



March 12, 2015

Mr. Andrew Yancey
LATHAM & WATKINS, LLP
12670 High Bluff Drive
San Diego, CA 92130

**Subject: Suggestions for Consideration in EIR
 Newland Sierra Project**

Dear Andrew:

As a follow up to the NOP meeting conducted on March 4, 2015 and a review of materials provided by County of San Diego for the Newland Sierra Project, we have identified a series of transportation related issues that should be addressed in the mobility assessment for the project to be included in comments submitted to the County on behalf of the Golden Door:

- Caltrans is preparing a Project Study Report for the I-15 Deer Springs Interchange. The mobility assessment for the Newland Sierra project should include a detailed discussion of the alternatives considered, operational analysis of the interchange relative to the proximity to Mesa Rock Road and operational analysis of the recommended configuration.
- The Newland Sierra project should work with Caltrans and identify potential interchange configurations that will reduce traffic impacts on Deer Springs Road including a direct access ramp from I-15 into the project site.
- The Newland Sierra project should clearly identify its level of contribution toward future improvements to the interchange, timing of construction relative to the project development and potential construction impacts of construction related to the interchange, within the project site and on Deer Springs Road on the surrounding community.
- The Newland Sierra project should be responsible for identifying environmental impacts associated with the I-15/Deer Springs Interchange in the project EIR.
- Construction of the site will result in new traffic through the interchange, along Deer Springs Road and along local roadways in the community. The mobility assessment should address the construction related impacts including effect of heavy trucks on



existing roadways, material hauling trips and duration of hauling, and trips added to the roadway due to construction worker trips.

- Deer Springs Road is a narrow two-lane roadway, which is planned to be improved to a wider facility as specified in the County General Plan Circulation Element. Studies conducted by the applicant indicate that a significant portion of trips along Deer Springs Road are drivers by passing I-15 and SR-78 as well as trip generated from areas of San Marcos near SR-78. The mobility assessment should discuss the potential increase in by-pass traffic that may occur along Deer Springs Road should this project be responsible for widening the roadway. The project should also identify measures by which to minimize existing and additional by-pass traffic including, but not limited to improvements to SR-78 and I-15 and the SR-78/I-15 interchange to keep regional trips on the regional facilities.
- Newland Sierra project should identify potential treatments along Deer Springs Road to reduce the attractiveness of this roadway as a by-pass route including maintaining two-lanes between Sarver Lane and Mesa Rock Road, intersection treatments that control traffic speed including roundabouts and edge treatments such as bicycle lanes and trails to manage traffic speeds and provide access for multiple users.
- Construction of Deer Springs Road as four lane or six lane arterial may require significant grading and impacts to the adjacent properties. The Newland Sierra project should identify the environmental impacts associated with widening Deer Springs Road. Based on those findings, the project should identify alternatives to minimize the environmental impacts, including reducing traffic volumes along this roadway to maintain as a two-lane road from Sarver Lane to Mesa Rock Road.
- The project has identified three main points of entry into the site. The mobility assessment should clearly identify the intersection treatments, cross-sections and traffic control where the project access roads intersect with either Deer Springs Road or Twin Oaks Valley Road.
- The three roads providing access to the site are narrow, local roads with unimproved shoulders and slow travel speeds. The Newland Sierra mobility assessment should clearly identify the change in cross-section of these roads, impacts to right-of-way, anticipated speeds and compliance with County line of sight requirements.
- The Newland Sierra project is planned in a rural area with an active equestrian community. The mobility assessment should clearly identify transportation improvements within the project study area that will improve access for pedestrians, bicycle and



- equestrians. The project should identify potential project impacts to these modes along the existing roadways where applicable.
- Access to transit is limited within the existing community. The project should identify potential opportunities to improve connections to available transit in the area including connections to the Escondido Transit Center and the Sprinter Station in San Marcos in an effort to provide transportation options to the Newland Communities site. SANDAG is initiating an effort to develop a plan for mobility hubs in the region. The applicant should work with SANDAG in identifying the feasibility of providing a mobility hub within the Newland Sierra project to provide access to regionally serving light rail and BRT service.
 - The Newland Sierra project should address vehicle miles traveled and potential VMT measures to reduce the number of single occupancy vehicle trips, shorten trip lengths and encourage use of transit or other modes. The mobility assessment should, at a minimum, acknowledge SB743 and the analytical requirements outlined in the most current version of the draft or final guidelines, depending upon the timing of the submittal of the mobility assessment.

We appreciate the opportunity to provide this list of comments. If you would like to discuss these comments further, please call me at (619) 758-3010.

Sincerely,

FEHR & PEERS

Dawn L. Wilson, PE TE
Senior Associate