	Old Hwy. 395 (Rainbow)
Rancho Santa Fe Road	2.2F Light Collector w/ Reduced Shoulder	Encinitas city limits	La Bajada (San Dieguito)
San Dieguito Rd.	2.1A Community Collector w/ Raised Median	El Apajo Rd. (San Dieguito)	San Diego city limits
7 th St.	2.2E Light Collector	Elm St. (Ramona)	A St. (Ramona)
		Main St. (Ramona)	D St. (Ramona)
Valley Center Rd.	4.2A Boulevard w/ Raised Median	Miller Rd (Valley Center)	Indian Creek Rd (Valley Center)
Via de la Valle	2.1B Community Collector w/ Continuous Turn Lane	San Diego city limits (San Dieguito)	Las Planideras (San Dieguito)
	2.1E Community Collector	Las Planideras (San Dieguito)	Paseo Delicias (San Dieguito)
West Willows Rd.	2.2E Light Collector	Alpine Blvd (Alpine)	Viejas Grade Rd. (Alpine)
Wildcat Canyon Rd.	2.1D Community Collector w/ Improvement Options	Willow Rd. (Lakeside)	Barona Casino (Ramona)
Woods Valley Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Oakmont Rd (Valley Center)	Kanbu Ln. (Valley Center)

I51n-6 cont.

Mobility Element Goals

M 1.2 - Interconnected Road Network:

“Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.”

The LHR project is totally inconsistent with this policy. The proposed LHR Project is requesting to increase the automotive traffic 15 times by adding traffic to the only two existing Public Roads, and adding no additional access roads out of the area. This is a significant unmitigated safety issue.

I51n-7

I51n-7 It is not entirely clear what the comment means, but it appears to allege that the project is not providing additional public roads in the area outside the project site. No additional public roads are required. Further, the project is consistent with Goal M.1-2 in that the project will not disrupt an interconnected public road network. As discussed in the REIR at Subchapters 2.3.S.1 and 2.3.5.1, and Table 2.3-23, all direct project impacts to road segments and intersections within the County’s jurisdiction are reduced to a level below significance after mitigation measures are implemented. In addition, as discussed in the FEIR in Subchapters 2.3.S.2 and 2.3.5.1, and Table 2.3-24, nearly all cumulative impacts to road segments within the County’s jurisdiction, and all impacts to intersections within the County’s jurisdiction, would be reduced to a level below significance after feasible mitigation measures are implemented.

In addition, the project will not result in any significant safety impacts related to traffic and transportation, or emergency response plans. As discussed in the FEIR in Subchapters 2.3.4.2, 2.3.4.6, and 2.7.2.3, the project will not create any significant transportation system hazard, and would not interfere with the Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan.

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<p>M - 2.1 Level of Service Criteria:</p> <p>“Require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.”</p> <p>The project is adding 20,000 additional trips greater than the General Plan approved land use. This additional traffic will be added to several roadways that were approved to operate at LOS “E”/“F” without requiring mitigation of the projects additional traffic. The impact of adding additional traffic to the roadways that are operating at LOS “E”/“F” beyond the level of service reported with the General Plan needs clarification. Can additional traffic from the proposed General Plan Amendments be allowed to further degrade the approved LOS “E”/“F” designations?</p> <p>M-3.3 Multiple Ingress and Egress:</p> <p>“Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.”</p> <p>The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues.</p> <p>M-4.2 Interconnected Local Roads:</p> <p>“Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.”</p>	<p>I51n-8 The project is consistent with the General Plan Mobility Element, which authorizes LOS E/F under certain circumstances. Policy M-2.1 applies to the County Mobility Element road network and roadway capacities (classifications) required to handle the traffic under build-out of the General Plan. As stated in the text box adjacent to Policy M-2.1 in the General Plan, the end of the Mobility Element chapter includes a list of roadways that have been accepted to operate at LOS E/F under the buildout scenario (Table M-4).</p> <p>The project is consistent with Policy M-2.1 because all roadways would operate at LOS D or better under the General Plan (Land Use Element and Mobility Element) buildout scenario except for eight roadway segments as described under FEIR subchapter 2.3.3.2. The affected roadway segments that are not currently in Table M-4 are proposed to be added to the Table as part of the project’s General Plan Amendment - Mobility Element Table M-4 with rationale in the record for why the road should be accepted at LOS E/F and adding travel lanes is not justified. As a result of the proposed General Plan Amendment, the project would be consistent with Policy M-2.1.</p> <p>The Policy does not apply to a project’s direct or cumulative traffic impacts; however, with mitigation, the project’s significant impacts to County Mobility Element roads would be mitigated to LOS D or better with two exceptions: Impact TR-16: Pankey Road, between Pala Mesa Drive and SR-76, and Impact TR-12: Gopher Canyon Road, between E. Vista Way and Little Gopher Canyon Road. The EIR determined that mitigation for these two road segments would be infeasible, as discussed in section 6.4 of Appendix E of the FEIR, because the cost of the required improvements is not roughly proportional to the impact of the project. Mitigation measures must be roughly proportional to the environmental impacts caused by the project. (CEQA Guidelines, sections 15126.4(a)(4)(B) and (5).) Therefore, these impacts would be significant and unmitigable, and the impacts are fully disclosed in the FEIR for consideration by the decision maker.</p> <p>It should be noted, however, that the segment of Pankey Road between Pala Mesa Drive and SR-76 is currently required to be improved to the Mobility Element Road Classification of 2.1A, in compliance with General Plan Mobility Element Policy 2.1, as a condition of the previously approved Campus Park and Meadowood projects and, therefore, as improved, the segment would operate at an acceptable LOS.</p>
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	<p>I51n-8 (cont.)</p> <p>As to Gopher Canyon Road, although the segment between E. Vista Way and Little Gopher Canyon Road will operate below LOS D in the existing plus project plus cumulative project traffic scenario (but not in the General Plan buildout scenario), there is no inconsistency with the General Plan. Under Mobility Element Policy M-2.1, LOS E/F is acceptable when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. In this case, Gopher Canyon Road is heavily used as a “cut through route” for regional travel. I-15 approaching SR-78, and SR-78 between San Marcos and I-15, both operate at very poor LOS F conditions with long delays during peak periods. In fact, this portion of SR-78 is routinely listed as one of the most congested freeways in all of San Diego County. Because of this congestion, Gopher Canyon Road between I-15 and East Vista Way is used as a route to avoid the I-15 and SR-78 corridors.</p> <p>As discussed in this EIR, potential mitigation measures that would provide additional capacity to I-15 and, as a result, likely reduce some of the “cut through traffic” are infeasible. As to SR-78, planned future improvements consist of one additional high occupancy vehicle (HOV) lane in each direction. However, the additional HOV lanes will not be constructed for many years and, once constructed, would not appreciably reduce cut-through traffic. Furthermore, while the project would coordinate with NCTD/MTS and SANDAG as to the future siting of transit stops/stations on the Project site through the proposed Transportation Demand Management Program, such actions would not reduce existing (i.e., non-Project) traffic levels. Therefore, even though Gopher Canyon Road would operate at worse than LOS D, the LOS would comply with Mobility Element Policy 2.1.</p> <p>I51n-9 The project is consistent with Policy M-3.3. Mountain Ridge Road only provides access for the southern one-third of the project which consists of the senior community and a church; however, in an emergency situation, Mountain ridge Road would provide secondary emergency access as an evacuation exit for the project. The project does not request any road design exceptions that would result in reduced capacity on the roadways, nor create safety issues, see subchapter 2.3 of the FEIR.</p>
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	<p>I51n-10 The project is consistent with Policy M-4.2. The project includes four connecting points to existing roads, ensuring that both local and surrounding residents have alternate routes. The internal road system in Lilac Hills Ranch is interconnected and appropriately scaled allowing all internal roads to be two lanes, reinforcing the village atmosphere of this new community. Roads throughout Phases 1-3 are open to all area residents but will be maintained privately, ensuring that limited County road maintenance resources are not burdened. Access to the new Village is from West Lilac Road, a Mobility Element public road that will be improved to County standards. Finally, a separate system of pedestrian walkways and bike lanes will ensure that walkers and bicyclists are encouraged to leave the car at home.</p>
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<p>The development of the project proposes numerous design exceptions to reduce the width design and safety aspects of the surrounding roadways. Discussions of Design Exceptions are presented in a separate memorandum.</p> <p>M - 4.4 Accommodate Emergency Vehicles:</p> <p>“Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.”</p> <p>The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues.</p> <p>M - 4.5 Context Sensitive Road Design:</p> <p>“Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.”</p> <p>The LHR Project will create significant and unmitigatable environmental impacts to West Lilac and Circle R Public Roads and Covey Lane, Rodriguez, and Mountain Ridge Private Roads by creating unmitigated hazards to wildlife in this Rural and Semi-Rural Area.</p> <p>M-6.1 Designated Truck Routes:</p> <p>“Minimize heavy truck traffic (generally more than 33,000 pounds and mostly used for long-haul purposes) near schools and within Villages and Residential Neighborhoods by designating official truck routes, establishing incompatible weight limits on roads unintended for frequent truck traffic, and carefully locating truck-intensive land uses.”</p> <p>The development of the LHR project non-residential uses will increase trucks within the project and will add truck traffic to the offsite roadway system. Due to the number of Design Exceptions requested the adequacy of the on-site and off-site roadways needs to be assessed for their ability to handle truck traffic.</p>	<p>I51n-11 cont.</p> <p>I51n-11</p> <p>I51n-12</p> <p>I51n-13</p> <p>I51n-11 The project is consistent with Policy M-4.4. All proposed on site roads, including Mountain Ridge Road have been designed in accordance to the County Consolidated Fire Code and DSFPD standards and can accommodate emergency service vehicles and allow residents to evacuate efficiently if necessary. See FEIR Appendix J (FPP). (Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix, Appendix P of the FPP.) In addition, with respect to concerns regarding the exceptions being requested for the roadway improvements, these exceptions were included as part of the project’s circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The FEIR analyzed the issue of transportation hazards with respect to the road network designed for the project, and determined that impacts associated with transportation hazards would be less than significant. (FEIR, subchapter 2.3.2.3, and 2.3.6.2).</p> <p>The Evacuation Plan examined the existing and the planned roads and determined that it would provide adequate multi-directional primary and secondary emergency evacuation routes. As detailed in the Evacuation Plan, the project would provide four connecting points to existing roads ensuring that both local and surrounding residents have alternate routes (FEIR, subchapter 2.3.3.3).</p> <p>I51n-12 The project is consistent with Policy M-4.5. While the grading needed for the project will be similar to other local developments of its scale, earthwork will be minimized (especially along all perimeters of the site) by focusing density in locations where slope is minimal. The road pattern thus follows the terrain while still providing a safe and efficient road network. The project includes two points of ingress and egress plus a third controlled access to ensure adequate access while reducing effects on surrounding rural areas. Native habitat in the survey area is located primarily along the western portion of the project site and along the major drainage courses. Habitat connectivity to off-site lands to the east is confined mostly to drainage courses that have remnant patches of native riparian habitat. The majority of the land to the east is in some state of agriculture or localized urban development. As described in the FEIR subchapter 2.5.2.1, the impacts to wildlife are less than significant.</p>
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<p>M - 9.1 Transportation Systems Management:</p> <p>“Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.”</p> <p>The roadway improvements proposed by the project are not designed to adequately serve pedestrian and bicycle operations. The proposed improvements also need to be reassessed to provide left turn lanes at intersection onsite and offsite.</p> <p>Safety Element Goals</p> <p>S-14.1 Vehicular Access to Development:</p> <p>“Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.”</p> <p>The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues</p> <p>In addition, the LHR project has not provided a feasible solution to provide 5 minute emergency response time for fire and emergency medical services for the proposed LHR project area.</p> <p>Sincerely,</p> <p>Mark Jackson 9550 Covey Lane Escondido, CA 92026 760-731-7327 jacksonmark92026@gmail.com</p>	<p>I51n-13 The project is consistent with Policy M-6.1. There are no designated truck routes in or adjacent to Lilac Hills Ranch, nor is there any requirement to make such a designation. This policy provides guidance to the County with respect to ensuring that goods are moved efficiently and in a manner that does not unduly affect residents’ quality of life. There are no truck intensive land uses proposed within Lilac Hills Ranch.</p> <p>I51n-14 The project is consistent with Policy M-9.1. As indicate on Figure 8-1 (page 239 of the TIS), the project proposes to create multiple Multi-Use Trails in and around the project site. These Multi-Use Trails are proposes to connect to the regional trail network providing a safe path for both bicyclist and pedestrian.</p> <p>Additionally the project proposes to add left-turn lanes at intersections on-site and off-site where the peak hour volumes indicate that the addition of a left-turn lane would improve the intersection operation for example:</p> <p>Old Highway 395/W. Lilac Road - As indicated previously, the project proposes to improve W. Lilac Road between Old Highway 395 and Main Street to a 2.2C (Light Collector with Intermittent Turn Lanes). Hence, along with the signalization at the intersection of Old Highway 395/W. Lilac Road, a westbound left-turn lane would also be constructed.</p> <p>In addition, as displays in Table 10.5 of the TIS, additional turn lanes are proposed to mitigate cumulative impacts.</p> <p>I51n-15 The project is consistent with Policy S-14.1. The project would provide multiple access roads as shown in the project’s Evacuation Plan. Emergency access is also provided by Rodriguez Road. See Appendix K and subchapter 2.7 of the FEIR.</p> <p>I51n-16 The FPP offers three potential options for serving the project, all of which would include coverage of the entire project within five minutes as well as benefits to existing residents within the District. These three options are detailed in FEIR subchapter 2.7.</p>
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