

## I-241 Betsy and Todd Landers

Comment Letter I-241

**From:** Todd Landers <tlandersusa@gmail.com>  
**Sent:** Monday, August 14, 2017 6:58 AM  
**To:** Smith, Ashley  
**Cc:** Karen Binns; Tom Kumura; Ana Rosvall; Betsy Landers; Todd Landers  
**Subject:** Newland Sierra EIR

Dear Ashley,

We live at the west end of Buena Creek Road in [Walnut Cove at 2120 Walnut Lane](#), very close to the Sprinter Station. In the last several years, Buena Creek has become the favored east-west corridor from Riverside County with traffic almost unbearable and unmanageable during the morning and evening rush hours, so we were very interested in the impact the Newland Sierra project would have on our only access to the outside world. For the past two months, we have been struggling to read and understand the Section 2.13, titled Transportation and Traffic. We found the layout of the section to be very confusing with the most glaring omission being that the North County Transit District (NCTD), responsible for the rail crossings and safety signaling, was barely mentioned. Oddly, NCTD is not listed as having any jurisdiction over the traffic patterns in the area and was apparently not contacted to discover current restrictions of traffic and future plans for affected intersections. Other points of confusion include the ambiguous road classification – the reader cannot determine what road classifications were used to perform each portion of the study and appears to incorrectly list the road classifications after the Newland Project is complete. (Buena Creek is an example of a misclassified road we were able to identify during the very short review period allowed for community response to the EIR.) And finally, it was impossible to decipher which traffic mitigation steps would be completed before, during, and after the project; who is funding the mitigation steps; and what agency, or private party is accountable for the mitigation. We've included seven (7) questions or requests for information we believe are important to understand what the impact to our neighborhood will be from the project.

### General:

1. This EIR conflates traffic Mitigation Steps being completed by the Newland project, the County of San Diego, the State of California, the City of San Marcos, the City of Vista, and possibly NCTD. In order to understand the impact of the project on the Buena Creek, South Santa Fe, Robelini, and NCTD.
  - *Please clearly delineate each traffic mitigation step, the responsible jurisdiction, the schedule for the mitigation, and if the mitigation step is currently funded.*

### Buena Creek Road:

2. Buena Creek Road is described as a two lane rural road in the current conditions portion of EIR, the county standard for a level of service of E is <8000 ADTs for a Mobility Element segment; however in a METROCOUNT TRAFFIC study from June 2002 indicates that 15 years ago Buena Creek Road was handling well in excess of 8000 ADT, meaning it was LOS F in 2002! Oddly, no portion of Buena Creek Road appeared in the section listing failing road segments, even though the entire length of Buena Creek Road has been failing for over 15 years. With the projects impact bringing the anticipated traffic to over 19,000 ADT's on Buena Creek Road, the traffic density will be more than twice the ADT's to be classified as "F" condition making Buena Creek an extremely unsafe road segment for those of us who rely on it for our daily existence.

- *Please update the traffic portion of the EIR to show the true condition of Buena Creek and the project's plans to mitigate its impact along the entire length of the failing road segment.*

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- The EIR states that Buena Creek is listed as 4.1B Major Road, it appears this designation was the basis for not classifying Buena Creek as a Failing Road Segment. With the expansion of Buena Creek and Los Posas being deferred in the San Marcos General Plan 2035 projection and no evidence showing plans to expand Buena Creek Road elsewhere in the EIR, it appears that the Newland EIR is saying that Buena Creek Road will remain an unimproved 2 lane road at least through 2035 when Newlands traffic projections show it needing to handle 19,200 ADTs. If Buena Creek Road were built out to the 4.1B standard, it would be a Level of Service of "C", it appears that the calculations are based on the expansion being in place, but the discussion appears to say that no improvements are anticipated.
  - *Please clarify what designation was used when calculating the Level of Service for the Road Segment*

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- As stated in the County Mobility Element, and reflected in the Newland EIR, Buena Creek Road is assumed to become a 4.1B Major Road in the County Mobility Plan, however the community has been working with County Engineers to begin the process of expansion for traffic abatement in accordance with the General Plan. Based on the communities' investigations/findings, the General Plan did not take into consideration several financial and environmental issues surrounding the expansion of Buena Creek Road that must be addressed before the road can be expanded. The environmental issues include implications to a sensitive stream habitat, as well as impacts to sensitive plant, bird, mammal, and reptile species. Also, there are significant Eminent Domain issues that must be resolved to secure the right of way for the proposed project. Currently, the County is considering removing the Buena Creek expansion from the General Plan because of the cost and environmental issues associated with the project. Additionally, the Army Corp of Engineers is required to survey and approve any changes to the flood channels associated with the Buena Creek Riparian flood channels.
  - *Please update the Newland Sierra EIR to include the most likely scenario in which Buena Creek remains an unimproved two lane country road, or provide evidence that the County is proceeding with the Buena Creek expansion with the Army Corp of Engineer review and associated Environmental Impact Studies.*

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### NCTD Buena Creek Sprinter Station

- There is no discussion of the Sprinter Station at the intersection of Buena Creek and South Santa Fe in the EIR although the presence of the station has had a huge impact to the traffic in the surrounding community. During community discussions with the North County Transit District, NCTD plans to double the number of trains in the system within the next 5-7 years which will further impact the traffic in the surrounding community.
  - *Please expand the EIR to include the impact of the rail crossing on the traffic on Buena Creek Road, South Santa Fe and Robelini.*

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- Also during discussions with North County Transit District, the community requested that turn lanes be installed at the intersection but was told that turn lanes were not safe on that intersection and declined to

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pursue the issue further. In the EIR, Newland implies (no plans or schedules were provided) that as part of the project they would install right turn lanes at the intersection to mitigate traffic. This is in direct conflict with the safety issues defined by NCTD.

- *Please expand the EIR to include evidence that the mitigation is possible, that it is funded and achievable before the completion of the Newland Sierra project.*

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### South Santa Fe Area

7. The EIR lists several mitigation steps to for the South Santa Fe area, including widening, straightening, etc., but provides no schedule or details. It also states that the intersection is over 5 miles from the project and further states that impacts are only indirect, while and because of (undefined) right of way constraints there is no feasible mitigation for the impacted South Santa Fe area. As mentioned above, Buena Creek has become the favored east-west corridor from Riverside County with traffic almost unbearable and unmanageable during the morning and evening rush hours.

- *Please clarify all of these contradictory explanations and provide detailed planning information including mitigation project schedules, details, and funding sources for the mitigation projects.*

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Thank you for your quick response to these items, as we believe that the answers will lead to the conclusion that the proposed project will severely impact the Buena Creek Road community and our quality of life unless major infrastructure is added before approving such a project in our semi-rural/rural community area.

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Regards,

Todd Landers

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