

To: Mr. Scott Molloy
Newland Communities

Date: March 15, 2018

From: John Boarman, P.E. & Narasimha Prasad
LLG, Engineers

LLG Ref: 3-17-2664

Subject: **Newland Sierra Project, Four-Lane Deer Springs Road Traffic Results**

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This memorandum has been prepared in response to comments raised by Golden Door Properties, LLC, on the Newland Sierra Project Draft EIR Traffic Impact Analysis. On behalf of Golden Door Properties, consultants Dawn Wilson with STC Traffic and Latham & Watkins, LLP stated in comments that the Traffic Impact Analysis should have included a scenario where Deer Springs Road is assumed widened to four lanes before the project's traffic is added to the road network to determine the potential effect of inducing traffic on a four-lane-wide Deer Springs Road. Specifically, Latham & Watkins made the following comment (Comment O-1-242) on this issue:

"If added capacity on Deer Springs Road attracts more trips, then it is impossible to support the TIA's portrayal in Table 16-6 of exactly equip trip volumes for Deer Springs Road under Options A and B. The TIA's traffic model's omission of a four-lane alignment fails to account for the conditions under Option B. Therefore, the DEIR's conclusions M-TR-9 can mitigate impacts to Deer Springs Road between Mesa Rock Road and Sarver Lane are not supported by substantial evidence."

Dawn Wilson made a related comment (Comment O-1.16-6), stating:

"The TIA should have provided volumes for a four-lane Major Road as proposed in Option B, which the traffic study indicates would fully mitigate the project impacts along Deer Springs Road. Because the TIA does not provide the traffic volumes of the proposed configuration for Option B, it is unknown what impacts would result from implementation and construction of Option B and what mitigation may be required. Assuming that Option B would result in the same volumes as Option A, as occurred in Table 16-6, underestimates Option B's impacts."

In essence, as it pertains to the Newland Sierra Project, Dawn Wilson and Latham & Watkins are advocating that the Newland Sierra Project EIR use a methodology for analyzing traffic impacts that is inconsistent with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Transportation and Traffic (County CEQA Guidelines). The commenters are advocating for incorporating the project's proposed road improvements to Deer Springs Road, which

serve as mitigation for the project's direct and cumulative impacts to Deer Springs Road, into the near-term analysis of cumulative traffic volumes on the same road.

Instead, near-term cumulative impact analyses should be based on the existing road network. The reason for this is that assuming road improvements to the existing road network in a near-term analysis that may or may not be required as mitigation for a project before assessing a project's impacts would be speculative and also risk nullifying impacts to other portions of the road network as improvements to portions of the road network have the potential to create a shift or diversion of traffic on other portions of the road network.

However, in an effort to be responsive to the comments raised, a SANDAG Series 12 Year 2020 analysis was performed (without project traffic) to determine the effect on traffic volumes along Deer Springs Road when Deer Springs Road and the two-lane portion of Twin Oaks Valley Road are widened to four lanes. Based on the modeling results, widening these roads to four lanes results in a diversion of trips off of the I-15 and SR 78 freeways and onto Deer Springs Road, Twin Oaks Valley Road, and Buena Creek Road (the local area's regional arterials). The modeling resulted in an increase of 1,200 Average Daily Trips (ADT) along the segment of Deer Springs Road between Mesa Rock Road and Sarver Lane, a reduction of 100 ADT on the I-15 freeway north of Deer Springs Road, and a reduction of 1,100 ADT on the I-15 freeway south of Deer Springs Road (refer to Table 1 and Figure 1 below and SANDAG Series 12 Volume Plots attached to this memorandum).

The modeling produced similar reductions in freeway volumes for SR 78. For the SR 78 freeway segments analyzed by the project, the decrease in ADT ranged from a low 500 ADT along the segment between Mar Vista Drive and Sycamore Avenue to a high of 1,600 ADT along the segment between Rancho Santa Fe Road to Las Posas Road. Of these five segments of SR 78, the project would only result in a significant cumulative impact to the segment between Mar Vista Drive and Sycamore Avenue.

Therefore, the SANDAG modeling forecasts a modest shift of traffic off of the freeway and onto the local road network when the local area's regional arterials are improved. This shift in traffic does not affect the mitigation required for the project's direct and cumulative impacts to Deer Springs Road or the project's other road and intersection impacts. For example, with an additional 1,200 ADT of diverted trips included, Deer Springs Road would still operate at an acceptable Level of Service (LOS) C in the Existing Plus Project traffic condition and an acceptable LOS D in the Existing Plus Project Plus Cumulative Projects traffic condition.

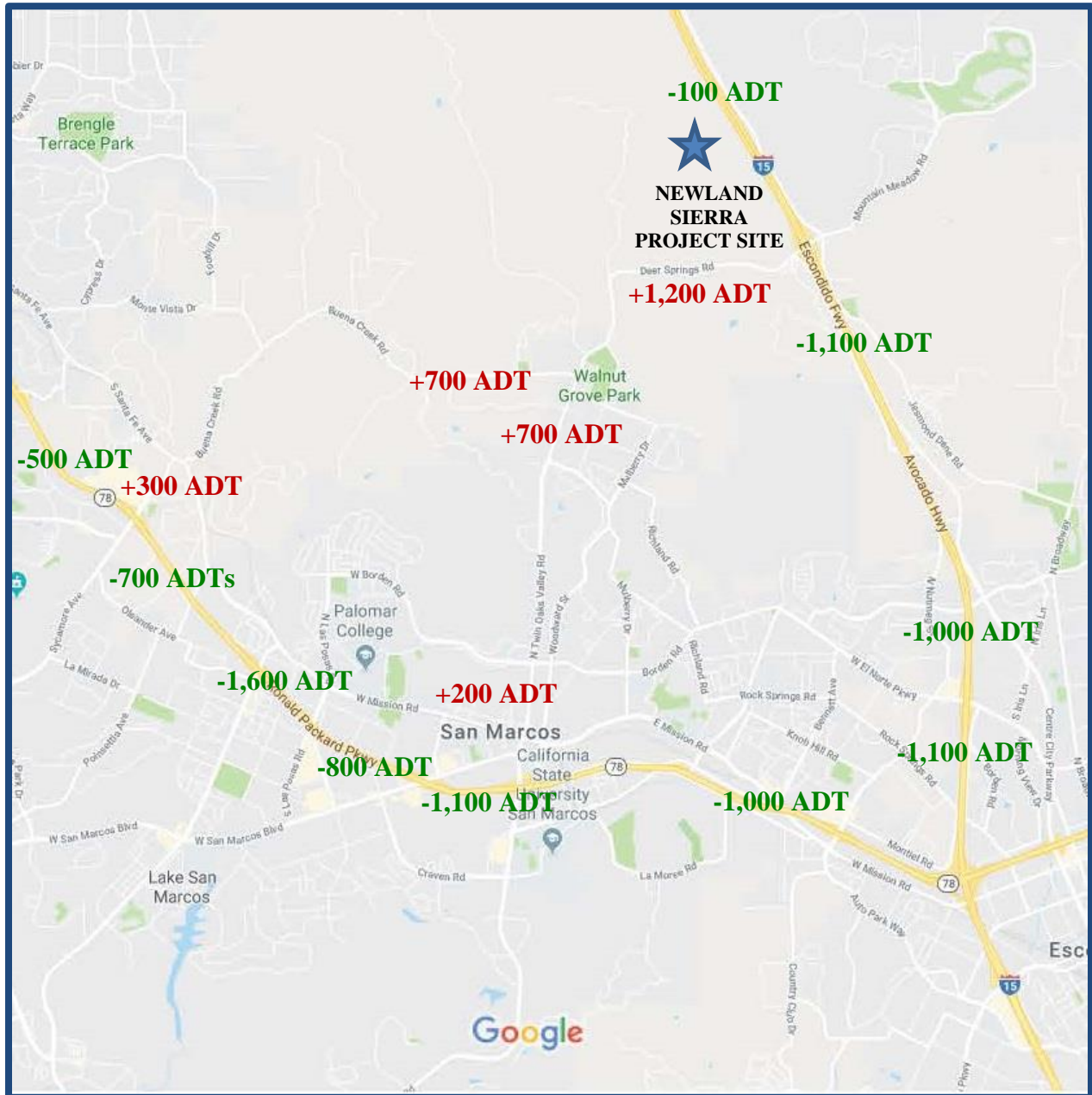
Finally, it is worth noting that the diversion of traffic off of the freeways and onto the regional arterials in the area means that the project's mitigation for impacts to Deer Springs Road and Twin Oaks Valley Road serve as partial mitigation for the project's

impacts to I-15 and SR 78 mainlines. Notwithstanding the foregoing, no change to the project's impact analysis or significance determination for either the local road network or the freeway mainlines is proposed based on these modeling results.

TABLE 1:
SANDAG Series 12
Four-Lane Deer Springs Road/Twin Oaks Valley Road
Forecasted Traffic Volume Shift

Segment	2 Lanes (ADT)	4 Lanes (ADT)	Change (ADT)
I-15 MAINLINE			
Gopher Canyon to Deer Springs Road	126,400	126,300	-100
Deer Springs Road to N. Centre City Parkway	123,500	122,400	-1,100
N. Centre City Parkway to El Norte Parkway	122,500	121,500	-1,000
El Norte Parkway to SR 78	137,700	136,600	-1,100
SR 78 MAINLINE			
Mar Vista Road to Sycamore Avenue	138,400	137,900	-500
Sycamore Avenue to Rancho Santa Fe Road	134,600	133,900	-700
Rancho Santa Fe Road to Las Posas Road	127,800	126,200	-1,600
Las Posas Road to San Marcos Boulevard	122,200	121,400	-800
San Marcos Boulevard to Twin Oaks Valley Road	138,500	137,400	-1,100
DEER SPRINGS ROAD			
Sarver Lane to Mesa Rock Road	17,400	18,600	+1,200
Twin Oaks Valley Road to Sarver Lane	17,000	18,300	+1,300
TWIN OAKS VALLEY ROAD			
Deer Springs Road to Buena Creek Road	19,900	21,400	+1,500
Buena Creek Road to Cassou Road	14,500	15,200	+700
BUENA CREEK ROAD			
Monte Vista Drive to Twin Oaks Valley Road	8,700	9,400	+700

**FIGURE 1:
SANDAG Series 12
Four-Lane Deer Springs Road/Twin Oaks Valley Road
Forecasted Traffic Volume Shift**



Attachments:

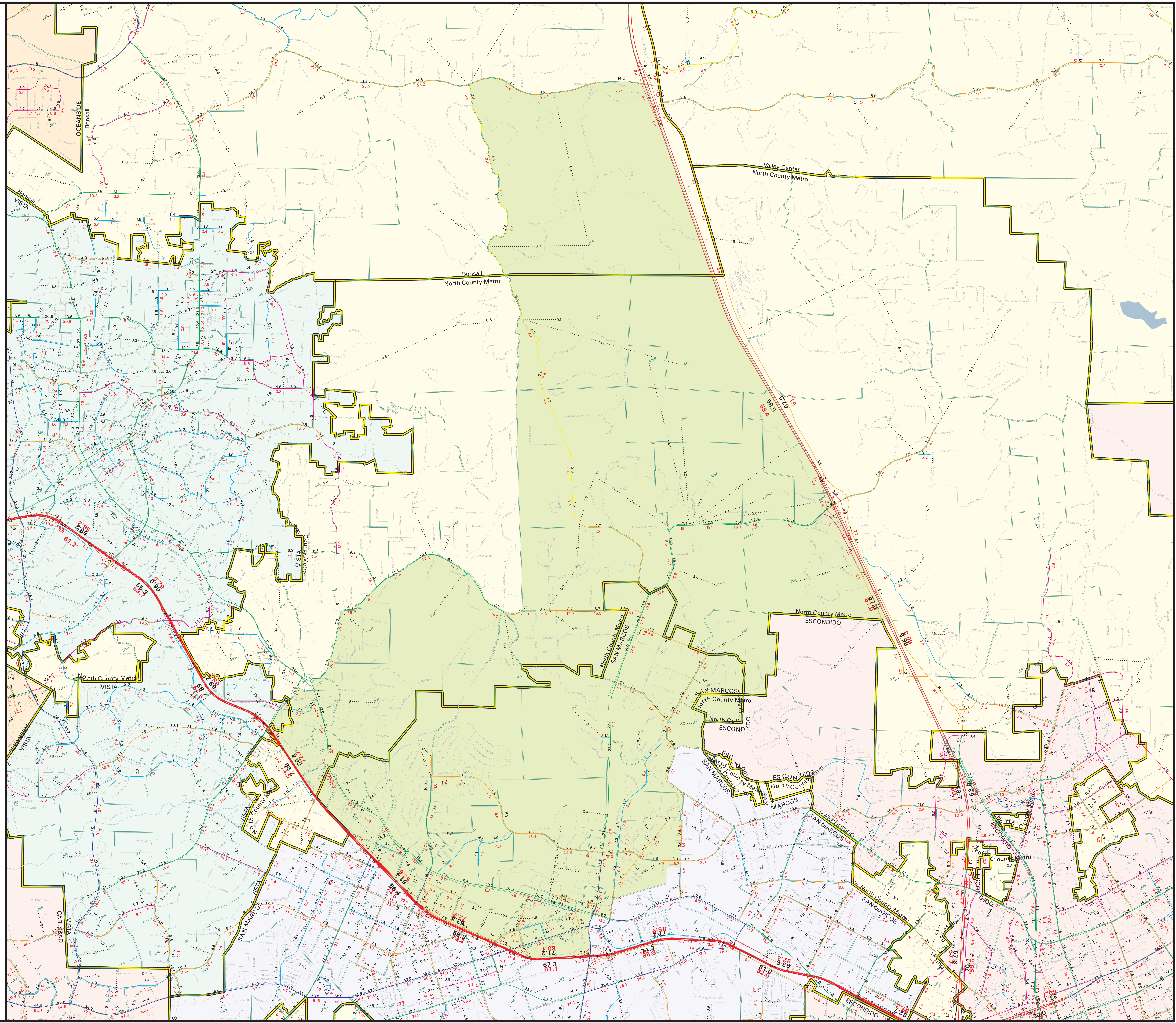
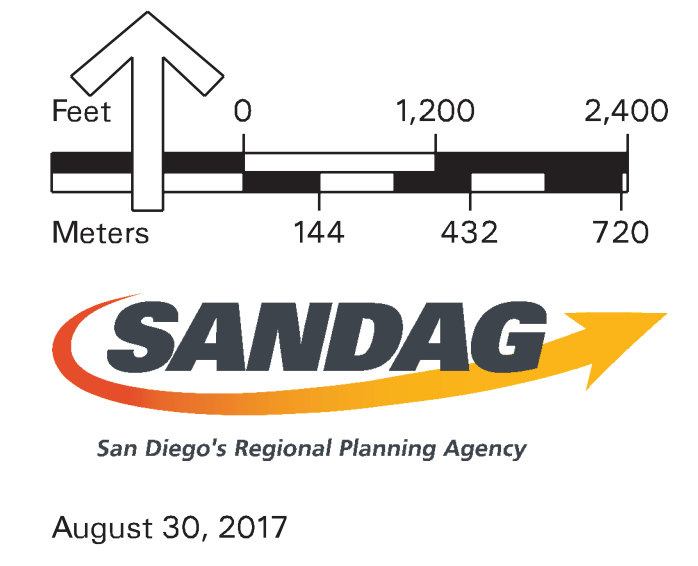
SANDAG Series 12 Two-Lane Deer Springs Road Plot

SANDAG Series 12 Four-Lane Deer Springs Road Plot

**SANDAG Series 12
2020 Revenue Constrained
Highway Network
Forecasted Daily Volumes**

Sierra Project Area
Model Run 8/29/17
SR12 V3 2020 RC RTP11
Sierra 2020 E1
No Build Project
2-Lane Existing Deer Springs

Forecasted Volumes:
Adjusted Volume
* Unadjusted Volume
+ Traffic Analysis Zone



**SANDAG Series 12
2020 Revenue Constrained
Highway Network
Forecasted Daily Volumes**

Sierra Project Area

Model Run 8/30/17
SR12 V3 2020 RC RTP11
Sierra 2020 E2
No Build Project
4-Lane Major Deer Springs

Forecasted Volumes:
Adjusted Volume
* Unadjusted Volume
+ Traffic Analysis Zone

