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March 12, 2015

Mr. Mark Slovick  
County of San Diego, Planning & Development Services  
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San Diego, CA 92123-1239  
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**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Newland Sierra General Plan Amendment, Specific Plan, Rezone and Tentative Map Project (PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597, LOG NO. PDS2015-ER-08-001), County of San Diego, California (SCH#2015021036)**

Dear Mr. Slovick:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the Newland Sierra Project (SCH#2015021036) (Project) dated February 12, 2015. The comments provided herein are based upon information provided in the NOP for the DEIR (and associated reference materials including Dudek's December 2013 Memorandum), our knowledge of sensitive and declining vegetation communities, and ongoing regional habitat conservation planning in the County of San Diego (County). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State of California's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA, Fish and Game Code §2050 *et seq.*) and other sections of the Fish and Game Code. The Department is also responsible for the administration of the Lake and Stream Alteration Agreement Program (Fish and Game Code §1600 *et seq.*). The Department also administers the Natural Community Conservation Planning (NCCP) program (NCCP, Fish and Game Code §2800 *et seq.*). The County is a participant in the Natural Community Conservation Planning (NCCP) program. Currently, the County has an adopted South County Multiple-Species Conservation Program (MSCP), and is actively pursuing its draft North County MSCP (NC-MSCP). The NC-MSCP is a comprehensive habitat conservation planning program that attempts to preserve native habitats for a multitude of sensitive species for which the County, Fish and Wildlife Service, and California Department of Fish and Wildlife entered into a Planning Agreement (County of San Diego, 2014).

The Project site consists of 51 parcels totaling approximately 1,985 acres located west of Interstate 15, north of Deer Springs Road, and east of Twin Oaks Valley Road within the Twin Oaks Valley and Hidden Meadows Communities of the North County Metropolitan Subregional Plan area (southern portion) and the Bonsall Community Planning area (northern portion) of the unincorporated San Diego County (County). The project would include the development of a

new master planned community consisting of 2,135 dwelling units, 81,000 square feet of general commercial uses, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space. Overall, the master-planned development would consist of seven planning areas focused around a town center located off Deer Springs Road in the southeastern corner of the site and include an extensive trail system including: 7.1 miles of multi-use pathways along the main road; 8.7 miles of internal pathways and trails within neighborhoods; two miles of multi-purpose trails through the open space area; and, 1.3 miles of secondary trails through the open space area. The project would require several County approvals, including a General Plan Amendment, Specific Plan, Rezone, Tentative Map and habitat loss permit (HLP). Access to the project site would be provided by two main access points along Deer Springs Road, with an additional access point provided at Camino Mayor off of Twin Oaks Valley Road. Earthwork for the Project is estimated to consist of 10,700,000 cubic yards of balanced cut/fill with construction anticipated to occur in three phases over a 5 to 10 year period. The project would require the extension of fire protection services (Deer Springs Fire Protection District), sewer and water utilities [Vallecitos Water District (VWD)] and natural gas and electricity utilities [San Diego Gas & Electric Company (SDG&E)].

The project site is located within the northern portion of the Merriam Mountains range, a narrow 8.5-mile-long chain of low mountains generally running north-south with a variety of east-west trending ridgelines and scattered peaks. The property is primarily undeveloped with on-site topography composed mostly of hills and valleys dominated by rock (granodiorite) outcroppings with moderate to steeply sloping terrain, with elevations ranging from approximately 660 feet above mean sea level (AMSL) near the northwestern end to approximately 1,750 feet AMSL in the west central portion of the Project site. Various dirt roads and trails that provide access to each parcel and service roads for existing water infrastructure traverse the project site. An abandoned quarry is located in the northwest portion of the project site and an abandoned private landing strip is located in the north central portion. Surrounding land uses to the north, west, and south of the project site include large-lot, single-family residential development, agricultural uses and conserved open space.

The project site is also located within the NC-MSCP planning area, within Planning Unit 9 (San Marcos-Merriam Mountains Core Area) and the Pre-Approved Mitigation Area (PAMA) and represents one (Merriam Mountains) of only two remaining large blocks of natural habitat west of Interstate 15 in the PAMA. Vegetation on the project site consists of large blocks of Southern Mixed Chaparral with interspersed patches of



Diegan Coastal Sage Scrub, Coast Live Oak Woodlands, and Southern Willow Scrub. The South Fork of Moosa Canyon also runs from the northern to northeastern area of the project site. In addition, the habitat evaluation mapping for the County's draft NC-MSCP plan indicates that habitats on and adjacent to the project site are "moderate", "high", and "very high" habitat quality, and areas to the north, south, east, and west are also identified as PAMA.

The Department offers the comments and recommendations in the enclosure to assist in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the Project is consistent with ongoing regional habitat conservation planning efforts (i.e. that it would not preclude the preserve assembly or prevent the achievement of the biological goals anticipated under the NC-MSCP Subregional Plan). We appreciate the opportunity to comment on this NOP and look forward to further coordination with the County on this Project. If you have questions regarding our letter, please contact Randy Rodriguez (858) 637-7111 or [Randy.Rodriguez@wildlife.ca.gov](mailto:Randy.Rodriguez@wildlife.ca.gov).

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

Enclosure: (9 pages)

cc: State Clearinghouse, Sacramento  
Karen A. Goebel, U.S. Fish and Wildlife Service ([Karen\\_Goebel@fws.gov](mailto:Karen_Goebel@fws.gov))  
Mindy Fogg, County of San Diego ([Mindy.Fogg@sdcounty.ca.gov](mailto:Mindy.Fogg@sdcounty.ca.gov))  
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## ENCLOSURE

California Department of Fish and Wildlife Comments and Recommendations:  
NOP for the DEIR for the  
Newland Sierra Project

### NOP Comments

1. To enable the Department to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, wildlife, and other biological resources, we recommend the following information be included in the DEIR:

A. A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.

B. Analyses of a range of feasible alternatives to ensure that alternatives to the proposed Project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity, where appropriate. For example, to provide for a larger, contiguous block of open space in the eastern and northern portion of the property, to minimize edge effects to onsite biological open space areas, and to maintain connectivity between on- and offsite areas designated for conservation, we recommend that the draft EIR include the following alternatives: 1) one that would remove the three easternmost development bubbles (i.e., areas identified by the County in a prior meeting as Towncenter, Terraces, and Hillside) and associated access roads; 2) another possible alternative to consider would remove the easterly half of the Mesa development area (located just northwest of Hillside) and the Terraces and Hillside areas (but retain the Towncenter area); and, 3) a third alternative that would move some of the development proposed in the central and eastern areas of the site to the old quarry locations (also see Comment No. 3).

C. A complete assessment of the flora and fauna within and adjacent to the project area; specifically, the DEIR should include:

- a) Discussions regarding the regional setting, pursuant to CEQA Guidelines, section 15125(c), with special emphasis on resources that are rare or unique to the region that would be affected by the Project. This discussion is critical to an assessment of environmental impacts.
- b) A current inventory of the biological resources (to include rare, threatened, and endangered, and other sensitive species) associated with each habitat type on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. The Department's California Natural Diversity Data Base in Sacramento should be contacted at [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- c) Discussions regarding seasonal variations in use of the project area and vicinity by sensitive species, and acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

D. A thorough discussion of direct, indirect, and cumulative Project-related impacts expected to adversely affect biological resources. All facets of the Project should be included in this assessment. Specifically, the DEIR should include:

- a) Specific acreages and descriptions of the types of wetlands, coastal sage scrub, and other habitats that would potentially be affected by the proposed Project or project alternatives. Maps and tables should be used to summarize such information.
- b) Detailed discussions, including both qualitative and quantitative analyses, of potential direct effects on listed and other sensitive species (fish, wildlife, plants) and their habitats within the area of impact of the proposed and alternative projects.
- c) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (*e.g.*, preserve lands associated with a NCCP).
- d) Impacts to wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated.
- e) Discussions of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: Project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site.
- f) If applicable, a discussion of the effects of any Project-related dewatering or ground water extraction activities to the water table and the potential resulting impacts on the wetland/riparian habitat, if any, supported by the surface and groundwater.
- g) Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development Project and natural habitats.
- h) A cumulative effects analysis as described under CEQA Guidelines, section 15130, assessing the impacts of the proposed Project in conjunction with past, present, and anticipated future projects, relative to their impacts on native plant communities and wildlife.

E. A thorough discussion of mitigation measures for adverse Project-related impacts on sensitive plants, animals, and habitats. Specifically, the DEIR should include/address:

- a) Measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. The Wildlife Agencies consider these communities as threatened habitats having both regional and local significance.
- b) Where avoidance is infeasible, mitigation measures that emphasize minimization of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable (*e.g.*, it would not adequately mitigate the loss of biological functions and values), off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The Wildlife Agencies generally do not encourage the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown these efforts are experimental in nature and do not provide for the long-term viability of the target species.
- c) Mitigation measures to alleviate indirect Project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.

- d) Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.
- e) A requirement that a qualified biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the Lead Agency and the Wildlife Agencies.
- f) Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals, particularly cats. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.
- g) Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site biological open space easements, if applicable. An appropriate natural lands management organization, subject to approval by the County and Wildlife Agencies, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR) or comparable method should be completed to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Wildlife Agencies for review and approval prior to initiating construction activities; the final plan should be submitted to the Wildlife Agencies and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.

2. The Department recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1 - September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

3. The County and the Wildlife Agencies have met multiple times to discuss the proposed Newland-Sierra Project site, formerly known as Merriam Mountains, including the following dates: January 23rd, 2014; March 27th, 2014 (Site Visit); April 3rd, 2014; July 29th, 2014 (Site Visit); November 19th, 2014; and, most recently on February 19th, 2015. Based on our past meetings with the County, the Department has provided the following tenets that will guide any hardlined agreement negotiations for the Project:

- a) Though this is a new project, it is very similar to the Merriam Mountains project; however, all parties agree that it will be evaluated independent of the previous Merriam Mountains Project;
- b) Potential hardline discussion will be based on current conditions at the project site, in the North County Plan area, and in the County as a whole, as conditions have changed;
- c) A suite of species, not the coastal California gnatcatcher alone, is the driver for preservation at this location;
- d) The project should achieve a 25 percent development and 75 percent preservation ratio on-site to the maximum extent practicable; initial proposals only showed an approximate 60:40 ratio. For any portion of the 75 percent conservation that cannot be achieved on-site, the balance should be met by contributing land that adds value to the Merriam Mountains connection, preferably in the same NC-MSCP planning unit. Additional off-site conservation, if part of the proposal, should emphasize additional conservation of coastal sage scrub habitat. For example, at prior meetings, there were discussions about potentially acquiring excess Caltrans rights-of-ways along the easterly project boundary to enhance the proposed open space configuration and wildlife connections along the eastern border of the Project;
- e) The north-south habitat connectivity along I-15 is important for the NC Plan;
- f) Internal open space (e.g., block 3) is not acceptable for preservation credit;
- g) Removal of the northern access road to Lawrence Welk Court would improve preservation in the northern open space; however, there needs to be commitment by the County/Fire that a secondary access road would not be required at any time for the Project;
- h) Proposed trails need to be compatible with habitat preservation for wildlife.
- i) It must be demonstrated that restoration of the old quarry site can be achieved, considering the slope, soils and other factors in the area;
- j) Where vineyards are proposed in areas adjacent to proposed open space, best management practices that are effective and can be enforced should be included as part of any hardline agreement; and,
- k) Drought conditions have worsened and the site is old growth chaparral and prime for wildfire. The wildlife agencies need proof of fire district agreement or accepted Fire Protection Plan [also see 3.f)].

Based on our February 19<sup>th</sup>, 2015 meeting with the County, to ensure that the proposed project is consistent with the conservation goals of the draft NC-MSCP (see comment No. 4), we recommend that the DEIR fully analyze the following project alternatives: 1) an alternative that would remove the three easternmost development bubbles (i.e., areas identified by the County in a prior meeting as Towncenter, Terraces, and Hillside) and associated access roads; 2) an alternative that would be to remove the easterly half of the Mesa development area (located just northwest of Hillside) and the Terraces and Hillside areas (but retain the Towncenter area) to open up the easterly corridor and provide better connection along the northern and eastern portions of the property and to the south, while maximizing the conservation of coastal sage scrub; and, 3) an alternative that move some of the development proposed in the central and eastern areas of the site to the old quarry locations. The first two alternatives recommended for inclusion in the DEIR would substantially minimize project impacts to the draft PAMA, provide for a large, contiguous block of open space in the eastern and northern portion of the property, minimize edge effects to onsite biological open space areas, and maintain connectivity between on and offsite areas designated as draft PAMA within Planning Unit 9 and to other conservation efforts outside the NC-MSCP planning area. The last alternative would have the same benefits of the first two, but also conserve more coastal sage scrub and provide a better preserve design in the central area of the site while locating development in an existing disturbed area, closer

to access and eliminate the need to expend resources on restoration that may or may not be successful (see Comment No. 1).

4. As stated above, the proposed Project is located primarily within the PAMA, within the San Marcos-Merriam Mountains Core Area (Planning Unit 9) and is identified as a large block of habitat (typically 500 acres or more) that supports a viable population of multiple wildlife species and represents one of only two remaining large blocks of natural habitat west of Interstate 15 (I-15) in the PAMA. Site conditions and size currently facilitate the movement of small and larger mammals to traverse across to adjacent mostly undeveloped areas, such as the San Marcos Mountains located northwest of the project site. The draft NC-MSCP plan anticipates that approximately 75 percent of lands designated as PAMA would be conserved with 25 percent utilized for development and anticipates the following conservation goals for the San Marcos-Merriam Mountains Core Area (Planning Unit 9):

- a) Conserve oak woodlands, coastal sage scrub (particularly in Twin Oaks) to maintain populations and connectivity of coastal California gnatcatcher and other coastal sage scrub-dependent species, and chaparral on mafic or gabbro soils that support sensitive plant species, such as chaparral beargrass and Parry's tetracoccus, San Diego thornmint (particularly in San Marcos Mountains), or California adolphia;
- b) Ensure that a core community of coastal California gnatcatcher and other coastal sage scrub-dependent species remains in the coastal sage scrub block in Twin Oaks;
- c) Conserve the north-south connectivity of coastal California gnatcatcher habitat along I-15 between the Riverside County line and the City of Escondido. Maintain the east-west connectivity of natural habitats on either side of I-15 for dispersal of coastal sage scrub community birds;
- d) Conserve the riparian and upland habitats of Gopher Canyon Creek for water quality and sensitive species, such as southwestern pond turtle and least Bell's vireo; and,
- e) Ensure the San Diego thornmint population in the Palisades open space preserve is maintained and enhanced, if practicable.

Current project proposals have shown only about 60 percent conservation of lands designated as PAMA, which would not be consistent with the NC-MSCP reserve assembly targets and would fragment a core block of habitat that is planned to connect designated preserve areas with high value habitat within the NC-MSCP PAMA, including areas currently conserved to mitigate impacts to gnatcatchers and gnatcatcher habitat. Fragmentation reduces habitat quality and promotes increased levels of nest predation and brood parasitism, and ultimately, increased rates of local extinction (Wilcove 1985, Rolstad 1991, Saunders *et al.* 1991, Soulé *et al.* 1988). Connectivity among habitat reserve areas (i.e., connectivity among gnatcatcher habitat within the NC-MSCP PAMA) is essential for long-term maintenance of the viability of gnatcatcher in this area. Maintaining connectivity among these patches of gnatcatcher habitat serves to: (1) allow exchange of genetic material among populations; (2) allow recolonization of habitat patches from which gnatcatchers have been extirpated; and (3) allow relatively safe travel for gnatcatchers moving from one area to another. Fragmentation of habitat within core habitat areas and the narrowing of connections among blocks of remaining habitat for gnatcatchers are expected to reduce the function and value of these areas.

The DEIR should evaluate direct and indirect impacts the proposed development would have on the planned San Marcos-Merriam Mountains Core Area linkage and NC-MSCP planning unit goals, as well as north-south and east-west wildlife movement through/across the site (e.g., from open space Block 3 to other conserved areas on-site and designated PAMA off-site and from areas east of I-15, through the site and across Twin Oaks Valley/Deer Springs Road), including impacts to wildlife movement (including gnatcatchers, mammals and herpetofauna), loss of and fragmentation to habitat patches/blocks, corridor length/width, connectivity, etc.



5. The Department recommends a 100-foot buffer from the riparian habitat in the major drainage of Moosa Canyon Creek. This habitat is expected, either currently or in time, to support sensitive riparian species such as the endangered least Bell's vireo. We further recommend that any limited encroachment (necessitated by site topography) from on-site trails not approach any closer than 50-feet to riparian/wetland habitat. The DEIR should include a map showing the location of all proposed trails.

6. The current project description includes several parks and fuel modification zones within the open space acreage. Parks and fuel modification zones are considered fully impacted by the Wildlife Agencies and cannot be included in biological open space proposed for conservation to offset impacts to sensitive resources and must be mitigated appropriately. The DEIR should clearly differentiate between biological open space that would be used as mitigation to offset Project impacts (natural open space) and open space (i.e., parks and fuel modification zones) that would be routinely impacted.

7. The Section 10 of the CEQA Initial Study (Environmental Checklist Form) indicates that the Project would require issuance of a County Habitat Loss Permit (HLP, Ordinance Nos. 8365, 8380, 8608, 8846, 9457, and 9671), which implements the interim 4(d) rule of the federal Endangered Species Act and the state Natural Community Conservation Planning (NCCP) Process Guidelines for loss of coastal sage scrub habitat during preparation of a NCCP-HCP. To approve an interim habitat loss application, the local agency must make the following findings:

- a) The proposed habitat loss is consistent with the interim loss criteria in the Conservation Guidelines and with any subregional process if established by the subregion;
- b) The habitat loss does not cumulatively exceed the 5% guideline;
- c) The habitat loss will not preclude connectivity between areas of high habitat values;
- d) The habitat loss will not preclude or prevent the preparation of the subregional NCCP (e.g., the loss would not foreclose future reserve planning options;
- e) The habitat loss has been minimized and mitigated to the maximum extent practicable;
- f) The habitat loss will not appreciably reduce the likelihood of the survival and recovery of listed species in the wild; and,
- g) The habitat loss is incidental to otherwise lawful activities.

The NC-MSCP Planning Agreement also establishes guidelines for interim projects while the Plan is being completed (Section 6.6, Interim Project Processing Interim Review Process and Exhibit B). The Interim Review guidelines identify that where a project will not affect CSS but will negatively affect (a) biological resources in areas mapped as "high value" and "very high value" based on the County's habitat evaluation models that utilize the best available information at the time, (b) areas mapped as "moderate" or "low" value that may be important for preserve assembly, and/or (c) proposed Covered Species or their habitat based on current biological surveys, the NCCP/4(d) findings shall be considered and preserve design principles shall be applied to the project including the following:

- a) On-site open space should provide a long-term biological benefit;
- b) On-site open space must protect habitat of equal or greater value as that being impacted. No isolated pockets of open space should be used for mitigation credit;
- c) Separate lots should be used whenever possible for on-site open space to help protect the biological value of the preserved areas;
- d) On-site open space shall contribute to regional conservation efforts;
- e) Open space design, to the extent known, should not reduce the biological diversity found on the site;
- f) Open space design shall maintain habitat connectivity between areas of high quality habitat;
- g) The most sensitive resources shall be protected to maximize long-term viability; and,
- h) Edge effects and habitat fragmentation shall be minimized by maximizing the surface area to perimeter ratio, preserving large blocks of contiguous open space. Edge effects shall be further

minimized by establishing buffers, providing fencing and/or permanent signs, and limiting trails and/or lighting.

The DEIR should include sufficient information and analysis to demonstrate how the project is consistent with the preliminary conservation objectives of the NC-MSCP (including the planning units goals for the San Marcos-Merriam Mountains Core Area, see Comment No. 4) and the Planning Agreement Exhibit B guidelines for interim projects and how it would meet the NCCP/4(d) findings required for the County to issue a HLP for impacts to coastal sage scrub (which are subject to Wildlife Agency approval).

8. The proposed Project is located adjacent to various lands that have been or are planned to be conserved for biological resources, including lands owned by the City of Oceanside located immediately to the north of the Project. The DEIR should evaluate the direct and cumulative effects that the proposed development would have on the adjacent existing and proposed conservation located in both jurisdictions. The analysis should include effects on these lands from the proposed Project, including direct and indirect impacts from: (a) increased public use of these open space areas from the Project's population; (b) lighting; (c) noise; (e) drainage; (f) landscaping and introducing vegetation, etc.

9. All plans for restoration/revegetation associated with the Project should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. The plan for restoring coastal sage scrub on 4.9 acres onsite and 4.7 acres offsite would require approval by the Wildlife Agencies as part of the federal/state authorization(s) for impacts to coastal sage scrub.

10. The Department is concerned about the potential direct and indirect effects to biological resources associated with the construction of pedestrian trails in areas proposed for designation as open space on site. We recommend that trails in open space be located to not bisect intact areas and instead be placed along the perimeter or edge of open space areas. The following information should be included in the DEIR regarding any proposed pedestrian trail: an aerial photograph with an overlay of the proposed alignment of the trail in relation to designated or proposed open space; specifications of the trail design; specification that the trail would be for hiking only; measures to avoid/minimize impacts related to hikers straying off-trail and/or trail use by unauthorized vehicles including bicycles; and a discussion of how the proposed location and use of the trail would be consistent with the County's draft NC-MSCP.

11. To increase potential habitat and functionality of on-site wildlife corridors, we recommend that any Project-graded slopes and fuel clearing areas requiring replanting be planted with compatible, low-fuel natives (e.g., cacti and other succulents) to minimize the potential for invasive species to spread into the proposed on-site mitigation/open space areas and into adjacent natural lands.

12. The County should ensure that all development-related landscaping proposed adjacent to on- or off-site habitat does not include exotic plant species that may be invasive to native habitats. Exotic species should be removed and replaced with native or non-invasive exotic species based on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list that can be obtained from Cal-IPC's web site at <http://www.cal-ipc.org>. This list includes such species as pampas grass, fountain grass, myoporum, black locust, capeweed, tree of heaven, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping should not use plants that require intensive irrigation, fertilizers, or pesticides adjacent to preserve areas and water runoff from landscaped areas should be directed away from

the biological conservation easement area and contained and/or treated within the development footprint. The applicant should submit a draft list of species to be included in the landscaping to the Wildlife Agencies for approval at least 60 days prior to initiating Project impacts. Additionally, the applicant should also submit to the Agencies the final list of species to be included in the landscaping within 30 days of receiving approval of the draft list of species.

13. The NC-MSCP is still in-progress, and is expected to be completed in 2017. Until the NC-MSCP is completed and permit issued, the Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options [Fish and Game Code §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

14. The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or “entity”) must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. The project area supports aquatic, riparian, and wetland habitats. The DEIR should include a jurisdictional delineation of the creeks/drainages and their associated riparian habitats. The delineation should be conducted pursuant to the Service wetland definition adopted by the Department (Cowardin *et al.* 1979). Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department’s issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City’s DEIR for the project. We recommend that all wetlands and watercourses on-site, whether ephemeral, intermittent or perennial, should be retained and provided with substantial setbacks to preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife and plant populations. Moreover, to minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.<sup>1</sup>

## REFERENCES

Atwood, J. L. 1990. Status review of the California gnatcatcher (*Polioptila californica californica*). Unpublished technical report, Manomet Bird Observatory, Manomet, Massachusetts. 79 pp.

---

<sup>1</sup> A notification package for a SAA may be obtained by accessing the Department’s web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

County of San Diego. 1997. South County Multiple Species Conservation Program. Section 4.2.3 (Linkages) - Goals and Criteria for Linkages and Corridors, Page 4-9 and Biological Mitigation Ordinance (2010) - Attachment H (Design Criteria for Linkages and Corridors).

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Dudek. 2013. Memorandum for Newland Sierra: Proposed Open Space Design and Relationship to Draft North County MSCP. December 11, 2013.

ERC Environmental and Energy Services (ERCE) (Ogden). 1990. Phase I report, Amber Ridge California gnatcatcher study. Prepared for Weingarten, Siegel, Fletcher Group, Inc. April 1990. 26 pp.

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Saunders, D. A., R. J. Hobbs, and C. R. Margules. 1991. Biological consequences of ecosystem fragmentation: A review. Conservation Biology Vol. 5, No. 1. Pp. 18-32. Soulé, M. E., D. T. Bolger, A. C. Roberts, R. Sauvajot, J. Wright, M. Soric, and S. Hill. 1988. Reconstructed dynamics of rapid extinctions of chaparral-requiring birds in urban habitat islands. Conservation Biology. Vol. 2. Pp. 75-92.

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Wilcove, D.S. 1985. Nest predation in forest tracts and the decline of migratory songbirds. Ecology. Vol. 66. Pp. 1211-1214.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
PLANNING DIVISION  
4050 TAYLOR STREET, MS 240  
SAN DIEGO, CA 92110  
PHONE (619) 688-6960  
FAX (619) 688-4299  
TTY 711  
www.dot.ca.gov



*Flex your power!  
Be energy efficient!*

February 26, 2015

11-SD-15  
PM 36.64  
NOP SCH 2015021036

Mr. Mark Slovick  
San Diego County  
Department of Planning & Development Services  
5510 Overland Ave, Suite 310  
San Diego, CA 92123

Dear Mr. Slovick:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Notice of Preparation (NOP) SCH 2015021036 for the Newland Sierra project. The project will be located along Interstate 15 (I-15) and north of Deer Springs Road. Caltrans would like to make the following comments:

Caltrans commented previously on the traffic impact study on the Newland Sierra project in our letter dated January 27, 2015 (Attached). Caltrans looks forward to continued coordination on the Environmental Impact Report and technical studies for this project.

If you have any questions, or require further information, please contact Trent Clark, at (619) 688-3140 or email at [Trent\\_Clark@dot.ca.gov](mailto:Trent_Clark@dot.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Armstrong", written over a horizontal line.

JACOB ARMSTRONG, Chief  
Development Review Branch

c: Nick Ortiz (SD County)



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
PLANNING DIVISION  
4050 TAYLOR STREET, MS 240  
SAN DIEGO, CA 92110  
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*Flex your power!  
Be energy efficient!*

January 27, 2015

11-SD-15  
PM 36.64  
TIA November 7, 2014

Mr. Nick Ortiz  
San Diego County  
Department of Planning & Development Services  
5510 Overland Ave, Suite 310  
San Diego, CA 92123

Dear Mr. Ortiz:

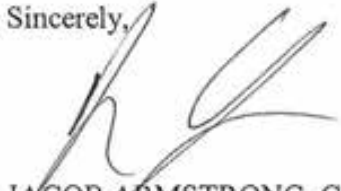
The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Traffic Impact Analysis (TIA) dated November 7, 2014 for the Newland Sierra project. The project will be located along Interstate 15 (I-15) and north of Deer Springs Road. Caltrans would like to make the following comments:

1. 2.4.3, pg. 8, Off-Site Roadway Improvements, Deer Springs Road
  - a. Add a figure showing both Option A and Option B.
  - b. 4<sup>th</sup> paragraph, "...there is a significant reduction in cut-through trips since traffic on I-15 would be discouraged from using Deer Springs Road during peak hours." Why? Please explain.
2. 2.4.3, pg. 9, Off-Site Roadway Improvements, I-15 Interchange / Park-and-ride Improvements
  - a. Add number of lanes.
3. 4.5.2, pg. 19, Peak Hour Intersection Turning Movement Volumes
  - a. Figure 4-3 shows the Existing AM/PM peak hour traffic volumes, but the actual Figure 4-3 on pg. 36 mentions Existing Traffic Volumes. It should read the Existing AM/PM peak hour traffic volumes. The same with Figure 8-8 and 8-10 on pages 72 and 74 respectively.
4. 8.0, pg. 60, Project Trip Generation / Distribution / Assignment
  - a. Add an explanation about the SANDAG land use (TAZ 444), and explain that TAZ was divided up (disaggregated) into seven TAZs.
5. 8.2, pg. 61, Trip Distribution
  - a. Appendix C (Select Zone Assignment Plots) has blank pages and no maps.
  - b. Figure 8-1, 13% traffic distribution for residential on Deer Springs Road seems low. Please provide further clarification.

Mr. Nick Ortiz  
January 27, 2015  
Page 2

If you have any questions, or require further information, please contact Trent Clark, at (619) 688-3140 or email at [Trent\\_Clark@dot.ca.gov](mailto:Trent_Clark@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'JA', with a stylized flourish extending from the end.

JACOB ARMSTRONG, Chief  
Development Review Branch

STATE OF CALIFORNIA  
 NATIVE AMERICAN HERITAGE COMMISSION  
 1550 Harbor Blvd., Suite 100  
 West SACRAMENTO, CA 95691  
 (916) 373-3710  
 Fax (916) 373-5471



February 26, 2015

Mark Slovick  
 San Diego County  
 5510 Overland Avenue, Suite 310  
 San Diego, CA 92123

RE: SCH# 2015021036, Newland Sierra, San Diego County.

Dear Mr. Slovick,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064.5(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **SFL Check Completed with Positive Results. Please contact the San Luis Rey Band of Mission Indians for further information.**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

*Katy Sanchez*

Katy Sanchez  
 Associate Government Program Analyst

CC: State Clearinghouse

**Native American Contacts  
San Diego County  
February 26, 2015**

Pala Band of Mission Indians  
Shasta Gaughen, PhD, THPO  
PMB 50, 35008 Pala-Temecula      Luiseno  
Pala, CA 92059      Cupeno  
sgaughen@palatribe.com  
(760) 891-3515

(760) 742-3189 Fax

Pauma & Yuima Reservation  
Randall Majel, Chairperson  
P.O. Box 369      Luiseno  
Pauma Valley CA 92061  
(760) 742-1289 ext 317

(760) 742-3422 Fax

Pechanga Band of Mission Indians  
Paul Macarro, Cultural Resources Manager  
P.O. Box 1477      Luiseno  
Temecula, CA 92593  
pmacarro@pechanga-nsn.gov  
(951) 770-8100

(951) 506-9491 Fax

Rincon Band of Mission Indians  
Vincent Whipple, Tribal Historic Pres. Officer  
1 West Tribal Road      Luiseno  
Valley Center, CA 92082  
vwhipple@rincontri.org  
(760) 297-2635

(760) 297-2639 Fax

Soboba Band of Mission Indians  
Rosemary Morillo, Chairperson; Attn: Carrie Garcia  
P.O. Box 487      Luiseno  
San Jacinto, CA 92581  
carrieg@soboba-nsn.gov  
(951) 654-2765

(951) 654-4198 Fax

Pauma Valley Band of Luiseño Indians  
Bennaec Calac  
P.O. Box 369      Luiseno  
Pauma Valley CA 92061  
bennaecalac@aol.com  
(760) 617-2872

(760) 742-3422 Fax

Pauma & Yuima  
ATTN: EPA  
P.O. Box 369      Luiseno  
Pauma Valley CA 92061  
kymberli\_peters@yahoo.com  
(760) 742-1289

(760) 742-3422 Fax

Rincon Band of Mission Indians  
Bo Mazzetti, Chairperson  
1 West Tribal Road      Luiseno  
Valley Center, CA 92082  
bomazzetti@aol.com  
(760) 749-1051

(760) 749-8901 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed  
SCH # 2015021036, Newland Sierra, San Diego County.

**Native American Contacts  
San Diego County  
February 26, 2015**

San Luis Rey Band of Mission Indians  
Tribal Council  
1889 Sunset Drive Luiseno  
Vista , CA 92081  
cjmojado@slrmissionindians.org  
(760) 724-8505

(760) 724-2172 Fax

San Luis Rey Band of Mission Indians  
Cultural Department  
1889 Sunset Drive Luiseno  
Vista , CA 92081 Cupeno  
cjmojado@slrmissionindians.org  
(760) 724-8505

(760) 724-2172 Fax

Kupa Cultural Center (Pala Band)  
Shasta Gaughen, Assistant Director  
PMB 50, 35008 Pala-Temecula Luiseno  
Pala , CA 92059  
sgaughen@palatribe.com  
(760) 891-3515

(760) 742-4543 Fax

Pechanga Band of Mission Indians  
Mark Macarro, Chairperson  
P.O. Box 1477 Luiseno  
Temecula , CA 92593  
mgoodhart@pechanga-nsn.  
(951) 770-6100

(951) 695-1778 Fax

La Jolla Band of Mission Indians  
Lavonne Peck, Chairwoman  
22000 Highway 76 Luiseno  
Pauma Valley CA 92061  
Rob.roy@lajolla-nsn.gov  
(760) 742-3771

(760) 742-1704 Fax

Pauma & Yuima Reservation  
Charles Devers, Cultural Committee  
P.O. Box 369 Luiseno  
Pauma Valley CA 92061  
(760) 742-1289

(760) 742-3422 Fax

Pala Band of Mission Indians  
Robert H. Smith, Chairperson  
PMB 50, 35008 Pala-Temecula Luiseno  
Pala , CA 92059 Cupeno  
dhuss@palatribe.com  
(760) 891-3500

(760) 742-3189 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed  
SCH # 2015021036, Newland Sierra, San Diego County.





Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

Notice of Preparation

February 12, 2015

To: Reviewing Agencies

Re: Newland Sierra  
SCH# 2015021036

Attached for your review and comment is the Notice of Preparation (NOP) for the Newland Sierra draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Mark Slovick  
San Diego County  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments

cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2015021036  
**Project Title** Newland Sierra  
**Lead Agency** San Diego County

---

**Type** NOP Notice of Preparation  
**Description** The applicant proposes to develop a new master planned community consisting of 2,135 dwelling units, 81,000 sf of general commercial uses, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space. The project would consist of entitlements for a General Plan Amendment, Specific Plan, Rezone, and Tentative Map.

---

**Lead Agency Contact**

**Name** Mark Slovick  
**Agency** San Diego County  
**Phone** 858 495 5172 **Fax**  
**email**  
**Address** 5510 Overland Avenue, Suite 310  
**City** San Diego **State** CA **Zip** 92123

---

**Project Location**

**County** San Diego  
**City**  
**Region**  
**Cross Streets** Deer Springs Road (County Road S 12) and Twin Oaks Valley Road  
**Lat / Long** 33° 18' .9647" N / 116° 40' 16.8958" W  
**Parcel No.**  
**Township** 11S **Range** 2/3W **Section** Varies **Base**

---

**Proximity to:**

**Highways** I-15  
**Airports**  
**Railways**  
**Waterways** San Luis Rey River  
**Schools** Twin Oaks ES, Rancho Minerva MS  
**Land Use** Various

---

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

---

**Reviewing Agencies** Resources Agency; Department of Conservation; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Department of Housing and Community Development; Office of Emergency Services, California; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9

---

**Date Received** 02/12/2015 **Start of Review** 02/12/2015 **End of Review** 03/13/2015

---

**Notice of Completion & Environmental Document Transmittal****2015021036**

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # \_\_\_\_\_

**Project Title:** Newland SierraLead Agency: County of San DiegoContact Person: Mark SlovickMailing Address: 5510 Overland Avenue, Suite 310Phone: 858-495-5172City: San DiegoZip: 92123County: San Diego**Project Location:** County: San DiegoCity/Nearest Community: Twin Oaks ValleyCross Streets: Deer Springs Road (County Road S 12) and Twin Oaks Valley RoadZip Code: 92069Lat. / Long.: 33° 18' 0.9647" N / 116° 40' 16.8958" WTotal Acres: 1,985Assessor's Parcel No.: see attachedSection: 13, 14, 19, 24, 25 and 30 Twp.: 11 S Range: 2 and 3W Base:Within 2 Miles: State Hwy #: I-15Waterways: San Luis Rey RiverAirports: N/ARailways: N/ASchools: Twin Oaks Elementary, Rancho Minerva Middle School**Document Type:**CEQA: ☒ NOP  
☐ Early Cons  
☐ Neg Dec  
☐ Mit Neg Dec☐ Draft EIR  
☐ Supplement/Subsequent EIR  
(Prior SCH No.)  
Other \_\_\_\_\_NEPA: ☐ NOI  
☐ EA  
☐ Draft EIS  
☐ FONSIOther: ☐ Joint Document  
☐ Final Document  
☐ Other \_\_\_\_\_**Local Action Type:**☐ General Plan Update  
☒ General Plan Amendment  
☐ General Plan Element  
☐ Community Plan  
☒ Specific Plan  
☐ Master Plan  
☐ Planned Unit Development  
☐ Site Plan☒ Rezone  
☐ Prezone  
☐ Use Permit  
☒ Land Division (Subdivision, etc.)☐ Annexation  
☐ Redevelopment  
☐ Coastal Permit  
☐ Other \_\_\_\_\_**Development Type:**☒ Residential: Units 2,135 Acres \_\_\_\_\_  
☐ Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☒ Commercial: Sq.ft. 81,000 Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☐ Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☒ Educational Charter School (6 acres)  
☒ Recreational Parks and trails☐ Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  
☐ Transportation: Type \_\_\_\_\_  
☐ Mining: Mineral \_\_\_\_\_  
☐ Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
☐ Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
☐ Hazardous Waste: Type \_\_\_\_\_  
☐ Other: \_\_\_\_\_**Project Issues Discussed in Document:**

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Vegetation
<input checked="" type="checkbox"/> Agricultural Land	<input checked="" type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input checked="" type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Archeological/Historical	<input checked="" type="checkbox"/> Geologic/Seismic	<input checked="" type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Wildlife
<input type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Growth Inducing
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Population/Housing Balance	<input checked="" type="checkbox"/> Toxic/Hazardous	<input checked="" type="checkbox"/> Land Use
<input type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Traffic/Circulation	<input checked="" type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Other _____			

**Present Land Use/Zoning/General Plan Designation:**

Vacant land /General Commercial (C36), Office Professions (C30), Rural Residential (RR), Limited Agricultural (A70), Extractive (S82), and General Rural (S92)/ Rural Lands 20 (RL-20), General Commercial (C-1), Office Professional (C-2), and Semi-Rural 10 (SR-10)

**Project Description:** (please use a separate page if necessary)

The applicant proposes to develop a new master planned community consisting of 2,135 dwelling units, 81,000 square feet of general commercial uses, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space. The project would consist of entitlements for a General Plan Amendment, Specific Plan, Rezone, and Tentative Map.

# NOP Distribution List

62

County: *San Diego*

SCH#

2015021036

## Resources Agency

☒ Resources Agency  
Nadell Gayou

☐ Dept. of Boating & Waterways  
Nicole Wong

☐ California Coastal Commission  
Elizabeth A. Fuchs

☐ Colorado River Board  
Lisa Johansen

☒ Dept. of Conservation  
Elizabeth Carpenter

☐ California Energy Commission  
Eric Knight

☒ Cal Fire  
Dan Foster

☐ Central Valley Flood Protection Board  
James Herota

☐ Office of Historic Preservation  
Ron Parsons

☒ Dept of Parks & Recreation  
Environmental Stewardship Section

☐ California Department of Resources, Recycling & Recovery  
Sue O'Leary

☐ S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam

☒ Dept. of Water Resources  
Agency  
Nadell Gayou

## Fish and Game

☐ Dept. of Fish & Wildlife  
Scott Flint  
Environmental Services Division

☐ Fish & Wildlife Region 1  
Donald Koch

☐ Fish & Wildlife Region 1E  
Laurie Harnsberger

☐ Fish & Wildlife Region 2  
Jeff Drongesen

☐ Fish & Wildlife Region 3  
Charles Amor

☐ Fish & Wildlife Region 4  
Julie Vance

☒ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program

☐ Fish & Wildlife Region 6 IM  
Heidi Sickler  
Inyo/Mono, Habitat Conservation Program

☐ Dept. of Fish & Wildlife M  
George Isaac  
Marine Region

## Other Departments

☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture

☐ Depart. of General Services  
Public School Construction

☐ Dept. of General Services  
Anna Garbeff  
Environmental Services Section

☐ Delta Stewardship Council  
Kevan Samsam

☒ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

## Independent

## Commissions, Boards

☐ Delta Protection Commission  
Michael Machado

☒ OES (Office of Emergency Services)  
Dennis Castillo

☒ Native American Heritage Comm.  
Debbie Treadway

☐ Public Utilities Commission  
Leo Wong

☐ Santa Monica Bay Restoration  
Guangyu Wang

☒ State Lands Commission  
Jennifer Deleong

☐ Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

## Cal State Transportation Agency CalSTA

☐ Caltrans - Division of Aeronautics  
Philip Grimmins

☐ Caltrans - Planning  
HQ LD-IGR  
Terri Pencovic

☒ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

☐ Caltrans, District 1  
Rex Jackman

☐ Caltrans, District 2  
Marcelino Gonzalez

☐ Caltrans, District 3  
Eric Federicks - South  
Susan Zandhi - North

☐ Caltrans, District 4  
Erik Alm

☐ Caltrans, District 5  
Larry Newland

☐ Caltrans, District 6  
Michael Navarro

☐ Caltrans, District 7  
Dianna Watson

☐ Caltrans, District 8  
Mark Roberts

☐ Caltrans, District 9  
Gayle Rosander

☐ Caltrans, District 10  
Tom Dumas

☒ Caltrans, District 11  
Jacob Armstrong

☐ Caltrans, District 12  
Maureen El Harake

## Cal EPA

## Air Resources Board

☒ All Other Projects  
Cathi Slaminski

☐ Transportation Projects  
Nesamani Kalandyur

☐ Industrial/Energy Projects  
Mike Tollstrup

☐ State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

☐ State Water Resources Control Board  
Jeffery Werth  
Division of Drinking Water

☐ State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

☐ State Water Resources Control Board  
Phil Crader  
Division of Water Rights

☐ Dept. of Toxic Substances Control  
CEQA Tracking Center

☐ Department of Pesticide Regulation  
CEQA Coordinator

## Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

☐ RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

☐ RWQCB 3  
Central Coast Region (3)

☐ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

☐ RWQCB 5S  
Central Valley Region (5)

☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

☐ RWQCB 6  
Lahontan Region (6)

☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

☐ RWQCB 7  
Colorado River Basin Region (7)

☐ RWQCB 8  
Santa Ana Region (8)

☒ RWQCB 9  
San Diego Region (9)

☐ Other \_\_\_\_\_

☐ \_\_\_\_\_  
Conservancy



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-SDG-15B0150-15CPA0175

MAR 12 2015

Mr. Mark Slovick  
County of San Diego  
Department of Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

Subject: Notice of Preparation of an Environmental Impact Report for the Newland Sierra Project, Unincorporated San Diego County, California

Dear Mr. Slovick:

We have reviewed the subject Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), dated February 12, 2015, which we received on March 5, 2015. The proposed Newland Sierra project encompasses 1,985 acres located west of Interstate 15, north of Deer Springs Road, and east of Twin Oaks Valley Road within unincorporated San Diego County (County). The proposed project would include the development of a new master planned community consisting of 2,135 homes, general commercial uses, school site, 37 acres of parks, and 1,202 acres of biological open space. In addition, the project would include an extensive trail system consisting of: 7.1 miles of multi-purpose pathways along the main road; 8.7 miles of internal pathways and trails within neighborhoods; and 3.3 miles of trails through the open space areas (2 miles of multi-purpose trail and 1.3 miles of secondary trails).

The primary concern and mandate of the U.S. Fish and Wildlife Service (Service) is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), the Migratory Bird Treaty Act (16 U.S.C. 703), and the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c). Our comments are based on the information provided in the NOP, our knowledge of sensitive and declining vegetation communities in the County, and our participation in regional conservation planning efforts.

One of our primary concerns is the potential impacts of the proposed project to assembling a subregional preserve system. The proposed project site is located within the planning area for the North County Multiple Species Conservation Program (NCMSCP). The NCMSCP is a comprehensive habitat conservation planning program that attempts to preserve native habitats for a multitude of sensitive species for which the County, Service, and California Department of Fish and Wildlife entered into a Planning Agreement (Revised and Amended May 12, 2014). The proposed project site and areas to the north, south, east, and west are identified as "Pre-approved Mitigation Area" (PAMA) in the draft NCMSCP plan. More specifically, the proposed project site is located

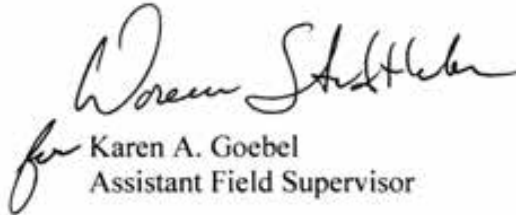


within Planning Unit 9 (San Marcos-Merriam Mountains Core Area) and represents one (Merriam Mountains) of only two remaining large blocks of natural habitat west of Interstate 15 in the PAMA. In addition, the habitat evaluation maps of the County's draft NCMSCP plan indicates that habitats on and adjacent to the project site are "moderate", "high", and "very high" habitat quality.

To ensure that the proposed project is consistent with the conservation goals of the draft NCMSCP as well as Planning Unit 9 of the draft PAMA, we recommend that the DEIR fully analyze a project alternative that would remove the three development bubbles identified as Towncenter, Terraces, and Hillside (see Figure 1 which was provided to us by the County) and associated access roads. The redesign would minimize project impacts to the draft PAMA, provide for a large, contiguous block of open space in the eastern and northern portion of the property thereby contributing to assemblage of the San Marcos-Merriam Mountains Core Area, and maintain connectivity between on and offsite areas designated as draft PAMA and to other conservation efforts outside the NCMSCP planning area. To further assist you in evaluating the proposed project, we have provided the enclosed recommendations for inclusion in the DEIR.

We appreciate the opportunity to comment on the subject NOP and request that a copy of the DEIR be provided to our office upon its release. If you have any questions regarding this letter or require additional information, please contact Michelle Durflinger of our office at 760-431-9440, extension 356.

Sincerely,



Karen A. Goebel  
Assistant Field Supervisor

Enclosure

cc: David Mayer, California Department of Fish and Wildlife, San Diego, California



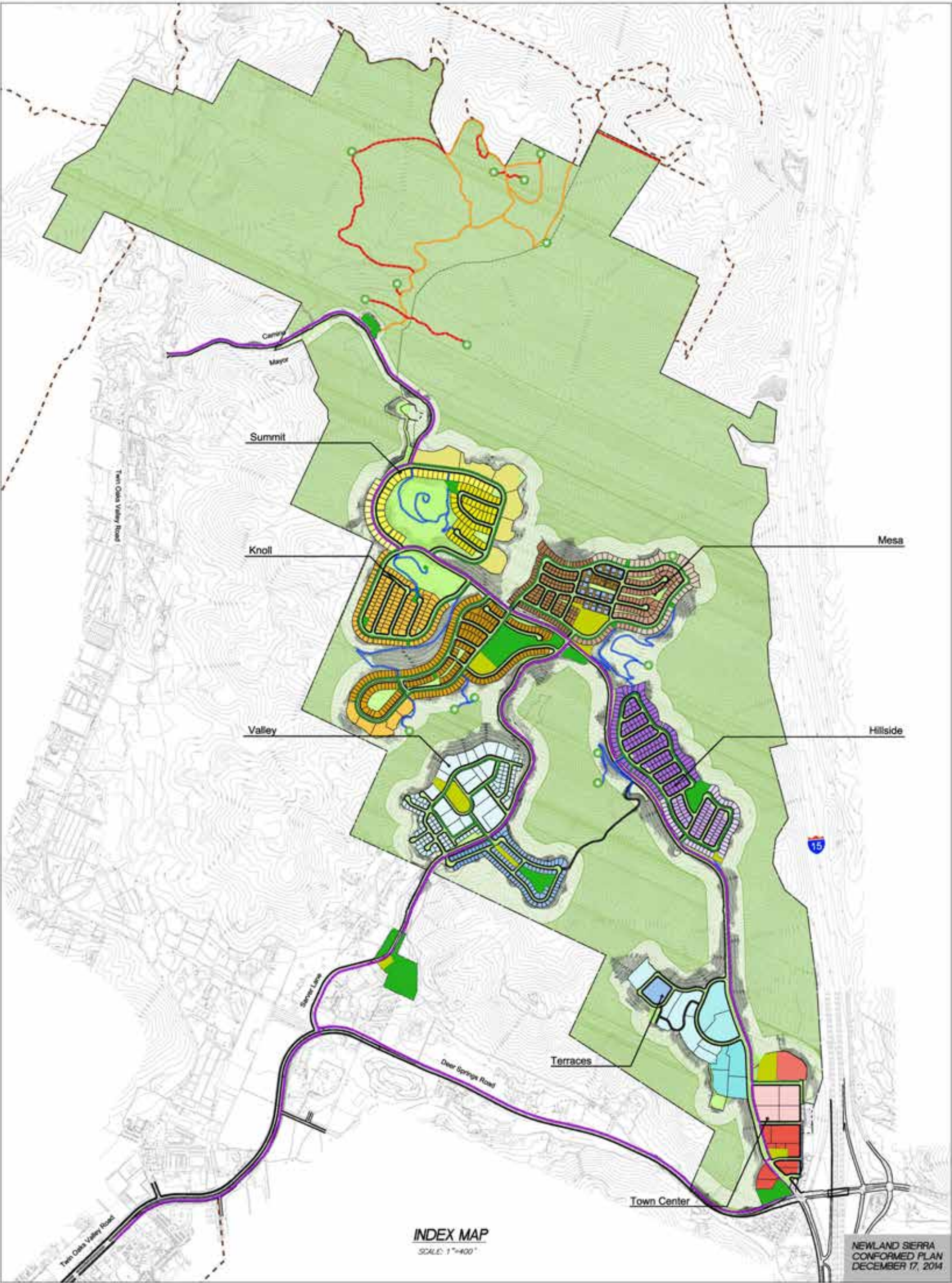


Figure 1. Newland Serra Conformed Plan. Provided by San Diego County

## **ENCLOSURE**

To assist our review of the project and to assist the County in compliance with pertinent Federal statutes and laws, we recommend that the DEIR for the proposed Newland Sierra project contain the following information.

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all ancillary facilities, staging areas, and access routes to the construction and staging areas.
2. A complete analysis of the effect that the project may have on completion and implementation of regional and/or subregional conservation programs including the County of San Diego's draft North County MSCP. We recommend that the County ensure that the development of this and other proposed projects do not preclude long-term preserve planning options.
3. A complete list and assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying federally listed threatened, endangered, or proposed candidate species, and any locally unique species and sensitive habitats. Specifically, the DEIR should include:
  - a. Discussions regarding the regional setting with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
  - b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact.
  - c. A thorough assessment of rare plants and rare natural communities.
  - d. A current inventory of rare, threatened, and endangered species on site and within the area of impact.
  - e. Discussions regarding seasonal variations in use by sensitive species of the project site as well as the area of impact on those species, using acceptable species-specific survey procedures as determined through consultation with the Service and the California Department of Fish and Wildlife, collectively the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
4. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DEIR should provide:
  - a. Specific acreage and descriptions of the types of wetlands, scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.



- b. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.
  - c. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any proposed Natural Community Conservation Planning (NCCP) protected lands.
    - i) Impacts to wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated.
    - ii) Discussions of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
  - d. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
5. A thorough discussion of mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Specifically, the DEIR should include/address:
- a. Where avoidance is infeasible, mitigation measures that emphasize minimization of project impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be discussed in detail. If onsite mitigation is not feasible or would not be biologically viable (e.g., it would not adequately mitigate the loss of biological functions and values), offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
  - b. Mitigation measures to alleviate indirect project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of onsite and downstream habitats.
  - c. Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.

- d. A requirement that a County-approved biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority, and responsibility, to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the County and the Wildlife Agencies.
- e. Plans for restoration and revegetation, to be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria (e.g., percent cover of native and nonnative species; species richness); (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
- f. Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.
- g. Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on and/or offsite biological open space easements, if applicable. An appropriate natural lands management organization, subject to approval by the County and Wildlife Agencies, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR) or similar analysis should be completed to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the County and Wildlife Agencies for review and approval prior to initiating construction activities; the resulting final plan should be submitted to the County and Wildlife Agencies and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.



- h. To avoid impacts to nesting birds, the DEIR should require that all clearing and grubbing occur outside the avian breeding season. The general breeding season for nesting birds occurs approximately February 15 through September 15; however, raptors may begin breeding as early as January 1. If project construction is necessary during the avian breeding season, a qualified biologist should conduct a survey for nesting birds within 3 days prior to the work in the area to ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer shall be a minimum width of 300 feet (500 feet for raptors), shall be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be affected by the construction.



9335 Hazard Way • Suite 200 • San Diego, CA 92123  
(858) 614-7755 • FAX (858) 614-7766

San Diego Local Agency Formation Commission

Website: [www.sdlafco.org](http://www.sdlafco.org)

#### Chairman

Bill Horn  
County Board of  
Supervisors

March 6, 2015

#### Vice Chairman

Sam Abed  
Mayor  
City of Escondido

TO: Mark Slovick, Environmental Planner (O650)  
Department of Planning and Land Use

#### Members

Dianne Jacob  
County Board of  
Supervisors

FROM: Chief, Governmental Services (O216)  
Local Agency Formation Commission

Andrew Vanderlaan  
Public Member

SUBJECT: Notice of Preparation of an Environmental Impact Report (EIR):  
Newland Sierra (Previously Known as Merriam Mountains):  
PDS2015-GPA-154-001; PDS2015-SP-15-001; PDS2015-REZ-  
15-001; PDS2015-TM-5597; Log. No. PDS2015-ER-08-001

Lorie Zapf  
Councilmember  
City of San Diego

Lorraine Wood  
Councilmember  
City of Carlsbad

Jo MacKenzie  
Vista Irrigation District

Thank you for the opportunity to provide comments on the above-referenced project. Environmental documents should contain the following: (1) descriptions of the manner in which public services (i.e., water, sewer, fire protection, etc.) are proposed to be provided to the project area; (2) the ability of subject agencies to provide adequate services to territory after development; (3) discussion of any proposed public facilities to enhance service; (4) impacts to open space and agricultural lands; and (5) an evaluation of all direct, indirect, and cumulative environmental impacts associated with any potential boundary and sphere of influence changes to local government agencies. Please note that, on October 11, 2007, LAFCO responded to the Draft EIR when the project was known as Merriam Mountains, and now offer the following comments:

#### Alternate Members

Greg Cox  
County Board of  
Supervisors

Chris Cate  
Councilmember  
City of San Diego

Racquel Vasquez  
Councilmember  
City of Lemon Grove

#### Fire and Emergency Medical Services

Ed Sprague  
Olivenhain Municipal  
Water District

Harry Mathis  
Public Member

Because no map was provided with the NOP, our staff utilized Figure 3 – Specific Plan Land Use Map from the Initial Study to determine boundary lines for the Deer Springs and San Marcos Fire Protection Districts (FPD). According to this research, a majority of the project footprint is in the Deer Springs FPD with an area of approximately 9 acres located in the San Marcos FPD. Having all territory in a single agency reduces jurisdictional issues associated with response, administration, and planning. Despite both Districts being signatories to the North Regional Zone Master Automatic Aid Agreement for Fire Medical, and Rescue Responses, it is desirable that a project be in the boundary of a single service provider.

#### Executive Officer

Michael D. Ott

#### Special Counsel

Michael G. Colantuono

Thus, the EIR should contain a discussion of consolidating the responsibility for the provision of fire services under a single agency – likely Deer Springs FPD – via a reorganization involving annexation to that District with concurrent detachment from the San Marcos FPD, as well as any associated adjustments to the sphere. Any proposed jurisdictional changes fall under LAFCO's purview.

Because public safety is a top priority for LAFCO, fire and emergency medical service provision is an important factor during project analysis. While most of the site is in the Deer Springs FPD, the District contracts with CALFIRE for structural fire service provision rather than having a staff of its own. In addition, the entire project area is designated as State Responsibility Area and under CALFIRE's jurisdiction for wild land fire protection. Fire apparatus designed and dedicated for *structural* fire suppression in this area is housed at a Deer Springs station located on the west side of Interstate 15. However, the development plan proposes the construction of 2,135 dwelling units, 81,000 sq. ft. for commercial use, and a school. Once completed, this project will significantly increase the population living in the Deer Springs FPD service area. LAFCO believes that a project of this magnitude may require an additional fire station, especially since most emergencies are medical calls rather than fire events. Both a Fire Protection Plan and the EIR should address this matter satisfactorily.

#### Open Space and Agricultural Preservation Policy


LAFCOs were established to oversee the efficient extension of government services and have been directed by the State Legislature to preserve open space and agricultural lands and to establish local policies to do so (Government Code Sections 56001 and 56301). San Diego LAFCO Policy L-101 encourages preservation of open space and agricultural land, discourages the conversion of agricultural land to other uses, and assists LAFCO in guiding development away from prime agricultural land. It also must be noted that LAFCO's definition of "prime agricultural land" differs from that used by the County. For your convenience, a copy of the definition contained in the Cortese-Knox-Hertzberg Act has been included with this letter.

Thus, the EIR should address the conversion of prime agricultural land to other non-agricultural uses, contain a thorough discussion of potential impacts to prime agricultural land, as defined in Government Code Section 56064, and address the preservation of agricultural and open space lands in the context of Policy L-101, a copy of which is attached.

In summary, to satisfy LAFCO's requirements, the EIR should: (1) identify potential changes of organization, including sphere amendment(s), annexation, and detachment; (2) evaluate consistency with applicable fire protection plans to ensure that an adequate level of fire protection and emergency medical services will be available; and (3) discuss the project's agricultural implications as they relate to Government Code Section 56064 (definition of prime agricultural land) and LAFCO's Policy L-101.

If jurisdictional and sphere of influence changes are proposed, then they should be identified and discussed in the project description and added to the list of discretionary actions contained in the summary section of the final EIR document. Should you have any questions, or if LAFCO may be of any further assistance, please contact me at (858) 614-7755.

Sincerely,

A handwritten signature in cursive script that reads "Ingrid E. Hansen".

INGRID E. HANSEN

Chief, Governmental Services

IEH:

Attachments:      LAFCO Definition of "Prime Agricultural Land"  
                            LAFCO Policy L-101

**"Prime agricultural land" 56064.**

"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

- (a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- (b) Land that qualifies for rating 80 through 100 Storie Index Rating.
- (c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- (d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.
- (e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.

**Subject**

**PRESERVATION OF OPEN SPACE AND AGRICULTURAL LANDS**

**Purpose**

To further the policies and priorities of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 regarding the preservation of open space and prime agricultural lands.

**Background**

The State Legislature has instructed Local Agency Formation Commissions to establish policies that address the preservation of open space (Govt. Codes § 56300 and 56377). LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency's boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

**Policy**

It is the policy of the San Diego Local Agency Formation Commission to:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area *or* the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;
2. Require rezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;

## L-101    LEGISLATIVE POLICY

---

3.     Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Adopted:                    November 6, 1978  
Amended:                  June 4, 1990  
Amended:                  May 4, 1998  
Technically Updated:    January 1, 2001

**Cross-reference:**

***SAN DIEGO LAFCO PROCEDURES:***  
-Open Space and Agricultural Preservation





401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
sandag.org

March 17, 2015

File Number 3330300

Mr. Mark Slovick  
County of San Diego Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Dear Mr. Slovick:

SUBJECT: Comments on the Notice of Preparation of the Environmental Impact Report for the Newland Sierra Project

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Newland Sierra Project Environmental Impact Report.

Our comments are based on policies included in the Regional Comprehensive Plan and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination, and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP/SCS sets forth a multimodal approach to meeting the Region's transportation needs. Therefore, it is recommended that the traffic analysis consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed:

### **Transportation Demand Management**

In considering mitigation for regional transportation impacts and to increase mobility choices in and around the Newland Sierra Project, consider developing a comprehensive Transportation Demand Management (TDM) plan that could include the following TDM measures:

- Shuttle service to connect to nearby transit centers and major destinations
- On-site carshare and bikeshare program for residents and employees
- Subsidized transit passes for residential and commercial tenants and transit pass sales on-site
- Transportation kiosks with information about regional transit services and TDM programs
- Designated Transportation Coordinator to provide promote, manage, and monitor TDM programs for residents and employees
- Bicycle and pedestrian facilities that connect residents to commercial areas

#### **MEMBER AGENCIES**

Cities of  
Carlsbad  
Chula Vista  
Coronado  
Del Mar  
El Cajon  
Encinitas  
Escondido  
Imperial Beach  
La Mesa  
Lemon Grove  
National City  
Oceanside  
Poway  
San Diego  
San Marcos  
Santee  
Solana Beach  
Vista  
and  
County of San Diego

#### **ADVISORY MEMBERS**

Imperial County  
California Department  
of Transportation  
  
Metropolitan  
Transit System  
  
North County  
Transit District  
  
United States  
Department of Defense  
  
San Diego  
Unified Port District  
  
San Diego County  
Water Authority  
  
Southern California  
Tribal Chairmen's Association  
  
Mexico

and available shuttle/transit services. Extended bicycle routes can also serve to connect residents and employees to destinations beyond the development itself.

- Bicycle amenities such as secure and convenient bicycle parking, locker rooms, and bike repair stands
- Access to Park & Ride facilities that includes priority parking for carpools and vanpools

Additionally, marketing and promotion of existing regional TDM programs and services such as the regional vanpool program, online ridematching, multimodal trip planning, and Guaranteed Ride Home can assist with reducing traffic congestion and greenhouse gas emissions in and around the Newland Sierra development. The presence of Interstate 15 Express Lanes to the south of Newland Sierra provides an incentive for residents and employees to carpool and vanpool to key commute and non-commute destinations within the San Diego region. Additional information on current regional TDM programs can be accessed through [iCommuteSD.com](http://iCommuteSD.com).

Please also consider measures to incentivize developers to incorporate TDM strategies early on in the development process (e.g. expedited application review, streamlined permit processing). Incorporation of TDM into development and lease agreements can also assist in sustaining TDM strategies long-term.

### **Other Considerations**

We appreciate the opportunity to comment on the Newland Sierra Project NOP.

We encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications (which can be found on our website at [sandag.org/igr](http://sandag.org/igr)):

1. Designing for Smart Growth, Creating Great Places in the San Diego Region
2. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
3. Trip Generation for Smart Growth
4. Parking Strategies for Smart Growth
5. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports
6. Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities
7. Riding to 2050, the San Diego Regional Bike Plan
8. SANDAG Regional Parking Management Toolbox

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or [susan.baldwin@sandag.org](mailto:susan.baldwin@sandag.org).

Sincerely,



SUSAN BALDWIN  
Senior Regional Planner

SBA/SSSTR/asa/abar



March 16, 2015

Mark Slovick  
County of San Diego  
Department of Planning & Land Use  
5201 Ruffin Road, Suite B  
San Diego, California 92123

Re: Notice of Preparation for a Draft Environmental Impact Report  
PDS2015-GPA-15-001, PDS2015-SP-15-001; PDS2015-REZ-15-001; PDS2015-TM-5597  
Proposed construction of a new master planned community consisting of 2,135 dwelling units, 81,000 square feet of general commercial use, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space

Dear Mr. Slovick:

The City thanks you for the opportunity to respond to the Notice of Preparation (NOP) Draft Environmental Impact Report (DEIR) currently under preparation for the above referenced project. The City of San Marcos Development Services Department has following Notice of Preparation comments:

Traffic & Transportation

In terms of the scope of the DEIR traffic analysis scope discussed in the Initial Study, the City staff has a major concern about Option A for Deer Springs Road (DSR). Downgrading the classification of a DSR segment to a two-lane Community Collector is completely contrary to the cooperative efforts between the County, SANDAG and San Marcos to establish the Twin Oaks Valley Road (TOVR)/DSR corridor as a significant regional arterial roadway in the two local agency General Plans and SANDAG's 2050 Regional Transportation Plan. The TOVR/DSR corridor is a big part of SANDAG's designated regional arterial network, which is vital to an overall County highway mobility plan that does not rely exclusively on the Interstate and State Highway Systems. Further, the DSR/TOVR route was recently added to the National Highway System as part of the federal MAP-21 legislation. To have a relatively isolated, standalone land developer outside of any community plan area suggest that this arterial route, which directly connects SR-78 to I-15, be downgraded despite the multi-year transportation planning efforts at the Federal, State, regional and local government level, is not warranted. As such the City's position is that Option A should not be considered.

If the County should still decide to consider Option A in the environmental analysis, the trip distribution in the traffic impact analysis should be reviewed very carefully. The developers have suggested to City staff that downgrading that segment, specifically on TOVR, will have a "if you do not build it, they will not come" effect on minimizing traffic impacts in San Marcos. This is not realistic, since through traffic will still want to travel that route, and existing significant congestion will become intolerable with the new traffic from the development. There may be a temptation to reassign vehicle trips away from San Marcos towards I-15, because "they won't go that way if the road remains narrow", as the developers have characterized to City staff. That would not be an appropriate way to analyze the traffic per CEQA, especially in light of the major attractors for the project residents that are located in San Marcos, such as our large public parks, other recreational amenities, private schools, Palomar College, CSUSM, major shopping, restaurants and entertainment venues. An appropriate analysis will undoubtedly have a



significant impact on TOVR, as did the prior Merriam Mountains proposal that will require mitigation within the City. The City requests that the DEIR traffic analysis consider, at minimum, the following:

- 1- Trip distribution should be thoroughly reviewed and considered as to the real magnitude of DSR/TOVR usage by the project. Significant numbers of trips will pass through San Marcos.
- 2- Should the project impacts result in need to construct DSR from six to four lanes in the segment from I-15 to TOVR, then perhaps the appropriate City Transportation Impact Fees should be collected to fund a portion of costs of upgrading the existing under-improved segments of TOVR in San Marcos.
- 3- At a minimum, the traffic analysis should examine impacts to all TOVR intersections and segments to State Route 78. City staff foresees significant project impacts to some of these intersections and segments.
- 4- For this size project, alternative full access points for project access from the north of the site should be explored to the I-15, perhaps to Gopher Canyon Road via Lawrence Welk Drive.
- 5- If alternative access to the site cannot be achieved, the project should eliminate the Sarver Lane access, and rely on the access closest to the I-15 interchange, and the upper Twin Oaks Valley Road access.

#### Parks & Recreation

The Initial Study discusses that the project would develop approximately 37 acres of parks that would provide recreational opportunities to the residents of the proposed 2,135 dwelling units, and therefore, would not increase the use of existing neighborhood or regional parks. To avoid substantial physical deterioration of local park and recreational facilities, the project would dedicate land for local parks to the County pursuant to the Park Land Dedication Ordinance (PLDO). Based upon the County General Plan standards of 15 acres/1,000 population, the project should provide 89 acres of public parkland.

The Initial Study states that there are 21,765 acres of regional recreational facility parklands owned by the County, which exceeds the General Plan standard of 15 acres/1,000 population. In addition, there are over one million acres of publicly owned land in San Diego County dedicated to parks or open space including Federal lands, State Parks, special districts, and regional river parks. Due to the extensive acreage of existing publicly owned lands that can be used for recreation, the Initial Study states that the project would not result in substantial physical deterioration of regional recreational facilities or accelerate the deterioration of regional parkland. These regional recreational facilities will not provide for direct local parkland demands for the project area, including impact to the City of San Marcos public parklands.

Although there may be regional parklands, the City is concerned that the project would still fail to provide adequate parklands and active recreational facilities onsite, given that the public and private parklands proposed with the plan are 52 acres below the County standards, and lack highly demanded amenities such as athletic fields. There are only five athletic fields proposed in park P3 to serve the entire project area. The DEIR should address how the proposed public and private park amenities will serve the project area, and whether the amenities proposed will be sufficient to serve the approximately 5,900 future project residents. Of the utmost concern on the part of the City, is a lack of park amenities, in terms of type, amount, and proximity to project residents, within the plan area. This deficiency will result in an impact to the City's Walnut Grove Park, located less than a mile from the project site, as well as other City parks located within a couple miles of the project site. The DEIR should also include appropriate mitigation measures to address project impacts to City parks.



### Fire Protection

The proposed Newland Sierra site plan and project information has been reviewed. Based on a review of the documents provided and a meeting with the County Fire Authority, the following comments are provided:

This project is located entirely within jurisdiction of Deer Springs Fire Protection District. An existing automatic aid agreement for emergency fire response and mutual aid agreement for medical response between Deer Springs Fire Department and San Marcos Fire Protection District will remain in place. Deer Springs Fire Department has provided a fire service commitment letter to the County of San Diego. The County Fire Authority has indicated this department has sufficient capacity to serve the project from their existing fire station location. It is our understanding that Capital improvements will be made to the Deer Springs fire station which is proposed to be rebuilt and increased in size. Currently, primary EMS response and transport services are provided through the Valley Center exclusive operation agreement (EOA) with primary ambulance response provided thru Mercy EMS. San Marcos Fire Protection District has an existing mutual aid agreement with Mercy EMS for ambulance response. The DEIR should demonstrate the provision of adequate equipment and staffing that will be provided to the project by Deer Springs Fire Protection District.

The project proposes three separate ingress and egress routes to serve the community and emergency access needs. The City of San Marcos has not had an opportunity to review any related traffic reports or studies. The DEIR should evaluate how access will be designed and how the project access points are anticipated to function. The City of San Marcos reserves the right to comment further on access design and function pending the City's review of traffic related reports and studies.

A comprehensive Fire Protection Plan (FPP) has been submitted to the County Fire Authority and Deer Springs Fire Protection District for review, and should be included in the DEIR. The FPP includes but is not limited to the following details: compliance with building construction, defensible space, emergency access and water supply. The FPP also details fuel load and flame height computer modeling, fire resistive landscaping and fire protection requirements. The review and final approval of the FPP and the Newland Sierra Project as a whole are the responsibility of the Deer Springs Fire Protection District.

Thank you in advance for your consideration of these comments. The City request that these comments are considered in the DEIR before it is circulated for public review. If you have any questions, please feel free to contact Susan Vandrew Rodriguez in the Planning Division at (760) 744-1050 extension 3237 to discuss our comments.

Cordially,

A handwritten signature in blue ink, which appears to read "Jerry Backoff", is located below the word "Cordially,".

Jerry Backoff  
Planning Division Director

cc: Michael D. Edwards, City Engineer  
Buck Martin, Community Services Director  
Robert Scott, Division Chief/Fire Marshal



201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

March 16, 2015

County of San Diego  
Planning & Development Services  
Project Processing Counter  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

**RE: NEWLAND SIERRA, PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597, LOG NO. PDS2015-ER-08-001**

General

The proposed Newland Sierra project (Project) would include the development of a new master planned community consisting of 2,135 dwelling units, 81,000 square feet of general commercial uses, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space. The project site is bounded by Interstate 15 on the east, Deer Springs Road on the south and Twin Oaks Valley Road on the west, with a small portion of the northwestern edge of the site transected by Twin Oaks Valley Road.

The Project is within the water service boundary of the Vallecitos Water District (VWD or District) and is eligible for service. While portions of the project are within VWD's sewer service boundary, the majority of the project property is outside of the sewer service boundary and would require annexation prior to being eligible for sewer service. Service will be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied.

Any existing District pipelines located within the boundaries of the project that are in conflict with the proposed development will require relocation within the public right-of-way or District easements. Drivable access to, and along, the facilities must be maintained at all times.

All parcels must have frontage upon a District main and extensions of facilities to serve each parcel will be required. The exact location of the main line extensions and relocation will be determined during the design phase of the project.

Water or Sewer facilities not within the public right-of-way will require a minimum 20-foot easement granted to the District. The District may require additional easements through



the project or private properties for future extensions. The owner of the project is responsible for obtaining any easements required to provide service to the project, including expenses incurred. Joint use of these easements is not allowed by the District and easements for storm drain and other facilities should be analyzed early so that adequate sizing of easements for all facilities and various agencies is provided.

No structures will be allowed over District facilities. This includes but is not limited to, walls, entrance medians, landscaping, gates, guard house structures, curbs and gutters, or driveways that will be constructed over District facilities.

### Water Service

The Project is located within three pressure zones (source of water for fire protection and domestic use). One zone maintains a hydraulic gradeline (HGL) of 1228, a second maintains an HGL of 1330 and the third maintains an HGL of 1608 feet above sea level (msl). The District requires minimum static water pressure of 40 psi at the water meter. For protection of District facilities, any areas with water pressures near or higher than 150 psi will require water pressure regulators before the meter.

VWD will require the completion of a water and sewer study that will evaluate the Project's proposed land use against the County-approved land use that is utilized in the District's current Master Plan. The water and sewer study will assess the impacts of the project and determine if the existing facilities both onsite and offsite are adequately sized to provide service, and provide conditions of service and required improvements which will be required prior to District approval of the Project.

The appropriate Fire Department(s) should be contacted to verify fire flow requirements and location of fire flow facilities required for the Project. These requirements will be used in the above-referenced Water Study to determine the available fire flow for the Project and identify upgrades to existing facilities as well as on-site facilities.

A Water Supply Assessment (WSA) will also be required for this Project. The WSA will identify long term water supplies from both the San Diego County Water Authority and the Metropolitan District of Southern California and determine if sufficient water supplies are expected to be available over the next 20 years to serve the development.

### Sewer Service

The property is partially within the boundaries of the Vallecitos Water District for sewer service. The portion of the property not within VWD's sewer service boundary will require annexation in accordance with District Ordinance No. 153, prior to being eligible for sewer service. Sewer service will only be provided under the rules and regulations of the District, under normal operating conditions and after all required fees have been paid and all



conditions of the District have been satisfied.

There are existing sewer facilities located in Deer Springs Road at the very southern portion of the project.

VWD will require the completion of a water and sewer study that will evaluate the Project's impact to existing facilities as well as the District's current Master Plan. The water and sewer study will assess the impacts, determine if the existing facilities both onsite and offsite are adequately sized to provide service, and conditions of service which will be required prior to District approval of the Project. The sewer study will also identify any regional components necessary to serve the project.

### Conclusion

The developer/owner is required to complete a water and sewer study for the Project to determine any impacts the Project may have on existing water and sewer facilities and to determine required on-site water and sewer facilities required to serve the Project. The Project's specific impacts shall be analyzed utilizing water demands and sewer generation factors and design criteria identified in the District's current Master Plan.

The developer/owner is also required to complete a Water Supply Assessment for the Project to identify long term water supplies from both the San Diego County Water Authority and the Metropolitan District of Southern California and determine if sufficient water supplies are expected to be available over the next 20 years to serve the development.

Costs associated with the District's review shall be the responsibility of the developer/owner. It is recommended that the required studies be completed early in the process so not to cause any delay in the design and plan check process. To avoid any delays in processing the project, it is recommended that the studies be requested early to allow ample time for the District to complete review.

The District adopted Ordinance No. 162 on May 6, 2009, which identifies various water conservation measures as they relate to current and future drought conditions including the curtailment of availability letters and limiting new service connections at Drought Level 3.

This letter is issued for planning purposes only, and is not a representation, expressed or implied that the District will provide service at a future date. The Vallecitos Water District relies one hundred percent on imported water supplies. Water may not be available at the time the project is built. Commitments to provide service are made by the District Board of Directors and are subject to compliance with District fees, charges, rules and regulations.

Newland Sierra  
March 16, 2015  
Page 4

Sincerely,

VALLECITOS WATER DISTRICT



Robert Scholl  
Development Services Senior Engineer

cc: Ken Gerdes, Director of Engineering and Operations  
James Gumpel, District Engineer  
Eileen Koonce, Engineering Technician III

## ***Back Country Coalition***

Post Office Box 70 • Santa Ysabel, CA 92070 • 858-273-2426

March 16, 2015  
**Via Electronic Mail**

San Diego County DPDS  
Director Mark Wardlaw [mark.wardlaw@sdcounty.ca.gov](mailto:mark.wardlaw@sdcounty.ca.gov)  
Project Manager Mark Slovick [mark.slovick@sdcounty.ca.gov](mailto:mark.slovick@sdcounty.ca.gov)  
EIR Coordinator Darin Newfield [darin.newfield@sdcounty.ca.gov](mailto:darin.newfield@sdcounty.ca.gov)

**RE: Proposed Newland Sierra General Plan Amendment – OPPOSITION  
PDS2015-GPA-15-001; PDS2015-SP-15-001; PDS2015-REZ-15-001;  
PDS2015TM5597**

The Back Country Coalition has been involved with San Diego County's General Plan Update since 1998. As an active member of the Interest Group Committee, we participated continually in developing the principles and guidelines that were to direct future growth within San Diego County's unincorporated areas in a responsible and intelligent direction. The referenced project ignores and disregards the work of many experts and dedicated professional people who worked to achieve an excellent plan over many years. Instead, the referenced project proposes a dangerous, leapfrog urban development in the middle of a rural residential area.

County staff and developer Newland Sierra are resurrecting the subject project which has been proven to be a planning failure. Here we have the public being force fed a dreaded second "bite of the apple" so loathed by the Red Tape Reduction Task Force, as the main planning objective. The cosmetic and miniscule changes in design elements advanced in scoping do not succeed in reducing the outright danger and significant adverse health, well being and environmental impacts the project would present for existing residents.

What is categorically absent from this attempt to destroy the County's 2011 General Plan Update are the original scoping opposition comments from the predecessor Stonegate/Merriam Mountains project; project concepts that were rejected outright by the County Board of Supervisors and thousands of citizens who were involved in its defeat. Scoping and DEIR comments related to the physical alterations of land forms, fire hazards, traffic, emergency evacuations, archeology, water supply, greenhouse gas generation and silica particulate contamination are now more relevant and topical than the day Merriam was dismissed as a failure of planning by the County Board of Supervisors and the then-employed DPLU management and staff.

These long identified project defects pose increased relevance, danger and permanent significant negative environmental and health impacts to the present adjacent residents, but also Escondido, City of San Marcos, Lawrence Welk community, Hidden Meadows, Gopher Canyon, Twin Oaks, Vista, Bonsall and the region.

WE HEREBY INCORPORATE INTO THIS LETTER BY REFERENCE ALL OPPOSITION COMMENTS THAT RESPONDED TO THE DEIR OF THE STONEGATE/MERRIAM MOUNTAIN PROJECT REJECTED BY THE SAN DIEGO BOARD OF SUPERVISORS MARCH 24, 2010. Any attempt by DPDS management and staff to ignore, discount or claim as untimely these archived comments would not only be disingenuous but would be a violation of CEQA mandates governing public participation.

There is a comprehensive and long established record of the public's clear refusal to accept the dangers to public health and safety inflicted by the County/Developer schemes on this property. Opponents of the previous project are still active and fully engaged with the same objections to the proposed Sierra project. These exact arguments were upheld in the initial failure of the Merriam Mountain/Stonegate proposal at the Board of Supervisors, as well as Supervisor Ron Roberts' personal dismantling of the Merriam project after five hours of additional Board examination. A failure by DPDS to recognize the public's historically overwhelming rejection of Merriam would prove as significant as refusing to acknowledge Supervisor Roberts' project criticisms.

Scoping is crucially important to the project review process - as is integrity. The interested and fully involved public was denied integrity at the Sierra scoping hearing by DPDS, who claimed the DPDS staff had not taken a positive or negative position on the Sierra proposal, and that it would not make such a decision "until all the facts are known." That statement is ludicrous because of the close similarity between the proposed Sierra project and the rejected Merriam Mountain project. No project, even the most egregious example, has ever been abandoned by County planning during a Board of Supervisors project hearing.

DPDS' stated claims to offer an independent, level playing field, to be an unbiased County department, with no interest in project success or denial is the very height of irresponsible misinformation and should require a thorough investigation by County Counsel to prevent any such false and misleading statements in the future.

You will note that, despite all of the County's resources, County DPDS staff and management stated at the onset that the scoping meeting would not be recorded. That clear failure to maintain or examine a scoping record, and consider public opinions expressed, goes to the heart of how County DPDS is demonstrating it is unworthy of public trust. The actions of DPDS' agency approval begins when the agency commits to a definite course of action, i.e. following a pre-application examination moving the project forward to a course of scoping.

The scope of the proposed Newland Sierra project's negative impacts to transportation would be so far-reaching and profound that communication and comments must be sought from federal, state, local cities, local community planning and sponsor groups' jurisdictions.

**RE: BCC OPPOSITION - Proposed Newland Sierra General Plan Amendment  
PDS2015-GPA-15-001; PDS2015-SP-15-001; PDS2015-REZ15001;  
PDS2015TM5597**

Page three

Temecula government planners may have particular reason to comment because of the existing and proposed uses of Deer Springs Road, which would create even more traffic gridlock for commuters to and from their city. Wide ranging comments would also be critical as well as an independent study to determine the adequacy of the existing bridge over I-15, expansion of off and on ramps, widening of road shoulders, increasing the number of emergency stop areas, as well as bicycle lanes and pedestrian crossings and access.

While the following block quotation from “Guidelines for CEQA” is self-explanatory, we nonetheless include it herein for clarity relating to significant adverse traffic impacts to the entire region from the proposed referenced project.

**“Guidelines for California Environmental Quality Act**

**California Code of Regulations Title 14 Natural Resources Division 6 Resources  
Agency Chapter 3 Guidelines for Implementation of California Environmental Quality  
Act Article 13 Review and Evaluation of EIRs and Negative Declarations**

**Consultation with Public Agencies, Transportation Planning Agencies:** PRC Section 21092.4 further *requires* the lead agency for a project which would have statewide, regional, or areawide significance to consult with the regional transportation planning agency and public agencies that have transportation facilities which could be affected. Statewide, regional or areawide significance is defined in Guidelines Section 15206.” (emphasis added)

Please place this communication in the permanent administrative record for the Newland Sierra proposed project. Thank you.

Sincerely,

George Courser, Director  
gcourser@hotmail.com

Bonnie Gendron, Coordinator  
[bgendron@nethere.com](mailto:bgendron@nethere.com)

cc: San Diego County Board of Supervisors  
Interested parties

# BONSALL COMMUNITY SPONSOR GROUP

*Dedicated to enhancing and preserving a rural lifestyle*



March 16, 2015

## VIA EMAIL DELIVERY

Mark Slovick, Project Manager  
Cunty of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, California 92123

Re: Bonsall Sponsor Group Comments on Notice of Preparation for Newland Sierra  
PDS2015-GPA-15-00, PDS2015-SP-15-001, PDS2015-REZ-15-001,  
PDS2015-TM-5597, LOG NO. PDS NO, PDS2015-ER-08-001

We have assessed the Project's potential impacts based on the information available to date, and we have a number of significant concerns. Issues that are of great concern based on the information available to date. This Project proposes to implement urban-style development in a rural area of unincorporated San Diego County (the "County") that lacks the connectivity and transit infrastructure to comply with modern smart growth planning principles. The Project impacts the entire area and will turn Deer Springs Road into a massive freeway bypass system destroying the community's rural character.

### I. THE EIR SHOULD ANALYZE ALTERNATIVES THAT REDUCE IMPACTS

The Project proposes to drastically increase the density in a rural area that contradicts the recently adopted General Plan Update and regional plans developed by the San Diego Association of Governments ("SANDAG"). The General Plan Update designates most of the Project site as RL-20, one unit per twenty acres, which would limit development to approximately 100 units. The EIR should analyze alternatives that reduce density on the Project site, mitigate the impacts of density increases on the Project site, or shift density increases to an alternate location in order to mitigate or avoid traffic, greenhouse gas, fire safety, biological and other impacts.

- A. Alternate Route Alternative: The EIR should Analyze an Alternative that Includes a Four-Lane Road ("Newland Sierra Parkway") Through the Project Site that Avoids Dumping Traffic onto Deer Springs Road.

The most direct route for many residents on the Project's west side-where the majority of residential units are located – to reach the commercial center would be to exit the Project at Sarver Lane and cross Deer Springs Road, re-entering the Project at Mesa Rock Road. Further, the Project proposes to add pedestrian, bicycle, and equestrian traffic to a multi-purpose trail adjacent and parallel to Deer Springs Road. Dumping project traffic on to Deer Springs Road poses a safety threat to the non-vehicular traffic on that road, including the new non-vehicular traffic accommodated on the Project's proposed multi-use path.



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## B. Alternate Location Alternative: The EIR Should Analyze an Alternative Location that is Located in Existing Communities with Infrastructure

The City of Escondido would be the best alternative location and meets all of the principles set forth in the General Plan. All Alternate locations should be considered using planning and GHG emission as well as VMT while preserving rural lands. The EIR should study any other Project site with fewer environment impacts and more in line with the General Plan's Guiding Principles and policies.

## C. Agricultural Alternative: The EIR Should Analyze an Alternative that Implements and Agricultural Use of the Property

The alternative section of the EIR should include an Agricultural Alternative that would utilize the steep slopes of the Project site for the production of lucrative produce providing an economically viable alternative for the Project applicant, which is consistent with the land use designation for the majority of the site as it is designated a Rural Lands in the General Plan. This area is also part of the proposed North County MSCP which has not been approved by the Board of Supervisors but is linking corridor for several animals.

## D. Aesthetics

The urbanization of the Twin Oaks Valley area would irrevocably destroy the community's rural character. Please review the Bonsall Sponsor Group's Community Plan **APPENDIX B INTERSTATE 15/ STATE ROUTE 76 INTERCHANGE MASTER SPECIFIC PLAN** the concern we share with most commuters is that the I-15 not look like Orange County with strip malls from San Diego to the Riverside boundary.

## E. Traffic/Greenhouse Gas Emissions

Because of its location far from existing communities, job centers, and transit infrastructure, the Project will cause long single-occupant automobile trips that increase VMT, resulting in harmful GHG emissions. The EIR should analyze mitigation measures and alternative site location for such a large project.



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## F. Hazards and Hazardous Materials

The proposed Project is located in a High Fire Hazard Severity Zone. Drastically increasing the density on this property puts thousands of people in creased danger from fire hazards and exponentially increases the potential for fire-related damage to property value. The staff report for the NC42 Property Specific Request discussed in notes that the entire site is in a Very High Fire Hazard Severity Zone. The Project contradicts the thoughtful consideration that was given to the density designation on this site during the multi-year General Plan Update process. The EIR should analyze reduced-density alternatives and mitigation measures that will avoid or mitigate density-related fire safety impacts. This Project lacks an emergency evacuation plan to accommodate the current road design and needs to be re-issued.

## G. Land Use and Planning

1. The EIR Should Analyze Whether the Project Will Require Amendments to the General Plan's Guiding Principles

The General Plan lists ten Guiding Principles that apply to all development in the unincorporated County.

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreation opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

The EIR should analyze the Project's compliance with each of the Guiding Principles as it appears it violates the Guiding Principles in at least the following ways": (1) locating growth far from existing and planned communities, infrastructure, and services; (2) drastically altering existing community character; (3) impacting operations of business that rely on the peace and tranquility of a rural setting;



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(4) disrupting wildlife corridors; (5) developing despite physical constraints posed by the Project site's slop; (6) failing to provide transit options; (7) requiring long single-occupant vehicle trips that increase greenhouse gas emissions; (8) urbanizing a rural agricultural community; (9) requiring the extension of utility services and annexation into the Vallecitos Water District (VWD"); and (10) developing the Project despite significant community opposition, and previous rejection of a similar project.

County staff has previously determined that increasing density on the Project site would change the General Plan's objectives and would likely require recirculation of the General Plan's EIR.

## 1. The EIR Should Analyze the Project's Consistency with the General Plan's Leapfrog Policy

General Plan Policy LU-1.2 (Leapfrog Policy") prohibits leapfrog development:

**Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries.

We do not agree with the applicant that one gas station constitutes a village and therefore this project is LEAPFROG DEVELOPMENT.

We appreciate the opportunity to send you are comments regarding this project.

Sincerely,

*Margarette Morgan*

Margarette Morgan, Chair  
Bonsall Sponsor Group



<http://www.bcsbg.org>



## Neufeld, Darin

---

**From:** Slovic, Mark  
**Sent:** Friday, March 20, 2015 9:26 AM  
**To:** Neufeld, Darin  
**Subject:** FW: Newland Sierra GPA-15-001

-----Original Message-----

From: Dan Silver [<mailto:dsilverla@me.com>]  
Sent: Monday, February 23, 2015 10:38 AM  
To: Slovic, Mark  
Subject: Newland Sierra GPA-15-001

Dear Mr Slovic:

Endangered Habitats League (EHL) is in receipt of the NOP for this project. Please retain EHL on all notification and distribution lists, including CEQA documents and public hearings.

Best regards,  
Dan

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750  
[dsilverla@me.com](mailto:dsilverla@me.com)  
[www.ehleague.org](http://www.ehleague.org)

Christopher W. Garrett  
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## LATHAM & WATKINS LLP

### FIRM / AFFILIATE OFFICES

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March 16, 2015

### VIA EMAIL AND HAND DELIVERY

Mark Slovick, Project Manager  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, California 92123

File No. 025388-0011

Re: Golden Door Comments on Notice of Preparation for Newland Sierra,  
PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001,  
PDS2015-TM-5597, LOG NO. PDS2015-ER-08-001

Dear Mr. Slovick:

As you know, we represent the Golden Door Properties LLC (the "Golden Door"), 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 avocado groves and fresh vegetable gardens as well as citrus and olive trees.

We appreciate the opportunity to share with you our comments regarding the Notice of Preparation ("NOP") for Newland Real Estate Group, LLC's ("Newland") Sierra project (the "Project") which is proposed to be located just across Deer Springs Road from the Golden Door's property. As you know, we have attended public meetings and workshops regarding this Project, held several meetings with County of San Diego Planning and Development Services staff ("County staff") and the Project applicant, and obtained and reviewed voluminous materials relating to the Project's Application and NOP. We have assessed the Project's potential impacts based on the information available to date, and we have a number of significant concerns. This Project proposes to implement urban-style development in a rural area of unincorporated San Diego County (the "County") that lacks the connectivity and transit infrastructure to comply with modern smart growth planning principles. The Project also risks turning Deer Springs Road into a massive freeway bypass system and destroying the community's rural character. We have proposed several alternatives to be reviewed in the Project's environmental impact report ("EIR") to determine the extent to which these alternative would mitigate or avoid the Project's significant impacts. We have also provided a number of comments on specific issues that we believe require review in the EIR.

This Project was proposed once before as the Merriam Mountains project, and was rejected by the Board of Supervisors in 2010. The General Plan Update in 2011 decreased the density permitted on the Project site such that the site is largely zoned RL-20, allowing one residential unit per 20 acres, permitting approximately 100 units. County staff then reviewed a request to increase the density by approximately 1,100 residential (General Plan Property Specific Request NC42), which County staff noted would require amendments to the General Plan's Guiding Principles and additional environmental review of the General Plan. Despite the two recent decisions by the County Board of Supervisors (the 2010 rejection of the first Merriam Mountains proposal and 2011 application of appropriate density in the General Plan Update to maintain a low rural and semi-rural density on the Project site), the Project now proposes 2,135 residential units, 81,000 square feet of commercial development, a charter school, and the expansion of Deer Springs Road.

The County has heard from this community for years that we value the rural character of our community and want it to be preserved in line with these recent actions related to the Project site. Public participation in this process is imperative to ensure that yet another bite at the apple does not result in a drastic density increase against the will of the community and the policy direction given twice by the County Board of Supervisors. We thank you for the opportunities you have provided for public comment and education thus far, and we encourage you to aggressively pursue public outreach throughout this process.

## **I. THE EIR SHOULD ANALYZE ALTERNATIVES THAT REDUCE IMPACTS**

An EIR must demonstrate that the lead agency identified and investigated all significant environmental effects of a proposed project. 14 Cal. Code Regs. § 15126.2(a). Through mitigation measures or project alternatives, the California Environmental Quality Act ("CEQA") requires a public agency to mitigate or avoid any significant environmental effects of a project whenever feasible. Pub. Res. Code § 1002.1(b). An agency may reject a proposed project alternative or mitigation measure and approve a project, despite significant environmental impacts, only if the agency makes appropriate findings that the mitigation or alternative is infeasible. Pub. Res. Code § 21081.5; *Cal. Native Plant Soc'y v. City of Santa Cruz*, 177 Cal. App. 4th 957, 959 (2009). A measure is "infeasible" if it is incapable of being accomplished in a successful manner within a reasonable time. Pub. Res. Code § 21061.1.

Like other EIR findings, a finding of infeasibility must be based on substantial evidence. *Preservation Action Council v. City of San Jose*, 141 Cal. App. 4th 1336 (2006); *Ctr. for Biological Diversity v. Cnty. of San Bernardino*, 184 Cal. App. 4th 1342, 1357 (2010). The findings of expert consultants may not be sufficient to constitute substantial evidence of infeasibility if they are not adequately supported. *See Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F. Supp. 2d 1098, 1125-29 (E.D. Cal. 2013). An agency must directly respond to any proposed mitigation measure or project alternative unless the measure is facially infeasible. If a proposed measure is not facially infeasible, an agency must respond with a good faith and reasoned analysis. *Los Angeles Unified Sch. Dist. v. City of Los Angeles*, 58 Cal. App. 4th 1019, 1029-30 (1997).



The Project proposes a drastic density increase in a rural area that contradicts the recently adopted General Plan Update and regional plans developed by the San Diego Association of Governments (“SANDAG”). The General Plan Update designates most of the Project site as RL-20, one unit per twenty acres, which would limit development to approximately 100 units. Moreover, SANDAG’s land use and density projections for 2020, 2035, and 2050 forecast a largely rural and agricultural region along the Interstate 15 corridor in North County. *See* Attachment A, SANDAG Land Use and Population Density Maps. The EIR should analyze alternatives that reduce density on the Project site, mitigate the impacts of density increases on the Project site, or shift density increases to alternate locations in order to mitigate or avoid traffic, greenhouse gas, fire safety, biological, and other impacts.

To avoid and mitigate potential impacts, that would result from the Project as currently designed, the Golden Door suggests that the EIR evaluate the following alternatives.

**A. Alternate Route Alternative: The EIR Should Analyze an Alternative that Includes a Four-Lane Road (“Newland Sierra Parkway”) Through the Project Site that Avoids Dumping Traffic onto Deer Springs Road**

The Project is configured to dump Project traffic on to Deer Springs Road, which already accommodates substantial bypass traffic from regional trips fleeing the congested freeway system, as indicated by a license plate conducted last year by Linscott Law & Green (“LLG”). *See* Attachment B, LLG License Plate Survey (May 5, 2014). The Project would add trips to Deer Springs Road both from trips traveling to and from the Project, but also from external trips with origins and destinations within the Project. Indirect, winding roads within the Project site, featuring many cul-de-sacs, grade changes, and intersections, and no connections to the north, northeast, or northwest, cause trips from the western portion of the Project to exit the Project and travel across Deer Springs Road to reach the commercial center and school located on the eastern portion of the property. A traffic volumes report completed by LLG, indicates that the Project will cause a net 5,110 annual trips across the segment of Deer Springs Road between Mesa Rock Road and Sarver Lane by 2040. Attachment C, LLG, Traffic Volumes Report I-15/Deer Springs Road Interchange. pp. 25, 29 (Dec. 10, 2014).

The most direct route for many residents on the Project’s west side—where the majority of residential units are located—to reach the commercial center would be to exit the Project at Sarver Lane and cross Deer Springs Road, re-entering the Project at Mesa Rock Road. Further, the Project proposes to add pedestrian, bicycle, and equestrian traffic to a multi-purpose trail adjacent and parallel to Deer Springs Road. Dumping project traffic on to Deer Springs Road poses a safety threat to the non-vehicular traffic on that road, including the new non-vehicular traffic accommodated on the Project’s proposed multi-use path. In addition, “traffic-calming” measures should be installed on Deer Springs Road to encourage the traffic from Newland’s own project, or traffic seeking to reach Newland’s own commercial center, to use the Project’s internal roads to reach Interstate 15, rather than a winding two lane country road such as Deer Springs Road.

The EIR should study an alternative that constructs a direct four-lane road (which can be referred to as “Sierra Parkway”) which accommodates all of the planned traffic that needs to travel through the Project and keeps trips off of Deer Springs Road, causing traffic to instead travel through the Project on the north side of the ridgeline immediately north of Deer Springs Road (the “Alternate Route Alternative”). This “*Newland Sierra Parkway*” road would connect the dense residential configuration on the west side of the Project with the commercial center and Interstate 15 on the east side of the Project and provide for a more unified project connecting both residential and commercial uses rather than sprawling in disconnected fashion across the property. Caltrans is currently developing a Project Study Report (“PSR”) to re-design the Interstate 15/Deer Springs Road interchange and should be asked to analyze a configuration that provides direct access to the “*Newland Sierra Parkway*,” directly funneling traffic from the interchange to Newland’s proposed commercial center, rather than forcing the traffic to take a circuitous route to the south and then multiple turns to reach the commercial center and access the Project. (The current interchange alignment across Interstate 15 does not run “north-south” but instead cuts diagonally to the south to directly connect to Deer Springs Road. The Golden Door has submitted a letter (*see* Attachment D) requesting that Caltrans include such a configuration in its PSR. The new “*Newland Sierra Parkway*” road should also connect to an expanded park-and-ride facility and transit center which should be integrated into the Project’s commercial center and provide direct access to Interstate 15. Attached hereto as Attachment E is a rudimentary map depicting the approximate location of such a road.<sup>1</sup>

The Alternate Route Alternative would also include a traffic circle or four-way intersection with a full stop at the Sarver Lane/Deer Springs Road intersection. This design would increase safety to motor vehicles as well as pedestrians, cyclists, and equestrians. This design is also essential to allow residents to the south of Deer Springs Road to safely cross Deer Springs Road at this intersection to connect to Newland’s own proposed trail system, as well as to the new trail proposed for the north side of Deer Springs Road. This traffic intersection could also substantially decrease the need to condemn private property near the Deer Springs Road/Sarver Lane intersection—particularly through the TERI, Inc., property—that would be needed to facilitate Newland’s proposed “direct connect” high-speed curve now proposed as part of the project, to funnel traffic at a high speed directly into Deer Springs Road, with no stops or cross-walks. Finally, this four way intersection at Sarver Lane would allow traffic to travel north and connect to the proposed “*Newland Sierra Parkway*” to reach Newland’s commercial center which is embedded on the far east side of the project, rather than diverting traffic trying to reach Newland’s commercial center onto Deer Springs Road at a high rate of speed.

The Alternate Route Alternative should be designed to encourage trips on the new four-lane road through the Project rather than on to Deer Springs Road in order to avoid traffic, noise, air quality, and safety impacts to the community and the pedestrians, cyclists, and equestrians traveling along Deer Springs Road, and instead route trips through the Project. County Road 12 should be re-designated to include this four-lane road across the Project rather than Deer Springs

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<sup>1</sup> Note that the map has not been drawn to scale, nor does it depict the route’s precise contours. This map is intended for general illustrative purposes only.

Road east of Sarver Lane. The Project's commercial center portends to be a significant draw for trips from the west, which should be routed through the Project site rather than impacting the existing community's uses on Deer Springs Road.

Newland's intention is to build a "master-planned" and integrated community. An alternative which provides for an internal road that directly links the east and west sides of Newland's own project should be studied, rather than allowing Newland to simply dump its project traffic onto Deer Springs Road.

**B. GHG Reduction Alternative: The EIR Should Analyze a Transit-Oriented Alternative to Reduce Greenhouse Gas Emissions**

The EIR should also study an alternative with all residential units clustered around the commercial center on the eastern side of the Project near Mesa Rock Road and Interstate 15 that would reduce greenhouse gas ("GHG") emissions (the "GHG Reduction Alternative"). The GHG Reduction Alternative would allow all Project residents to walk to the commercial center as part of a mixed use project and provide a transit connection via an expanded park-and-ride facility and a transit center with direct access on to Interstate 15. Under this alternative, the developer should provide for a peak hour shuttle system (funded by the developer) to the Escondido Transit Center (similar to the One Paseo shuttle system required by the San Diego City Council as part of its approval of that project).

This alternative would remove the units on the west side of the property and the steep, winding roads throughout the Project, thus eliminating the need to drive from one side of the Project to the other. This design could also limit the Project's primary entrance to Mesa Rock Road—with direct access to the Project from Interstate 15—and limit additional ingress and egress points to emergency access. Again, direct freeway access could be studied in Caltrans' PSR (*see* Attachment D, Golden Door Letter to Caltrans, Mar. 16, 2015), and Newland's current design which requires multiple turns to access the commercial center from the freeway interchange to discourage or prohibit transit or shuttle bus easy access, or use of the commercial center parking lot as a park-and-ride, should be discarded. The residential units could be designed as multistory town homes, and would extend further north along Interstate 15, but would not necessarily result in a reduction in the total number of residential units proposed by the Project, though the number of units that could be accommodated by a transit-oriented design should be studied as well. A key feature of this GHG Reduction Alternative would be to allow transit more direct access to the commercial center, so that buses or shuttles provided by the Project can operate more effectively with greater usage.

This clustered, transit-oriented design of the GHG Reduction Alternative would minimize the Project's single-occupant vehicle trips by providing transit for longer trips and walkability for trips internal to the Project, thus reducing vehicle miles traveled ("VMT") and GHG emissions. 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.” Attachment F, General Plan Introduction and Vision and Guiding Principles at 1-16. In addition, the County Mobility Element states the following:

Reducing vehicle miles traveled is also an important component of reducing greenhouse gas emissions. Along with compact land use patterns, a well-connected road network contributes to reducing vehicle miles traveled. The Mobility Element requires the provision of multi-modal facilities to accommodate alternative modes of travel, such as public transportation, bicycling, and walking. In addition, goals and policies are included to minimize single occupancy vehicular travel through carpooling, vanpooling, and other transportation demand management methods.

Attachment G, General Plan Mobility Element at 4-3.

In addition, SANDAG has developed a Regional Transportation Plan (“RTP”) and Sustainable Communities Strategy (“SCS”) that favor a transit-first approach to new development. 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 an SCS be prepared as part of the RTP to integrate land use and transportation planning in an effort to curb VMT and associated GHG emissions. SANDAG published its RTP/SCS in October 2011. The SCS’ guiding principles include “focus[ing] housing and job growth in urbanized areas where there is existing and planned transportation infrastructure . . . [and] invest[ing] in a transportation network that provides residents and workers with transportation options that reduce GHG emissions.” Attachment H, RTP/SCS at 3-2. In addition, the 2050 RTP “focuses major roadway and transit improvements in urban and suburban areas of the region, encouraging growth away from the region’s more rural areas.” *Id.* at 6-39.

According to these planning principles, when a rural area is proposed to be transformed into an urban area (such as proposed by the Project), transit must be a central focus and not an afterthought. 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 proceed only after the construction of, and funding of contributions to, planned transit facilities to ensure that their added impacts and increased emissions are fully mitigated or avoided. As proposed, the Project lacks any meaningful transit proposals, instead requiring long, single-occupant vehicle trips from its rural location to urban and job centers. Additionally, the Project is designed to “sprawl” across the property, with the majority of the residential units placed on the far west side of the property behind disconnected winding roads and cul-de-sacs, without any direct internal Project roadway that can be used to easily or quickly reach the commercial center. The Golden Door’s GHG Reduction Alternative, however, would embrace the County’s updated General Plan policies favoring connectivity and transit, the

RTP/SCS, the Community Development Model, and the planning principles embodied in SB 375.

Further, the GHG Reduction Alternative would cluster development near the area currently designated as village in the County's General Plan. We understand that the County does not intend to create a "new" village designation for the Project; therefore, any added density should be clustered in or near the existing village designation rather than spreading out in a very disconnected fashion into existing rural lands. A failure to provide for this design would cause the Project to conflict with the County's General Plan policies. The Project should be consolidated around Newland's commercial center, so that all new Project residents can reach the commercial center (and new transit and park-and-ride facilities that should be included in the center) by walking or biking a short distance. Depending upon the design, the GHG Reduction Alternative could eliminate the need for a General Plan and Community Plan amendment and would likely reduce potential significant land use impacts from the Project.

**C. Alternate Location Alternative: The EIR Should Analyze an Alternative Location that Is Located in Closer Proximity to Existing Communities and Infrastructure**

The EIR should analyze an alternative location for the Project that complies with General Plan policies. The preamble to the General Plan's Land Use Element provides clear policy direction that, "[f]ocusing development in and around existing unincorporated communities allows the County to maximize existing infrastructure, provides for efficient service delivery, and strengthens town center areas while preserving the rural landscape that helps define the unique character of the unincorporated County." Attachment I, General Plan Land Use Element at 3-2. The Land Use Element goes on to state that, "the core concept for the County's development directs future growth to areas where existing or planned infrastructure and services can support growth and locations within or adjacent to existing communities. By giving priority to areas identified for urban level densities, this concept also helps to retain the rural setting and lifestyle of remaining areas of the County." *Id.* at 3-5. Further, General Plan Goal LU-2 seeks to maintain the rural character of existing rural lands in the unincorporated County, and Goal LU-5 directs development patterns and techniques that curb GHG emissions and VMT while preserving rural lands. *Id.* at 3-24, 3-27 to 3-28. The Project, however, is located far from existing communities and infrastructure and would urbanize existing rural lands.

The EIR should analyze alternative locations that meet the principles set forth in the General Plan—locations that are closer to existing communities and infrastructure, in close proximity to transit, and that do not convert existing rural lands. The North County Metro Sites Inventory has identified areas for housing development, that may serve as a guide for determining an alternative location for the Project. Alternate locations could consist of a single site or a combination of sites that would accommodate the amount of development proposed by the Project. By way of example, the General Plan's Housing Element Inventory for North County Metro includes site NC 2-1 which is located in the same planning area as the Project, could accommodate a similar number of residential units, is located in closer proximity to existing communities and transit infrastructure, and appears to largely avoid the Project's

impacts. *See* Attachment J. The EIR should study alternative locations, such as NC 2-1, that accommodate the housing and commercial development proposed by the Project with fewer environmental impacts and more in line with the General Plan's Guiding Principles and policies.

**D. Agricultural Alternative: The EIR Should Analyze an Alternative that Implements an Agricultural Use of the Property**

The alternatives section of the EIR should include an Agricultural Alternative that would utilize the steep slopes of the Project site for the production of avocados and other lucrative produce, providing an economically viable alternative for the Project applicant, which is consistent with the land use designations for the property in the General Plan. Agriculture is an appropriate use of the Project site because the majority of the site is designated as Rural Lands in the General Plan. The General Plan notes that, "[t]he Rural Lands category is applied to large open space and very-low-density private and publicly owned lands that provide for agriculture, managed resource production, conservation, and recreation and thereby retain the rural character for which much of unincorporated County is known." Attachment G, General Plan Land Use Element at 3-8 (emphasis added). The General Plan goes on to note that "the undeveloped nature of Rural Lands benefits all of San Diego County by . . . [p]reserving and providing land for agricultural opportunities." *Id.* at 3-9. The Agricultural Alternative would be consistent with the site's designation in the General Plan, and would also allow the preservation of open space, enhancement of the County's economy, provision of jobs, and creation of an economically viable use for the property.

Avocado production is a lucrative economic enterprise that is a feasible alternative to residential development on the Project site. The San Diego County Farm Bureau notes that San Diego County ranks first nationally for the production of avocados, is the twelfth largest farm economy among 3,000 counties, and that the annual value of farming to San Diego County economy is \$5.1 billion. Attachment K, San Diego County Farm Bureau, San Diego County Agriculture Facts. The County of San Diego Department of Agriculture 2013 Crop Statistics and Annual Report shows that avocado production in San Diego County increased in value over 2012 for a total of \$197,915,300 or over \$9,000 per acre of avocado production. Attachment L, County of San Diego Dept. of Agriculture, Weights and Measures, 2013 Crop Statistics and Annual Report ("San Diego County Ag. Report"), at 6.

In addition, other lucrative crops such as citrus, wine grapes, and nursery plants could all be grown on the property. The steep hillsides and rocky soils of Merriam Mountains, combined with the morning fog and later morning heat of the area would be good growing conditions for wine grapes. The flatter, lower lying areas of the property could also be used for nursery and greenhouse plants, which in San Diego County were worth over \$1 billion in 2013 according to the County Crop Report. Attachment L, San Diego County Ag. Report, at 5. If organic farming methods were used, the potential for higher economic returns would grow. In addition, organic farming can eliminate pesticide use, and better harmonize with the habitat around the farming operation.

Finally, as noted by the San Diego County Farm Bureau, farming provides carbon sequestration that can reduce GHG emissions (Attachment K, San Diego County Farm Bureau, San Diego County Agriculture Facts) as opposed to the proposed Project which would significantly increase GHG emissions from increased VMT and construction.

**E. The EIR Should Analyze Other Reduced-Density Alternatives that Would Minimize Environmental Impacts**

In addition to the alternatives described above, the EIR should analyze other reduced-density alternatives. These alternatives should include reductions in both residential and commercial density to determine the extent to which various reductions in density reduce traffic, greenhouse gas, fire safety, biological, and other impacts.

**II. THE EIR SHOULD PROVIDE A BROAD-BASED ENVIRONMENTAL REVIEW TO ENSURE IT ANALYZES ALL OF THE PROJECT'S IMPACTS**

An EIR must “identify and analyze the significant effects on the environment, state how those impacts can be mitigated or avoided, and identify alternatives to the project, among other requirements.” *Cal. Native Plant Soc’y*, 177 Cal. App. 4th at 979 (internal citation omitted). A significant effect is a “substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.” 14 Cal. Code Regs. § 15382. Among other things, the County will need to determine whether there is a “reasonable plan of actual mitigation” from the relevant agency that is fully enforceable through project conditions, agreements, or other legally binding instruments. *Anderson First Coalition v. City of Anderson*, 130 Cal. App. 4th 1173, 1187-89 (2005); *see also* Cal. Pub. Res. Code § 21081.6(b); 14 Cal. Code Regs. § 15126.4(a)(2).

Further, the Project constitutes a project of statewide, regional, or areawide significance under CEQA Guidelines Section 15206, because the Project proposes a General Plan Amendment and consists of more than 500 dwelling units. *See* 14 Cal. Code Regs. § 15206(b)(1), (b)(2)(A). As such, the Project must hold a public scoping meeting pursuant to CEQA Guidelines Section 15082(c)(1), provide sufficient copies of its Draft EIR to the State Clearinghouse, and allow a 45-day period for public comment on the Draft EIR. Moreover, pursuant to CEQA Guidelines Section 15086(a)(5), the County must consult with and request comments on its Draft EIR from Caltrans, SANDAG, and North County Transit District (“NCTD”), and any other agencies with transportation facilities within area described in Section 15086(a)(5). This designation under CEQA as a project of statewide, regional, or areawide significance further demonstrates the breadth of the Project’s impacts and need for thorough public participation.

Based on the Project’s drastic density increase in a rural area and lack of proximity to existing communities and infrastructure causing far-reaching connectivity issues, the scope of the EIR must encompass a broad array of communities in order to determine the extent of the



Project's impacts. The Golden Door's comments on specific potential impacts are provided below.<sup>2</sup>

#### A. Aesthetics

The urbanization of the Twin Oaks Valley area would irrevocably destroy the community's rural character. Community residents and businesses have expressed time and time again that we value the feel and appearance of our rural community. We have chosen to reside or operate our businesses in this area because of its tranquil, rural characteristics, not in spite of them. Newland's current design exacerbates this disruption of the surrounding Twin Oaks Valley area, and seems to be designed to maximize the disruption to surrounding properties while minimizing Newland's own infrastructure costs. Under the current design, many of the housing units are placed at the far west side of the property, without any easy or direct connection to Newland's commercial center, which is in turn placed on the far east side of the property. Rather than build a direct four lane road to connect the two disconnected parts of the project into a cohesive whole, the project includes winding internal roads and cul-de-sacs designed to dump the Project's traffic onto Sarver Lane and Deer Spring Road, and to discourage residents seeking to reach Newland's commercial center from entering the Project on the west side.

Additionally, the rural atmosphere outside of the Project site is further ruined by Newland's proposal to realign Deer Springs Road to take land from surrounding property owners to the south to "smooth the curve" and allow high speed travel into Deer Springs Road without stopping or entering Newland's own Project roads. The community trail, including equestrian uses, along the north side of Deer Spring Road, is rendered unusable and inaccessible from the south by this high speed "raceway" design.

The County has acknowledged this unacceptable increase in density its October 22, 2014 letter to Newland discussing the Pre-Application noting in a list of "major project issues" that "[t]he project proposes to locate a high density urbanized development, characterized by small lots, commercial and civic use types within an existing semi-rural community, which may conflict with some goals and policies of the General Plan." See Attachment M, Letter from Mark Slovick, County Planning and Development Services, to Rita Brandin, Newland, at 4 (Oct. 22, 2014) (emphasis added). The EIR should analyze the Project's impacts to community character and consider alternative designs and mitigation measures which minimize or eliminate the Project's disruption of surrounding roads and property.

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<sup>2</sup> While the Golden Door does not provide specific comments on mineral resources, public services, or recreation impacts or on mandatory findings of significance, the Golden Door generally encourages a wide-lensed approach to reviewing such impacts due to the breadth of the communities that may be impacted by the Project.

## **B. Agriculture and Forestry**

Analysis of agricultural impacts should not be limited to the Project site. The surrounding area consists primarily of agricultural lands, including 120 acres of agricultural production on the Golden Door's property. Project-related impacts, including increased traffic from construction and operations, decreased water supply, and fugitive dust and other particulate emissions from construction could impact surrounding agricultural operations. In addition, the Project's and cumulative growth-inducing impacts could decrease the land available for agricultural production, which as noted above, is a significant source of jobs and economic activity in San Diego County. The EIR should analyze the Project's direct and indirect impacts on agriculture.

## **C. Air Quality**

The Initial Study notes that the Project could result in a potentially significant impact from objectionable odors. Such odors could be particularly harmful to the Golden Door's guest experience. The EIR should analyze the extent of any objectionable odors and specify whether such odors will be limited to construction and operations within the Project site or will result from construction or other trips on Deer Springs Road that could impact the Golden Door and other properties located on Deer Springs Road.

In addition, both construction and Project air emissions could significantly impact the surrounding community. This rural area is unaccustomed to the air pollutants associated with urbanization, and agricultural uses may be particularly sensitive to the effects of air pollutants on their crops. Moreover, the amount of rock crushing proposed by the Project could result in significant air quality impacts during the lengthy construction process. The EIR should analyze the impacts of air pollution from multi-year construction and Project operations on surrounding properties.

## **D. Biological Resources**

The Project site is home to valuable species and habitat. As noted in the Initial Study, the Project site is located within the North County Multi-Species Conservation Program ("NCMSCP") subregional plan. The NCMSCP designates the Project site as having very high, high, and moderate habitat value. *See* Attachment N, NCMSCP Habitat Evaluation Map. In addition, the Project site contains areas designated as ecologically valuable Pre-Approved Mitigation Area ("PAMA"). The NCMSCP sets a goal of conserving 75 percent of natural lands in the PAMA; yet, Newland only proposes to conserve approximately 60 percent of natural lands on its Project site. The NCMSCP's 75 percent goal should be the minimum amount of preservation required by the County on the Project site. The EIR should analyze the Project's conformance with the NCMSCP and impacts on PAMA.

County staff noted in their report on the General Plan Property Specific Request NC42 that the Project site contained sensitive habitat and that the urban development proposed would not support the General Plan's Guiding Principles for steep slope development and habitat

conservation: “The site is entirely constrained by steep slopes, sensitive habitat and is also located within the Very High Fire Hazard Severity Zone. Because of the predominance of upland chaparral habitat, the County’s habitat evaluation model qualifies the site as low value. However, a site-specific study indicated that this area supports rare plants and is conducive to wildlife movement. . . . Specifically the request does not support Guiding Principle #5 due to the steep topography of the land and sensitive habitat.” *See* Attachment O, Property Specific Request NC42. The Property Specific Request also includes maps that indicate the steep slopes on the site, and moderate to high habitat value for the property. The June 20, 2012 County staff report on the NC42 request also states that, “portions of the requestor’s property contain High and Very High Value Habitat and would require additional environmental analysis to ascertain the impact of development on such sensitive habitat.” Attachment P, County Staff Report for NC42 and Study Area, at 2 (June 12, 2012). The EIR should provide at least the level of analysis noted by County staff regarding the NC42 request, which proposed a less drastic density increase than the Project does.

Altering the rural character of the Project site could significantly impact various populations and habitats. Moreover, the Project site includes both north-south and east-west wildlife corridors, including a stepping stone corridor for the California Gnatcatcher, a species that has been sighted on the property. Attachment Q, Merriam Mountains Project Recirculated Environmental Impact Report, State Clearinghouse No. 2004091166 (“Merriam Mountains EIR”), Biological Resources Subchapter, at 3.2-8, 3.2-10 (Mar. 2009). Any urbanization of this rural area should not come at the expense of precious habitat. The EIR should study impacts to species due to urbanization of the rural site and impacts to the California Gnatcatcher. The EIR should further analyze the Project’s impacts to wildlife movement.

The Project’s impacts will require substantial mitigation. The EIR should analyze mitigation measures for impacts to biological resources, including off-site mitigation and whether such off-site mitigation land is available. Mitigation lands for biological impacts from development is at a premium in San Diego County. Because the site could be used for biological mitigation for another project, the EIR should analyze how the significant loss of this potential mitigation land could impact development throughout San Diego County, including development in incorporated urban areas that could purchase parts of the property to mitigate their development impacts. In addition, the housing, population, and land use sections of the EIR should analyze how the loss of this property as potential mitigation land could affect development in urban areas, where the County General Plan, the SANDAG Regional Comprehensive Plan and the General Plans of incorporated cities like San Diego direct growth. If, for example, the PAMA located on the Project site is not available as mitigation land, it could constrain development in urban areas that will require biological mitigation land to allow development. This could create significant regional land use impacts that implicate fundamental public policy impacts not only on the County General Plan, but the General Plans of incorporated cities throughout the County.

In addition, the fuel modification zones proposed by Newland indicate a tension between the need for fire safety and the prerogative to preserve valuable habitat. It should be noted that Property Specific Request NC42 provides a map showing that the entire property is within the

“Very High” Fire Hazard Severity Zone. *See* Attachment O. The extensive clearing of vegetation needed to protect homes from fire hazards deprives wildlife of previously available habitat. This conundrum of choosing between fire safety measures and biological conservation efforts only serves to highlight the need to uphold the General Plan’s density designation for the Project site rather than shoe-horning an urban-style development on to land with both high habitat value and high fire hazard severity. The EIR must analyze the impacts that result from mitigation measures. The EIR, therefore, should analyze impacts to biological resources from the Project’s fire safety mitigation measures and vice versa.

#### **E. Cultural Resources**

The Project will require extensive grading, blasting, and excavation that could exhume fossils or cultural remains of Native American tribes in the area. Senate Bill 18 requires cities and counties to contact, and consult with, California Native American tribes prior to amending or adopting a general plan or specific plan, or designating land as open space. In addition, the Project must be analyzed against the San Diego County Resource Protection Ordinance (“RPO”). The EIR for the Merriam Mountains proposal that was rejected by the County Board of Supervisors found two RPO sites that would be impacted by the project’s requirement to expand Deer Springs Road. *See* Attachment R, Merriam Mountains EIR, Cultural Resources Subchapter at 2.5-8. The Merriam Mountains EIR notes that impacts to RPO sites that are within an essential public facility are exempt from the RPO.

#### **F. Geology and Soils**

The Project site is composed of steep slopes that could pose the potential risk of landslide. In addition, mountainous regions are typically created through earth movement over millions of years. A thorough analysis of potential earthquake faults will be required.

#### **G. Greenhouse Gas Emissions**

GHG emissions present a pressing global environmental concern. As the Initial Study notes, on-road transportation is the primary contributor of GHG emissions in the San Diego region. The Project, however, follows an outdated auto-centric development model with development sprawling across the property in a disconnected manner. Because of its location far from existing communities, job centers, and transit infrastructure, the Project will cause long single-occupant automobile trips that increase VMT, resulting in harmful GHG emissions. The EIR should analyze mitigation measures and alternatives that reduce the Project’s VMT, including the integration of developer-funded shuttles or transit into the project design.

The County’s Climate Action Plan (“CAP”) was invalidated by a 2014 Court of Appeal decision. *Sierra Club v. Cnty of San Diego*, 231 Cal. App. 4th 1152 (2014) *petition for review denied*, No. S223591 (Cal. Mar. 11, 2015). The County’s General Plan relied on the CAP to mitigate GHG emissions impacts. *See* Attachment S, San Diego County General Plan Update EIR, State Clearinghouse No. 2002111067, Global Climate Change Subchapter, at 2.17-30 (Mitigation Measure CC-1.2) (Aug. 2011). The Project’s EIR, however, cannot merely rely on

the invalidated CAP for GHG impact mitigation, but must propose enforceable mitigation measures and alternatives. The Climate Action Plan is attached hereto as Attachment T. Additionally, the County should carefully consider whether it can move forward to analyze this major regional project without first adopting a replacement Climate Action Plan.

The Project's Application notes that the Project is located within six miles of three of NCTD's Sprinter stations. *See* Attachment U, Project Application, Project Description at 22. The EIR should analyze the feasibility of relying on such distant points of access to transit to reduce long vehicle trips, especially given that the developer's application includes no proposal to link the project to these stations with a shuttle system or transit. In addition, the Initial Study notes "[e]arly project coordination with . . . Metropolitan Transit System (MTS) and the North County Transit District (NCTD)." Initial Study at 44. Reliance on MTS or NCTD services to mitigate the Project's GHG impacts must result in concrete and enforceable mitigation measures. The EIR cannot rely on mere "early project coordination" with transit entities to mitigate GHG impacts.

#### **H. Hazards and Hazardous Materials**

The Project is located in a High Fire Hazard Severity Zone. Drastically increasing the density on this property puts thousands of people in increased danger from fire hazards and exponentially increases the potential for fire-related damage to property value. This increased density directly conflicts with the County General Plan Safety Element Policy S-1.1- Minimize Exposure to Hazards: "Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards." Attachment V, San Diego County General Plan Safety Element at 7-4 (2011). It should be noted that the County recently went through the General Plan Update process of designating land at appropriate density levels to minimize the exposure of people to the risk of fire hazards. The staff report for the NC42 Property Specific Request discussed above notes that the entire site is in a Very High Fire Hazard Severity Zone. *See* Attachment O. The Project contradicts the thoughtful consideration that was given to the density designation on this site during the multi-year General Plan Update process. The EIR should analyze reduced-density alternatives and mitigation measures that will avoid or mitigate density-related fire safety impacts.

In addition, the influx of residents, commercial shoppers, and students, faculty, and staff at the charter school on the Project site will severely hinder evacuation efforts during a fire. During the fires in May of last year, area roads were at a standstill and Interstate 15 and State Highway 78 both experienced closures. With the Project's proposed "Ready, Set, Go" evacuation plan, individuals within the Project and in the surrounding areas will simultaneously be attempting to flee. The Project's steep, circuitous loop roads and cul-de-sacs, as well as the grouping of the majority of residential units on the west side of the Project furthest from Interstate 15, could result in residents being trapped within the Project if limited emergency access points are blocked by congestion or are impassable due to the location of a wildfire. It is important to provide multiple emergency access points to increase the opportunities for safe, passable routes in and out of the Project in the event of an emergency. Further, the Project's Application states that its fire plan will include a "regional approach." *See* Attachment U,

Project Application, Project Description at 23. The EIR should analyze a plan that includes moving evacuees out the north side of the Project—to North Twin Oaks Valley Road, Gopher Canyon Road, and Lawrence Welk Court—to avoid evacuation in a single direction or taking the risk of trapping residents if the fire is to the south. Improvements to northern access points necessary to mitigate fire safety impacts cannot be deemed infeasible simply due to costs to the developer.

In addition, the Golden Door echoes comments made by the Fire Marshal and Deer Springs Fire Protection District calling for independent analysis and additional information regarding various issues, including response times, the Project's internal "loop roads," and the effect of impacts from other development on the Fire Protection Plan. *See* Attachment W, Letter from James Pine, San Diego County Fire Authority, to Mark Slovick, County Planning and Development Services (July 21, 2014).

A crucial mitigation measure that must be studied is the redesign of the Project to include a direct four-lane road ("*Newland Sierra Parkway*"), as discussed above in Section I.A, that will provide a new east-west evacuation route for the thousands of new residents that Newland wants to add to the west side of the project, and the elimination of the current circuitous loop roads, cul-de-sacs and limited use fire roads now proposed by the developer. In an emergency, it is crucial that all residents and the community have access to a new direct four-lane east-west road across the project to evacuate to the east, rather than limiting evacuation points.

## **I. Hydrology and Water Quality**

Water availability is a significant concern for agricultural and domestic uses in the areas surrounding the Project site—and throughout California generally. Some properties in the area use water from on-site wells. Water is a precious resource, particularly to the agricultural properties in the Twin Oaks Valley community. The County Water Authority has declared the County to be in Drought Level 2, requiring 20% mandatory conservation. If the County Water Authority further downgrades the condition to Drought Level 3, no new potable water service will be available. The County should ensure that Newland's proposed urbanization of the area does not adversely impact existing water and wastewater services. The EIR should analyze the Project's impacts on water supply under various drought conditions, including Drought Level 3. The EIR should also analyze the impacts to water availability and quality to the area's water resources, including wells.

Due to the number of residential units proposed in the Project, the Project will require both a Water Supply Assessment and a Water Supply Verification under Water Code section 10910 and Government Code section 66473.7. The Water Supply Verification must provide written verification from the proposed water agency that sufficient water will be available during normal, single-dry, and multiple dry years within a 20-year time period, and must consider future growth of the region.

## **J. Land Use and Planning**

The State Planning and Zoning Law requires the County's project approvals to be consistent with the General Plan. *See Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553, 570-71 (1990). The County recently completed a General Plan Update in 2011, which zoned the Project site as rural lands allowing one residential unit for every 20 acres (RL-20), with just a sliver of village, office, and commercial designation near Interstate 15. *See* Attachment X, Twin Oaks Valley Land Use Map. The RL-20 designation is actually a *decrease* in the density previously allowed. Because the Project proposes a substantial increase in density so soon after the conclusion of the lengthy General Plan Update process, it is important that the EIR provide an in-depth analysis of the Project's compliance with the General Plan's policies and Guiding Principles and whether any General Plan Amendment will have an impact on similarly situated property elsewhere in the County.

### **1. The EIR Should Analyze Whether the Project Will Require Amendments to the General Plan's Guiding Principles**

The General Plan lists ten Guiding Principles that apply to all development in the unincorporated County:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.



8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

Attachment F, General Plan Introduction and Vision and Guiding Principles at 2-6.

The EIR should analyze the Project's compliance with each of the Guiding Principles. The Project could violate the Guiding Principles in at least the following ways: (1) locating growth far from existing and planned communities, infrastructure, and services; (2) drastically altering existing community character; (3) impacting operations of businesses that rely on the peace and tranquility of a rural setting; (4) disrupting wildlife corridors; (5) developing despite physical constraints posed by the Project site's slope; (6) failing to provide transit options; (7) requiring long single-occupant vehicle trips that increase greenhouse gas emissions; (8) urbanizing a rural agricultural community; (9) requiring the extension of utility services and annexation into the Vallecitos Water District ("VWD"); and (10) developing the Project despite significant community opposition, a previous rejection of a similar project, and a recent General Plan Update that spent years weighing stakeholder input. Any change to the County's Guiding Principles would require an analysis of the impacts of the change on similarly situated properties throughout the County and could require additional public input on the County General Plan's EIR.

County staff has previously determined that increasing density on the Project site would change the General Plan's objectives and would likely require recirculation of the General Plan's EIR. After completing an update of the General Plan in 2011, County staff evaluated a Property Specific Request to increase density on the Project site to permit an additional approximately 1,100 residential units over the approximately 100 residential units permitted under the General Plan's designation. *See* Attachment O. County staff designated the request as "Major" and "High Complexity." *See* Attachments O, P. According to the Staff Report for a January 9, 2012 workshop on the General Plan Property Specific Requests, a "Major" category designation indicates an inconsistency with General Plan Guiding Principles and "would require more fundamental and extensive changes to the General Plan Update and associated environmental documents." *See* Attachment Y, County Staff Report for General Plan Property Specific Requests Workshop ("Workshop Staff Report"), at 3 (Jan. 9, 2012). The Workshop Staff Report further noted that "if the County chooses to implement the Guiding Principles differently for a single property, it risks establishing an inconsistent basis for applying the Guiding Principles to other similar properties," that additional public outreach and review would be required to modify the Guiding Principles, and that changes to the General Plan's Land Use Map could be required for consistency. *Id.* at 4.

In a follow-up report by County staff on June 20, 2012, for the NC42 Property Specific Request, the request was deemed “Very High” complexity by County staff specifically because the significant changes being sought could alter the basic policy construct and planning principles of the General Plan. The staff report for NC42 notes the following rationale for the “Very High” complexity classification of Property Specific Request NC42:

- The workplan outlines an extensive community remapping that will have a major impact on the Twin Oaks Community and neighboring communities. The effects of adding over 1,000 dwelling units on land that is currently undisturbed rural land will require extensive study to determine the impact on the community, resources, and the environment and to address consistency with Policy LU-2.3 assigning densities in a manner that is compatible with the character of the community.
- The proposal would shift the focus of the Twin Oaks community from its center to its edge along I-15. At a minimum it would be necessary to review the proposed change to address consistency with the Community Development Model, Policy LU-1.1, and Guiding Principle 2. The Community Development Model supports decreased densities as the distance increases from the village core to promote compact development and preserve distinct boundaries between communities.
- The study area affects over 250 property owners. A change affecting such a large number of people increases the complexity involved in notifying owners of the proposed changes, seeking their input, and addressing their concerns. Given the large amount of community opposition to this project, additional issues will be brought up over the life of the approval process.
- The adjacent study area constitutes primarily agricultural lands. Further analysis would be required to determine the effect of a density increase on efforts to preserve important agricultural areas of the county such as this one.
- Portions of the requestor’s property contain High and Very High Value Habitat and would require additional environmental analysis to ascertain the impact of development on such sensitive habitat.
- Review of the mapping principles regarding prohibiting “leapfrog” development as outlined in Policy LU-1.2 and consistency with Policy LU-1.4 involving establishing new Village Regional Category designations outside of an existing or planned Village will be required.

See Attachment P, County Staff Report for NC42 and Study Area, at 2.

As noted above, Newland’s Project Specific Request NC42, which only proposed an approximately 1,100 residential unit increase (over the approximately 100 residential units

permitted by the General Plan's designation) was designated as "Major" and "Very High" complexity, indicating inconsistency with General Plan Guiding Principles and extensive changes to the General Plan's environmental review. As such, the EIR must analyze whether the even more significant density increase proposed by the Project—to 2,135 residential units—is consistent with the General Plan Guiding Principles and whether it requires additional environmental review of the General Plan. The EIR should analyze any change in County staff's position.

In addition to analyzing the Project's consistency with the General Plan's Guiding Principles, the EIR should also analyze the Project's consistency with each of the General Plan's specific policies. For example, Policy LU-2.3 requires density to be compatible with community character. Attachment I, General Plan Land Use Element at 3-25. The Project proposes to drop urban development into a rural and semi-rural area, thus violating this policy.

County staff correctly noted that "if the County chooses to implement the Guiding Principles differently for a single property, it risks establishing an inconsistent basis for applying the Guiding Principles to other similar properties." Attachment Y, Workshop Staff Report at 4. County staff's concern raises the issue of whether the proposed Project constitutes "spot zoning," which was specifically noted in County staff's review of Property Specific Request NC42. See Attachment O. The EIR must analyze whether the Project's General Plan and zoning changes constitute discrimination against similarly situated properties, which could be construed as impermissible "spot zoning." See *Foothill Communities Coalition v. County of Orange*, 222 Cal. App. 4th 1302, 1311-12 (2014); see also *Avenida San Juan Partnership v. City of San Clemente*, 201 Cal. App. 4th 1256, 1268 (2011).

2. The EIR Should Analyze the Project's Consistency with the General Plan's Leapfrog Policy

General Plan Policy LU-1.2 ("Leapfrog Policy") prohibits leapfrog development:

**Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries.

Attachment I, General Plan Land Use Element at 3-23.. We understand it is the County's position that the Project is exempt from the Leapfrog Policy because a small portion of the Project site is currently designated as "village" and, therefore, does not constitute a "new

village.” There are at least five flaws in this position, described below, that must be analyzed in the EIR.

First, the Project proposes to alter the boundary of the existing village designation. Attachment U, Project Application, Project Description at 9. This alteration will result in areas not previously designated as “village” being changed to “village” designation. The EIR should analyze whether this boundary change results in a “new” village.

Second, a plain reading of the Leapfrog Policy contradicts the County’s position that the Leapfrog Policy does not apply to the Project because the Project does not create a “new” village. The first sentence of the Leapfrog Policy is a clear prohibition on leapfrog development with no reference to new or existing village designations. The second sentence provides a limited exemption from the prohibition for “new villages” that meet certain criteria. This exemption, therefore, applies only to a subset of “new villages”—and does not apply to an “existing” village. Consequently, if the County determines the Project is not a “new” village, the second sentence’s exemption does not apply. Without the protection afforded by the exemption, the Leapfrog Policy, as described in the first sentence, applies to the Project.

Third, even if an existing village designation could trigger the Leapfrog Policy’s exemption, the small area in the corner of the Project site designated as “village” cannot exempt the *entire* Project from the Leapfrog Policy. This would be an absurd result allowing even the smallest village designation on the General Plan’s Land Use Map to provide protection for clear-cut leapfrog development as far out as a developer is willing to build a road from that village designation. The majority of the Project’s residential units are proposed to be constructed on the west side of the Project, far from the sliver of village designation in the Project’s southeast corner, which currently supports a gas station convenience store and several roadside stands. *If* the existing village designation provides protection from the Leapfrog Policy (and we contend it does not), it can only do so for units clustered closely around the existing village designation, such as are proposed in the Golden Door’s GHG Reduction Alternative.

Fourth, County staff has previously taken the position that an increase in density on the Project site must be reviewed for consistency with the Leapfrog Policy as well as with Policy LU-1.4, which applies to new village designations. The County staff report for Property Specific Request NC42 states that the requested General Plan change would require a “[r]eview of the mapping principles regarding prohibiting ‘leapfrog’ development as outlined in Policy LU-1.2 and consistency with Policy LU-1.4 involving establishing new Village Regional Category designations outside of an existing or planned Village . . . .” See Attachment P, County Staff Report for NC42 and Study Area, at 3. This position by County staff pertained to a less severe proposed density increase on the Project site of approximately 1,100 residential units, whereas the Project proposes a more drastic increase to 2,135 residential units. Again, the EIR should analyze County staff’s change in position regarding this issue.

Fifth and finally, even if the exemption found in the second sentence of the Leapfrog Policy could apply to the Project, the Project does not meet the exemption’s three criteria: consistency with the Community Development Model, provision of services and facilities, and

LEED-Neighborhood Development (“LEED-ND”) standard or its equivalent. The Project’s design is not consistent with the Community Development model because of its density allocation clustering residential units on the far side of the Project from the area designated as village. Also, there are not sufficient existing facilities and services to support the Project. Further, the Project does not meet LEED-ND or equivalent standards. LEED-ND requires a project’s connectivity to transit and existing communities and infrastructure. The US Green Building Council’s FAQ on LEED-ND states that, “[u]sing the framework of other LEED rating systems, LEED for Neighborhood Development recognizes development projects that successfully protect and enhance the overall health, natural environment, and quality of life of our communities. The rating system encourages smart growth and new urbanist best practices, promoting the location and design of neighborhoods that reduce vehicle miles traveled and communities where jobs and services are accessible by foot or public transit. It promotes more efficient energy and water use—especially important in urban areas where infrastructure is often overtaxed.” See Attachment Z, U.S. Green Building Council LEED-ND FAQ.

As discussed above, the Project lacks connectivity to existing urban and job centers or public transportation and will require long single-occupant vehicle trips which increase VMT. In addition, as noted in our previous comments, the Project does not promote efficient energy and water use, and is the antithesis of “new urbanist best practices.” While we understand the County is in the process of determining what criteria to use for LEED-ND “equivalent,” such criteria cannot include the wholesale discarding of central tenets of LEED-ND, such as connectivity, protection of the natural environment, and other such new urbanist best practices.

The EIR should analyze the Project’s consistency with the General Plan’s Leapfrog Policy in light of the points raised above.

### 3. The EIR Should Analyze the Project’s Consistency with County and Regional Plans’ Smart Growth Principles

The EIR must analyze whether and to what extent the Project is consistent with County and regional plans, including SANDAG’s RTP/SCS and with the Regional Comprehensive Plan (“RCP”). 14 Cal. Code Regs. § 15125(d). Additionally, recent Court of Appeal decisions invalidated the County’s CAP and SANDAG’s RTP/SCS for not going far enough in efforts to curb GHG emissions, and the California Supreme Court has granted a petition for review to address the SANDAG case. See *Sierra Club*, 231 Cal. App. 4th 1152, *petition for review denied*, No. S223591 (Cal. Mar. 11, 2015).; *Cleveland Nat’l Forest Foundation et al. v. San Diego Ass’n of Governments*, 231 Cal. App. 4th 1056 (2014).<sup>3</sup> The EIR should analyze the Project’s

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<sup>3</sup> The Supreme Court has granted a petition to review the SANDAG RTP/SCS case based on a specific issue related to the Governor’s Executive Order for GHG reductions. See *Cleveland Nat’l Forest Found. v. San Diego Ass’n of Gov’ts*, 231 Cal. App. 4th 1056, *modified upon denial of rehr’g*, No. D063288, 2014 Cal. App. LEXIS 1150 (Dec. 16, 2014), *petition for review granted*, No. S223603 (Cal. Mar. 11, 2015).

consistency with the CAP and RTP/SCS and measures that go further to limit GHG emissions or provide substitute criteria that meets the plans' underlying goals as provided in the County's General Plan and SB 375 respectively. The EIR should further analyze the Project's consistency with County and SANDAG growth forecast maps, including SANDAG's Smart Growth Concept Maps. *See* Attachment AA, SANDAG's San Diego Region Smart Growth Concept Map and North County Subregional Smart Growth Concept Map, both dated January 27, 2012.

The Project proposes to develop 2,135 residential units and 81,000 square feet of commercial development on rural lands far from urban and job centers—and without meaningful transit options—in stark contradiction to the planning principles encompassed in the County's General Plan, LEED-ND, SANDAG's RTP/SCS and RCP, and SB 375. SANDAG's RTP/SCS was developed based on the County's General Plan current designation of rural residential. General Plan Goal LU-5 promotes “[a] land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.” Attachment I, General Plan Land Use Element at 3-27. Newland's proposal does not discuss how it is consistent with the RTP/SCS which assumed no urban development on this site. In addition, the County's 2013 General Plan Annual Progress Report states that “[t]he core concept for the County's Land Use Element is to direct future growth to areas where existing or planned infrastructure and services can support that growth and to locations within or adjacent to existing communities.” *See* Attachment BB, 2013 General Plan Annual Progress Report, at 3 (Mar. 2014). As previously discussed, the Project will be located away from existing services, includes internal street designs with long looping roads and cul-de-sacs, includes no proposal for transit or shuttle services to nearby transit, does not provide for compact development within the property or direct road access from residential areas to the commercial center, and will require long, single-occupant vehicle trips in contradiction of these policies.

The EIR should analyze the Project's consistency with the smart growth principles contained in the General Plan, SANDAG's RTP/SCS, and SB 375. The Project simply lacks the connectivity and compact land use planning required of smart growth development. Claims of reduced vehicle trips within the Project site (to the extent they can be supported by substantial evidence) would not negate the impacts of long single-occupant vehicle trips required to job and urban centers. In addition, Project features such as a multi-use trail and bicycle share programs will do little to decrease vehicle trips internal to the Project. For example, residents on the west side of the Project site—where most residential units are located—are unlikely to walk or ride a bicycle or horse to the far eastern side of the Project to visit a grocery store, leaving themselves carrying bags of groceries back to their home. Also, the sheer topography of the Project site does not lend itself to pedestrian or bicycle trips unless commercial and residential uses are more closely clustered, given the long looping roads, cul-de-sacs and grade changes. The EIR should analyze alternative designs for internal circulation and layout of units to reduce the length of internal trips. Even if such changes provide for a reduction in internal Project trips, they do nothing to decrease external Project trips that result in greater VMT and GHG emissions impacts. The Project must do more than merely pay lip-service to County, regional, and State planning requirements emphasizing smart growth principles.

## **K. Noise**

Noise related to construction activities would persist for years with the phased development of the Project's various neighborhoods. In its Application, Newland notes that rock crushing will be performed on-site, but provides no details of the volume, duration, or location of rock crushing activities. *See* Attachment U, Project Application, Project Description at 13. The Golden Door has specifically requested this information from Newland for over 9 months, but it has not been provided. As it appears that significant quantities of rock will be crushed or could be blasted on-site to be used in various aspects of the Project, the noise produced by rock crushing and blasting would pose a long-lasting and significant impact to the community. The EIR should analyze alternatives to on-site rock crushing as well as noise-reducing mitigation measures. In addition, the EIR should identify the specific location or locations within the Project site that will most effectively mitigate noise impacts from rock crushing operations.

The EIR should analyze noise and ground vibration impacts on the Golden Door and other surrounding properties from construction and Project operations and on the Project site and on Deer Springs Road. The EIR should also analyze appropriate mitigations for noise impacts to the Golden Door and other surrounding property owners.

## **L. Population and Housing**

The Project's proposed urbanization of a rural area could result in growth-inducing impacts both in the areas surrounding the Project site and elsewhere in the unincorporated County. Because the General Plan encourages new development near existing communities, adding a new community on the Project site could induce other communities to develop nearby. As noted in the County staff report on Property Specific Request NC42, "[t]he proposal would shift the focus of the Twin Oaks community from its center to its edge along I-15." Attachment P, County Staff Report for NC42 and Study Area, at 2. Because of this shift, the Project could act as a bridge between previously designated rural and urbanized areas creating an incentive for in-fill development of development of rural areas between the Project site and urbanized areas. The EIR must analyze the Project's potential to induce additional development of rural lands.

In addition, setting the precedent that the 2011 General Plan Update is subject to amendment that drastically increases density in contradiction of the General Plan's Guiding Principles could pave the way for other General Plan Amendments adding similar urban density in other areas of the unincorporated County with existing rural designations. The EIR should analyze the Project's growth inducing impacts to the area surrounding the Project site as well as other areas in the unincorporated County.

## **M. Transportation and Traffic**

The Project's density and design will cause significant traffic impacts on freeways and surface streets. The Project is located far from urban and job centers without any meaningful transit options, and proposes steep, circuitous internal Project roads, replete with cul-de-sacs, that cause traffic to be dumped on to Deer Springs Road, which already experiences significant peak



hour cut-through trips in contradiction of General Plan policies for regional connectivity and rural roads. Newland's road design seems intended to dump or divert traffic onto surrounding streets outside of the Project, and reduce Newland's own infrastructure costs by avoiding the need to build a direct four-lane east-west connection such as the "*Newland Sierra Parkway*" described above. As discussed in more detail below, the EIR should analyze the Project's traffic impacts on a broad scale as well as feasible alternatives and mitigation measures, such as the alternatives proposed above by the Golden Door. Additional comments on the NOP are included in a letter from the Golden Door's traffic consultants, Fehr & Peers, attached hereto as Attachment CC.

1. The EIR Should Study Mitigation Measures and Alternatives to Maintain a Two-Lane Configuration on Deer Springs Road and Stop Newland's Attempt to Dump Project Traffic on the Road and Divert Any Through Traffic from Newland's Own Property

The Project proposes a drastic increase in density far from existing communities and infrastructure or job and urban centers. Furthermore, much of the Project's density is placed on the far west side of the Project, as remote as possible from the Project's own commercial center. Moreover, as shown an LLG license plate survey, a number of trips on Deer Springs Road are freeway bypass trips resulting in regional impacts. *See* Attachment B. These freeway bypass trips occur now and will increase in the future because of existing freeway congestion on Interstate 15 and State Highway 78. As discussed below, Newland's Project will contribute to gridlock Level of Service "F" on Interstate 15 in the future, causing large numbers of residents to divert from Interstate 15 to escape stopped traffic on Interstate 15. Rather than accommodating this "cut-through" traffic on Newland's own project roads, Newland has designed its roads as a circuitous system with cul-de-sacs to funnel the cut-through traffic away from their property and on to Deer Springs Road.

As a result, the Project could cause traffic impacts within a broad geographic radius from the Project site. Under CEQA, the County will be required to consider mitigation measures or alternatives which could fully mitigate or avoid predicted traffic impacts (as well as the complete and detailed performance objectives for mitigation measures for impacts on state highways provided by Caltrans under CEQA Guideline Section 15086). Pub. Res. Code § 21100; *see also Gray v. County of Madera*, 167 Cal. App. 4th 1099, 1116-17 (2008). Courts have found mere fair-share payments made to undefined or insufficient mitigation fee programs to violate CEQA. *See Anderson First Coalition*, 130 Cal. App. 4th at 1187-89 (requiring fair-share payments to fund a program that would *actually mitigate* cumulative traffic impacts) (emphasis added); *Endangered Habitats League, Inc. v. County of Orange*, 131 Cal. App. 4th 777 (2005) (invalidating EIR that did not provide evidence of improvements funded by the project's mitigation fee or evidence that fees would adequately mitigate traffic impacts).

A traffic study included in the Lilac Hills Ranch project's EIR forecasts a failing Level of Service "F" on Interstate 15 from Escondido all the way to the Riverside County line when both Newland's Project and the Lilac Hills Ranch project are developed. *See* Attachment DD, Lilac Hills Ranch Draft Revised EIR, State Clearinghouse No. 2012061100, Transportation/Traffic

Subchapter (June 2014) at 2.3-41 to 2.3-42, 2.3-96 to 2.3-97. The Golden Door believes that when Interstate 15 reaches Level of Service “F,” a large number of motorists traveling to and from SR-78 will simply view Deer Springs Road/Twin Oaks Valley Road/Buena Creek Road as an alternate freeway ramp to the West 78, the City of Vista and south San Marcos, including Cal. State San Marcos. For this Project, the EIR’s traffic studies should analyze impacts, mitigation measures, and alternatives within a broad study area—including multiple segments of Interstate 15 and State Highway 78, Twin Oaks Valley Road, and Buena Creek Road—due to the prevalence of freeway bypass trips on Deer Springs Road affecting a wide range of freeways and surface streets. Any mitigation measures should be fully funded before the Project moves forward. The traffic study should consider improvements funded by the Project on Interstate 15 and State Highway 78 that would minimize the congestion that the Project will cause on the freeways which will otherwise exacerbate future cut-through traffic.

The EIR should consider improvements to Deer Springs Road, without adding lanes on Deer Springs Road, that discourage additional cut through trips in this rural area and avoid making the road more attractive for bypass trips that should remain on the freeway rather than burdening local property owners. If the County staff nonetheless believes an east-west regional freeway “cut-through” should be built in this area, the County staff should consider instead the alternative of building the “cut-through” road across Newland’s own property using a direct four-lane parkway and through a realignment of the Deer Springs Road interchange bridge, rather than widening Deer Springs Road.

The updated General Plan no longer views road-widening as a “one-size-fits-all” solution to congestion. According to the General Plan’s Mobility Element, the “widening of roads, which can dramatically change the character of a community, should be pursued only after environmental and community character impacts are also considered. The need to widen roads is minimized when trip vehicle miles traveled are reduced, the performance of the existing network is optimized, and the use of alternative modes of travel is maximized.” Attachment G, General Plan Mobility Element at 4-3. The EIR should study the environmental and community impacts that would occur if Deer Springs Road were expanded, such as the following: (1) the rural character of the community does not support a major thoroughfare ferrying passers-through from one freeway to the next, (2) the extensive grading on steeply sloped landscape would destroy habitat and potentially water flows, (3) the extensive blasting required to fit the road into Deer Springs Road, (4) the impacts to residents to the south of Deer Springs Road near Mesa Rock Road, (5) the impacts of a high speed road adjacent to the planned trail on the north side of Deer Springs Road, and (6) an expanded roadway inviting vehicle trips would create an additional hindrance to wildlife and pedestrian, bicycle, and equestrian movement, especially north-south movement across the road.

Moreover, the General Plan supports County road configuration that discourage freeway-bypass trips. LLG’s license plate survey indicates that approximately 78% of trips on Deer Springs Road originating at the Interstate 15 southbound ramp during morning peak hours are freeway bypass trips. *See* Attachment B. With the County’s projection that Interstate 15 will reach Level of Service “F” and be extremely congested for many hours of the day, (due in large part to Newland and other newly planned developments), many more motorists will be

encouraged to “flee the freeway” and find any surface street that can provide an alternative. We understand that County staff, nonetheless, has expressed a lack of concern over freeway bypass trips on Deer Springs Road and would support the transformation of this rural road into freeway-to-freeway bypass. We could not disagree more—and neither could the General Plan.

Policy M-1.1 of the General Plan’s Mobility Element requires prioritizing travel *within* communities by encouraging “a public road network that accommodates travel between and within community planning areas **rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.**” Attachment G, General Plan Mobility Element at 4-12 (emphasis added). The Twin Oaks Valley community should not be burdened by a massive freeway bypass because of congestion on Interstate 15 and State Route 78. The EIR should study alternatives and mitigation that would maintain the area’s rural character, which would be destroyed by a “Deer Springs Freeway Bypass System,” which, even if effective, would merely serve as a short-term stop-gap measure instead of seeking a more systematic solution to freeway congestion through more efficient freeway management and alternative means of transportation.

In addition, General Plan Policy M-2.1 describes situations in which acceptance of a failing Level of Service is necessary to achieve other General Plan goals, such as environmental preservation or enhancing community character. One situation justifying acceptance of a failing Level of Service involves regional connectivity issues, “when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. Rather than widening County roads to accommodate this traffic, the deficiencies in the regional road network should be addressed.” Attachment G, General Plan Mobility Element at 4-14. Another situation calling for acceptance of a failing Level of Service on a County Road is when “adding travels lanes to a road that would adversely impact environmental and cultural resources . . . . This situation would also occur in areas with steep slopes where widening roads would require massive grading, which would result in adverse environmental impacts and other degradation of the physical environment.” *Id.*

Moreover, SANDAG’s RTP/SCS sets forth a policy of keeping freeway-to-freeway trips on the freeways and off of local roads: “The local streets and arterials that connect our communities are typically used for shorter trips, while the region’s highways link homes with major centers for jobs, education, shopping, and recreation.” Attachment H, RTP/SCS at 6-22. It would be inconsistent with the RTP/SCS for the County to approve of a project which funnels traffic onto surface streets and requires their widening to accommodate increased traffic. We also believe that the environmentally superior alternative under CEQA would be to accommodate this bypass traffic using improvements in traffic and transit facilities on the Interstate 15 and SR-78 corridors, and that this would assist the region in meeting the GHG reduction goals contained in SANDAG’s SCS.

Because the segment of Deer Springs Road between Sarver Lane and Mesa Rock Road meets these criteria, acceptance of a failing Level of Service is warranted. Moreover, the Project would not *create* a failing segment on Deer Springs Road by maintaining this segment at two lanes. The two-lane segment is *already* failing today. As demonstrated by the LLG license plate

survey, a two-lane configuration between Sarver Lane and Mesa Rock would result in the same or improved Levels of Service on all other segments of Deer Springs Road. *See* Attachment B.

Expanding Deer Spring Roads would require significant right-of-way acquisition from local property owners and could destroy the Golden Door and other businesses in the area. Based on the steep slope in front of the Golden Door and the Golden Door's need to access Deer Springs Road at grade, grading to or constructing four lanes—and even more so for six lanes<sup>4</sup>—would require substantial encroachment onto the Golden Door's property and would significantly harm the Golden Door's business. Such an encroachment may result in a “taking” of both the Golden Door's property and business and require the County to compensate the Golden Door for the value of both its property and its business.

Other area property owners would also be subject to significant property loss and potential destruction of their intended use. For example, the various alignments of the southward bend on Deer Springs Road would require differing degrees of condemnation of the TERI property. Depending on the configuration, it could render the TERI property useless for the non-profit's intended equestrian center and other facilities for developmentally disabled individuals. A two-lane configuration of Deer Springs Road, and a reduced speed limit, would be more likely to allow for a tight turn radius or T-intersection that would limit the need to acquire right-of-way from TERI or other area property owners. The EIR should analyze the impacts to local property owners of the extensive condemnation that would be required for expanding Deer Springs Road, including impacts that would occur if the encroachment caused a closing of businesses, blight, or the conversion to other uses.

Finally, the County should implement measures to reduce the speed at which vehicles travel on Deer Springs Road, including a reduced speed limit, traffic calming circles, and a T-intersection at the intersection of Sarver Lane and Deer Springs Road. Reduced speed would not only discourage freeway bypass trips, it would increase safety in the area—the safety of vehicles as well as pedestrians, cyclists, and equestrians. Various residences and businesses, including the Golden Door, access Deer Springs Road directly, and excessive speeds pose a significant safety risk. Moreover, high-speed travel is not necessary for true “local trips,” but benefit only the freeway bypass drivers seeking to treat Deer Springs Road as a long freeway access ramp. The EIR should study alternatives and mitigation measures that maintain Deer Springs Road as two lanes.

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<sup>4</sup> While the Golden Door encourages analysis of all options to maintain Deer Springs Road in a two-lane configuration, the EIR must study the severe environmental impacts that would occur, as well as necessary mitigation measures, if the County expanded Deer Springs Road to six lanes, even if specific proposals are limited to two-, three-, and four-lane configurations. *Laurel Heights Improvement Ass'n. v. Regents of the Univ. of California*, 47 Cal. 3d 376, 396 (1988) (requiring future expansion of a project to be included in a project's CEQA review if it is reasonably foreseeable and would be significant in changing the scope or nature of the project or its environmental effects).

## 2. Deer Springs Road/Interstate 15 Interchange Impacts

We are aware that Caltrans is developing a Project Study Report (“PSR”) for the Deer Springs Road/Interstate 15 interchange. County staff has stated that the EIR will analyze all alternatives proposed in the PSR, and will not publish the EIR until after the PSR has been completed and the County has analyzed the impacts resulting from the alternatives contained therein. While the County should analyze the impacts of all alternatives in the PSR, it should not limit its analysis to those alternatives. The EIR should analyze all feasible mitigation measures and alternatives even if they are not included in the PSR.

## 3. The EIR Should Study Transit Options

In addition, the Project lacks any meaningful transit options. The Project’s Application notes that three Sprinter stations are located “within six miles” of the Project. *See* Attachment U, Project Application, Project Description at 22. This distance would preclude the Sprinter train from serving as a viable everyday commute option for Project residents. Despite the strong policy preference for transit in the County General Plan and SANDAG’s RTP/SCS, and the LEED-ND standards, the Project Description in the Project’s Application makes no mention of transit aside from this wholly ineffectual reference to distant Sprinter stations. Because the Project would be located in the rural Interstate 15 corridor in North County, which lacks transit infrastructure, the Project should take a “transit-first” approach to transportation. If the Project is approved, the County should allow it to proceed only after the construction of, and funding of contributions to, planned transit facilities to ensure that the Project’s added impacts and increased emissions are fully mitigated or avoided. Such facilities must be coordinated on a regional basis with SANDAG, rather than created on a partial, haphazard or unfunded basis at the project level. In addition, the EIR should consider a shuttle operating at regular intervals that would connect the Project to the closest Sprinter stations and the Escondido Transit Center, which could reduce some of the thousands of single-occupancy car trips that will be generated by the Project.

In addition, the EIR should analyze traffic impacts using both Level of Service and VMT criteria. Analysis of VMT impacts is necessary to demonstrate the necessity of a substantial transit component as mitigation.

## N. Utilities and Service Systems

The Project proposes that VWD will provide water and wastewater services. As noted in VWD’s June 5, 2014 comment letter on the Project, additional study is required for the provision of water and wastewater services. *See* Attachment EE, Letter from Eileen Koonce, VWD, to County Planning and Development Services. VWD’s letter concludes that the Project’s density could cause significant impacts on water and wastewater services: “[T]he potential increased density of the project may have a significant impact on offsite facilities both for this project and cumulatively with other projects currently being proposed. These projects may significantly impact District facilities including local water and sewer mains, water storage, the sewer interceptor, pump stations, outfall and treatment.” *Id.* at 4. The EIR should analyze the impacts

to water and wastewater services of the Project's drastic proposed density increase, including to other users in the VWD area or that users who service providers share facilities with VWD.

### III. CONCLUSION

The Project would result in a drastic increase in density and poses connectivity issues that could impact a broad geographic area and policy issues that could alter the County's General Plan framework that was only updated four years ago. As such, the Project's environmental review should require a broad analysis of potentially significant impacts. The Golden Door has proposed four distinct alternatives for analysis and encourages the analysis of many additional alternatives and mitigation measures that would mitigate or avoid the Project's many significant impacts.

Thank you for your time and attention to our comments. Please feel free to contact me at (858) 523-5400 or [christoper.garrett@lw.com](mailto:christoper.garrett@lw.com) if you would like to discuss these matters further.

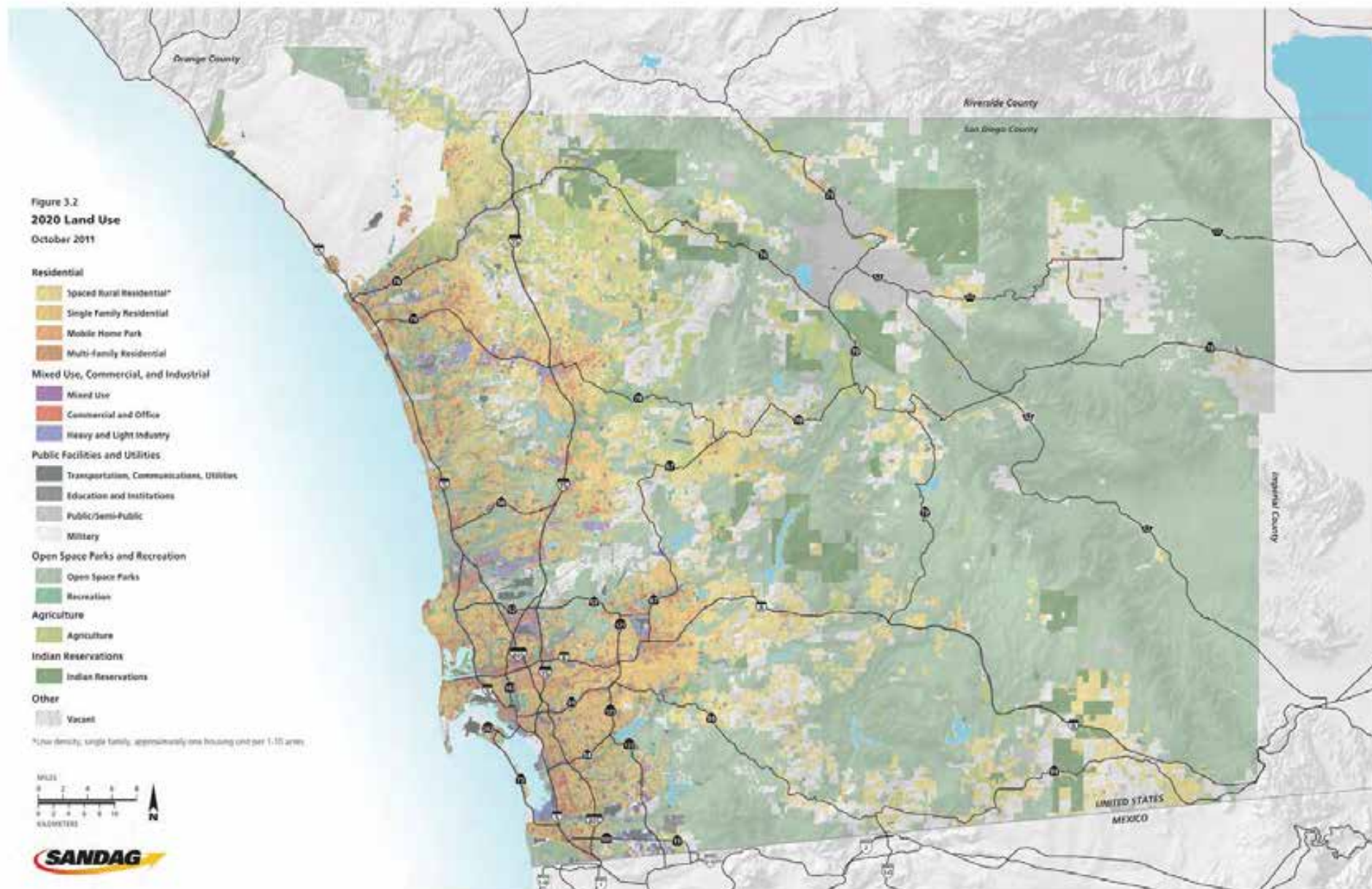
Best regards,



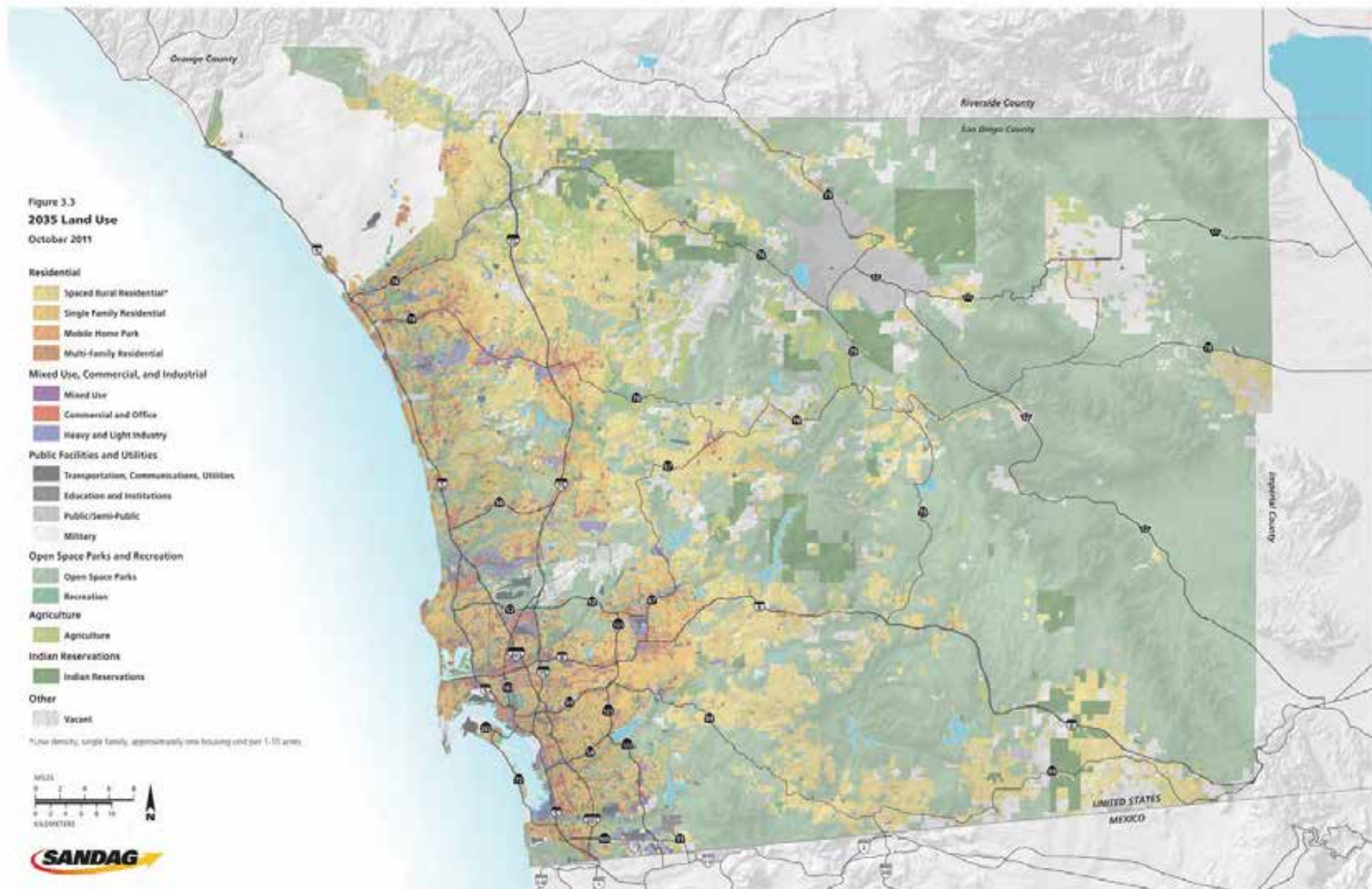
Christopher W. Garrett  
of LATHAM & WATKINS LLP

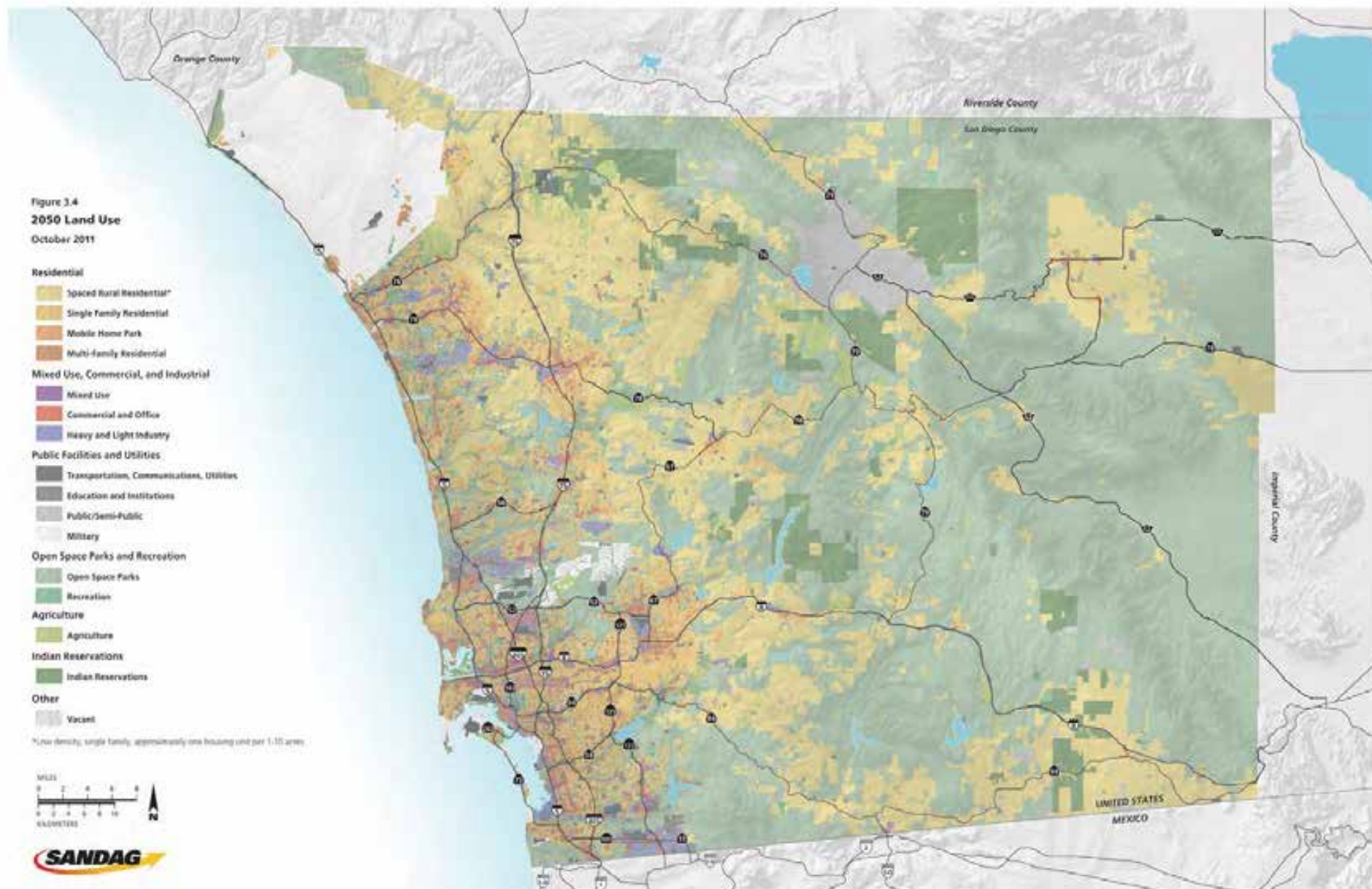
cc: Kathy Van Ness, Golden Door  
Jeff Dawson, Golden Door  
Stephanie Saathoff, Clay Co.  
Maddy Kilkenny, Clay Co.  
Dawn Wilson, Fehr & Peers  
Andrew Yancey, Latham & Watkins



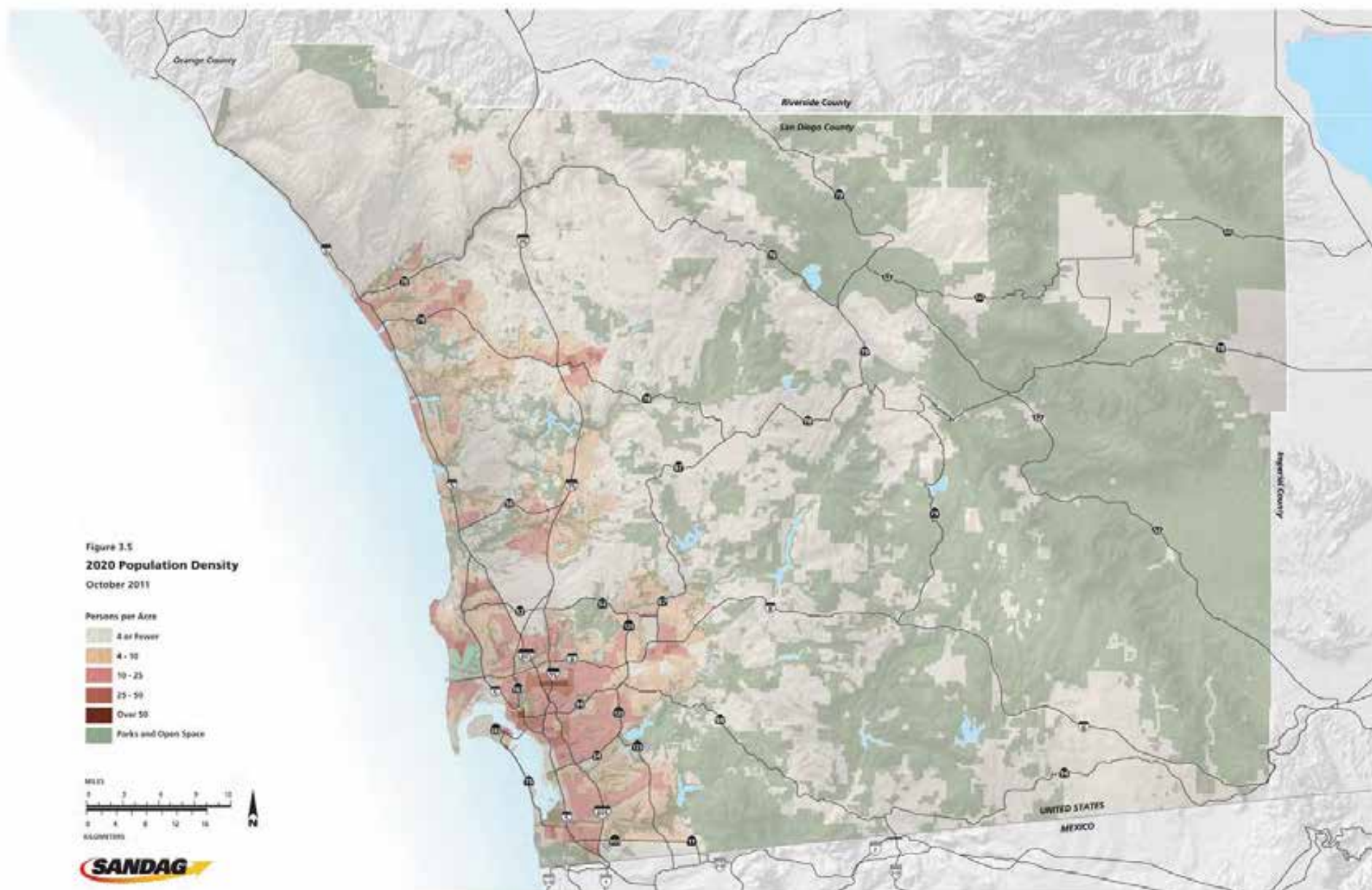


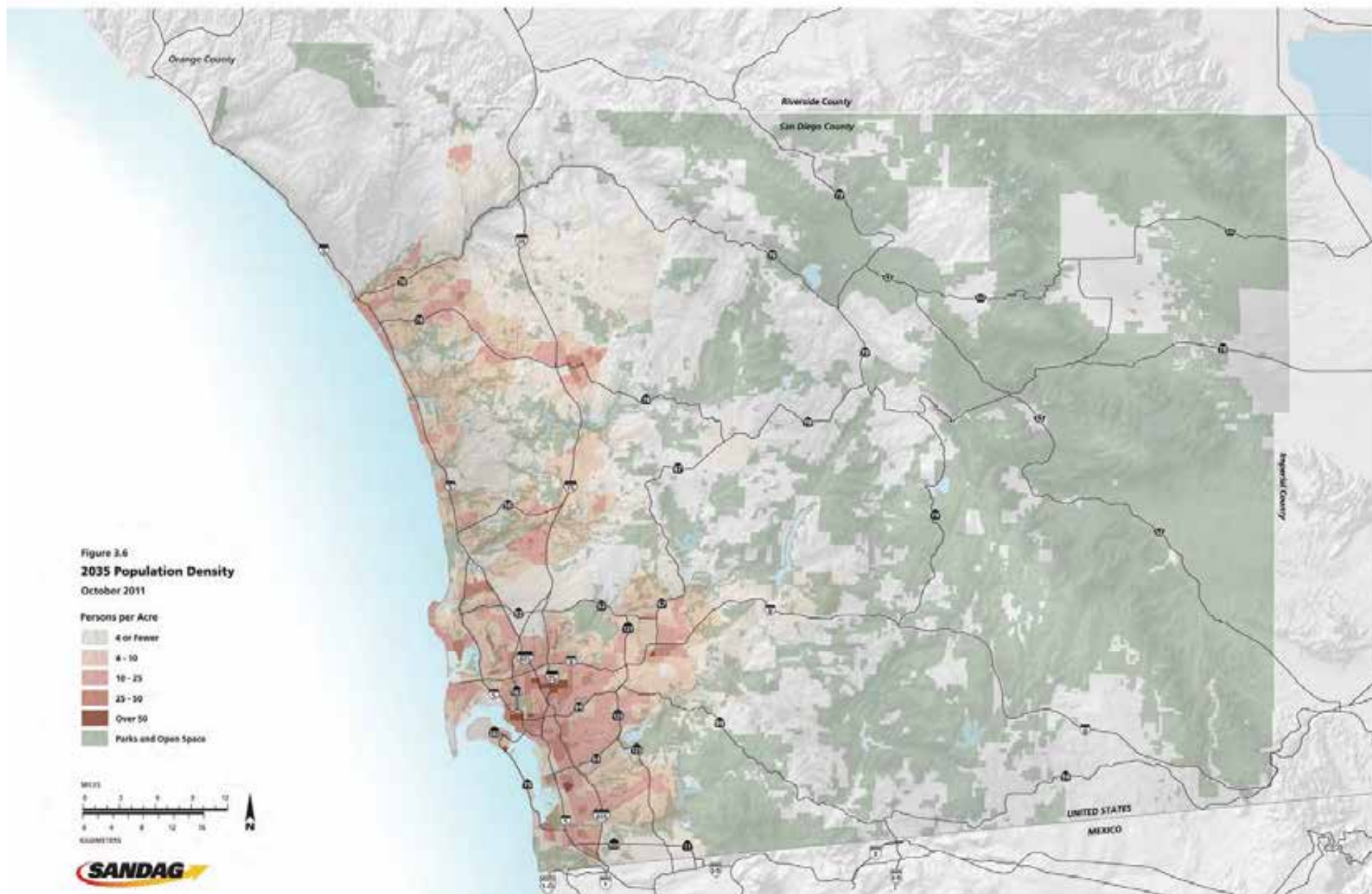




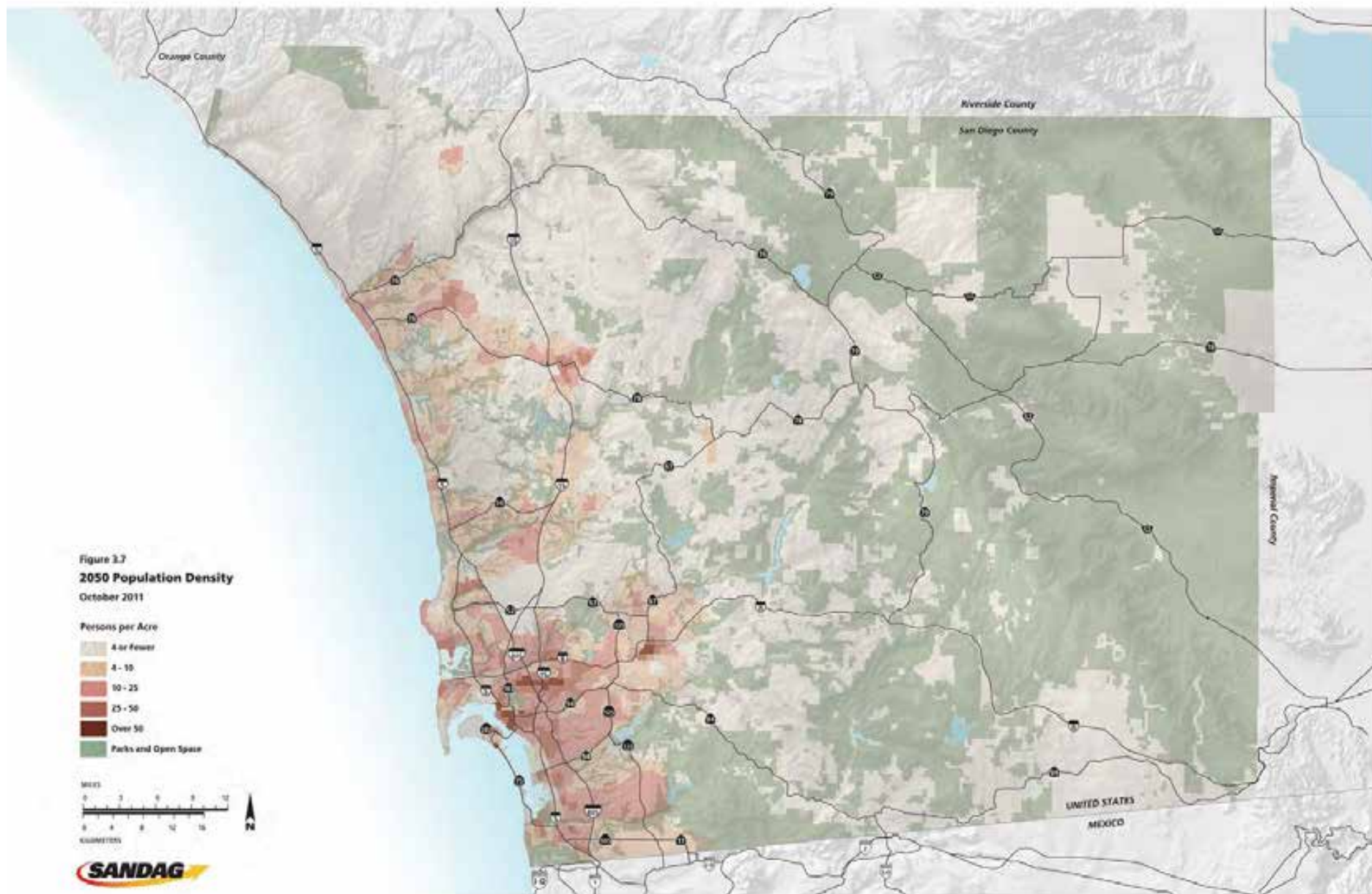












Sierra Project  
Comparison of Long-Term (Year 2035) Segment Volumes

Street Segment	Existing Counts			Deer Springs Road 6-Lanes			Deer Springs Road 4-Lanes			Deer Springs Road 2-Lanes (Mesa Rock Road to Sarver Lane)		
	LOS E Capacity	Volume	LOS	LOS E Capacity	Volume	LOS	LOS E Capacity	Volume	LOS	LOS E Capacity	Volume	LOS
<b>Deer Springs Road</b> Twin Oaks Valley Rd to Sarver Ln Sarver Ln to Mesa Rock Rd Mesa Rock Rd to I-15 I-15 to Champagne Blvd	16,200	17,200	F	57,000	39,100	C	37,000	34,600	E	37,000	27,200	C
	16,200	17,000	F	57,000	35,300	B	37,000	31,200	D	16,200	23,500	F
	16,200	20,000	F	57,000	34,500	B	37,000	29,800	D	37,000	23,400	B
	16,200	11,200	E	34,200	22,100	C	34,200	17,300	B	34,200	15,400	B
	34,200	7,900	A	34,200	17,500	B	34,200	16,400	B	34,200	15,800	B
<b>Twin Oaks Valley Road</b> Solar Ln to Deer Springs Rd <sup>a</sup> Deer Springs Rd to Buena Creek Rd	4,500	2,500	C	4,500	3,000	C	4,500	3,400	C	4,500	3,400	C
	19,000	17,900	E	40,000	40,800	F	40,000	36,400	E	40,000	29,300	D
<b>I-15</b> Gopher Canyon Rd to Deer Springs Rd Deer Springs Rd to Center City Pkwy <b>Gopher Canyon</b> West of I-15 I-15 to Champagne Blvd.					159,500			163,900			163,300	
					155,700			168,300			171,600	
					45,000			32,800			33,600	
					21,100			10,000			10,700	
<b>SR 78</b> West of I-15					132,500			175,200			176,300	

Footnotes:

a. This segment of Twin Oaks Valley Road is not built to its classification and hence a lower capacity (residential street) is assumed.

May 5, 2014

Existing and Estimated Future (Year 2040) Travel Time on Deer Springs Road

Between Mesa Rock Road and Buena Creek Road

(With Sierra Project)

Segment	Peak Hour	Segment Length (miles)	Existing  (Observed)	Estimated Year 2040 Travel Time With Sierra Project (Minutes:Seconds)		
				DSR 6-Lanes	DSR 4-Lanes	DSR 2-Lanes
WB Deer Springs Road	AM	2.37	9:46	4:17	4:03	5:47
EB Deer Springs Road	PM	2.37	9:17	4:35	5:01	5:17

# I-15 Southbound Off Ramp @ Deer Spring Road to Buena Creek Road License Plate Survey

May 5, 2014

Date

Locations

16-Apr 17-Apr

LINSCOTT  
LAW &  
GREENSPAN

engineers

## Location 1 I-15 @ Deer Spgs Rd Total Right Turns

7:00 to 8:00 AM	738	876
8: 00 to 9:00 AM	673	686
<b>Two Hour Total</b>	<b>1411</b>	<b>1562</b>

## Location 2 Buena Creek Rd & Deer Spgs Rd Total Right Turns

7:00 to 8:00 AM	278	337
8: 00 to 9:00 AM	271	274
<b>Two Hour Total</b>	<b>549</b>	<b>611</b>

## Location 3 Buena Creek Rd & Deer Spgs Rd Total Thru Traffic

7:00 to 8:00 AM	760	764
8: 00 to 9:00 AM	763	602
<b>Two Hour Total</b>	<b>1523</b>	<b>1366</b>

## Location 1 to Location 2

7:00 to 8:00 AM	160	237
8: 00 to 9:00 AM	124	192
<b>Two Hour Total</b>	<b>284</b>	<b>429</b>

## Location 1 to Location 3

7:00 to 8:00 AM	322	436
8: 00 to 9:00 AM	453	399
<b>Two Hour Total</b>	<b>775</b>	<b>835</b>

75% 81%

## SB I-15 to Buena Creek

7:00 to 8:00 AM	22%	27%
8: 00 to 9:00 AM	18%	28%
<b>Two Hour Total</b>	<b>20%</b>	<b>27%</b>

## Average

24%

23%

24%

## SB I-15 to Twin Oaks Valley Road (San Marcos)

7:00 to 8:00 AM	44%	50%
8: 00 to 9:00 AM	67%	58%
<b>Two Hour Total</b>	<b>55%</b>	<b>53%</b>

47%

63%

54%



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## LATHAM & WATKINS<sup>LLP</sup>

March 16, 2015

### VIA EMAIL AND U.S. MAIL

Mr. Jacob Armstrong  
Branch Chief  
Caltrans District 11 - Planning Division  
Development Review Branch  
4050 Taylor Street, MS 240  
San Diego, California 92110

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Madrid	Washington, D.C.

File No. 025388-0011

Re: Alternative Designs for Evaluation in Caltrans' Project Study Report re Interstate 15/Deer Springs Road Interchange

Dear Mr. Armstrong,

As you know, we represent the Golden Door Properties LLC (the "Golden Door"), 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 avocado groves and fresh vegetable gardens as well as citrus and olive trees.

We write with regard to the Project Study Report ("PSR") Caltrans is preparing for the Interstate 15/Deer Springs Road interchange in conjunction with the proposed Newland Sierra Project (the "Project"). We appreciate you taking the time on previous occasions to meet with us about this Project and share information regarding the PSR. As you likely know, the County of San Diego (the "County") has issued a Notice of Preparation ("NOP") for the Project and has determined that it will publish an environmental impact report ("EIR"). The Project proposes a drastic density increase in a rural area that contradicts the recently adopted General Plan Update as well as regional plans developed by the San Diego Association of Governments ("SANDAG"). The Golden Door is proposing that the County's EIR study alternatives that reduce density on the Project site, mitigate impacts from density increases, and shift density increases to alternate locations in order to mitigate or avoid traffic, greenhouse gas, fire safety, biological, and other impacts. In particular, the Golden Door is proposing an Alternate Route Alternative and GHG Reduction Alternative that include direct access to Interstate 15 from the Project site, thus impacting Caltrans' facility.

LATHAM & WATKINS<sup>LLP</sup>

County Planning and Development Services staff has informed us that the EIR will analyze all alternatives studied in Caltrans' PSR. Because the Golden Door's alternatives would impact the eventual Interstate 15/Deer Springs Road interchange re-design, we are informing you of our alternatives proposals and requesting that you study interchange designs in your PSR that provide direct access to the Project site and a potential transit center and park-and-ride facility, as described below. We encourage Caltrans, as a Responsible Agency under CEQA, to consult with the County regarding our proposed alternatives and interchange designs that would mitigate the Project's significant impacts and to secure developer funding for implementation through a Memorandum of Understanding or some other instrument. *See* CEQA Guidelines § 15086(d) ("[T]he responsible . . . agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing [significant environmental effects identified by the Responsible Agency] or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures."). The Golden Door is working with its own expert consultants to develop its proposed alternatives and requests that Caltrans accommodate any requests for information necessary to assist our experts. As noted above, we appreciate your cooperation with our efforts thus far, and look forward to continuing this relationship.

Newland obviously has a strong financial incentive to design its project to minimize infrastructure costs and to avoid any use of Newland's project to handle "through traffic." As a result, the Newland proposal diverts or "dumps" its own Project traffic from the west side of its Project onto Deer Springs Road, and its Project contains winding circuitous internal loop roads and cul-de-sacs to discourage any through traffic within the Project. Even though Newland proposes a new commercial center that will be a strong attraction for regional trips, Newland has designed its road system to force all the traffic going to and from the commercial center to enter from Deer Springs Road. Newland has also proposed a commercial center design that separates the center from the park-and-ride facilities, presumably to avoid any use of their own land for this type of use, even though this makes the park-and-ride facilities further disconnected from the Project. The interchange designs Newland has proposed to you are designed to reinforce these goals to minimize Newland's own infrastructure costs and burdens of through traffic, transit access and park-and-ride parking, to the detriment of the surrounding community.

As an independent public agency, we believe that Caltrans should also consider alternatives to Newland's proposals to provide for an interchange alternative that will allow for a direct connection to Newland's commercial center and to Newland's internal road system, rather than designing the interchange to funnel traffic to the south onto Deer Springs Road. Such a direct connection will also facilitate the necessary transit center which should also be incorporated into Newland's commercial center. Additionally, Caltrans should consider integrating the new park-and-ride facilities into Newland's commercial center.

The following sections describe the Golden Door's proposed Alternate Route Alternative and GHG Reduction Alternative.

**A. The Golden Door's Alternate Route Alternative Includes a Four-Lane Road Through the Project Site that Avoids Dumping Traffic onto Deer Springs Road**

The Project is configured to dump Project traffic on to Deer Springs Road, which already accommodates substantial bypass traffic from regional trips fleeing the congested freeway system, as indicated by a license plate conducted last year by Linscott Law & Green ("LLG"). See LLG License Plate Survey (May 5, 2014), attached hereto as Attachment A. With the County's projection that Interstate 15 will reach Level of Service "F" and be extremely congested for many hours of the day, many more motorists will be encouraged to "flee the freeway" and find any surface street that can provide a more passable route.

The Project would add trips to Deer Springs Road both from trips traveling to and from the Project, but also from external trips with origins and destinations within the Project. Indirect, winding roads within the Project, featuring many cul-de-sacs, grade changes, and intersections, and no connections to the north, northeast, or northwest, cause trips from the western portion of the Project to exit the Project and travel across Deer Springs Road to reach the commercial center and school located on the eastern portion of the property. A traffic study completed by LLG, prepared as part of the PSR process and provided to us by Caltrans, indicates that the Project will cause a net 5,110 annual trips across the segment of Deer Springs Road between Mesa Rock Road and Sarver Lane by 2040. LLG, Traffic Volumes Report I-15/Deer Springs Road Interchange. pp. 25, 29 (Dec. 10, 2014). The most direct route for many residents on the Project's west side—where the majority of residential units are located—to reach the commercial center would be to exit the Project at Sarver Lane and cross Deer Springs Road, re-entering the Project at Mesa Rock Road. Further, the Project proposes to add pedestrian, bicycle, and equestrian traffic to a multi-purpose trail adjacent and parallel to Deer Springs Road. Dumping project traffic on to Deer Springs Road poses a safety threat to the non-vehicular traffic on that road, including the non-vehicular traffic accommodated on the Project's proposed multi-use path.

The Golden Door proposes that the County's EIR study an alternative that constructs a four-lane road traveling through the Project that keeps trips off of Deer Springs Road, causing them to instead travel through the Project on the north side of the ridgeline immediately north of Deer Springs Road (the "Alternate Route Alternative"). This road would connect the dense residential configuration on the west side of the Project with the commercial center and Interstate 15 on the east side of the Project. The Alternate Route Alternative would also feature a direct connection from the Interstate 15 access ramps to the commercial center within the Project directing trips onto the new four-lane road rather than Deer Springs Road. The new four-lane road could also connect to an expanded park-and-ride facility and transit center near the Project's commercial center with direct access to Interstate 15. Direct access would cut down on stops and turns for trips leaving the freeway to access the Project and provide infrastructure to increase transit and park-and-ride facilities that makes strides toward complying with the County's and

SANDAG's transit-oriented planning principles. Attached hereto as Attachment B is a rudimentary map depicting the approximate location of such a road.<sup>1</sup>

The Alternate Route Alternative would also include a traffic circle or four-way intersection with a full stop at the Sarver Lane/Deer Springs Road intersection. This design would increase safety to motor vehicles as well as pedestrians, cyclists, and equestrians. It could also substantially decrease the need to condemn private property near the intersection—particularly through the TERI, Inc., property—that would be needed to facilitate a high-speed curve.

The Alternate Route Alternative should be designed to encourage trips on the new four-lane road through the Project rather than on to Deer Springs Road in order to avoid traffic, noise, air quality, and safety impacts to the community and the pedestrians, cyclists, and equestrians traveling along Deer Springs Road, and instead route trips through the Project. County Road 12 would be re-designated to include this four-lane road across the Project rather than Deer Springs Road to the east of Sarver Lane. The Project's commercial center portends to be a significant draw for trips from the west, which should be routed through the Project site rather than impacting the existing community's uses on Deer Springs Road.

This proposal would also provide for direct access for traffic coming off of Interstate 15 to Newland's new planned commercial center. To encourage transit, shuttle connections and carpooling, the existing Caltrans park-and-ride lot should be integrated into the parking facilities for Newland's new commercial center.

The Golden Door requests that Caltrans study an option in the PSR to provide direct access to a new four lane "*Newland Sierra Parkway*" that would connect to Newland's Project (as proposed in the Golden Door's Alternate Route Alternative), rather than funneling traffic to the south to connect to Deer Springs Road. This would include a realignment of the current Deer Springs Road interchange bridge so that instead of being configured diagonally to run from the northeast to the southwest, the bridge would run east-west so that traffic can directly enter Newland's project rather than being diverted to the southwest into the Deer Springs Road valley.

#### **B. The Golden Door's GHG Reduction Alternative Would Develop a Transit-Oriented Community to Reduce Greenhouse Gas Emissions**

The Golden Door also proposes that the County's EIR should study an alternative with the Project's residential units clustered around the commercial center on the eastern side of the Project near Mesa Rock Road and Interstate 15 that would reduce greenhouse gas ("GHG") emissions (the "GHG Reduction Alternative"). The GHG Reduction Alternative would allow all Project residents to walk to the commercial center as part of a mixed use project and provide a transit connection via an expanded park-and-ride facility and a transit center with direct access to Interstate 15. This alternative would eliminate units on the west side of the property and the

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<sup>1</sup> Note that the map has not been drawn to scale, nor does it depict the route's precise contours. This map is intended for general illustrative purposes only.

steep, winding roads throughout the Project, thus eliminating the need to drive from one side of the Project to the other. This design could also limit the Project's primary entrance to Mesa Rock Road—with direct access to the Project from Interstate 15—and limit additional ingress and egress points to emergency access. The residential units could be designed as multistory town homes, and would extend further north along Interstate 15, but would not necessarily result in a reduction in the total number of residential units proposed by the Project, though the number of units that could be accommodated by a transit-oriented design should be studied by the County as well. A key feature of this GHG Reduction Alternative would be to allow transit more direct access to the commercial center, so that buses or shuttles provided by the Project can operate more effectively with greater usage.

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Reducing vehicle miles traveled is also an important component of reducing greenhouse gas emissions. Along with compact land use patterns, a well-connected road network contributes to reducing vehicle miles traveled. The Mobility Element requires the provision of multi-modal facilities to accommodate alternative modes of travel, such as public transportation, bicycling, and walking. In addition, goals and policies are included to minimize single occupancy vehicular travel through carpooling, vanpooling, and other transportation demand management methods.

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In addition, SANDAG has developed a Regional Transportation Plan ("RTP") and Sustainable Communities Strategy ("SCS") that favor a transit-first approach to new development.<sup>2</sup> The RTP is a regional blueprint for a transportation system that meets the State's

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sustainable development planning priorities through 2050.<sup>3</sup> 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 VMT and associated GHG emissions. SANDAG published its RTP/SCS in October 2011. The SCS' guiding principles include "focus[ing] housing and job growth in urbanized areas where there is existing and planned transportation infrastructure . . . [and] invest[ing] in a transportation network that provides residents and workers with transportation options that reduce GHG emissions." RTP/SCS at 3-2. In addition, the 2050 RTP "focuses major roadway and transit improvements in urban and suburban areas of the region, encouraging growth away from the region's more rural areas." *Id.* at 6-39.

According to these planning principles, when a rural area is proposed to be transformed into an urban area (such as the Project proposes), transit must be a central focus and not an afterthought. 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 proceed only after the construction of, and funding of contributions to, planned transit facilities to ensure that their added impacts and increased emissions are fully mitigated or avoided. Direct access to Interstate 15 would improve the convenience of transit and park-and-ride facilities, making transit a more attractive means of transportation to and from the Project and reducing VMT in accordance with planning principles intended to reduce GHG emissions.

The Golden Door requests that Caltrans study an option in the PSR to provide direct access from Interstate 15 to the Newland commercial center and a new east-west direct road across the Newland Project (or to Newland's own proposed more circuitous roadway system) as proposed in the Golden Door's GHG Reduction Alternative.

### C. Conclusion

As we have emphasized in our previous communications with you, the Deer Springs Road/Interstate 15 design plans must proceed with consideration of adopted regional plans and near-term and buildout planning for the mainline portion of Interstate 15 and possible regional transportation improvements by SANDAG in this area. As part of our continuing efforts to ensure impacts from the Project's proposed urban development in rural North County are mitigated or avoided, we have proposed the Alternate Route Alternative, GHG Reduction Alternative, and others that would bring the Project more in line with State, regional, and County planning principles. We request that Caltrans' PSR study options that would accommodate these alternatives, as described above, including direct access from Interstate 15 to the Project.

---

<sup>3</sup> The RTP/SCS can be accessed at [http://www.sandag.org/uploads/2050RTP/F2050rtp\\_all.pdf](http://www.sandag.org/uploads/2050RTP/F2050rtp_all.pdf).

LATHAM & WATKINS<sup>LLP</sup>

We appreciate your time and attention to our concerns. Please feel free to contact me at (858) 523-5400 or [christopher.garrett@lw.com](mailto:christopher.garrett@lw.com) if you would like to discuss these matters further.

Sincerely,

*Christopher Garrett*

Christopher W. Garrett  
of LATHAM & WATKINS LLP

cc: Kathy Van Ness, Golden Door  
Jeff Dawson, Golden Door  
Mark Slovick, San Diego County Planning and Development Services  
Stephanie Saathoff, Clay Co.  
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## LATHAM & WATKINS LLP

March 16, 2015

### VIA EMAIL AND U.S. MAIL

Mr. Jacob Armstrong  
Branch Chief  
Caltrans District 11 - Planning Division  
Development Review Branch  
4050 Taylor Street, MS 240  
San Diego, California 92110

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Madrid	Washington, D.C.

File No. 025388-0011

Re: Alternative Designs for Evaluation in Caltrans' Project Study Report re Interstate 15/Deer Springs Road Interchange

Dear Mr. Armstrong,

As you know, we represent the Golden Door Properties LLC (the "Golden Door"), 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 avocado groves and fresh vegetable gardens as well as citrus and olive trees.

We write with regard to the Project Study Report ("PSR") Caltrans is preparing for the Interstate 15/Deer Springs Road interchange in conjunction with the proposed Newland Sierra Project (the "Project"). We appreciate you taking the time on previous occasions to meet with us about this Project and share information regarding the PSR. As you likely know, the County of San Diego (the "County") has issued a Notice of Preparation ("NOP") for the Project and has determined that it will publish an environmental impact report ("EIR"). The Project proposes a drastic density increase in a rural area that contradicts the recently adopted General Plan Update as well as regional plans developed by the San Diego Association of Governments ("SANDAG"). The Golden Door is proposing that the County's EIR study alternatives that reduce density on the Project site, mitigate impacts from density increases, and shift density increases to alternate locations in order to mitigate or avoid traffic, greenhouse gas, fire safety, biological, and other impacts. In particular, the Golden Door is proposing an Alternate Route Alternative and GHG Reduction Alternative that include direct access to Interstate 15 from the Project site, thus impacting Caltrans' facility.

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County Planning and Development Services staff has informed us that the EIR will analyze all alternatives studied in Caltrans' PSR. Because the Golden Door's alternatives would impact the eventual Interstate 15/Deer Springs Road interchange re-design, we are informing you of our alternatives proposals and requesting that you study interchange designs in your PSR that provide direct access to the Project site and a potential transit center and park-and-ride facility, as described below. We encourage Caltrans, as a Responsible Agency under CEQA, to consult with the County regarding our proposed alternatives and interchange designs that would mitigate the Project's significant impacts and to secure developer funding for implementation through a Memorandum of Understanding or some other instrument. *See* CEQA Guidelines § 15086(d) ("[T]he responsible . . . agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing [significant environmental effects identified by the Responsible Agency] or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures."). The Golden Door is working with its own expert consultants to develop its proposed alternatives and requests that Caltrans accommodate any requests for information necessary to assist our experts. As noted above, we appreciate your cooperation with our efforts thus far, and look forward to continuing this relationship.

Newland obviously has a strong financial incentive to design its project to minimize infrastructure costs and to avoid any use of Newland's project to handle "through traffic." As a result, the Newland proposal diverts or "dumps" its own Project traffic from the west side of its Project onto Deer Springs Road, and its Project contains winding circuitous internal loop roads and cul-de-sacs to discourage any through traffic within the Project. Even though Newland proposes a new commercial center that will be a strong attraction for regional trips, Newland has designed its road system to force all the traffic going to and from the commercial center to enter from Deer Springs Road. Newland has also proposed a commercial center design that separates the center from the park-and-ride facilities, presumably to avoid any use of their own land for this type of use, even though this makes the park-and-ride facilities further disconnected from the Project. The interchange designs Newland has proposed to you are designed to reinforce these goals to minimize Newland's own infrastructure costs and burdens of through traffic, transit access and park-and-ride parking, to the detriment of the surrounding community.

As an independent public agency, we believe that Caltrans should also consider alternatives to Newland's proposals to provide for an interchange alternative that will allow for a direct connection to Newland's commercial center and to Newland's internal road system, rather than designing the interchange to funnel traffic to the south onto Deer Springs Road. Such a direct connection will also facilitate the necessary transit center which should also be incorporated into Newland's commercial center. Additionally, Caltrans should consider integrating the new park-and-ride facilities into Newland's commercial center.

The following sections describe the Golden Door's proposed Alternate Route Alternative and GHG Reduction Alternative.

**A. The Golden Door's Alternate Route Alternative Includes a Four-Lane Road Through the Project Site that Avoids Dumping Traffic onto Deer Springs Road**

The Project is configured to dump Project traffic on to Deer Springs Road, which already accommodates substantial bypass traffic from regional trips fleeing the congested freeway system, as indicated by a license plate conducted last year by Linscott Law & Green ("LLG"). See LLG License Plate Survey (May 5, 2014), attached hereto as Attachment A. With the County's projection that Interstate 15 will reach Level of Service "F" and be extremely congested for many hours of the day, many more motorists will be encouraged to "flee the freeway" and find any surface street that can provide a more passable route.

The Project would add trips to Deer Springs Road both from trips traveling to and from the Project, but also from external trips with origins and destinations within the Project. Indirect, winding roads within the Project, featuring many cul-de-sacs, grade changes, and intersections, and no connections to the north, northeast, or northwest, cause trips from the western portion of the Project to exit the Project and travel across Deer Springs Road to reach the commercial center and school located on the eastern portion of the property. A traffic study completed by LLG, prepared as part of the PSR process and provided to us by Caltrans, indicates that the Project will cause a net 5,110 annual trips across the segment of Deer Springs Road between Mesa Rock Road and Sarver Lane by 2040. LLG, Traffic Volumes Report I-15/Deer Springs Road Interchange. pp. 25, 29 (Dec. 10, 2014). The most direct route for many residents on the Project's west side—where the majority of residential units are located—to reach the commercial center would be to exit the Project at Sarver Lane and cross Deer Springs Road, re-entering the Project at Mesa Rock Road. Further, the Project proposes to add pedestrian, bicycle, and equestrian traffic to a multi-purpose trail adjacent and parallel to Deer Springs Road. Dumping project traffic on to Deer Springs Road poses a safety threat to the non-vehicular traffic on that road, including the non-vehicular traffic accommodated on the Project's proposed multi-use path.

The Golden Door proposes that the County's EIR study an alternative that constructs a four-lane road traveling through the Project that keeps trips off of Deer Springs Road, causing them to instead travel through the Project on the north side of the ridgeline immediately north of Deer Springs Road (the "Alternate Route Alternative"). This road would connect the dense residential configuration on the west side of the Project with the commercial center and Interstate 15 on the east side of the Project. The Alternate Route Alternative would also feature a direct connection from the Interstate 15 access ramps to the commercial center within the Project directing trips onto the new four-lane road rather than Deer Springs Road. The new four-lane road could also connect to an expanded park-and-ride facility and transit center near the Project's commercial center with direct access to Interstate 15. Direct access would cut down on stops and turns for trips leaving the freeway to access the Project and provide infrastructure to increase transit and park-and-ride facilities that makes strides toward complying with the County's and

SANDAG's transit-oriented planning principles. Attached hereto as Attachment B is a rudimentary map depicting the approximate location of such a road.<sup>1</sup>

The Alternate Route Alternative would also include a traffic circle or four-way intersection with a full stop at the Sarver Lane/Deer Springs Road intersection. This design would increase safety to motor vehicles as well as pedestrians, cyclists, and equestrians. It could also substantially decrease the need to condemn private property near the intersection—particularly through the TERI, Inc., property—that would be needed to facilitate a high-speed curve.

The Alternate Route Alternative should be designed to encourage trips on the new four-lane road through the Project rather than on to Deer Springs Road in order to avoid traffic, noise, air quality, and safety impacts to the community and the pedestrians, cyclists, and equestrians traveling along Deer Springs Road, and instead route trips through the Project. County Road 12 would be re-designated to include this four-lane road across the Project rather than Deer Springs Road to the east of Sarver Lane. The Project's commercial center portends to be a significant draw for trips from the west, which should be routed through the Project site rather than impacting the existing community's uses on Deer Springs Road.

This proposal would also provide for direct access for traffic coming off of Interstate 15 to Newland's new planned commercial center. To encourage transit, shuttle connections and carpooling, the existing Caltrans park-and-ride lot should be integrated into the parking facilities for Newland's new commercial center.

The Golden Door requests that Caltrans study an option in the PSR to provide direct access to a new four lane "*Newland Sierra Parkway*" that would connect to Newland's Project (as proposed in the Golden Door's Alternate Route Alternative), rather than funneling traffic to the south to connect to Deer Springs Road. This would include a realignment of the current Deer Springs Road interchange bridge so that instead of being configured diagonally to run from the northeast to the southwest, the bridge would run east-west so that traffic can directly enter Newland's project rather than being diverted to the southwest into the Deer Springs Road valley.

#### **B. The Golden Door's GHG Reduction Alternative Would Develop a Transit-Oriented Community to Reduce Greenhouse Gas Emissions**

The Golden Door also proposes that the County's EIR should study an alternative with the Project's residential units clustered around the commercial center on the eastern side of the Project near Mesa Rock Road and Interstate 15 that would reduce greenhouse gas ("GHG") emissions (the "GHG Reduction Alternative"). The GHG Reduction Alternative would allow all Project residents to walk to the commercial center as part of a mixed use project and provide a transit connection via an expanded park-and-ride facility and a transit center with direct access to Interstate 15. This alternative would eliminate units on the west side of the property and the

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steep, winding roads throughout the Project, thus eliminating the need to drive from one side of the Project to the other. This design could also limit the Project's primary entrance to Mesa Rock Road—with direct access to the Project from Interstate 15—and limit additional ingress and egress points to emergency access. The residential units could be designed as multistory town homes, and would extend further north along Interstate 15, but would not necessarily result in a reduction in the total number of residential units proposed by the Project, though the number of units that could be accommodated by a transit-oriented design should be studied by the County as well. A key feature of this GHG Reduction Alternative would be to allow transit more direct access to the commercial center, so that buses or shuttles provided by the Project can operate more effectively with greater usage.

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LATHAM & WATKINS<sup>LLP</sup>

We appreciate your time and attention to our concerns. Please feel free to contact me at (858) 523-5400 or [christopher.garrett@lw.com](mailto:christopher.garrett@lw.com) if you would like to discuss these matters further.

Sincerely,

*Christopher Garrett*

Christopher W. Garrett  
of LATHAM & WATKINS LLP

cc: Kathy Van Ness, Golden Door  
Jeff Dawson, Golden Door  
Mark Slovick, San Diego County Planning and Development Services  
Stephanie Saathoff, Clay Co.  
Maddy Kilkenny, Clay Co.  
Dawn Wilson, Fehr & Peers  
Andrew Yancey, Latham & Watkins





# SAN DIEGO COUNTY GENERAL PLAN

A PLAN FOR GROWTH, CONSERVATION,  
AND SUSTAINABILITY

August 2011



## CERTIFICATE OF ADOPTION

I hereby certify that this is the text and exhibits of the San Diego County General Plan, and that it was considered by the San Diego County Planning Commission during nine hearings from November 6, 2009 through the 20<sup>th</sup> day of August 2010, and adopted by the San Diego County Board of Supervisors on the 3<sup>rd</sup> day of August 2011.



Attest: ERIC GIBSON, Director  
Department of Planning and Land Use

### Amendments

January 11, 2012 – GPA 04-002

April 10, 2013 – GPA 12-008

April 24, 2013 – GPA 12-009

June 18, 2014 – GPA 05-003

June 18, 2014 – GPA 12-007

June 18, 2014 – GPA 12-012

October 29, 2014 – GPA 14-002

# CONTENTS

CHAPTER 1	<b>Introduction.....</b>	<b>1-1</b>
	Overview of the General Plan .....	1-2
	Process for Preparing the General Plan .....	1-6
	Community Plans .....	1-11
	Related Documents.....	1-12
	Implementing and Amending the Plan .....	1-14
	Global Climate Change: AB 32 Compliance .....	1-15
	San Diego County History and Community Profile .....	1-25
CHAPTER 2	<b>Vision and Guiding Principles .....</b>	<b>2-1</b>
	Introduction .....	2-2
	Vision .....	2-2
	Guiding Principles .....	2-7
CHAPTER 3	<b>Land Use Element .....</b>	<b>3-1</b>
	Introduction .....	3-2
	Land Use Framework .....	3-6
	Regional Categories Map and Land Use Maps .....	3-18
	Goals and Policies for Land Use Element.....	3-20
	<i>The Community Development Model.....</i>	<i>3-23</i>
	<i>Planning for Sustainability.....</i>	<i>3-27</i>
	<i>Villages and Town Centers.....</i>	<i>3-31</i>
	<i>Semi-Rural/Rural Lands .....</i>	<i>3-34</i>
	<i>Commercial, Office, and Industrial Development.....</i>	<i>3-35</i>
	<i>Community Services and Infrastructure.....</i>	<i>3-37</i>
CHAPTER 4	<b>Mobility Element .....</b>	<b>4-1</b>
	Introduction .....	4-2
	Goals and Policies for Mobility Element .....	4-4
	<i>County Road Network.....</i>	<i>4-4</i>
	<i>Regional Transportation Coordination and Facilities .....</i>	<i>4-16</i>
	<i>Public Transit .....</i>	<i>4-21</i>
	<i>Transportation System and Travel Demand Management .....</i>	<i>4-24</i>
	<i>Parking.....</i>	<i>4-26</i>
	<i>Bicycle, Pedestrian, and Trail Facilities.....</i>	<i>4-27</i>
	Background Material .....	4-32
CHAPTER 5	<b>Conservation and Open Space Element .....</b>	<b>5-1</b>
	Introduction .....	5-2
	Goals and Policies for Conservation and Open Space Element .....	5-4
	<i>Biological Resources .....</i>	<i>5-4</i>
	<i>Water Resources.....</i>	<i>5-9</i>
	<i>Agricultural Resources .....</i>	<i>5-14</i>
	<i>Cultural Resources .....</i>	<i>5-16</i>
	<i>Paleontological Resources and Unique Geological Features.....</i>	<i>5-19</i>

	<i>Mineral Resources</i> .....	5-20
	<i>Visual Resources</i> .....	5-24
	<i>Air Quality, Climate Change, and Energy</i> .....	5-31
	<i>Parks and Recreation</i> .....	5-39
CHAPTER 6	<b>Housing Element</b> .....	<b>6-1</b>
	Introduction .....	6-2
	Policy Framework .....	6-10
	Goals and Policies for Housing Element .....	6-12
	<i>Housing Development</i> .....	6-12
	<i>Housing Affordability</i> .....	6-13
	<i>Affordable Housing Preservation</i> .....	6-14
	<i>Governmental Constraints</i> .....	6-15
	<i>Delivery of Housing Services</i> .....	6-15
CHAPTER 7	<b>Safety Element</b> .....	<b>7-1</b>
	Introduction .....	7-2
	Goals and Policies for Safety Element .....	7-3
	<i>Hazards Mitigation, Disaster Preparedness, and Emergency Response</i> .....	7-3
	<i>Fire Hazards</i> .....	7-5
	<i>Geological Hazards</i> .....	7-11
	<i>Flood Hazards</i> .....	7-16
	<i>Hazardous Materials</i> .....	7-21
	<i>Law Enforcement</i> .....	7-22
	<i>Airport Hazards</i> .....	7-23
CHAPTER 8	<b>Noise Element</b> .....	<b>8-1</b>
	Introduction .....	8-2
	Background Information and Context .....	8-3
	Noise Evaluation and Measurement .....	8-5
	Noise Standards .....	8-8
	Goals and Policies for Noise Element .....	8-11
	<i>Land Use Compatibility</i> .....	8-11
	<i>Noise Generators</i> .....	8-12
	<i>Temporary and/or Nuisance Noise</i> .....	8-14
CHAPTER 9	<b>Implementation of the General Plan</b> .....	<b>9-1</b>
	Introduction .....	9-2
	Implementation Plan Overview .....	9-2
CHAPTER 10	<b>Acronyms and Glossary</b> .....	<b>10-1</b>
	Acronyms .....	10-2
	Glossary .....	10-6

## Appendices

### Land Use Maps Appendix

Figure LU-A-1	Alpine Community Planning Area (CPA) Land Use Map
Figure LU-A-2	Bonsall Community Planning Area (CPA) Land Use Map
Figure LU-A-3	Central Mountain Subregion Land Use Map
Figure LU-A-3.1	Cuyamaca Subarea Land Use Map
Figure LU-A-3.2	Descanso Subarea Land Use Map
Figure LU-A-3.3	Pine Valley Subarea Land Use Map
Figure LU-A-4	County Islands Land Use Map
Figure LU-A-5	Crest / Dehesa Community Planning Area (CPA) Land Use Map
Figure LU-A-6	Desert Subregion Land Use Map
Figure LU-A-6.1	Borrego Subarea Land Use Map
Figure LU-A-7	Fallbrook Community Planning Area (CPA) Land Use Map
Figure LU-A-8	Jamul / Dulzura Subregion Land Use Map
Figure LU-A-9	Julian Community Planning Area (CPA) Land Use Map
Figure LU-A-10	Lakeside Community Planning Area (CPA) Land Use Map
Figure LU-A-11	Mountain Empire Subregion Land Use Map
Figure LU-A-11.1	Boulevard Subarea Land Use Map
Figure LU-A-11.2	Jacumba Subarea Land Use Map
Figure LU-A-11.3	Campo / Lake Morena Subarea Land Use Map
Figure LU-A-11.4	Potrero Subarea Land Use Map
Figure LU-A-11.5	Tecate Subarea Land Use Map
Figure LU-A-12	North County Metro Subregion Land Use Map
Figure LU-A-12.1	Twin Oaks Subarea Land Use Map
Figure LU-A-12.2	Hidden Meadows Subarea Land Use Map
Figure LU-A-13	North Mountain Subregion Land Use Map
Figure LU-A-13.1	Palomar Subarea Land Use Map
Figure LU-A-14	Otay Subregion Land Use Map
Figure LU-A-15	Pala / Pauma Subregion Land Use Map
Figure LU-A-16	Pendleton / DeLuz Community Planning Area (CPA) Land Use Map
Figure LU-A-17	Rainbow Community Planning Area (CPA) Land Use Map
Figure LU-A-18	Ramona Community Planning Area (CPA) Land Use Map
Figure LU-A-19	San Dieguito Community Planning Area (CPA) Land Use Map
Figure LU-A-20	Spring Valley Community Planning Area (CPA) Land Use Map
Figure LU-A-21	Sweetwater Community Planning Area (CPA) Land Use Map
Figure LU-A-22	Valle de Oro Community Planning Area (CPA) Land Use Map
Figure LU-A-23	Valley Center Community Planning Area (CPA) Land Use Map

### Mobility Element Network Appendix

Figure M-A-1	Alpine CPA Mobility Element Network
Figure M-A-2	Bonsall CPA Mobility Element Network
Figure M-A-3	Central Mountain Subregion Mobility Element Network
Figure M-A-4	County Islands CPA Mobility Element Network
Figure M-A-5	Crest/Dehesa CPA Mobility Element Network
Figure M-A-6	Desert Subregion Mobility Element Network
Figure M-A-7	Fallbrook CPA Mobility Element Network

Figure M-A-8	Jamul/Dulzura Subregion Mobility Element Network
Figure M-A-9	Julian CPA Mobility Element Network
Figure M-A-10	Lakeside CPA Mobility Element Network
Figure M-A-11	Mountain Empire Subregion Mobility Element Network
Figure M-A-12	NC Metro Subregion Mobility Element Network
Figure M-A-13	North Mountain Subregion Mobility Element Network
Figure M-A-14	Otay Subregion Mobility Element Network
Figure M-A-15	Pala/Pauma Subregion Mobility Element Network
Figure M-A-16	Pendleton / DeLuz CPA Mobility Element Network
Figure M-A-17	Rainbow CPA Mobility Element Network
Figure M-A-18	Ramona CPA Mobility Element Network
Figure M-A-19	San Dieguito CPA Mobility Element Network
Figure M-A-20	Spring Valley CPA Mobility Element Network
Figure M-A-21	Sweetwater CPA Mobility Element Network
Figure M-A-22	Valle de Oro CPA Mobility Element Network
Figure M-A-23	Valley Center Mobility Element Network

### **Forest Conservation Initiative Appendix**

### **Separately Bound Documents**

**Community Plans**

**Housing Element Background Report**



## CONTENTS

### Figures

Figure I-1	Regional Context .....	1-26
Figure I-2	Unincorporated County Communities .....	1-27
Figure LU-1	Regional Categories Map .....	3-19
Figure LU-2	Water Districts .....	3-39
Figure M-1	Airport Locations .....	4-19
Figure M-2	Regional Trails .....	4-30
Figure C-1	Habitat Conservation Programs .....	5-6
Figure C-2	Floodwater Accommodation .....	5-10
Figure C-3	Watersheds .....	5-11
Figure C-4	Mineral Resource Zones .....	5-22
Figure C-5	Scenic Highways .....	5-28
Figure H-1	Areas Served by Sewer .....	6-3
Figure H-2	Smart Growth Opportunity Areas (SANDAG) .....	6-4
Figure H-3	Median Household Income .....	6-9
Figure S-1	Fire Hazards .....	7-6
Figure S-2	Faults and Near Source Shaking Zones .....	7-12
Figure S-3	Landslide Susceptibility .....	7-13
Figure S-4	Expansive Clays .....	7-14
Figure S-5	Flood Plains .....	7-17
Figure S-6	Dam Inundation Areas .....	7-19
Figure N-1	Existing Noise Contours .....	8-6
Figure N-2	Future Noise Contours .....	8-7

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### Tables

Table I-1	General Plan Policies Addressing Climate Change .....	1-17
Table LU-1	Land Use Designations and Compatible Regional Categories .....	3-11
Table LU-2	Density Formula for Slope-Dependent Lands .....	3-12
Table M-1a	Road Classifications: Six- and Four-Lane Roads .....	4-7
Table M-1b	Road Classifications: Two-Lane Roads .....	4-8
Table M-2	Road Classification Suitability .....	4-11
Table M-3	Level of Service Descriptions .....	4-33
Table M-4	Road Segments Where Adding Travel Lanes is Not Justified .....	4-34
Table COS-1	County Scenic Highway System .....	5-26
Table S-1	Travel Time Standards .....	7-10
Table N-1	Noise Compatibility Guidelines .....	8-9
Table N-2	Noise Standards .....	8-10



## CHAPTER 1 Introduction



## Overview of the General Plan

This document is the first comprehensive update of the San Diego County General Plan since 1978 and is the result of the collective efforts of elected and appointed officials, community groups, individuals, and agencies who spent countless hours developing a framework for the future growth and development of the unincorporated areas of the County. This document replaces the previous General Plan and is based on a set of guiding principles designed to protect the County's unique and diverse natural resources and maintain the character of its rural and semi-rural communities. It reflects an environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality, while maintaining and preserving each unique community within the County, agricultural areas, and extensive open space.



*Rural landscape*



*Public meeting*



*Lakeside community*

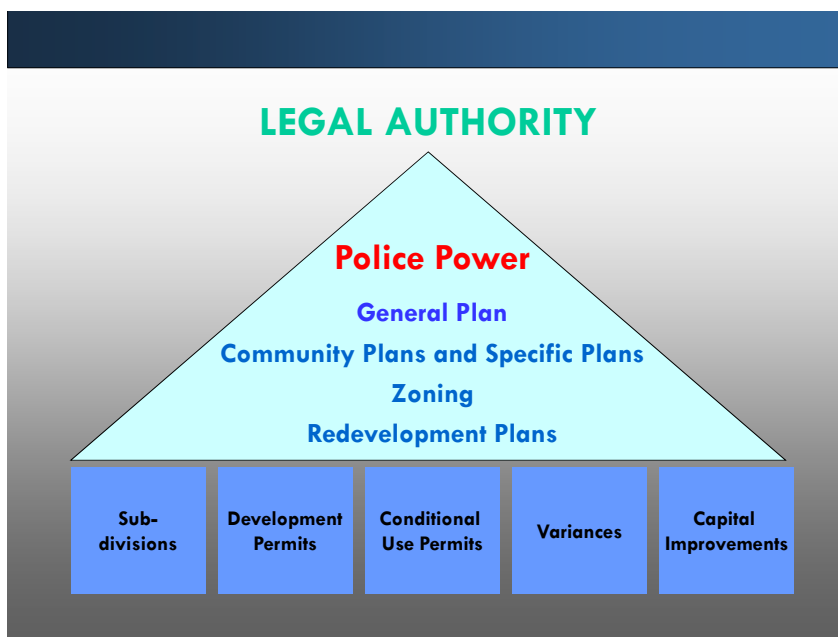
The General Plan directs future growth in the unincorporated areas of the County with a projected capacity that will accommodate more than 232,300 existing and future homes. This growth is targeted to occur primarily in the western portions of the unincorporated County where there is the opportunity for additional development. Compared to the previous General Plan, this update reduces housing capacity by 15 percent and shifts 20 percent of future growth from eastern backcountry areas to western communities. This change reflects the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting sensitive natural resources and protection of existing community character in its extensive rural and semi-rural communities. The General Plan provides a renewed basis for the County's diverse communities to develop Community Plans that are specific to and reflective of their unique character and environment consistent with the County's vision for its future.

### What Is a General Plan?

State law requires each city and county to prepare and adopt a comprehensive and long-range general plan for its physical development. The General Plan provides a consistent framework for land use and development decisions consistent with an established community vision. As the equivalent of a local "constitution" for land use and development, the General Plan's diagrams, goals, and policies form the basis for the County's zoning, subdivision, and infrastructure decisions. A number of important themes that are integral components of the County's vision for its future are woven throughout the General Plan rather than structured as separate elements such as community character, environmental sustainability, and global warming. As required by State law, the seven required elements of the General Plan are highly correlated and are presented in six chapters of the San Diego County General Plan as shown in the following matrix.

## OVERVIEW OF THE GENERAL PLAN

San Diego County General Plan Elements	Legally Required General Plan Topics						
	Lands Use	Circulation	Housing	Conservation	Open Space	Noise	Safety
Land Use	●						
Housing			●				
Circulation (Mobility)		●					
Conservation & Open Space				●	●		
Safety							●
Noise						●	
Implementation Plan	●	●	●	●	●	●	●



*The General Plan serves as the “constitution” for decision-making regarding the County’s physical development*

## How Is It Organized?

Following the Introduction and Vision, Chapters 3 through 8 comprise the “elements” of the General Plan required by State law. Each element includes a purpose and scope, the context of the planning issues, and the goals and policies for the various element topics. Chapter 9 describes the broad actions that implement the Plan’s policies and the final chapter presents the acronyms and a glossary of terms. Map figures depicted in the General Plan are also available online or hard copies are available for purchase at the County DPLU. The General Plan also includes appendices and other documents such as community plans that are separately bound. An overview of the Plan’s chapters follows:



1. **Introduction** presents information about the Plan's purpose and organization, describes the General Plan process, and provides a profile of San Diego County.
2. **Vision Statement and Guiding Principles** presents the vision and overarching themes that guided development of the goals, policies, and implementation programs.
3. **Land Use Element** presents a policy framework for shaping the type and location of new development and strategies to maintain and enhance existing development and community character.
4. **Circulation (Mobility) Element** provides a framework for providing a balanced, multi-modal transportation system for the movement of people and goods within the County.
5. **Conservation and Open Space Element** provides policies relating to the conservation, protection, and management of natural resources and the preservation of open space, along with provision of park and recreation resources.
6. **Housing Element** presents goals, policies, and programs designed to assist the development of housing for the County's current and future residents at all income levels.
7. **Safety Element** establishes policies that minimize the risk of personal injury, loss of life, and property and environmental damage associated with natural and man-made hazards.
8. **Noise Element** provides a process to control and abate environmental noise and to protect citizens from excessive exposure.
9. **Implementation of the General Plan** summarizes the general categories of the actions to be taken to carry out the vision of the General Plan as specified in the goals and policies. The Implementation Plan, a separate document from the General Plan, is envisioned to be a fluid document that will be used for developing annual work programs and establishing funding needs and priorities for County departments, as appropriate.
10. **Acronyms and Glossary** provides a listing and full description of acronyms used in the General Plan and a glossary that defines terminology used in the General Plan.

**Appendices** that provide technical information and maps in support of the elements:

- Land Use Maps are community-level maps that depict designations as color or graphic patterns that indicate allowable uses and permitted development densities or intensities.
- Mobility Element Roadway Network is depicted on community-level maps that show the road classification series and the general route of each road.
- Forest Conservation Initiative language enacted in 1993.

### **Separately Bound Documents**

- Community Plans, adopted as an integral parts of the County of San Diego's General Plan, are policy plans specifically created to address the issues, characteristics, and visions of communities within the unincorporated County.
- Housing Element Background Report

## How to Use the General Plan

The General Plan is intended for use by all members of the community as described below. The General Plan must be referred to in its entirety, including separately bound portions (such as community plans). While the General Plan is internally consistent, some issues are addressed through multiple policies and some receive refined and more detailed direction in community plans.

## OVERVIEW OF THE GENERAL PLAN

The policies contained within this General Plan were written to be a clear statement of policy but also to allow flexibility when it comes to implementation. Policies cannot be applied independently; rather, implementation of the policies must be balanced with one another and will address details such as how and when the policy is applied and any relevant exceptions. For example, a policy to conserve open space is not a mandate for preservation of 100 percent of the existing undeveloped land in the County. It must be balanced with other policies that allow development and other uses of the land. In this case, implementation of the policy in new developments will be achieved through regulations such as the Resource Protection Ordinance, Biological Mitigation Ordinance, and California Environmental Quality Act, which will guide to what degree open space must be conserved.

***If you are a San Diego County resident or property owner***, the General Plan indicates the general types of uses that are permitted around your home and changes that may affect your neighborhood, and the policies the County will use to evaluate development applications that might affect you and your neighbors. The Plan also informs you regarding how the County plans to improve mobility infrastructure, continue to provide adequate parks, schools, police, fire, and other public services, protect valued open spaces and environmental resources, and protect you from the risks of earthquakes, fires, and other natural hazards.

***If you are interested in developing land within the County or moving your household or business to the County***, the Plan will introduce you to the community and provides an overview of the County's overall approach to land development within its jurisdiction. However, it is also important to review other County planning documents and regulations to get a complete perspective on how and where development may take place. A complete listing of relevant documents and regulations is available on the Department of Planning and Land Use website (<http://www.sdcountry.ca.gov/dplu/>).

The General Plan is also a tool to assist County supervisors and planning commissioners as well as County staff in making land use and public infrastructure decisions. It provides the framework for the County's Zoning Ordinance. It identifies mobility and infrastructure improvements, community services, and environmental sustainability initiatives to sustain the County's quality of life. Future development decisions must be consistent with the Plan. Finally, the Plan is intended to help other public agencies, from Caltrans to local school districts, as they contemplate future actions in the County.



County Administration Center

While the General Plan's narrative text and maps frame the key proposals, the essence of the Plan lies in its goals, policies, and implementation programs. These are declarative statements that set forth the County's approach to various issues. Goals, policies, and implementation measures are described as follows:

- **Goals** describe ideal future conditions for a particular topic, such as town centers, rural character, protection of environmental resources, traffic congestion, or sustainability. Goals tend to be very general and broad.
- **Policies** provide guidance to assist the County as it makes decisions relating to each goal and indicates a commitment by the County to a particular course of action. The policy is carried out by implementation measures. While every effort has been made to provide clear and unambiguous policies, the need for interpretation will inevitably arise. The authority of interpretation lies with the





County and will be enacted through its implementation measures and decisions. Therefore, the Implementation Plan should be reviewed for a complete understanding of each policy.

- *Implementation Measures*, adopted by the County in a separate Implementation Plan, identify all the specific steps to be taken by the County to implement the policies. They may include revisions of current codes and ordinances, adoption of plans and capital improvement programs, financing actions, and other measures that will be assigned to different County departments after the General Plan is adopted.

The following diagram is intended to serve as a “reader’s guide” to the goals and policies of the General Plan.

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## Process for Preparing the General Plan

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### Steps in the Planning Process

The process of preparing the General Plan included the following key steps:

- Prepare background reports and technical studies
- Develop alternative growth plans and select a preferred plan through a public outreach process
- Prepare draft goals and policies
- Prepare the Draft General Plan
- Prepare the Implementation Plan
- Prepare the Draft Environmental Impact Report
- Conduct public hearings to adopt the General Plan and certify the EIR
- Publish the final General Plan and EIR

## TECHNICAL STUDIES AND BACKGROUND REPORTS

As required by State law, a General Plan must be based upon existing conditions and trends in a community and be responsive to the needs and issues identified in an analysis of existing conditions. Background Reports were prepared for each of the seven State-mandated topical areas to be covered in the General Plan including Land Use, Mobility, Housing, Safety, Conservation, Open Space, and Noise. In addition, technical studies such as traffic impacts, noise, and commercial and industrial lands needs analyses were conducted as a basis to develop a Land Use Plan responsive to community needs and issues.

## How to Use the General Plan

**SECTION HEADER**  
Identifies the section (if on an even-numbered page) or element (if on an odd-numbered page).

**GOAL NUMBERING**  
Each goal number starts with the element acronym and is followed by the number of the goal (e.g., S-14 = Safety Element, fourteenth goal).

**GOAL TITLE**  
Each goal contains a leading title in bold for a quick reference to the goal.

**GOALS**  
A goal is a general direction-setter. Each goal has one or more policies associated with the goal.

**POLICIES**  
A policy is a specific statement that guides decision-making. It indicates a commitment to a particular course of action carried out by implementation measures. Each policy is associated with a specific goal.

**POLICY NUMBERING**  
Continuing from the goal numbering, the policy number is shown as the last number, supporting the goal it follows (e.g., Policy S-14.3 = Safety Element, fourteenth goal, third policy).

**POLICY TITLE**  
Each policy contains a leading title in bold for a quick reference to the policy.

**PAGE NUMBER**  
Shows the chapter and page number (e.g., 7-28 = Chapter 7, page 28).

**POLICY BACKGROUND AND SIDEBARS**  
Provides further clarification and reasoning for the policy.

**SAFETY ELEMENT GOALS AND POLICIES**

**GOAL S-5**  
**Regional Fire Protection.** Regional coordination among fire protection agencies.

**Policies**

S-5.1 **Regional Coordination Support.** Advocate and support regional coordination among fire protection and emergency service providers.

S-5.2 **Fire Service Provider Agreements.** Encourage agreements between fire service providers to improve fire protection and to maximize service levels in a fair, efficient, and cost effective manner.

**GOAL S-6**  
**Adequate Fire and Medical Services.** Adequate levels of fire and emergency medical services (EMS) in the unincorporated County.

**Policies**

S-6.1 **Water Supply.** Ensure that water supply systems for development are adequate to combat structural and wildland fires.

S-6.2 **Fire Protection for Multi-Story Development.** Coordinate with fire services providers to improve fire protection services for multi-story construction.

S-6.3 **Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

S-6.4 **Fire Protection Services for Development.** Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards).

Travel times are to be calculated using accepted methodology based on the travel distance from the fire station to the furthest dwelling unit of the development. Fire stations must be staffed year-round, publicly supported, and committed to providing service. These do not include volunteer stations, seasonal fire stations, and stations that are not obligated by law or agreement to automatically respond to an incident. Table S-1 establishes a service level standard for fire and first responder emergency medical services that is appropriate to the area that a development is located. Standards are intended to (1) help ensure development occurs in areas with adequate fire protection and/or (2) help improve fire service in areas with inadequate coverage by requiring services level improvements prior to project approval.

**COUNTY OF SAN DIEGO** **7-28** **GENERAL PLAN**



## ALTERNATIVE LAND USE/GROWTH PLANS

Prior to adoption of the Land Use Map, four alternative maps were considered. These alternatives included (1) a Referral Map that the Board of Supervisors created during the land use mapping phase of the project to incorporate a number of property-specific requests not included in the Draft Land Use Map, (2) a Draft Land Use Map that was created out of a stakeholder-driven process and includes land uses to meet the County's Housing Element allocation and achieve a balanced road network, (3) a Hybrid Map that strikes a balance between the Referral Map and the Draft Land Use Map in meeting the County's targeted growth consistent with its guiding principles, and (4) an Environmentally Superior Map that reflects more stringent and aggressive application of the principles to restrict growth in portions of the Semi-Rural and Rural Lands Regional Categories.

## GOALS, POLICIES, AND IMPLEMENTATION PLAN

Goals, policies, and an Implementation Plan were prepared based on the land use maps, current issues, and community needs, understandability, effectiveness in previous applications, practicality, and feasibility, embodiment of state-of-the-art planning practices, consistency with current legislation and court decisions, community values, and past Board of Supervisors policy decisions. General guiding principles, goals, and policies developed by the advisory committees served as the foundation for this undertaking. Specific goals, policies, and implementation measures were then prepared by working with internal and external technical review committees for inclusion in the Draft General Plan.

## DRAFT GENERAL PLAN

The Draft General Plan was first circulated for public review in November 2008, incorporating an overview of background data, goals, and policies. As part of this review, the Draft General Plan was reviewed by the advisory committees, stakeholders, and relevant public agencies. Comments were incorporated and the revised Draft General Plan was circulated for public review in July 2009, along with the Draft Environmental Impact Report, Implementation Plan, and revisions to the Community Plans.

## ENVIRONMENTAL IMPACT REPORT

A Draft EIR was prepared in accordance with the requirements of the *California Environmental Quality Act* (CEQA). In July 2008, the Draft EIR was circulated for a 60-day public review and comment period. Responses to all comments were prepared and incorporated into the Final EIR, which was reviewed and certified by the Board of Supervisors.

## ADOPTION AND CERTIFICATION

The Planning Commission and Board of Supervisors conducted public hearings on the Draft General Plan and EIR. In consideration of the public input, the Commission made a recommendation to the Board of Supervisors regarding the General Plan and certification of the Final EIR. The Board of Supervisors considered the Commission's



*Meeting of the County Board of Supervisors*

## PROCESS FOR PREPARING THE GENERAL PLAN

input and based on its findings, the Board of Supervisor adopted the General Plan with changes and certified the Final EIR.

## PLAN IMPLEMENTATION

Once adopted, implementation of the County of San Diego General Plan will begin in accordance with the Implementation Plan. Associated changes to zoning, other regulations, policies, and procedures will be made. Implementation of the General Plan will be monitored and reported on an annual basis.



*Planning Commission meeting*

## Public Outreach and Involvement in the Planning Process

The General Plan planning process involved a broad spectrum of the community through an extensive public outreach program that included hundreds of meetings, mailings, and e-mail updates, a hotline, and a website. The outcome of the effort led to the development of land use maps and a road network, the development of goals and policies, and the preparation of the General Plan based upon input from the numerous workshops, open houses, and community meetings.



*Interest Group meeting*



*Steering Committee meeting*



*Community meeting*

The entire process was guided by two regional advisory committees:

- **Steering Committee**—Chairpersons or designated representatives from 26 Community Planning and Sponsor Groups
- **Interest Group**—Designated representatives from environmental groups, professional organizations, building industry representatives, and the Farm Bureau

These groups made policy recommendations to staff, the Planning Commission, and Board of Supervisors. All meetings were advertised, open to the public, and held in accordance with the Brown Act.

Through frequent work sessions, the public and stakeholders were provided the opportunity for involvement throughout the entire planning process from the initial establishment of population growth targets, to development of a land use framework, identification and refinement of desired goals and policies, and review of land use map and road network alternatives. In addition to the advisory groups, the community



planning and sponsor groups served as the primary conduit for public outreach throughout the planning process. Community planning groups worked closely with staff throughout the development of the land use map, along with town center and road network planning efforts. Since 2000, staff participated in over 212 meetings with the full Planning and Sponsor groups, 109 workshops, and 216 subcommittee meetings. All meetings were advertised to the general public through standard planning and sponsor group agendas or through the General Plan Update mailing lists described below. Most meetings were advertised in multiple ways.



*Public workshop*

Other groups involved in the planning process included:

- *Native American Tribal Nations*—A tribal outreach strategy that invited the 18 tribes in the County to participate in the process coordinated through the Native American Heritage Commission.
- *City Planning Directors*—Staff coordinated with the Planning Directors from incorporated cities within the County to provide status reports on the progress of the General Plan Update and solicit their feedback.

In an effort to continually involve interested parties in the planning process to obtain valuable feedback, other methods of public outreach over the course of the project included a General Plan Update Hotline number, informational flyers, and a General Plan website where members of the public could find out up-to-date information about the project.

- *Hotline*—An unmanned telephone hotline was established that allowed the public direct access to the San Diego County Department of Planning and Land Use with an ability to leave a message (i.e., be placed on mailing lists), or could get general questions answered.
- *Project Initiation Postcard*—All property owners in the unincorporated County in January 2001 were mailed a postcard introducing the General Plan Update to inform the public about the update and encourage their involvement.
- *Flyer*—In 2002, an informational flyer was developed to inform the public about the proposed changes to land use density and announce a Land Use Map. This flyer was mailed to every property owner in the unincorporated County.
- *Monthly Newsletter*—A monthly e-mail newsletter was used to inform interested parties of project progress, major milestones, website updates, documents available for review, and upcoming meetings or events.
- *Mailing Lists*—Mailing lists were accumulated over the project duration of individuals and organizations interested in receiving the newsletter, notices of specific meetings, hearings, and documents available for review. Parties were notified through their requested method, mail or e-mail, when appropriate.
- *Website*—A website was developed and maintained by County Staff to inform the public about the General Plan Update, including its progress and any upcoming public meetings. The site also provided the population forecast projections, land use and circulation frameworks, and land use distribution and road network maps for each community for quick access to information as they evolved

throughout the planning process. In addition, complete reports to the Planning Commission and Board of Supervisors were posted prior to each public hearing to inform the public of the issues and other information that were planned to be addressed during the hearing.  
<http://www.sdcountry.ca.gov/dplu/gpupdate/index.html>

- *Local Newspapers*—Several regional and local newspapers published notices, stories, and editorials related to the General Plan Update.

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## Community Plans

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Community plans are policy plans specifically created to address the issues, characteristics, and visions of communities within the County. These diverse communities each have a distinct physical setting with a unique history, culture, character, life style, and identity. Community and subregional plans, thus provide a framework for addressing the critical issues and concerns that are unique to a community and are not reflected in the broader policies of the Land Use Element of the General Plan. These goals and policies are designed to provide more precise guidance regarding the character, land uses, and densities within each community planning area. Generally, these goals and policies are more limiting and restrictive than the countywide goals and policies, consistent with State legislation for internal consistency. The Community Plans are adopted as integral parts of this General Plan but bound separately, and must be referenced in determining the types and density of land use that may be considered for any property within the community planning area.

When updating Community Plans, communities are encouraged to delineate areas within their plans that will assist with the future planning of developments, infrastructure, facilities, and regulations. An Urban Limit Line and/or Village Boundary may be defined in the Community Plan as a community-specific growth boundary that identifies an area to which development should be directed. These boundaries may also serve as the basis for community specific goals and policies.

Another convention that is encouraged for use in Community Plans is the designation of Special Study Areas. Special Study Areas define areas for further planning and implementation and should be further defined in more detail in the Community Plan for each area that is identified. The designation a Special Study Area does not presume that modifications to the General Plan are necessary nor does it bestow any additional entitlement upon the property. The property retains the land use designations shown in the General Plan. Any changes to the General Plan resulting from this additional study must occur through a General Plan Amendment (GPA), be evaluated independently, and must be consistent with all other components of the General Plan. The designation of a Special Study Area is intended to give a clear commitment to the community and property owners that if further changes to the General Plan are processed in the future, those changes will address the areas identified as areas needing further information and evaluation. The Special Study Area designation provides assurances that the areas of concern will be addressed as staff and stakeholders change over time. Outlining the objectives of the study area helps ensure that all interested parties continue to have the same understanding of the intent of efforts for that area.

The scope of the additional planning will vary widely between areas and communities but some possibilities include (but are not limited to): Specific Plans; master development plans; design guidelines; circulation networks including local public roads, bicycle and pedestrian facilities; and plans for civic, park and





recreational facilities. Special Study Areas are particularly useful for town centers, village cores where revitalization is desired, areas designated for mixed use, transit nodes, and areas that are generally undeveloped or developed at low intensities but are planned as future growth areas. Where appropriate, the Community Plan may restrict development within the Special Study Area until more detailed plans are prepared and approved, so that interim development does not preclude the preparation and implementation of the study.

As integral components of the County of San Diego General Plan, Community Plans have the same weight of law and authority in guiding their physical development. The Community Plans are introduced by a vision statement defining intentions regarding the role, character, and values of each community. This is followed by a description of the community and goals and policies corresponding to each of the countywide elements. In some cases, there may be no unique local policies applicable to a countywide element topic.

The Community Plans are prepared for the following communities and subregional planning areas:

- |   |                      |                     |
|---|----------------------|---------------------|
| ■ Alpine  | ■ Julian             | ■ North Mountain    |
| ■ Bonsall                                       | ■ Lakeside           | ■ Otay              |
| ■ Central Mountain                              | ■ Mountain Empire    | ■ Pala-Pauma Valley |
| > Cuyamaca                                      | > Boulevard          | ■ Pendleton/ De Luz |
| > Descanso                                      | > Jacumba            | ■ Rainbow           |
| > Pine Valley                                   | > Campo/Lake Morena  | ■ Ramona            |
| ■ Crest/Dehesa/Harbison<br>Canyon/Granite Hills | > Potrero            | ■ San Dieguito      |
| ■ Desert  | > Tecate             | ■ Spring Valley     |
| > Borrego Springs                               | ■ North County Metro | ■ Sweetwater        |
| ■ Fallbrook                                     | > Twin Oaks Valley   | ■ Valle de Oro      |
| ■ Jamul/Dulzura                                 | > Hidden Meadows     | ■ Valley Center     |

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## Related Documents

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### Background Reports and GIS

The General Plan is based upon a series of Background Reports containing relevant topical data and analyses as well as identification of relevant issues and trends to be considered in preparation of the General Plan. These reports and technical studies serve as the existing conditions or existing setting for the General Plan elements and the Environmental Impact Report (EIR). These background reports are not adopted by the County and may be expanded or modified without an amendment to the General Plan. Also, separate from the General Plan but utilized as background data for analysis is the County's Geographic Information System (GIS) database. Data related to land use, physical constraints, and resources, included in various figures in the General Plan are available from the San Diego Geographic Information Source (SanGIS) at [www.sangis.org](http://www.sangis.org).

### Environmental Impact Report

A program EIR was prepared for the General Plan in accordance with the substantive and procedural requirements of the *California Environmental Quality Act* (CEQA). The EIR describes environmental conditions



## RELATED DOCUMENTS

in the County, assesses the possible adverse environmental impacts that the General Plan adoption will have on these conditions, identifies actions that will be undertaken to reduce these impacts, and evaluates the comparative impacts of alternatives to adoption of the General Plan. Mitigation measures in the EIR are incorporated both as policies in the General Plan and as implementation measures in the Implementation Plan and, consequently, the General Plan is generally considered to be “self-mitigating.”

The document is considered a “program level” EIR, meaning that it examines the general nature of impacts at a Countywide scale. The findings of the EIR help determine the appropriate level of environmental review that should be performed when subsequent projects consistent with the Plan are proposed.

## Implementation Plan

The Implementation Plan is a set of the principal actions and procedures necessary to achieve the goals and policies set forth in the General Plan. It is a separate document that is directly correlated and cross referenced to the policies in the General Plan, but it may be modified and updated as necessary without the necessity of a General Plan amendment. An overview of the Implementation Plan is provided in Chapter 9.

## Regional and Multi-Jurisdictional Plans

There are 19 jurisdictions in San Diego County, including the unincorporated County, with local land use authority along with the responsibility for preparing their own general plans. Regional coordination is necessary to guide overall development and ensure an efficient allocation of infrastructure funding. The San Diego Association of Governments (SANDAG) serves as the region’s Metropolitan Planning Organization (MPO) responsible for area-wide coordination and as the technical and informational resource for the region’s local jurisdictions. SANDAG prepares regional land use and transportation plans, which provide a basis for allocating federal and state funds used for specific items such as land use incentives and transportation improvements.

The Regional Comprehensive Plan (RCP) identifies existing and planned Smart Growth Opportunity Areas (SGOAs)—compact, mixed use, pedestrian-oriented development patterns where a higher priority is placed on providing transportation facility improvements. A specific SGOA category was developed to accommodate the unique community character and development patterns found in village centers for some unincorporated communities. Therefore, the SGOA is closely related to the community development model, which is one of the fundamental components of this General Plan Update. The Regional Transportation Plan (RTP) seeks to improve transportation connections to SGOAs. Road network planning for the County General Plan Update considered the RTP when identifying the necessary improvements to the County’s Mobility Element road network.

The Multiple Species Conservation Program (MSCP) is a County conservation planning program designed to establish connected preserve systems that ensures the long-term survival of sensitive plant and animal species and protects the native vegetation found throughout the unincorporated County. Plans created under this program are both a federal Habitat Conservation Plan (HCP) and a State Natural Community Conservation Planning (NCCP) program plan. The MSCP addresses the potential impacts of urban growth, natural habitat loss, and species endangerment and creates plans to mitigate for the potential loss of



sensitive species and their habitats. The MSCP Plan covers 582,243 acres over twelve jurisdictions. Each jurisdiction has its own Subarea Plan; however, there are only minor differences in how each is implemented. The MSCP is also an important program that significantly contributes to the County's ability to realize its watershed protection and climate change goals.

The County also works with the San Diego County Regional Airport Authority (SDCRAA) on a regular basis to ensure land use compatibility around each of the eight County-owned airports. The SDCRAA serves as San Diego County's Airport Land Use Commission (ALUC), responsible for protecting public health and safety surrounding airports. The ALUC is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for all public-use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general.

The San Diego Local Agency Formation Commission (LAFCO) is a regulatory agency responsible for annexation and detachment of territory, incorporation of cities, and the formation of special districts. LAFCO also develops and adopts spheres of influence for each city and special district within the unincorporated county. A sphere of influence is defined as a "plan for the probable physical boundaries and service area of a local government agency. In addition to LAFCO, the County of San Diego also coordinates planning efforts with tribal governments and special district agencies, such as fire, water, school, and sanitation districts.

## Other County Policies and Ordinances

A number of local plans and ordinances are impacted by the County's General Plan:

- **Zoning Ordinance**—The County administers its General Plan primarily through its Zoning Ordinance. While the General Plan identifies general land use designations, zoning identifies specific uses and development standards. As mandated by the State, the General Plan must be consistent with the County Zoning Ordinance. Changes in this General Plan Update require an update to the County Zoning Ordinance.
- **Subdivision Ordinance**—State law, through the *Subdivision Map Act*, governs local approval of land subdivision, which is further directed in the County Subdivision Ordinance. Review of proposed subdivisions and parcel maps includes a determination of consistency with General Plan goals and policies.
- **Specific Plans**—Specific plans provide an alternative to the Zoning Ordinance in that they are customized plans that delineate land uses, infrastructure, development standards and criteria, and implementation measures. Specific plans must be consistent with the General Plan, and can be used to implement the General Plan within a limited area.
- **The Forest Conservation Initiative (FCI)**—Enacted in 1993 with the goal of preserving the area's unique resources and the rural environment and open space, the FCI affects nearly 91,000 acres of privately owned land in the unincorporated County within the Cleveland National Forest by establishing a 40-acre minimum parcel size with a restriction of one dwelling unit per parcel. This initiative only remains in effect until December 31, 2010, and is included as an appendix to this General Plan. Upon expiration, a General Plan amendment will be required to redesignate the FCI lands to be consistent with the General Plan Update.

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## Implementing and Amending the Plan

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This comprehensive update to the General Plan will be implemented through a variety of ordinances, programs, and activities. These specific actions are described in the Implementation Plan, which is a separate document to the General Plan.

The General Plan is intended to be a dynamic document and must be periodically updated to respond to changing community needs. An annual review of the Plan is required to ensure that it remains relevant. Moreover, any of the Plan's mandatory elements may be amended up to four times a year. Any proposed amendment will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety, and welfare. Environmental review is required for substantive General Plan amendments. A comprehensive update to the General Plan requires an assessment of all seven mandated regional elements, including the Land Use and Mobility Element network maps. This General Plan includes policies that require a comprehensive General Plan update to accommodate significant land use changes.

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## Global Climate Change: AB 32 Compliance

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The issue of global climate change has received greater attention from governments around the world in recent years. Global climate change refers to the transformation in the average weather of the earth as observed in wind patterns, storms, precipitation, and temperature.

Human activities associated primarily with the use of carbon-based fossil fuels have led to changes in the composition of the atmosphere. The combustion of carbon-based fossil fuels creates greenhouse gas (GHG) emissions such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), which has caused the earth's atmosphere to absorb more heat from the sun. The concentration of greenhouse gases in the atmosphere has significantly increased as a result of combustion of fossil fuels primarily associated with automobile use and energy production. Scientists have already observed some of the negative effects of climate change, and expect more changes in the future. Governments, organizations, and private citizens all over the world are looking for ways to reduce GHG emissions to create a better future, while preparing to adapt as necessary to the inevitable repercussions of this situation.

In 2006, the California State Legislature took a proactive role in addressing the challenges of climate change with the adoption of the California *Global Warming Solutions Act of 2006*, Assembly Bill 32 (AB 32). AB 32 focuses on reducing GHG emissions in California. By 2020, AB 32 requires the California Air Resources Board (CARB), the state agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990. Since 2006, the State Legislature has adopted several other pieces of legislation to further efforts in addressing climate change. Senate Bill 375 (SB 375), adopted in 2008, is one of those bills and is significant because it connects land use planning with AB 32. SB 375 will result in development of regional greenhouse gas emission reduction targets by the State



that will then be implemented by regional transportation planning agencies. In San Diego, this responsibility falls to the San Diego Association of Governments (SANDAG).

In California, carbon dioxide accounts for approximately 84 percent of all greenhouse gases, while methane makes up approximately eight percent and nitrous oxide and hydrocarbons contributing an additional six and two percent, respectively. Fossil fuel combustion is the principal source, an estimated 98 percent, of carbon dioxide emissions. Of this, transportation and development are the primary sources of fossil fuel combustion. In California, more than half of fossil fuel emissions of carbon dioxide are related in some way to transportation. Worldwide, buildings contribute 40 percent of greenhouse gases, though this is comparatively less in the County due to the rural character of many areas. Clearly, dispersed development patterns that necessitate extensive vehicle trips and gasoline consumption and the predominance of buildings that use extensive climate control systems play a significant role in affecting greenhouse gases.

An underlying premise of the San Diego County General Plan is to conserve natural resources and develop lands and infrastructure more sustainably in the future. Planning and developing a truly sustainable future depends on a healthy environment, strong economy, and the social well-being of the County's residents. Throughout the General Plan are goals and policies that contribute to achieving this goal, including the following:

- **Environment:** conserving air, water, land, soils, minerals, natural habitat, energy, and aesthetic resources; while protecting life and property from the risks of wildfires, flooding, and other hazards.
- **Economy:** creating good jobs, income, and financial resources.
- **Equity and Social Well-Being:** providing library, park and recreations facilities, along with programs that contribute to improvements in education, income, health, safety, arts, and cultural attainment for all.

AB 32's mandate to reduce greenhouse gas emissions represents a key element in meeting sustainability objectives. The General Plan takes steps to address the challenging issue of climate change by reducing GHG emissions, retaining and enhancing natural areas, improving energy efficiency, reducing waste, recycling, and managing water use. The 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. Policies also address adaptation to climate change, such as continued wildfire management and protection, monitoring flood hazards, and regional collaboration on biological preservation, water use and supply, and other areas of concern.

The sources, impacts, and solutions to climate changes are complex. Climate change and GHG emissions reduction are addressed in policies and programs from multiple elements of this General Plan rather than in a single section. Table I-1 (General Plan Policies Addressing Climate Change) identifies the policies in the San Diego County General Plan that carry out the primary objectives of AB 32: mitigation (reduce greenhouse gas emissions) and adaptation (changing current strategies to adapt to climate change). Table I-1 further categorizes the General Plan policies according to the strategies identified to accomplish the two primary objectives. The primary objectives of AB 32 are identified below.

- **Mitigation (Objective A)**—Responses producing a strategy that seeks to reduce greenhouse gas emissions.

- **Adaptation (Objective B)**—Responses adapting current strategies so that Climate Change is integral to planning activities and decisions.

Table I-1 General Plan Policies Addressing Climate Change		
Element	Policies	
OBJECTIVE A: MITIGATION—REDUCTION IN GREENHOUSE GAS EMISSIONS		
Strategy A-1: Reduce vehicle trips generated, gasoline/energy consumption, and greenhouse gas emissions		
Land Use	LU-1.2	Leapfrog Development
	LU-1.3	Development Patterns
	LU-1.4	Village Expansion
	LU-3.3	Complete Neighborhoods
	LU-5.1	Reduction of Vehicle Trips within Communities
	LU-5.2	Sustainable Planning and Design
	LU-5.4	Planning Support
	LU-5.5	Projects that Impede Non-Motorized Travel
	LU-6.3	Conservation-Oriented Project Design
	LU-6.4	Sustainable Subdivision Design
	LU-9.5	Village Uses
	LU-9.7	Town Center Planning and Design
	LU-9.8	Village Connectivity and Compatibility with Adjoining Areas
	LU-9.10	Internal Village Connectivity
	LU-9.12	Achieving Planned Densities in Villages
	LU-10.1	Residential Connectivity
	LU-10.4	Commercial and Industrial Development
	LU-11.1	Location and Connectivity
	LU-11.3	Pedestrian-Oriented Commercial Centers
	LU-11.6	Office Development
LU-11.8	Permitted Secondary Uses	
Mobility	M 1.2	Interconnected Road Network
	M-3.1	Public Road Rights-of-Way
	M-3.2	Traffic Impact Mitigation
	M-4.1	Walkable Village Roads
	M-4.2	Interconnected Local Roads
	M-4.3	Rural Roads Compatible with Rural Character
	M-5.1	Regional Coordination
	M-6.5	Adaptive Reuse of Abandoned Rail Lines
	M-8.1	Maximize Transit Service Opportunities
	M-8.2	Transit Service to Key Community Facilities and Services
	M-8.3	Transit Stops That Facilitate Ridership
	M-8.4	Transit Amenities
	M-8.5	Improved Transit Facilities
	M-8.6	Park and Ride Facilities
	M-8.7	Inter-Regional Travel Modes



**Table I-1 General Plan Policies Addressing Climate Change**

Element	Policies
	M-8.8 Shuttles
	M-9.1 Transportation Systems Management
	M-9.2 Transportation Demand Management
	M-9.3 Preferred Parking
	M-9.4 Park-and-Ride Facilities
	M-10.1 Parking Capacity
	M-10.2 Parking for Pedestrian Activity
	M-10.3 Maximize On-Street Parking
	M-10.5 Reduced Parking
	M-10.6 On-Street Parking
	M-11.1 Bicycle Facility Design
	M-11.2 Bicycle and Pedestrian Facilities in Development
	M-11.3 Bicycle Facilities on Roads Designated in the Mobility Element
	M-11.4 Pedestrian and Bicycle Network Connectivity
	M-11.5 Funding for Bicycle Network Improvements
	M-11.6 Coordination for Bicycle and Pedestrian Facility Connectivity
	M-11.7 Bicycle and Pedestrian Facility Design
	M-11.8 Coordination with the County Trails Program
	M-12.1 County Trails System
	M-12.2 Trail Variety
	M-12.3 Trail Planning
	M-12.4 Land Dedication for Trails
	M-12.5 Future Trails
	M-12.6 Trail Easements, Dedications, and Joint-Use Agreements
	M-12.7 Funding for Trails
	M-12.8 Trails on Private Lands
Conservation and Open Space	COS-14.1 Land Use Development Form
	COS-14.2 Villages and Rural Villages
	COS-14.3 Sustainable Development
	COS-14.4 Sustainable Technology and Projects
	COS-14.9 Significant Producers of Air Pollutants
	COS-14.10 Low-Emission Construction Vehicles and Equipment
	COS-14.13 Incentives for Sustainable and Low GHG Development
	COS-15.1 Design and Construction of New Buildings
	COS-15.2 Upgrade of Existing Buildings
	COS-16.1 Alternative Transportation Modes
	COS-16.2 Single-Occupancy Vehicles
	COS-16.3 Low Emission Vehicles
	COS-16.5 Transit-Center Development
	COS-21.5 Connections to Trails and Networks
	COS-23.2 Regional Coordination

Table I-1 General Plan Policies Addressing Climate Change		
Element	Policies	
Housing	H-1.2	Development Intensity Relative to Permitted Density
	H-1.3	Housing near Public Services
	H-1.4	Special Needs Housing near Complementary Uses
	H-1.5	Senior and Affordable Housing near Shopping and Services
	H-1.6	Land for All Housing Types Provided in Villages
	H-1.7	Mix of Residential Development Types in Villages
<b>Strategy A-2: Reduce non-renewable electrical and natural gas energy consumption and generation (energy efficiency)</b>		
Land Use	LU-5.2	Sustainable Planning and Design
Conservation and Open Space	COS-6.5	Best Management Practices
	COS-14.4	Sustainable Technology and Projects
	COS-14.5	Building Siting and Orientation in Subdivisions
	COS-14.6	Solar Access for Infill Development
	COS-14.7	Alternative Energy Sources for Development Projects
	COS-14.12	Heat Island Effect
	COS-15.1	Design and Construction of New Buildings
	COS-15.2	Upgrade of Existing Buildings
	COS-15.3	Green Building Programs
	COS-15.4	Title 24 Energy Standards
	COS-15.5	Energy Efficiency Audits
<b>Strategy A-3: Increase generation and use of renewable energy sources</b>		
Land Use	LU-4.6	Planning for Adequate Energy Facilities
	LU-5.2	Sustainable Planning and Design
Conservation and Open Space	COS-6.5	Best Management Practices
	COS-14.4	Sustainable Technology and Projects
	COS-14.5	Building Siting and Orientation in Subdivisions
	COS-14.6	Solar Access for Infill Development
	COS-14.7	Alternative Energy Sources for Development Projects
	COS-15.2	Upgrade of Existing Buildings
	COS-15.3	Green Building Programs
	COS-16.4	Alternative Fuel Sources
	COS-17.5	Methane Recapture
	COS-18.1	Alternate Energy Systems
	COS-18.2	Energy Generation from Waste
<b>Strategy A-4: Reduce water consumption</b>		
Land Use	LU-5.2	Sustainable Planning and Design
	LU-6.4	Sustainable Subdivision Design
	LU-6.9	Development Conformance with Topography
Conservation and Open Space	COS-4.1	Water Conservation
	COS-4.2	Drought-Efficient Landscaping





**Table I-1 General Plan Policies Addressing Climate Change**

Element	Policies	
	COS-4.5	Recycled Water
	COS-14.4	Sustainable Technology and Projects
	COS-14.11	Native Vegetation
	COS-15.1	Design and Construction of New Buildings
	COS-15.2	Upgrade of Existing Buildings
	COS-15.3	Green Building Programs
<b>Strategy A-5: Reduce and maximize reuse of solid wastes</b>		
Land Use	LU-5.2	Sustainable Planning and Design
	LU-6.1	Environmental Sustainability
	LU-6.4	Sustainable Subdivision Design
	LU-16.3	New Waste Management Facilities
Conservation and Open Space	COS-10.7	Recycling of Debris
	COS-14.4	Sustainable Technology and Projects
	COS-15.1	Design and Construction of New Buildings
	COS-15.2	Upgrade of Existing Buildings
	COS-15.3	Green Building Programs
	COS-17.1	Reduction of Solid Waste Materials
	COS-17.2	Construction and Demolition Waste
	COS-17.4	Composting
	COS-17.6	Recycling Containers
	COS-17.7	Material Recovery Program
	COS-18.2	Energy Generation from Waste
<b>Strategy A-6: Promote carbon dioxide consuming landscapes</b>		
Land Use	LU-1.3	Development Patterns
	LU-2.5	Greenbelts to Define Communities
	LU-5.2	Sustainable Planning and Design
	LU-5.3	Rural Land Preservation
	LU-6.1	Environmental Sustainability
	LU-6.2	Reducing Development Pressures
	LU-6.3	Conservation-Oriented Project Design
	LU-6.6	Integration of Natural Features into Project Design
	LU-6.9	Development Conformance with Topography
	LU-7.1	Agricultural Land Development
	LU-7.2	Parcel Size Reduction as Incentive for Agriculture
	LU-9.10	Internal Village Connectivity
Conservation and Open Space	COS-14.4	Sustainable Technology and Projects
	COS-14.11	Native Vegetation

Table I-1 General Plan Policies Addressing Climate Change		
Element	Policies	
Strategy A-7: Maximize preservation of open spaces, natural areas, and agricultural lands		
Land Use	LU-1.3	Development Patterns
	LU-1.4	Village Expansion
	LU-1.6	Conversion of Public Lands to Private Ownership
	LU-3.3	Complete Neighborhoods
	LU-5.2	Sustainable Planning and Design
	LU-5.3	Rural Land Preservation
	LU-6.1	Environmental Sustainability
	LU-6.2	Reducing Development Pressures
	LU-6.3	Conservation-Oriented Project Design
	LU-6.4	Sustainable Subdivision Design
	LU-6.6	Integration of Natural Features into Project Design
	LU-6.7	Open Space Network
	LU-6.9	Development Conformance with Topography
	LU-7.1	Agricultural Land Development
	LU-7.2	Parcel Size Reduction as Incentive for Agriculture
LU-9.11	Integration of Natural Features in Villages	
LU-10.2	Development—Environmental Resource Relationship	
Mobility	M-2.3	Environmentally Sensitive Road Design
Conservation and Open Space	COS-1.1	Coordinated Preserve System
	COS-1.2	Minimize Impacts
	COS-1.3	Management
	COS-1.4	Collaboration with other Jurisdictions
	COS-1.5	Regional Collaboration
	COS-2.1	Protection, Restoration and Enhancement
	COS-2.2	Habitat Protection Through Site Design
	COS-3.1	Wetland Protection
	COS-3.2	Minimize Impacts of Development
	COS-7.2	Open Space Easements
	COS-14.11	Native Vegetation
	COS-23.2	Regional Coordination
	COS-24.1	Park and Recreation Contributions
	COS-24.2	Funding Opportunities
Housing	H-2.2	Projects with Open Space Amenities in Villages
OBJECTIVE B: ADAPTATION—ADAPTING CURRENT STRATEGIES SO THAT CLIMATE CHANGE IS INTEGRAL TO PLANNING ACTIVITIES AND DECISIONS		
Strategy B-1: Reduce risk from wildfire, flooding, and other hazards resulting from climate change		
Land Use	LU-1.2	Leapfrog Development
	LU-1.4	Village Expansion
	LU-5.2	Sustainable Planning and Design

**Table I-1 General Plan Policies Addressing Climate Change**

Element	Policies	
	LU-5.3	Rural Land Preservation
	LU-6.3	Conservation-Oriented Project Design
	LU-6.4	Sustainable Subdivision Design
	LU-6.7	Open Space Network
	LU-6.9	Development Conformance with Topography
	LU-6.10	Protection from Hazards
	LU-6.11	Protection from Wildfires and Unmitigable Hazards
	LU-6.12	Flooding
Mobility	M-2.3	Environmentally Sensitive Road Design
Conservation and Open Space	COS-5.1	Impact to Floodways and Floodplains
	COS-5.3	Downslope Protection
	COS-5.4	Invasive Species
	COS-14.4	Sustainable Technology and Projects
Safety	S-1.3	Risk Reduction Programs
	S-2.2	Participation in Mutual Aid Systems
	S-2.3	Familiarity with National and State Response Plans
	S-2.5	Existing Development within 100-year Flood Zones
	S-2.6	Effective Emergency Evacuation Programs
	S-3.1	Defensible Development
	S-3.2	Development in Hillsides and Canyons
	S-3.3	Minimize Flammable Vegetation
	S-3.4	Service Availability
	S-3.5	Access Roads
	S-3.6	Fire Protection Measures
	S-4.1	Fuel Management Programs
	S-5.1	Regional Coordination Support
	S-5.2	Fire Service Provider Agreements
	S-6.1	Water Supply
	S-6.4	Fire Protection Services for Development
	S-9.1	Floodplain Maps
	S-9.2	Development in Floodplains
	S-9.3	Development in Flood Hazard Areas
	S-9.4	Development in Villages
	S-9.5	Development in the Floodplain Fringe
	S-9.6	Development in Dam Inundation Areas
	S-10.1	Land Uses within Floodways
	S-10.2	Use of Natural Channels
	S-10.3	Flood Control Facilities
	S-10.4	Stormwater Management
	S-10.5	Development Site Improvements
	S-10.6	Stormwater Hydrology

Table I-1 General Plan Policies Addressing Climate Change		
Element	Policies	
Strategy B-2: Conserve & improve water supply due to shortages from climate change		
Land Use	LU-5.2	Sustainable Planning and Design
	LU-6.2	Reducing Development Pressures
	LU-6.4	Sustainable Subdivision Design
	LU-6.5	Sustainable Stormwater Management
	LU-6.98	Development Conformance with Topography
	LU-8.1	Density Relationship to Groundwater Sustainability
	LU-8.2	Groundwater Resources
	LU-8.3	Groundwater-Dependent Habitat
	LU-8.4	Program for Borrego Valley Aquifer
	LU-13.1	Adequacy of Water Supply
	LU-13.2	Commitment of Water Supply
	LU-16.1	Location of Waste Management Facilities
Mobility	M-2.5	Minimize Excess Water Runoff
	M-10.7	Parking Area Design for Stormwater Runoff
Conservation and Open Space	COS-4.1	Water Conservation
	COS-4.2	Drought-Efficient Landscaping
	COS-4.3	Stormwater Filtration
	COS-4.4	Groundwater Contamination
	COS-4.5	Recycled Water
	COS-5.2	Impervious Surfaces
	COS-5.5	Impacts of Development to Water Quality
	COS-14.4	Sustainable Technology and Projects
	COS-19.1	Sustainable Development Practices
	COS-19.2	Recycled Water in New Development
Strategy B-3: Promote agricultural lands for local food production		
Land Use	LU-1.3	Development Patterns
	LU-5.2	Sustainable Planning and Design
	LU-5.3	Rural Land Preservation
	LU-6.1	Environmental Sustainability
	LU-6.2	Reducing Development Pressures
	LU-6.3	Compatibility with Recreational Open Space
	LU-6.4	Sustainable Subdivision Design
	LU-7.1	Agricultural Land Development
	LU-7.2	Parcel Size Reduction as Incentive for Agriculture
	LU-12.9	Environmental and Agricultural Resources
Conservation and Open Space	COS-6.1	Economic Diversity
	COS-6.2	Protection of Agricultural Operations
	COS-6.4	Conservation Easements

**Table I-1 General Plan Policies Addressing Climate Change**

Element	Policies	
Housing	H-3.6	Housing for Special Need Populations
	H-3.7	Alternative Affordable Housing Options
<b>Strategy B-4: Provide education &amp; leadership</b>		
Conservation and Open Space	COS-17.8	Education
	COS-20.1	Climate Change Action Plan
	COS-20.2	GHG Monitoring and Implementation
	COS-20.4	Public Education
Safety	S-2.4	Emergency and Disaster Education Programs

## San Diego County History and Community Profile

The San Diego County Profile is described below in terms of its history, physical setting, economy, population and growth patterns, and the unique communities in the unincorporated County.

### History

The County of San Diego was established on February 18, 1850, as one of the original 27 counties of California. The newly created County covered nearly 40,000 square miles including the present counties of San Diego, Imperial, Riverside, and San Bernardino, along with the eastern portion of Inyo County.

The territory comprising San Diego County was under Mexican rule from 1821 until 1846 during which time private land grants covering 948 square miles were bestowed throughout the County. The grants resulted in the formation of private ranchos, some of which are recognizable areas today, such as Rancho Santa Fe (Rancho San Dieguito), Marine Corps Base Camp Pendleton (Rancho Santa Margarita y Las Flores), Rancho Santa Maria (Ramona), and Rancho El Cajon (El Cajon, Lakeside, Santee, and Bostonia). Many ranchos were transformed into incorporated cities; for example, National City and Chula Vista were formed from Rancho de la Nación. Today, the County includes 18 incorporated cities, but retains a large unincorporated area which is the subject of this General Plan.

### Physical Setting and Community Planning Areas

*Valley landscape**Borrego desert**Fallbrook community*

San Diego County, including incorporated cities, contains approximately 4,261 square miles that cover 65 miles north to south and 86 miles east to west. The County is bordered by Riverside County and Orange

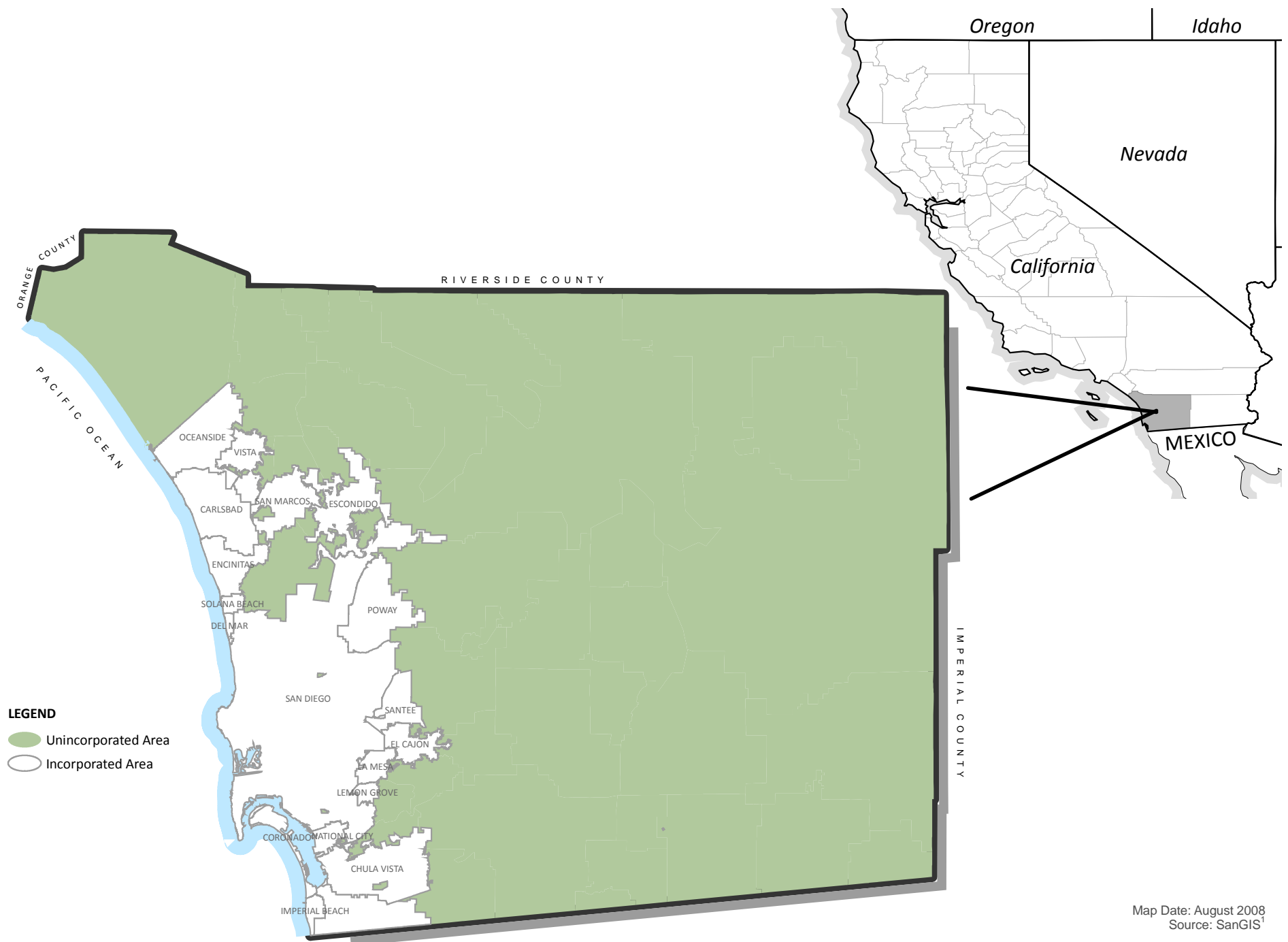
County to the north; Imperial County to the east; the nation of Mexico to the south; and the Pacific Ocean to the west as shown in Figure I-1 (Regional Context). The County's western portion includes 18 cities, while in the unincorporated area specifically designated subregions and community planning areas encompass the remainder of the County. These community and subregional planning areas are shown in Figure I-2 (Unincorporated County Communities). A majority of the land in the unincorporated area is open space or undeveloped and includes large tracts of federal, state, or regional parklands, and agricultural production areas. Residential land uses account for the majority of the developed land in the unincorporated County.

Relative to the incorporated areas located near the coast, development opportunities in the unincorporated areas of the County are generally more highly constrained due to more rugged terrain, more occurrences of sensitive species and habitat; and less opportunity for the provision of infrastructure and essential services. These physical, environmental, and infrastructure considerations, particularly the limited availability of water service from the County Water Authority (CWA), and the limited availability of other urban services such as sewer, fire, and emergency services, are major factors that shape the County's future growth and development potential.

The most developed communities in the unincorporated County are located at its westernmost boundaries within the CWA boundary; they have access to public services and infrastructure and have sustained growth at a more rapid rate than in other parts of the County. The communities closest to the core metropolitan area of the region have limited potential for future growth because much of their land is already developed. These communities—Valle de Oro, Spring Valley, Sweetwater, the western portions of Lakeside—contain substantial existing populations. These communities desire to retain the existing community character and remaining open space. These more densely populated communities are also concerned about limiting negative impacts caused by road construction and certain developments in incorporated jurisdictions.

Other communities that are more distant from the San Diego metropolitan center but within the CWA—Alpine, Ramona, Valley Center, North County Metro, Bonsall, Fallbrook, and Otay Mesa—have a greater capacity to grow when compared to other communities. However, in all of these communities, any future growth must be carefully balanced with other factors to preserve their identity and unique resources. Although within the CWA, growth potential is more limited in Rainbow, Twin Oaks, and Hidden Meadows (part of North County Metro), Jamul, and Crest/Dehesa/Harbison Canyon/Granite Hills due to the absence of infrastructure, the rugged terrain, and sensitive habitats.

San Diego's remaining major rural communities include Dulzura, Julian, Pala-Pauma, Palomar, Borrego Springs, Cuyamaca, Descanso, Pine Valley, Jacumba, Boulevard, Lake Morena, Campo, Potrero, and Tecate. Rugged terrain, agriculture, and sensitive environmental habitats, as well as limited road networks and public services, limit growth in these areas. With few exceptions, these communities are sparsely populated and lack the infrastructure and employment opportunities to support anything more than limited population growth. With the exception of some limited areas of sewer service, these communities rely largely upon septic systems. Without imported water, groundwater is also a limiting factor to growth. Further, this area of the County contains a substantial amount of public lands, tribal land, and land affected by the Forest Conservation Initiative (FCI). Residents in these communities desire to preserve the existing rural setting and character.



## REGIONAL CONTEXT

San Diego County General Plan

Figure I-1



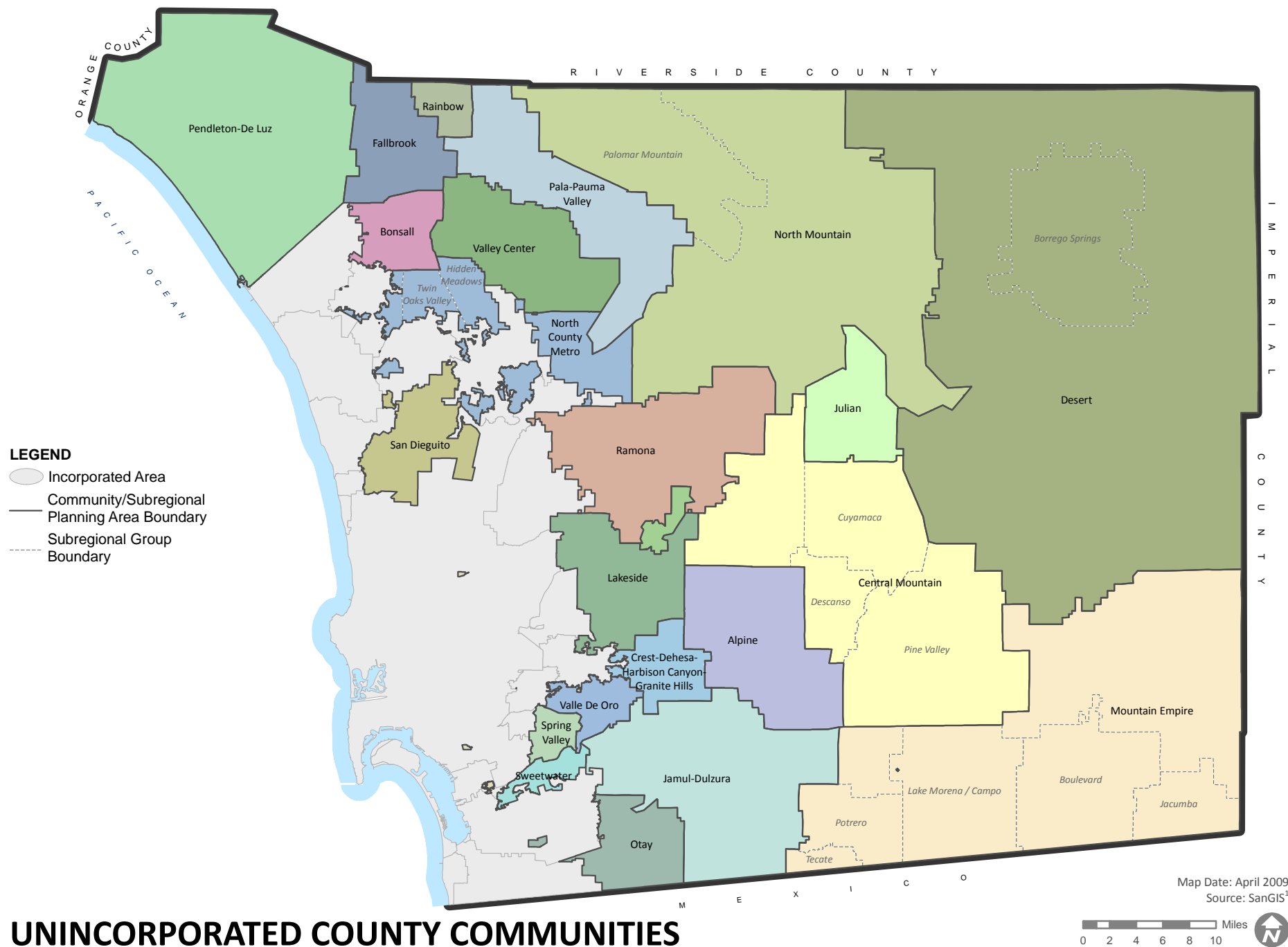


Figure I-2



## Demographic Patterns

The unincorporated County encompasses 3,570 square miles that represent 84 percent of the total land area of San Diego County, yet its 2008 population of 491,764 persons represented only 15.6 percent of the total County population. During the period from 1980 to 2008, the average annual population rate increase for the unincorporated area was approximately 1.1 percent, whereas the average annual rate of increase for the entire County was 3.4 percent between 1980 and 1990 and 1.3 between 1990 and 2008. Population forecasts for 2030 indicate that the population of the entire County will grow by 42 percent.

Once dependent on the military and defense-related industries, San Diego County now has a diverse economy that includes manufacturing, telecommunications, tourism, trade, biosciences, software, multimedia, and digital technology. These industries are largely located in the 18 cities, with the exception of agricultural production, which is primarily located in the unincorporated County and which is a significant component of its economy.



Valley Center



Fallbrook Village



Twin Oaks agriculture

## CHAPTER 2 **Vision and Guiding Principles**



## Introduction

The County of San Diego's General Plan sets a direction for the future of the unincorporated area of San Diego County by providing clear, unified framework for community development and conservation. The development of this General Plan began in 1998 and included extensive community involvement, the results of which informed the creation of the Vision Statement and Guiding Principles. The Vision Statement and Guiding Principles in turn establish the foundation upon which the General Plan elements and its components are consistent, related, and measured. The Vision represents the basis by which all updated plan goals, policies, and implementation programs are measured and constitute the Plan's legislative intent as approved by the Board of Supervisors.

## Vision

The Vision is derived from the strategic initiatives of the County's General Management System (GMS), which include:

- Kids—Improve opportunities for children
- The Environment—Manage resources to ensure environmental preservation, quality of life, and economic development
- Safe and Livable Communities—Promote safe and livable communities



The General Plan provides a key vehicle for the County to implement these strategic initiatives by identifying innovative growth solutions that address a full spectrum of issues, including housing, transportation, community infrastructure, and environmental impact. The County of San Diego is committed to improving opportunities and outcomes for children by providing a healthy and safe physical environment, while supporting recreational opportunities and land use patterns that encourage a healthy lifestyle. This General Plan guides the County's management of its environmental resources through policies to sustain and enhance the land, water, air, and biodiversity upon which all life depends, while recognizing that our growing population must also be accommodated. While the General Plan's goals and policies address San Diego County's natural hazards and human activities that pose a threat to public safety, promoting livable communities requires much more than just safety. Essential components of livable communities include: a sense of place with attractive and convenient service and support facilities, a safe and efficient

transportation network, public and personal safety, and sustainable development. The following represents the vision for what San Diego County is intended to become with build-out of this General Plan.

## What We Plan to Be



San Diego County is comprised of diverse communities offering residents with places to live, work, shop, be educated, and recreate in settings dominated by the natural environment and open spaces. It is generally a low-density alternative to the urbanized San Diego coastline and inland areas. Many communities consist of small scale villages or residences on large lots with agriculture and open space. Our villages are intended to grow in compact land development patterns to minimize intrusion into agricultural lands and open spaces; the distance that we travel to our local services and businesses; and the need for extensive infrastructure and services; while also inducing community association, activity, and walking. The County's ambience will remain quiet and peaceful, with nighttime skies illuminated by the stars. Our infrastructure and services will retain the characteristics of rural places with natural water courses, septic systems, low-level street lighting, and limited sidewalks. Buildings and architecture will continue to be subsumed within and complement our physical setting of valleys, hillsides, and deserts.

## Our Physical Setting



We recognize the importance of the San Diego region's natural environment and are committed to sustaining its diversity, health, and integrity as a distinguishing asset for residents and visitors. New development shall respect and maintain the physical and visual integrity of the hillsides, valleys, and deserts that shape and provide identity for our community. We will continue to avoid or minimize developing in areas susceptible to geologic, wildfire, and flooding risks and we will continue to retain and protect the viability of our woodlands, riparian corridors, and important plant and animal habitats, maintaining the health and viability of declining species. The County's lakes and streams will be free of toxins and harmful pollutants, sustaining fish populations and a healthy water supply, while offering abundant recreation opportunities for residents and





visitors. We will continue to recognize and maintain strong partnerships with state and federal agencies in protecting and preserving our natural environment.

### Protecting Our Agriculture



We will continue to value our agricultural lands and recognize the importance of preserving opportunities for the production of healthy food and ornamental crops for our population and others. We will emphasize the distribution of our agricultural products locally and within the region. Our future development patterns and parcel sizes will avoid incentivizing the conversion of agriculture for urban uses.

### Our Communities

The County of San Diego will continue to provide a diversity of choices for the type and character of community in which we live. These choices will include villages that contain a mix of housing types that are located near retail businesses, employment, schools, parklands, churches, and public institutions. These villages will vary in density and character that will provide affordable housing choices, some will be located near and transitioning with coastal suburban communities, while others will reflect the unique character of their mountain, valley, and desert setting. An alternative choice will be to continue to live on large parcels, separated from our neighbors by agriculture and open spaces with few or no urban services.

### How We Get Around



San Diego County infrastructure will be planned to offer easy and convenient access within and between our communities and to the greater region. The County's streets and highways will be planned to provide a comprehensive, well-connected network maintained to support use by all our road users — cars, trucks, transit, bicyclists, and pedestrians. Our road network will also be planned to channel traffic to avoid conflicts with our residential neighborhoods. Our traffic signalization and traffic control mechanisms will be planned to facilitate traffic flow and avoid congestion. As an alternative to the automobile, bicycle paths and

## VISION

pedestrian-ways will be planned to be strategically located within and around village areas and designed to provide a pleasant experience for users. We will continue to explore opportunities to expand transit services commensurate with needs and density. Our village cores will be planned to shared parking facilities that enable residents and visitors to park once, walk along lively streets, and patronize multiple business establishments and community services.

### How We Sustain Our Community



The County of San Diego recognizes its long-term obligations to future residents by simultaneously promoting ecological health, economic vitality, and social well-being. In our villages, the Land Use Map provides a mix and density of land uses that will minimize automobile trips and their length, invigorate the economic health of our businesses, and promote association with our neighbors. These, coupled with increased access to transit, will reduce our air emissions, greenhouse gas emissions, energy consumption, noise, and time spent away from our families. We will walk more in our village cores and participate in recreational activities, improving the health of our families and children. We will develop our properties and design our buildings to reduce energy consumption, use low-impact alternative energy sources, capture stormwater and recycle wastewater, use recycled construction materials, reuse our solid wastes, and use non-toxic paints and materials. Our sustainable practices will contribute to a healthy environment, enhancing the livability of San Diego County.

### Our Sustainable and Vital Economy

We will continue to strive to maintain a healthy and vital economy, providing a variety of jobs for our residents and a climate in which our businesses can prosper. Our businesses are diverse, building on the resources uniquely available in the County, including its agriculture and natural setting that offers opportunities for tourism and, at the same time, providing goods and services to our residents. By providing our residents with housing in compact villages, we will provide a strong customer base to maintain the viability of our businesses.



### Our Safe Community

We value the safety of our community. Our neighborhoods continue to be safe places to live and we continue to be comfortable in our business districts, parks, and open spaces with almost non-existent crime.





While we value and enjoy the beauty of our outdoors and environment, we continue to recognize the inherent risks of wildfires, flooding, earthquakes, and other natural hazards and take measures to locate and design our development to avoid these risks and provide excellent and responsive police and fire services to protect our well-being.

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# Guiding Principles

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The Guiding Principles constitute a set of rules by which updated General Plan policies were developed. They guide the formulation of growth and development plans, environmental conservation, provision of infrastructure and services, and protection from environmental and man-induced hazards. The General Plan maps, goals and policies, and implementation programs are based on a set of ten interrelated principles that provide guidance for accommodating future growth while retaining or enhancing the County's rural character, its economy, its environmental resources, and its unique communities. The ten Guiding Principles are:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

In summary, the Guiding Principles provide for the development of land uses, investment in infrastructure and public services, and conservation of natural resources that enable the County's residents and businesses to enjoy a more sustainable environment, economy, and well-being and health. Each of the guiding principles is outlined in more detail below.

## Guiding Principle 1

### **Support a reasonable share of projected regional population growth.**

California and the San Diego region have been among the fastest growing areas in the nation and projections indicate that this will continue during the upcoming decades, regardless of variations associated with

## GUIDING PRINCIPLES

economic cycles. Data indicate that much of the growth has been and will continue to be attributable to birth rates of existing residents coupled with the longer lifespan of the population and, secondarily, due to immigration. The San Diego Association of Governments (SANDAG) projects that the entire County's population will increase by 40 percent between 2000 and 2030, or approximately 1,140,000 persons. Though considerable growth in the region is likely to gravitate toward existing urbanized areas to facilitate access to jobs and services and reduce vehicle commutes and gasoline consumption, demand for development in unincorporated County areas is anticipated to continue as available lands within urbanized areas diminish and residents choose to live in a rural environment.

As growth continues in the region, the County will accommodate a reasonable share in the unincorporated County in a manner that sustains the natural setting, characteristics, and qualities that distinguish the County, its communities, and rural places as special places to live. The County will implement this guiding principle by planning and facilitating housing in and adjacent to existing and planned villages.

### Guiding Principle 2

#### **Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.**

Low-density, large-parcel development patterns in the County afford residents the opportunity to enjoy open spaces, natural areas, and a rural lifestyle. However, such fragmentation and dispersal of development can result in corresponding increases in impacts on environmental resources and the costs of community infrastructure and services. The complexity and cost of the network of highways, water pipes, electrical energy, and other utility infrastructure needed to serve development is a function of the distance from supply source to the user. The greater the dispersal of development, the greater the improvements and associated costs required for the user and community. Similarly, community services such as police and fire are provided from central locations and require travel times to access users. Those travel times increase with decreasing densities. Low-density and fragmented development patterns also increase travel distances and times from homes to jobs, shopping, and services. These, in turn, increase gasoline consumption, air pollution, greenhouse gas (GHG) emissions, and time away from home and the family.



*Julian's compact development patterns with a small central core surrounded by semi-rural and rural development*

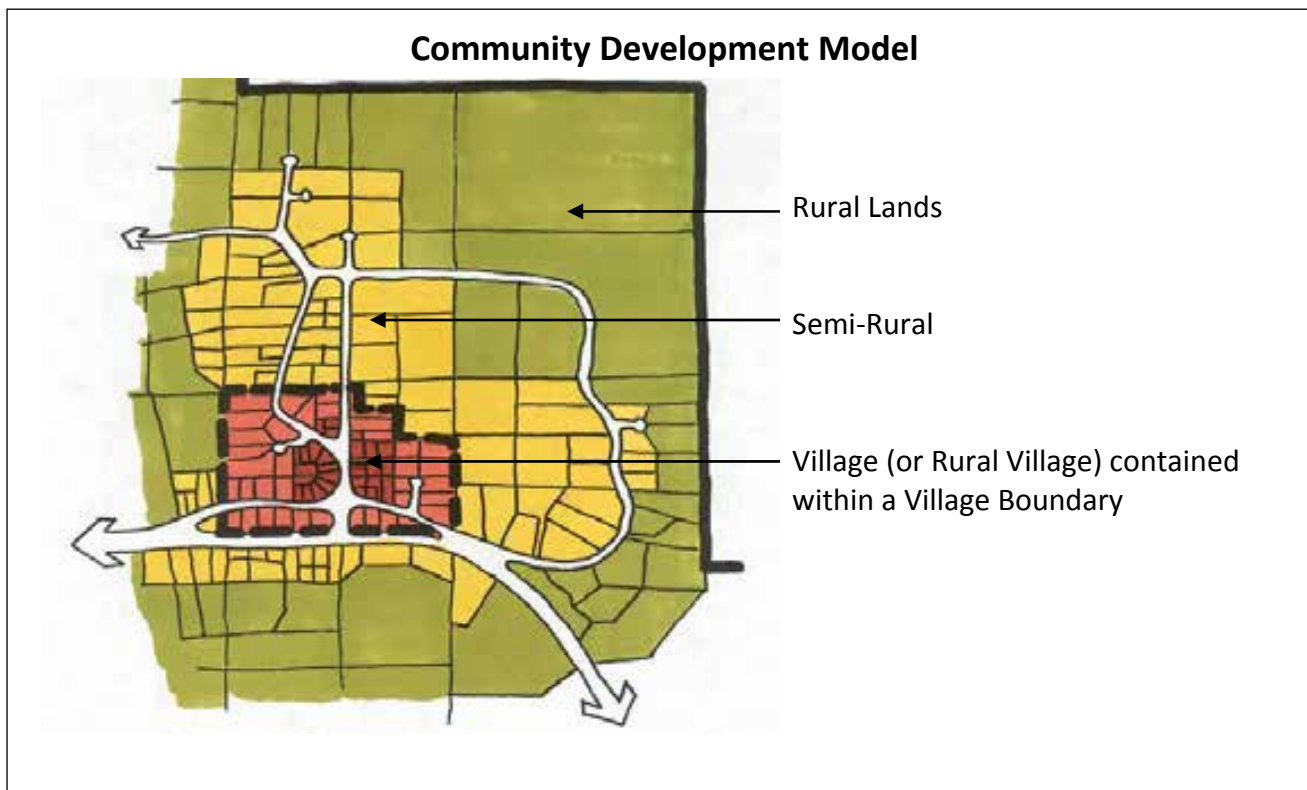
Large-parcel development also contributes to the loss of agriculture and natural habitats. Research for the Multi-Species Conservation Program (MSCP) indicates that there has been a considerable loss of habitat in San Diego region over the past several decades, with some habitats occupying less than 10 percent of their historic range.

As population growth continues in the San Diego County, more compact development should occur within existing and planned communities to reduce these impacts. Locating housing closer to retail, services, schools, and jobs and on smaller lots within communities can reduce the size of required infrastructure

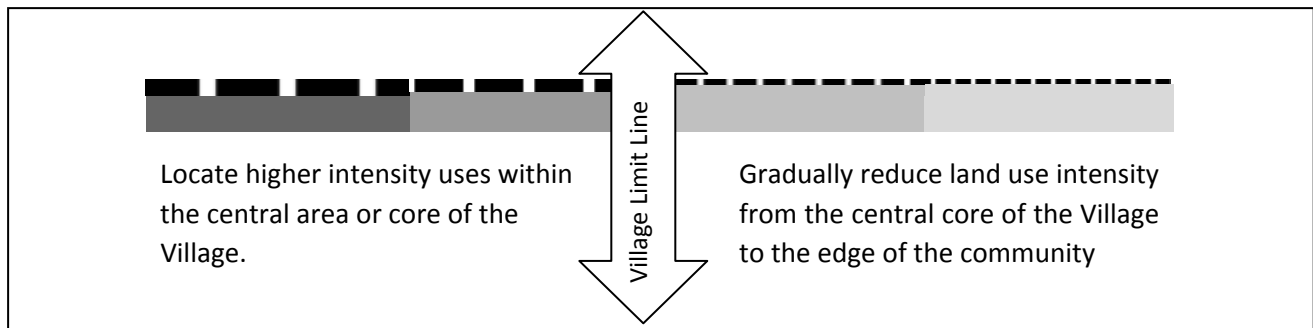


improvements and number and length of automobile trips, while increase the efficiency of delivering police, fire, and other public services and enhancing community livability. A more compact form of development in the County would reduce the amount of developed land, or its “footprint,” increasing the amount of open space, natural habitat, and agriculture that can be preserved, as well as reducing pressure on groundwater resources. It also would contribute to the retention of the rural setting and lifestyle of backcountry communities.

A model of compact development begins with a central core, referred to as a “Village” or, in very rural communities, a “Rural Village” in which the highest intensities of development are located. Under ideal conditions for achieving sustainability, the central core would be surrounded by areas of very low density. In unincorporated San Diego County, the ideal model has been modified with semi-rural areas surrounding the central core to reflect the existing pattern of development for most of the unincorporated County, along with a realization that the ideal Community Development Model is only achievable with a wide ranging and extensive transit network. Therefore, in the County’s Community Development Model, the central core is surrounded by areas of lesser intensity including “Semi-Rural” and “Rural Lands.” The edge of a “Village” or “Rural Village” can be defined by a boundary that can be used to differentiate permitted development densities and design standards. The “Village” would contain the densest neighborhoods and a broad range of commercial and civic uses that are supported by a dense network of local roads containing bicycle lanes and walkways linking the neighborhoods with parks, schools, and public areas. Outside of the “Village,” “Semi-Rural” areas would contain low-density residential neighborhoods, small-scale agricultural operations, and rural commercial businesses. In turn, these would be surrounded by “Rural Lands” characterized by very low-density residential areas that contain open space, habitat, recreation, agriculture, and other uses associated with rural areas. The diagrams below illustrate these relationships:



## GUIDING PRINCIPLES



Developing the County's communities more compactly meets critical objectives for compliance with the mandates of AB 32, the *California Global Warming Solutions Act of 2006*. The bill requires the reduction of GHG emissions to 1990 levels by 2020, about a 25 percent reduction from current levels. Governor Schwarzenegger's Executive Order S-E-05 requires further reductions to 80 percent below 1990 levels by 2050. As automobile use and energy consumption are principal contributors to GHG emissions, compact land use patterns and development practices that reduce trip generation and distances will be essential.

### Guiding Principle 3

**Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.**

Critically important in defining the San Diego region is the diversity and character of its distinct communities. Some are located at the edges and serve as transitions from coastal and inland urbanized cities to agriculture and open spaces. These communities are often integrated into the more urban fabric of the region and will serve an important role in meeting the region's housing and employment needs. Others are remotely located in agricultural, pine-covered mountain, valley, and desert locations. Each has emerged in a distinct physical setting with a unique history, culture, character, life style, and identity that has attracted residents and, in some cases, tourists.



*Main Street in Fallbrook*

As the County continues to grow, it is critical that development be located, scaled, and designed to retain and enhance the qualities that distinguish its communities. Development planning must consider uses; parcel sizes; building form, scale, massing, and architecture; landscapes; and site development practices that are comparable to, or transition with, existing development to ensure that new development "fits" with the community. Smaller parcel sizes in community cores, for example, can be developed to replicate the character and scale of existing development. An economically viable community must also provide housing for all income levels. Close coordination with communities will be essential in understanding those attributes that distinguish them. Clear and effectively crafted community plans have an important role in communicating these principles.



With new development, it is also crucial to accommodate, and provide incentives for, important missing uses that residents and other stakeholders indicate are needed to “complete” the community. These may include locally-needed retail and services and/or amenities, such as parks, sidewalks that are pedestrian-friendly, trails and pathways, and parking facilities.

### Guiding Principle 4

**Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance.**

The San Diego region is considered to be one of the most biologically diverse areas in the United States<sup>1</sup> and it is home to more rare and endangered species than any other region in the continental United States. Large lot development practices during recent decades have resulted in a loss of habitat resources, with some habitat types occupying less than five to ten percent of their historic ranges. The continued existence of over 400 sensitive plant and animal species depends on the assurance that sufficient amounts of native habitat, wildlife corridors, and habitat linkages are preserved and managed in a viable manner. The County, in cooperation with the City of San Diego, local, state, and federal agencies, has been aggressive in documenting and developing policies for the protection of sensitive species and habitats. The Multiple Species Conservation Program (MSCP) provides the foundation for these efforts through conservation of land and adaptive management and monitoring activities.

As growth and new development occur in the County, critical lands and habitat should be set aside and protected from development. On other lands, buildings, infrastructure, and other improvements should be located and designed to prevent degradation and adverse impacts on adjoining resources. Maintenance of viable and healthy habitats and biological resources not only sustains sensitive plant and animal species, but also contributes to the economic value, character, and identity of the County.

As practiced, the strict correlation of parcel size with density has been contrary to these objectives. Smaller lot sizes are an essential tool when planning for new development to preserve sensitive resources. Another important consideration is the configuration of the lots, which should be arranged to connect open spaces and create a linked network throughout the region.



<sup>1</sup> Dobson, A.P., J.P. Rodriguez, W.M. Roberts, and D.S. Wilcove. 1997 Geographic Distribution of Endangered Species in the United States. *Science* 275(5299): 550-553



## Guiding Principle 5

### **Ensure that development accounts for physical constraints and the natural hazards of the land.**

Residents, businesses, and visitors to the San Diego region are exposed to a diversity of natural and human-induced hazards that could affect life and property. Rupture of the Elsinore, Earthquake Valley, and San Jacinto Faults, and other ancillary faults, may incur property and personal damage due to ground shaking, landslides, liquefaction, and tsunamis. Landslides and rockfalls occur throughout the County's mountainous terrain. Hillside canyons, valleys, the desert floor, and flatlands may be impacted by heavy storm runoff and flooding. Wildland fires often occur in grasslands, chaparral, and forests, while threatening structures in urbanized areas. Some industrial and commercial businesses involve the use of toxic chemicals and hazardous materials that pose a risk to human health.



New development should be located and designed to protect life and property from these and similar hazards. In high risk areas, development should be prohibited or restricted in type and/or density. In other areas, structures, properties, infrastructure, and other improvements should be designed to mitigate potential risks from these hazards. Development that cannot avoid high risk areas should be carefully reviewed for consistency with County building codes and development regulations to eliminate or minimize potential risks.

## Guiding Principle 6

### **Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.**

The transportation system within the unincorporated County will rely primarily on a public road network that contains transportation routes for vehicular and non-vehicular travel such as pedestrians and bicycles. Future development will be more compact, which will reduce travel distances and the geographic extent of the transportation network, as discussed in Guiding Principle 2. These compact development patterns will support the development of a public transportation system. However, the mix and densities of land uses in the rural setting will be insufficient to support the development of a more comprehensive public transportation system accessible to a significant number of residents and the automobile will remain the primary mode of transportation in these areas. Nevertheless, public transit will be supported and enhanced where appropriate. Additionally, bike routes, pathways, and trails will be integrated with the road network providing options for travel and recreation.



An effective transportation system should provide convenient access to employment, education, public service, commercial, and recreational centers. It should provide connectivity within each community and within the region. The capacity of the transportation network should be adequate to support the development capacity of the land use plan for housing, retail, industrial, recreational, and other uses. Routes should be designed and developed that are sensitive to their context and minimize construction and environmental costs.

The transportation network should be built to support and correlate with community development patterns. Where more compact forms of development occur, a transportation network should provide a unified and connected system of public roads that accommodate private vehicles, bus or transit stops, pedestrian routes, and bicycles. In low-intensity rural areas, transportation routes should provide safe connections within the community, as well as connections to the regional transportation network.

### Guiding Principle 7

#### **Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.**

There is a growing body of evidence that our built communities and typical lifestyles are resulting in over-consumption and degradation of natural resources and that a major shift in human behavior and development practices is necessary to overcome these. Increasingly, communities are seeking more sustainable approaches to development and conservation where persons and societies can live within the means of what the Earth can provide over the long term. A generally accepted definition states “sustainability meets the needs of the present without compromising the ability of future generations to meet their own needs.”<sup>2</sup> The emission of GHGs is one critical issue among many that cumulatively contribute to a community’s and a region’s sustainability.



*Example of native landscaping*

Sustainability principles also recognize the need to balance the environment with economic and social equity needs. A sustainable economy is one in which good jobs are available for residents and businesses thrive, providing capital to support human needs and protect the environment. A sustainable society is one in which residents are well-educated, have access to cultural activities, are physically active and healthy, and

<sup>2</sup> United Nations World Commission on Environment and Development



## GUIDING PRINCIPLES

participate with their neighbors in community activity. Together, these are referred to as the “triple bottom line” of sustainability and all are considered of equal importance.

The County of San Diego can move towards sustainability and a reduction of GHG emissions by managing land development and building construction, conserving habitats and natural resources, providing efficient transportation and mobility systems, and developing its infrastructure and public services. As described for Guiding Principle 2, land should be developed more compactly, resulting in reduced automobile use and increased use of public transit, walking, and bicycling. This will result in less consumption of gasoline, generation of less air pollution and GHG emissions, the preservation of greater amounts of habitat and agricultural lands, and the improvement of the lifestyles and health of community residents. Locating residences closer to retail stores and jobs also increases the economic viability of those commercial entities. Providing new recreational facilities and access to the County’s abundant open spaces can improve public health. Similarly, choices for alternative transportation modes including bus and transit systems, pedestrian routes, and bicycle paths should be expanded, as described in Guiding Principle 6. This will result in similar benefits to public health by increasing outdoor activities.

Reduced consumption of energy, water, and raw materials, generation of waste, and use of toxic and hazardous substances should be considered in all aspects of development. Buildings should be oriented on properties to maximize opportunities for solar access and photovoltaic energy systems. Rainfall should be captured on site, lessening runoff into storm drainage facilities and pollution of creeks and streams, and used for irrigation and to replenish the groundwater supply. Buildings should be designed to reduce energy consumption by incorporating natural ventilation, insulation, sunshades, use of energy-efficient equipment, and similar techniques. Wastewater should be re-used for irrigation, toilets, and other suitable purposes. Sites should be landscaped with plant materials that are drought-tolerant and require little water and fertilizer. These represent some of the diverse techniques that should be considered as growth occurs in the County.

### Guiding Principle 8

#### **Preserve agriculture as an integral component of the region’s economy, character, and open space network.**

Agriculture contributes to the County’s rural character and is an important contributor to the regional economy. Unlike many agricultural areas that depend primarily on soil quality, agriculture in San Diego County relies primarily on the region’s mild climate and its long growing seasons. These factors allow the County to facilitate small farms and crop diversification through support of the Farm and Home Advisor.

Growth and development in the County should be directed to areas so as to protect opportunities for continued agricultural production. Development of compact communities, as defined by Guiding Principle 2, will contribute to this objective. Permitted densities in prime agricultural areas should be reduced to sustain sufficient parcel size





for viable agricultural activities. Incentives should be provided to enable farmers to create small lot subdivisions while retaining the bulk of their land for agricultural operation. Land uses that are incompatible with agricultural uses should be prohibited from major agricultural areas. Finally, a program for the purchase of development rights for agricultural lands should be implemented.

### Guiding Principle 9

#### **Minimize public costs of infrastructure and services and correlate their timing with new development.**

Population growth impacts the cost to build and operate essential public services. The development of housing, retail stores, and industrial jobs and services requires new roads, schools, parks, law enforcement, fire protection, and other public services. National studies indicate that a residential development does not pay for itself, requiring an estimated \$1.42 in public expenditures for every dollar it generates in tax revenues. In California, this deficit is even greater due to the limitations of Proposition 13. In addition, dispersed development patterns, common in unincorporated areas, are costly to serve because they require a more extensive road network for transportation and fire protection, law enforcement, and emergency services. The U.S. Department of Agriculture, for example, found that the capital costs for public infrastructure are typically 74 percent greater for low-density, semi-rural development than for high-density development.<sup>3</sup> Although entitlement fees cover some of the initial public costs for capital improvements, they do not pay for operational or maintenance costs and property taxes do not generate sufficient revenue to fund operational costs.

To reduce the costs of construction and maintenance, development in the County should be designed to be more compact and located in proximity to existing and planned infrastructure and services. New development located near existing and planned infrastructure and services would be served in a more efficient manner and would require less extensive roads and infrastructure, as defined by Guiding Principle 2. This could reduce the need to build and operate new road networks, emergency and law enforcement facilities, libraries, schools, parks, and other public services needed to support residential development in remote areas. Additionally, new technologies and planning approaches that improve cost effectiveness of services and infrastructure should be continually sought out and applied when appropriate.

### Guiding Principle 10

#### **Recognize community and stakeholder interests while striving for consensus.**

The residents of San Diego County's unincorporated communities and rural areas have chosen to live here largely due to its environmental setting of hillsides, valleys, deserts, and agriculture; low-density rural character; absence of congestion and pollution; friendliness of neighbors; and pace of life that contribute to a high quality of life distinct from the urbanized environment of coastal San Diego and adjoining inland areas. As growth continues, development must be managed to protect these assets.

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<sup>3</sup> "Development of the Urban Fringe and Beyond," Economic Research Service, USDA, June 2001. The report defines "low density" as less than 2 dwelling units per acre.

## GUIDING PRINCIPLES



*A community meeting held during the General Plan Update planning process*

In addition to individual property owners, stakeholders of this Plan primarily include community groups, the building industry, environmental organizations, agricultural interests, and planning and design professionals. These groups represent a myriad of competing interests as do the goals and policies in this Plan that address those interests. While there is often an apparent disconnect between the goals and policies, the Plan's implementation must strike a balance between these individual interests.

To this end, opportunities must continue to be provided to engage the County's residents, business persons, and stakeholder interests in planning and development decisions that affect the character and quality of the communities and rural areas. Forums for citizens to voice their opinions and provide input regarding proposed land uses to be accommodated; their density, design and development character; compatibility and "fit" with existing uses; obligations to support public infrastructure and services; and impact mitigation must be continued. Where significant debates occur, processes should be established to enable each viewpoint to be heard and for compromise positions to be reached. Community groups such as the community planning and sponsor groups should continue to have an active role in these processes.

## CHAPTER 4   **Mobility Element**



# Introduction

## Purpose and Scope

The Mobility Element includes several components including a description of the County's transportation network, the goals and policies that address the safe and efficient operation, maintenance, and management of the transportation network, and the Mobility Element Network Appendix, which depicts in map and matrix format the location of road network components. The goals and policies strive for a balanced multimodal transportation system with adequate capacity to support the land uses and development patterns in the Land Use Element of this General Plan.

The Mobility Element provides a framework for a balanced, multi-modal transportation system for the movement of people and goods within the unincorporated areas of the County of San Diego. A balanced system uses multiple modes of travel including motor vehicles, public transportation, bicycles, pedestrians, and to a lesser extent, rail and air transportation. While the automobile is the predominant mode of travel in the unincorporated County due largely to its rural character, opportunities for increased mode choice are addressed in this Element.



*Interstate 8, east of Alpine*

The Mobility Element identifies the County road network, much of which currently exists, to be developed in the unincorporated County during the implementation of this General Plan so that future rights-of-way can be preserved for future motorized and non-motorized roadway purposes. This network includes County and State roads that form the backbone of a regional network providing movement within and between communities in the unincorporated County. Interstate highways, as with State roads and highways, are managed and maintained by the California Department of Transportation (Caltrans). While the Mobility Element network map indicates some roadways within city boundaries, the County has no jurisdiction over roads in these cities. When applicable, the Mobility Element road network has been coordinated with adjacent cities to ensure consistency to the extent feasible.

With the exception of State roads and highways, the County is responsible for the operation and maintenance of the public roadway system in unincorporated areas of the County along with the operation of eight public aviation facilities. The San Diego Association of Governments (SANDAG) serves as the regional planning agency for the entire County and is a key partner to the County along with other State, regional, and public agencies, in planning and funding roadways and other components of the transportation network within the County.

## Guiding Principles for Mobility

The Mobility Element's goals and policies are based on and reflective of a number of the Guiding Principles for the General Plan introduced in Chapter 2. A central theme is support for a multi-modal transportation network that enhances connectivity and supports existing development patterns while retaining community character and maintaining environmental sustainability by reducing gasoline consumption and greenhouse gas emissions.

The Mobility Element balances competing goals of accommodating trips generated by land use, while striving to retain a transportation network that complements, rather than impacts, the character of communities, which is generally rural in much of the unincorporated County. Therefore, widening of roads, which can dramatically change the character of a community, should be pursued only after environmental and community character impacts are also considered. The need to widen roads is minimized when trip vehicle miles traveled are reduced, the performance of the existing network is optimized, and the use of alternative modes of travel is maximized.

Reducing vehicle miles traveled is also an important component of reducing greenhouse gas emissions. Along with compact land use patterns, a well-connected road network contributes to reducing vehicle miles traveled. The Mobility Element requires the provision of multi-modal facilities to accommodate alternative modes of travel, such as public transportation, bicycling, and walking. In addition, goals and policies are included to minimize single occupancy vehicular travel through carpooling, vanpooling, and other transportation demand management methods.

The Mobility Element strives to maximize traffic movement and enhance connectivity by creating multiple connections between existing and planned retail or employment centers and residential communities and between different areas within communities. A continuous network where roads have enhanced connectivity facilitates the provision of optional routes of travel. This enables commuters to avoid areas when roads are congested or closed. In addition, a network with enhanced connectivity provides multiple evacuation routes during emergencies, such as wildfires. The Mobility Element incorporates road types that are compatible with surrounding land uses and reinforce the positive aspects of a community's character, contributing to the economic and social development of the community.



*Road in Alpine*



*Bus service to Tecate*



*Biking at William Heise County Park in Julian*

Requiring new development to pay its fair share of road and related infrastructure costs minimizes public costs while ensuring the infrastructure is available to support the increased demand for services.



## Relationship to Other General Plan Elements

As mandated by State law, the Mobility Element must be consistent with all other elements of the General Plan (including community plans) and is related to these elements as discussed in the following section.

- *Land Use Element.* The Mobility Element is directly correlated to the Land Use Element this includes the identification of a road network that can adequately support the uses designated in the Land Use Map at build-out, based on a reasonable expectation for funding of the regional transportation network. The capacity required for the Mobility Element road network is based on the average number of daily vehicle trips that would be generated with build-out of the Land Use Map. The Mobility Element framework of road types relates to the varying characteristics of communities. The Land Use Element addresses non-transportation infrastructure components such as water, sewage, storm drainage, and communications; many of which are located within the rights-of-way of the road network.
- *Noise Element.* This element addresses noise generated by motorized traffic on roadways, rail lines, and at airports. Also, the Noise Element identifies noise level contours and determines their compatibility with each land use type.
- *Conservation and Open Space Element.* This element provides measures for the preservation, conservation, development, and use of natural resources. The element addresses the air quality impacts from motor vehicular traffic, along with the impacts to environmentally sensitive habitats from road construction or improvements. In addition, the Mobility Element identifies the regional trail system that enhances community circulation and provides connections to recreational opportunities within County parks, open space preserves, and other public lands.
- *Safety Element.* Emergency ingress and egress routes are addressed in both the Mobility and Safety Elements. The Safety Element further establishes land use compatibility policies for areas located within the vicinity of airports.

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## Goals and Policies for Mobility Element

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### County Road Network

#### CONTEXT

In the unincorporated County, the road network is by far the most dominant component of the County's transportation system. Although motorists are the primary users of the system, transit riders, bicyclists, pedestrians, and equestrians rely on the network for mobility within the unincorporated County as well as the greater San Diego region. State highways and regional arterials in the unincorporated County are part of an extensive regional network that is integrated with an interstate highway system that provides intra- and interregional travel within and through the unincorporated County as described below.

- Traffic from Orange County enters the County along Interstate 5 through Marine Corps Base Camp Pendleton and travels to the coastal cities.
- Traffic from Riverside County travels into the unincorporated County along Interstate 15 and State Route 79, through the Rainbow Community Planning Area and North Mountain Subregion, respectively.



## GOALS AND POLICIES

- Traffic from Imperial County enters the County along Interstate 8 through the Mountain Empire Subregion and along State Routes 78 and S22 through the Desert Subregion.
- Traffic from Baja California, Mexico enters the unincorporated County through the Tecate Port of Entry in Tecate, U.S.A. in the Mountain Empire Subregion.

## COUNTY ROAD SYSTEM

With the exception of state-maintained highways and roads, the County is responsible for the maintenance of the public (Mobility Element and Local Public) road network in the unincorporated areas, including associated bicycle and pedestrian facilities. In addition, the County also reviews development projects with private roads to ensure adequate ingress and egress is being provided. The three primary types of roads under the purview of the County are as follows:

- *Mobility Element roads* are County-maintained roads shown on the Mobility Element map and adopted in the General Plan. They provide for the movement of people and goods between and within communities in the County. The Mobility Element displays these roads showing both the road classification and its general alignment.
- *Local public roads* are County-maintained roads that feed traffic onto Mobility Element roads. These roads are not adopted in the General Plan; therefore deviations from planned networks do not require a general plan amendment.
- *Private roads*, including their rights-of-way, are not maintained by the County and generally are not available for general public use.



*Mobility Element road*



*Via de Fortuna Road, a San Dieguito local public road*



*Yellow Brick Road, a private road in Valley Center*

Transportation and land use are two important and related components of every community that help establish its character and function. Land use decisions take into account the road network when assessing the physical characteristics of the site along with resulting traffic impacts. Road design should minimize impacts to land use by including elements and features that accommodate community needs and reflect the character of the area. For example, the design of a four-lane road in an urbanized commercial center would differ from a four-lane road in a sparsely developed rural area. Functional road classifications are correlated to the Regional Categories identified in the Land Use Element.

While well designed roads respond to land use characteristics. A second major objective of the Mobility Element is to develop roads that are multi-modal and can safely accommodate vehicular, as well as transit, bicycle, equestrian, and pedestrian modes of travel. The San Diego County Public Road Standards and



supplemental manuals provide guidance for the road designs, along with including bus stops and non-motorized circulation facilities into the road right-of-way.

## **COUNTY ROAD OPERATIONS AND NETWORK**

The backbone of the County's road network is referred to as the Mobility Element network, which includes both State highways and County roads. However, the goals and policies for roadways apply to all roads, public and private, unless otherwise stated.

The Mobility Element road network is based on a combination of physical and environmental conditions, community input, and SANDAG traffic model forecasts based on full build-out of the General Plan land use map. When physical and other constraints preclude constructing roads to the number of lanes required to accommodate traffic with a LOS D or better, exceptions, coordinated with community planning or sponsor groups, have been made to accept the road operating at LOS E or F, according to the SANDAG traffic model forecasts. The SANDAG traffic model used 2030 projections for build-out of the regional (freeways, state highways, and transit facilities) transportation network and the road networks and land use plans for incorporated jurisdictions.

The road network identified by the Mobility Element is depicted on community level maps showing the road classification series and the general route of each road (see Mobility Element Network Appendix). Freeways, although shown on these maps, are included only for reference, as Mobility Element roads include State highways, but not freeways. The maps are accompanied by a matrix that identifies the road segment, its classification, any necessary improvements (such as a raised median, continuous or intermittent turn lanes, passing lanes, reduced shoulder width, or increased right-of-way requirements), and special circumstances including when it is deemed acceptable for a specific road segment to operate at a level of service E or F. Further explanation regarding the operating levels of service for each road segment is provided in the Background Material Section at the end of this chapter, along with specific exceptions to the established levels of service.

## **ROAD CLASSIFICATIONS**

The County's road classifications are specific to roads operated and maintained by the County, and may be different from roads in other jurisdictions. The County's classification system is arranged by road type in a hierarchy that begins with roads that provide the greatest capacity (six-lane roads) to those that provide the least capacity (two-lane roads). The greater the road capacity, the more vehicles can travel on the roadway at an acceptable level of service. Table M-1a (Road Classifications: Six- and Four-Lane Roads) and Table M-1b (Road Classifications: Two-Lane Roads) provide a description for each classification, the number of travel lanes, and both the minimum right-of-way requirements and the right-of-way requirements when bicycle lanes and pathways are provided. The County's Public Road Standards provide additional criteria for these road types, such as design speed and threshold capacity. When the volume of a roadway increases beyond the threshold capacity of its classification, a higher capacity classification is required.

## GOALS AND POLICIES

Flexibility exists within the Public Road Standards for exceptions that may be appropriate for community context or other reasons. Additionally, community specific road standards may also be prepared to implement context-sensitive solutions for individual communities. Where it is demonstrated that permanent bus or transit facilities are needed, such as in a regional transit or school district plan based upon the demand and frequency of buses, additional right of way may be required/obtained for the provision of a bus turn out at designated bus stop locations, based upon design criteria provided by the transit district or school district. In some instances this has been done by utilizing part of the parkway in lieu of increasing the overall right-of-way. The bus turn-outs are designed and implemented on a case by case basis depending on the need and design parameters at the proposed bus turnouts.



*Residential street with parking*

These road classifications are specific to County Mobility Element roads, and although another jurisdiction may have a similar classification, the design criteria and standards are not necessarily the same. In addition, although State highways are included in the Mobility Element road network, the cross-section and right-of-way requirements for State highways are within Caltrans' jurisdiction and may be different than those of Mobility Element road classifications. Generally Caltrans prefers that rural conventional highways with at-grade intersections and with speeds greater than 40 mph, have a Clear Recovery Zone of 20 feet beyond the edge of the traveled way. Fixed objects located at distances less than the required Clear Recovery Zone may not be allowed.

Table M-1a Road Classifications: Six- and Four-Lane Roads				
No.	Road Classification	Description	Typical ROW Range* (Feet)	Lanes
<b>SIX LANE ROAD SERIES</b> Roads that accommodate high speed, high volume traffic and should be located away from Villages and in areas with limited physical constraints. The median serves as a separation between travel ways, as opposed to an area for turning or entering adjacent property.				
6.1	Expressway	A divided roadway with a wide median and grade separated interchanges. Road type has a capacity of 86,000 ADT (or more depending upon the number of lanes).	146–160	6 or more
6.2	Prime Arterial	A divided roadway with a median and at-grade interchanges. Capacity for road type is 50,000 ADT.	122–136	6



**Table M-1a Road Classifications: Six- and Four-Lane Roads**

No.	Road Classification	Description	Typical ROW Range* (Feet)	Lanes
<b>MAJOR ROAD SERIES</b>				
A roadway that primarily serves medium to high volume traffic. Because of its high design speed, this road should typically be located in physically unconstrained areas and its use in Villages should be limited to industrial or heavy commercial areas with low levels of pedestrian and bicycle traffic. In some circumstances, an exception can be made for using a modified design speed of 45 mph.				
4.1A	Major Road with Raised Median	Appropriate for regional travel between communities where higher traffic volumes are forecast.	98–112	4
4.1B	Major Road with Intermittent Turn Lanes	Typically used in areas where turning movements are infrequent or where ROW is limited.	84–112	
<b>BOULEVARD SERIES</b>				
A roadway with a lower design speed and a wider parkway that should be used in Villages or similar locations where higher traffic volumes are combined with on-street parking, pedestrian, bicycle, and transit activities. The Boulevard Series can also be used in rural areas that are constrained by steep slopes or where the community requests a context sensitive solution that minimizes cut, fill, and grading requirements and pathways are requested.				
4.2A	Boulevard with Raised Median	Increased road capacity and access control by providing a separation between travel lanes and dedicated turn lanes, along with a wide parkway to accommodate non-motorized circulation.	106–120	4
4.2B	Boulevard with Intermittent Turn Lane	Typically used where turning movements are infrequent or where ROW is limited.	92–120	

\* Range reflects ROW requirement both with and without the provision of bicycle lanes, in accordance with the Bicycle Transportation Plan. The provision of pathways identified in the Community Trails Master Plan could require additional ROW, depending upon what other needs are being accommodated in the parkways.

**Table M-1b Road Classifications: Two-Lane Roads**

No.	Road Classification	Description	Typical ROW Range* (Feet)	Lanes
<b>COMMUNITY COLLECTOR SERIES</b> Roadway with higher design speeds that is appropriate for areas with few physical constraints and minimal pedestrian, bicycle, or other non-motorized traffic. Road type for use where physical constraints are limited.				
2.1A	Community Collector with Raised Median	The raised median provides more capacity, controls turn movements, and improves flow.	74–86	2
2.1B	Community Collector with Continuous Turn Lane	The continuous turn lane improves traffic flow in areas with multiple driveways and left-turn access requirements.	74–86	
2.1C	Community Collector with Intermittent Turn Lane	Intermittent turn lanes provide more capacity over a normal two-lane road and improve traffic flow.	60–86	
2.1D	Community Collector with Improvement Options	Road type with wider right-of-way for added flexibility to accommodate improvement options such as turn lanes, medians, or passing lanes.	84–96	

Table M-1b Road Classifications: Two-Lane Roads				
No.	Road Classification	Description	Typical ROW Range* (Feet)	Lanes
2.1E	Community Collector	Roadway with no improvement options. It accommodates low to medium traffic volumes in areas where turning movements are infrequent and where non-motorized traffic is limited.	60–72	
<b>LIGHT COLLECTOR SERIES</b> Roads with a lower design speed and wider parkway than the Community Collector. They can be used in rural areas with medium physical constraints or in urbanized areas with moderate levels of non-motorized circulation.				
2.2A	Light Collector with Raised Median	The median provides a separation between travel lanes; controls turn movements, and improves traffic flow.	78–90	2
2.2B	Light Collector with Continuous Turn Lane	Continuous turn lane improves traffic flow in areas with multiple driveways and left-turn access requirements.	78–90	
2.2C	Light Collector with Intermittent Turn Lanes	Dedicated intermittent turn lanes provide more capacity and improve traffic flow.	64–90	
2.2D	Light Collector with Improvement Options	Has a wider right-of-way for added flexibility to accommodate improvement options such as turn lanes, medians, or passing lanes.	88–100	
2.2E	Light Collector	Roadway has no special features and accommodates low to medium traffic volumes where turning movements are infrequent and where non-motorized traffic and physical constraints are limited.	64–76	
2.2F	Light Collector with Reduced Shoulder	Roadway with two-foot shoulder, a rolled curb with graded pathway, and a narrow right-of-way. In some instances the shoulder can be widened to six feet to serve as a bicycle lane.	52–60	
<b>MINOR COLLECTOR SERIES</b> Roadway with a low design speed that is appropriate for highly constrained rural areas and for areas within a Village with heavy non-motorized circulation and transit activities. This standard could also be used in semi-rural areas with high levels of "side friction" or access from adjacent parcels. Minor Collectors have a wide parkway that, in rural areas, can be used to grade slopes and improve visibility or moderate tight curves. In more urbanized areas, the wide parkway can be used for pathways and for landscape buffers between vehicular and non-vehicular circulation.				
2.3A	Minor Collector with Raised Median	Raised median with dedicated turn lanes and controlled turning movements that improve traffic flow and enhance community character when the median is landscaped.	82–94	2
2.3B	Minor Collector with Intermittent Turn Lane	Improves traffic flow in areas with multiple driveways and left-turn access requirements.	68–82	
2.3C	Minor Collector	No additional features and is primarily intended for residential neighborhoods or for rural areas with steep slopes and physical constraints.	68–80	

\* Range reflects ROW requirement both with and without the provision of bicycle lanes, in accordance with the Bicycle Transportation Plan. The provision of pathways identified in the Community Trails Master Plan could require additional ROW, depending upon what other needs are being accommodated in the parkways.



Local public roads provide important system connectivity and continuity for the road network designated by the Mobility Element by providing access to local residential neighborhoods and commercial and industrial areas. They support local traffic at a lower design speed and accommodate traffic volumes up to 4,500 average daily trips. The County Public Road Standards establish the local public road classifications and specify the associated range of improvements.

Local public roads are normally not included in the Mobility Element network, but are depicted with the network for informational purposes when they provide continuity between two Mobility Element roads, especially those that would operate at an unacceptable level of service without the local public roads. Local public roads are also depicted in areas that are currently undeveloped but planned as a future development area. Right-of-way should be reserved for these roads for local ingress/egress and non-motorized uses until subsequent planning efforts in the area determine specific locations of the local public road network. The basic criteria for depicting local public roads in the Mobility Element are provided in the County's Public Road Standards.

## LOCATION GUIDE

A Road Classification Location guide that expresses the suitability of a road classification based upon its correlation to the County's Regional Categories is provided as Table M-2 (Road Classification Suitability). As shown in this table, road classifications with lower design speeds are recommended for Villages and for Semi-Rural or Rural Lands with physical constraints. Classifications of roads should consider the predominant topography or land use patterns, and a change in road classification should occur only at road intersections or another easily identifiable location in the network.

At build-out of both the General Plan Land Use plan and designated road network, it is estimated that the road network will not meet the desired level of service standard (LOS D) on approximately 10 percent of all County roads and State highways. For these roads, a lower LOS was deemed acceptable only under special circumstances based on specific criteria as described in Policy M-2.1.



*Rural roadway*



*Residential street in the Valle de Oro community*

Table M-2 Road Classification Suitability			
Lanes	Village	Semi-Rural	Rural Lands
6	Limited use only: 6.1 Expressway or 6.2 Prime Arterial	6.1 Expressway or 6.2 Prime Arterial	6.1 Expressway or 6.2 Prime Arterial
4	Primary Suitability: 4.2 Boulevard Limited use only: 4.1 Major Road	Primary Suitability: 4.1 Major Road Limited use only: 4.2 Boulevard	Primary Suitability: 4.1 Major Road Areas with Physical Constraints: 4.2 Boulevard
2	Primary Suitability: 2.3 Minor Collector Secondary Suitability: 2.2 Light Collector Limited use only: 2.1 Community Collector	Primary Suitability: 2.2 Light Collector Secondary Suitability: 2.1 Community Collector Areas with Physical Constraints: 2.3 Minor Collector	Primary Suitability: 2.1 Community Collector Areas with Physical Constraints: 2.2 Light Collector or 2.3 Minor Collector

## ROAD NETWORK

State law requires jurisdictions to develop a network that accommodates the land uses proposed in the General Plan. A portion of the Mobility Element road network depicted in the Mobility Element Network Appendix is currently in place, and the remainder will need to be constructed as development proceeds. The network will be constructed by new development as a condition of project approval and/or mitigation for project traffic-related impacts, by County capital improvement projects funded by the Transportation Impact Fee (TIF) Program or other local funding, and by State or federal funds whenever available. The TIF fees collected are to fund identified transportation facilities, or portions thereof, that will provide increased road capacity necessitated by the cumulative impacts of future development. The primary objectives identified below form the basis for the network.

- *Efficient and effective movement of people and goods*—A primary goal of the Mobility Element is a road network that accommodates build-out of the land use map while operating with acceptable levels of congestion. The policies in this General Plan address the need to relieve traffic congestion by balancing the consideration of road capacity and connectivity with the accommodation of alternate modes of travel and the use of transportation demand management methods. Road capacity is based on the type of road constructed, along with its side friction, such as intersection spacing and driveways. Road capacity is maintained when the number of driveways accessing Mobility Element roads is minimized. In addition, a highly connected road network reduces the overall vehicle miles traveled and allows for a greater dispersion of the traffic.
- *Accommodate all users of the road right-of-way*—The Mobility Element also supports the concept of complete streets that are designed and operated to enable safe access for all users and for all modes of travel including non-motorized users and transit riders. This includes users of all ages and abilities such as the elderly, children, and people with disabilities.
- *Right-of-way for road alignments reserved by development*—New development generally causes the need for road improvements. Proposed development within or adjacent to the alignment of a road shown on the Mobility Element map will require coordination with the County to determine the extent to which property needs to be reserved for the alignment and the extent of property owner responsibility for construction of the roadway and right-of-way improvements for non-motorized uses.





An assessment of the need for coordinating the project development with the roadway, potential dedication of property, and/or acquisition of property will be discussed with the property owner. The County may, depending upon the specific circumstances, require dedication of the full width of the right-of-way for designated corridors or acquire all or a portion of the right-of-way for roads being constructed with TIF funds

- *The provision of a road network balanced with other General Plan goals*—While providing for mobility is a primary goal, specific road improvements need to also consider factors such as the protection of environmental resources, the reduction of noise impacts, the development of livable communities, land use compatibility issues related to health risks from air pollution, and the effective allocation of limited County resources. New or expanded road alignments should avoid environmental constraints such as floodplains and steep slopes. Noise impacts from roads vary depending on the type of vehicle and the speed and volume of traffic. To limit noise impacts, high volume roadways should be located away from residential areas and sensitive noise receptors (such as schools) or should include noise mitigating factors in their design.
- *Road design, operation, and maintenance that reflects community character and the Community Plan*—Transportation and land use are two related components of every community that help establish its character and function. Just as land use decisions take into account the road network, road design should include components and features that serve community needs and reflect the character of the surrounding area. Proper road design should accommodate both motorized and non-motorized users of the road and respond to both travel demands and the character of the place (neighborhood, village, open space, etc.) that the road traverses. Road design should also consider environmental impacts and minimize runoff pollutants entering County watersheds.

## GOALS AND POLICIES

### GOAL M-1

**Balanced Road Network.** A safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities.

#### Policies

- M 1.1 Prioritized Travel within Community Planning Areas.** Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.
- 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.
- M 1.3 Treatment of High-Volume Roadways.** Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.

## GOAL M-2

**Responding to Physical Constraints and Preservation Goals.** A road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character.

### Policies

- M-2.1 Level of Service Criteria.** 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.

*Refer to the Background Material section (Road Segments Where Adding Travel Lanes is Not Justified) at the end of this chapter for list of road segments accepted to operate at LOS E/F.*

#### **Criteria for Accepting a Road Classification with Level of Service E / F**

*Identified below are the applicable situations, and potential improvement options, for accepting a road classification where a Level of Service E / F is forecast. The instances described below specify when the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity. In addition, adding capacity to roads can be growth inducing in areas where additional growth is currently not planned, which is not consistent with County Global Climate Change strategies.*

##### ***Marginal Deficiencies***

*When This Would Apply—Marginal deficiencies are characterized when only a short segment of a road is forecast to operate at LOS E or F, or the forecasted traffic volumes are only slightly higher than the LOS D threshold. Classifying the road with a designation that would add travel lanes for the entire road would be excessive and could adversely impact community character and / or impede bicycle and pedestrian circulation. Also, in some instances, although underutilized alternate routes exist that could accommodate the excess traffic; they were not included in the traffic forecast model.*

*Potential Improvement Options—Rather than increase the number of travel lanes for the entire road segment to achieve a better LOS, it is more prudent to apply operational improvements only on the portion of the road operating at LOS E and F. This may require specifying a road classification “With Improvement Options” to retain sufficient right-of-way to construct any necessary operational improvements.*

##### ***Town Center Impacts***

*When This Would Apply—This situation would apply when the right-of-way required to add travel lanes would adversely impact established land development patterns and / or impede bicycle and pedestrian circulation. The Community Development Model (see the General Plan’s Guiding Principle #2) concept strives to establish a land development pattern with compact villages and town centers surrounded by areas of low and very low density development. The construction of large multi-lane roads could divide an established town center, even though the intent of the road would be to connect areas within the community or improve access to areas within or surrounding the community.*

*Potential Improvement Options—Traffic congestion impacts can be mitigated without adding travel lanes by establishing alternate parallel routes that would distribute the traffic volumes, such as a network of local public roads. Other means of mitigating traffic congestion impacts other than increasing the number of traffic lanes include promoting the use of alternate modes of travel in town centers to reduce single-occupant vehicle trips or maximizing the efficiency of a roadway with operational improvements, such as intersection improvements.*

**Regional Connectivity**

*When This Would Apply*—Regional connectivity issues would apply when congestion on State freeways and highways causes regional travelers to use County roads, resulting in congestion on the County road network. Rather than widening County roads to accommodate this traffic, the deficiencies in the regional road network should be addressed.

*Potential Improvement Options*—Coordinate with SANDAG to identify the necessary improvements to the regional transportation network and to support appropriate priority in the Regional Transportation Plan to improve these congested freeways and highways, rather than contributing to increased congestion on County roads.

**Impacts to Environmental and Cultural Resources**

*When This Would Apply*—This situation would occur when adding travel lanes to a road that would adversely impact environmental and cultural resources such as significant habitat, wetlands, MSCP preserves, wildlife movement, historic landmarks, stands of mature trees, or archaeological sites. This situation would also occur in areas with steep slopes where widening roads would require massive grading, which would result in adverse environmental impacts and other degradation of the physical environment.

*Potential Improvement Options*—Provide improvement options, such as passing lanes, to areas without significant environmental or cultural constraints. This may require specifying a road classification “With Improvement Options” to retain sufficient right-of-way to construct any necessary operational improvements.

- M-2.2 Access to Mobility Element Designated Roads.** Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.
- M-2.3 Environmentally Sensitive Road Design.** Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings.
- M-2.4 Roadway Noise Buffers.** Incorporate buffers or other noise reduction measures consistent with standards established in the Noise Element into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. Consider reduction measures such as alternative road design, reduced speeds, alternative paving, and setbacks or buffers, prior to berms and walls.
- Sensitive noise-receptors are described in the Noise Element.*
- M-2.5 Minimize Excess Water Runoff.** Require road improvements to be designed and constructed to accommodate stormwater in a manner that minimizes demands upon engineered stormwater systems and to maximize the use of natural detention and infiltration techniques to mitigate environmental impacts.

**GOAL M-3**

**Transportation Facility Development.** New or expanded transportation facilities that are phased with and equitably funded by the development that necessitates their construction.

**Policies**

- M-3.1 Public Road Rights-of-Way.** Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of

## GOALS AND POLICIES

sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.

- M-3.2 Traffic Impact Mitigation.** Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.
- M-3.3 Multiple Ingress and Egress.** Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.

### GOAL M-4

**Safe and Compatible Roads.** Roads designed to be safe for all users and compatible with their context.

#### Policies

- M-4.1 Walkable Village Roads.** Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.



*Road in Valle de Oro with bicycle lane and multi-use pathway*

- M-4.2 Interconnected Local Roads.** 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.
- M-4.3 Rural Roads Compatible with Rural Character.** Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. [See applicable community plan for possible relevant policies.]
- M-4.4 Accommodate Emergency Vehicles.** 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.
- M-4.5 Context Sensitive Road Design.** 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.
- M-4.6 Interjurisdictional Coordination.** Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a



consistent cross-section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.

## Regional Transportation Coordination and Facilities

### CONTEXT

The Mobility Element addresses the County-operated multi-modal transportation network that provides a variety of mobility options within the unincorporated County. These services are provided by the County in partnership with the San Diego Association of Governments (SANDAG), Caltrans, transit agencies, the San Diego County Airport Authority, and various railroad operators.

SANDAG is the Regional Transportation Planning Authority and has responsibility for planning and allocating local, state, and federal funds for the region's transportation network. State law and the California Transportation Commission require SANDAG to adopt a 20-year regional transportation plan every four years, which considers improvements to freeways, state highways, transit, and regional bicycle and pedestrian routes. A long-range plan, the *2030 Regional Transportation Plan (RTP): Pathways for the Future* addresses countywide growth through the year 2030 and is available on the SANDAG website at: [www.sandag.org/2030rtp](http://www.sandag.org/2030rtp).

The 2030 RTP identifies \$4.5 billion in improvement projects for highway and regional arterials in the unincorporated County necessary to accommodate development capacity through 2030. The Mobility Element road network is based on reasonably expected revenue forecasts where \$3.7 billion in funds of the \$4.5 billion in requirements will be available to fund improvement projects in the unincorporated County through 2030.

State highways serve intra-county traffic and include State Routes 67, 76, 78, 79, 94, and 125. The design of these roadways varies according to the volume of traffic they carry and ranges from freeway-style construction to two-lane rural roads with at-grade intersections. Generally, these roads require a larger right-of-way so they can be expanded if future traffic volumes warrant.



*Interstate 15 looking north*

In addition to the County's road network, there are other regional facilities that are critical to the movement of people and goods within unincorporated areas as well as the larger region including freight and cargo services via truck or rail, and air travel from local airports that primarily accommodate private aircraft, with limited, if any cargo service. These facilities, in conjunction with the County's extensive roadway network, provide a safe and comprehensive multi-modal mobility system for County residents, businesses, and visitors.

## TRUCK ROUTES

Trucks are the primary mode used to move goods in and out of the San Diego region although rail, water transport, and air transport facilities are located in the region and contribute to this goods movement system. Commercial trucking in San Diego region primarily uses interstate and State highways as routes of travel. The SANDAG 2030 RTP identifies the major interstate highways and State routes used for commercial trucking in the San Diego region and designated truck routes in the unincorporated County include the following roadways:

- Segments of Interstates 8 and 15
- State Routes 94, 125, 188, and 905
- Otay Mesa Road

The 2030 RTP states that the potential use of managed lanes in off-peak periods will be evaluated in the near future. It also identifies other considerations for additional truck capacity that include improvements on an outer loop which includes SR 67, SR 94, and SR 125 in the unincorporated County. Generally, County roads are only used when destinations are not accessible by one of these major routes.



*Semi-truck with cargo*

State Route 94 (Campo Road), south of Melody Road in the Jamul / Dulzura Subregion is proposed to remain a two-lane road. This results in inherent limitations for truck traffic using this segment of SR-94. Truck traffic should be shifted to Interstates 8, 805, and 905 and SR-125 after the Otay Mesa II and Calexico Ports of Entry are upgraded.

## RAIL FACILITIES

The North County Transit District (NCTD) and Metropolitan Transit System (MTS) own and maintain the main rail line along the coast from downtown San Diego to the Orange County line, which is shared between Amtrak intercity, COASTER, and Metrolink commuter passenger rail services and Burlington North Santa Fe (BNSF) Railway freight service. NCTD also owns the rail corridor between Oceanside and Escondido, operating SPRINTER light rail service, and shares the corridor with BNSF Railway freight service.

A freight line, the San Diego & Arizona Eastern Railway's Desert Line, is the primary rail line that traverses the unincorporated County. Existing rail lines, such as the Desert Line, may be underutilized at their current capacities. For these lines to remain economically feasible for continued operation, their usage should be maximized to provide an alternative to trucks, especially on SR-94, whenever feasible. In addition, BNSF is the operator of a freight line that runs from Oceanside to Escondido. The Amtrak and COASTER passenger lines run along the coast through Marine Corps Base Camp Pendleton. In addition, historical abandoned rail rights-of-way exist in broken segments, some of which are in public ownership, yet are currently underutilized and should be encouraged for adaptive reuse, such as rail to trail conversions.

Since 1996, the California High-Speed Rail Authority (CHSRA) has been the state agency charged with planning, designing, constructing, and operating a statewide high-speed train system. The High Speed Rail



alignment from San Diego would be connected to this proposed system via the Interstate 15 corridor, from downtown San Diego to Escondido, Riverside County, and Los Angeles. The High Speed Rail alignment would originate in Downtown San Diego linking University City, Escondido, Riverside County, and Los Angeles via the San Diego-Los Angeles-San Luis Obispo Rail Corridor Agency (LOSSAN), Miramar Road/Carroll Canyon Road, and Interstate 15 corridors. A programmatic environmental impact report/environmental impact statement (PEIR/EIS) was certified in 2005 and planning work continues on the corridor.

## AIRPORTS

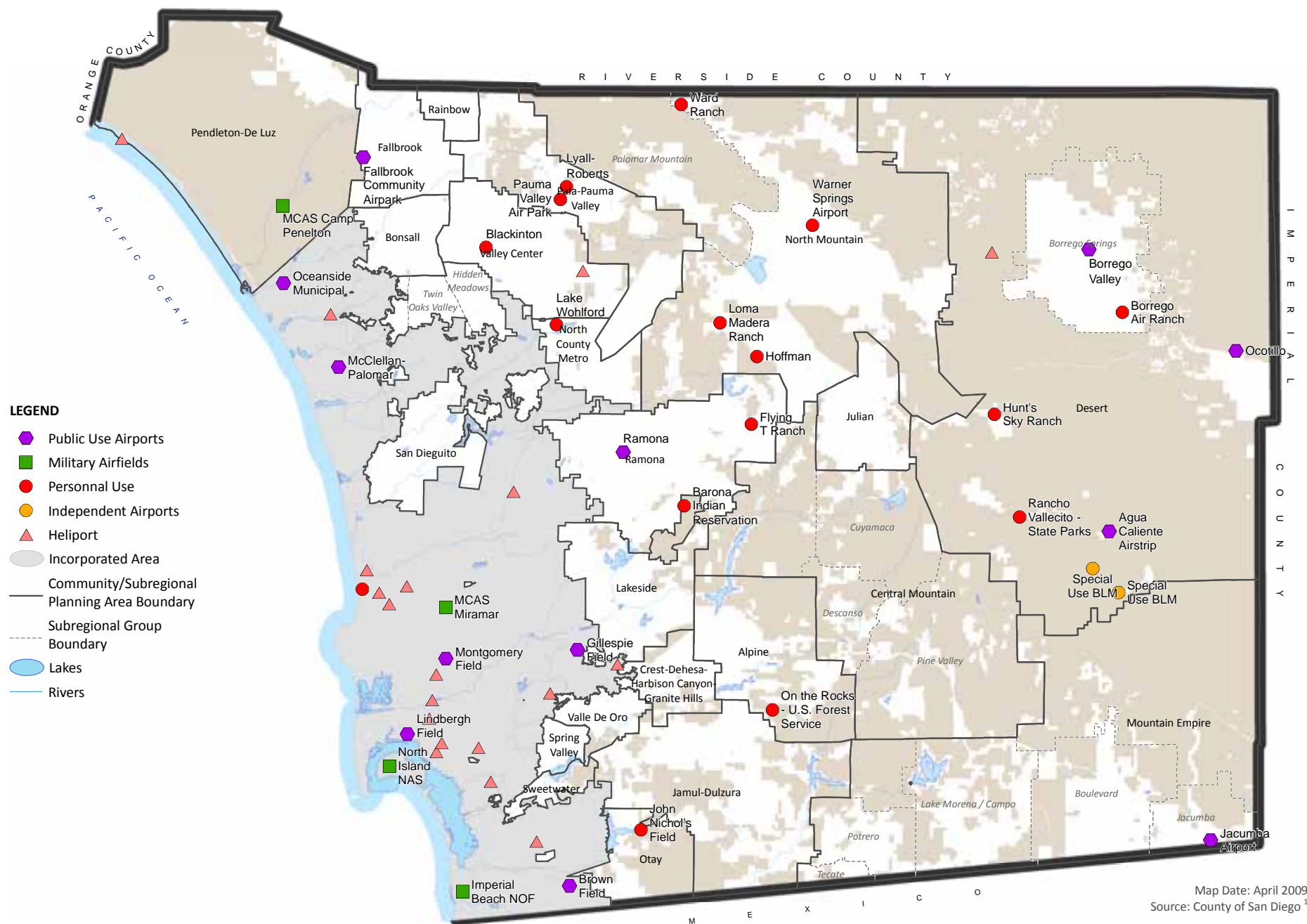
San Diego International Airport, located in the city of San Diego, along with John Wayne Airport (Orange County), Los Angeles International Airport (Los Angeles County), and Ontario International Airport (San Bernardino County) are regional airports located in Southern California that provide residents and businesses in the unincorporated County with passenger and cargo services.



*Borrego Valley Air field*

In addition to San Diego International Airport, eleven public-use airports are located within the boundaries of the County, along with four major military aviation facilities and numerous independent airports and heliports. The County owns and operates eight of these airports, six of which are located in the unincorporated County (Agua Caliente Airstrip, Borrego Valley Airport, Fallbrook Community Airpark, Jacumba Airport, Ocotillo Airstrip, and Ramona Airport). The County also owns Gillespie Field in the City of El Cajon and McClellan-Palomar Airport in the City of Carlsbad. The remaining public-use airports include Brown Field and Montgomery Field (City of San Diego) and Oceanside Municipal Airport (City of Oceanside). These airports are shown in Figure M-1 (Airport Locations).





## AIRPORT LOCATIONS

San Diego County General Plan



Figure M-1



## GOALS AND POLICIES

### GOAL M-5

**Safe and Efficient Multi-Modal Transportation System.** A multi-modal transportation system that provides for the safe, accessible, convenient, and efficient movement of people and goods within the unincorporated County.

#### Policies

**M-5.1 Regional Coordination.** Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands
- Maximized efficiency to enhance connectivity between different modes of travel



*Interstate 8 east of Alpine*

**M-5.2 Impact Mitigation for New Roadways and Improvements.** Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new State freeways or highways and to reduce impacts of road improvements and/or design modifications to State facilities on adjacent communities.

### GOAL M-6

**Efficient Freight Service Linked to Other Transportation Modes.** Freight services that efficiently move goods and that are effectively linked to other transportation modes.

#### Policies

**M-6.1 Designated Truck Routes.** 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.

**M-6.2 Existing Rail Line Use.** Support the use of existing rail lines for freight, public transit, and tourism.



*Rail depot and tourist train in Campo*

## GOALS AND POLICIES

- M-6.3 Visual Impacts on Scenic Corridors.** Coordinate with railroad and transit operators to ensure that infrastructure for freight and passenger service is planned and designed to limit visual impacts on scenic corridors.
- M-6.4 Locate Rail Facilities in Established Communities.** Encourage railroad operators to use existing rights-of-way and locate stations and support facilities in established communities.
- M-6.5 Adaptive Reuse of Abandoned Rail Lines.** Support the retention of abandoned railroad rights-of-way and adaptation for uses that benefit the general public, such as public transit, new road connections, regional trails and bike paths, or protected habitat areas, where appropriate.

## GOAL M-7

**Airport Facilities.** Viable and accessible airport facilities whose continuing operations effectively serve the evolving needs of the region while minimizing any adverse impacts of airport operations.

### Policies

- M-7.1 Meeting Airport Needs.** Operate and improve airport facilities to meet air transportation needs in a manner that adequately considers impacts to environmental resources and surrounding communities and to ensure consistency with Airport Land Use Compatibility Plans.

*Refer to the Airport Hazards section of the Safety Element for additional goals and policies pertaining to airports.*

## Public Transit

## CONTEXT

With the passage of State law (SB 1703), SANDAG is now responsible for transit planning, programming, project development, and construction. SANDAG prepared the 2007–2011 Coordinated Plan, which provides a framework for transit system development over the next five years and reflects the goals and direction for service development as described in the 2030 RTP. This plan also defines the level of service for transit in suburban and rural areas as follows:

- **Suburban**—Direct service along commute corridors with critical mass featuring rapid, frequent service during peaks with seamless coordinated transfers, and local service focused on smart growth areas and lifeline needs
- **Rural**—Transportation services that run only a few times a day on select days of the week (lifeline services)



*Pine Valley bus stop with rural-level services*



*The Sprinter, operated by the North County Transit District*

The two agencies responsible for transit operations and services in the unincorporated County areas are the Metropolitan Transit System (MTS) and the North County Transit District (NCTD). Transit services provided by these agencies include heavy and light rail, fixed-route bus service, demand-response service, and paratransit. Existing transit services for the unincorporated County consist of limited regional or local bus services, and light rail (the NCTD SPRINTER) in one very localized area. Transit services are primarily provided to the larger, more urbanized communities, although limited services are available outside this area. In addition, tribal governments operating casinos and non-profit agencies also provide transit services for their clients and customers.

SANDAG has the responsibility to designate the local Consolidated Transportation Services Agency (CTSA) in adherence to and to be funded in part by the state *Transportation Development Act* (TDA). SANDAG then retains regional oversight. The CTSA works to expand the availability and use of specialized transportation services by serving as an information resource for specialized transportation providers and providing technical assistance and public outreach to increase awareness of specialized transportation options. Full Access & Coordinated Transportation, Inc. (FACT), appointed under contract by SANDAG to serve as the CTSA for the San Diego region, is a non-profit corporation formed to coordinate and consolidate transportation services to people with disabilities, senior citizens, and social service agencies.

In addition, Tribal governments established the Reservation Transportation Authority (RTA), a consortium of 24 tribes, in order to pool resources and more effectively coordinate on transportation issues. In conjunction with SANDAG and the RTA, a consultant prepared a Transit Feasibility Study to assess the needs of tribes in the County to improve access for medical, educational, employment, and other essential transportation needs. As a result of the study, some bus routes were expanded.

The availability of public transit can reduce the dependency on motor vehicles and help to shape future growth patterns. Due to existing and planned development patterns, there are currently limited plans for expansion of transit service into unincorporated communities. Although transit currently comprises a small percentage of total trips in the unincorporated County, certain corridors enjoy high transit ridership. In addition, transit-supportive land uses can encourage increased transit use, and transit also is an important public service for lower income residents as well as residents with special needs including seniors and the disabled. A primary objective of the Land Use Element is to focus development in and around existing unincorporated communities to maximize existing infrastructure, provide for efficient delivery of services, and strengthen Town Center areas while preserving the rural landscape. The development patterns of the Land Use Map are intended to facilitate the use of public transportation in Village areas.

The goals and policies in this section seek to maximize opportunities for transit ridership in Village areas while reducing congestion on roadways.

## GOALS AND POLICIES

### GOAL M-8

**Public Transit System.** A public transit system that reduces automobile dependence and serves all segments of the population.

#### Policies

- M-8.1 Maximize Transit Service Opportunities.** Coordinate with SANDAG, the CTSA, NCTD, and MTS to provide capital facilities and funding, where appropriate, to:
- Maximize opportunities for transit services in unincorporated communities
  - Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes
  - Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible
  - Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops
- M-8.2 Transit Service to Key Community Facilities and Services.** Locate key County facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.
- M-8.3 Transit Stops That Facilitate Ridership.** Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit-oriented development, when appropriate.
- M-8.4 Transit Amenities.** Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.
- M-8.5 Improved Transit Facilities.** Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.
- M-8.6 Park and Ride Facilities.** Coordinate with SANDAG, Caltrans, and tribal governments to study transit connectivity and address improving regional opportunities for park-and-ride facilities and transit service to gaming facilities and surrounding rural areas to reduce congestion on rural roads.
- M-8.7 Inter-Regional Travel Modes.** Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated County residents.



- M-8.8 Shuttles.** Coordinate with Tribal governments, the Reservation Transportation Authority, and other large employers to provide shuttles and other means of connecting transit stops with job locations, civic, and commercial uses, where appropriate.

## Transportation System and Travel Demand Management

### CONTEXT

The road network designated in the Mobility Element strives to accommodate the Land Use Map while minimizing the need to build new roads or improve existing roads. Transportation System Management seeks to optimize the transportation network, while Travel Demand Management seeks to reduce the use of the road network.

### TRANSPORTATION SYSTEM MANAGEMENT (TSM)

TSM strategies focus on increasing the efficiency, safety, and capacity of existing transportation systems through strategies that relieve, lessen, or control congestion with minimal roadway widening. Techniques include performance monitoring, various types of intersection modifications, advanced technology, coordinated traffic signal timing across jurisdictional boundaries and with freeway ramps, signage and lighting upgrades, facility design treatments, high-occupancy vehicle (HOV) lanes, and targeted traffic enforcement. These strategies can reduce vehicle travel time and enhance system accessibility with little impact on other modes. Reducing traffic congestion keeps automobiles on roads designated for regional mobility, while minimizing through traffic within communities. Through better management and operation of existing transportation facilities, these techniques are designed to improve traffic flow, air quality, and movement of people and goods, as well as enhance system accessibility and safety.

### TRAVEL DEMAND MANAGEMENT (TDM)

TDM addresses traffic congestion by reducing travel demand rather than increasing transportation capacity. TDM programs such as employer outreach, carpool partner matching, parking cash outs, vanpools, subsidies and/or preferred parking to rideshare participants, guaranteed. rides home, bicycle lockers, and other amenities for bicyclists and pedestrians including clothing lockers and shower facilities are designed to increase the efficiency of the transportation system. TDM is a key tool to reduce single-occupant-vehicle travel as well as facilitate mobility options for area residents. SANDAG manages the regional TDM program including 511, a free phone and web service that consolidates the San Diego region's transportation information into a one-stop resource. The 511 program provides up-to-the minute information on traffic conditions, incidents and driving times, schedule, route and fare information for San Diego public transportation services carpool and vanpool referrals, bicycling information and more. The County has an opportunity to facilitate the use of TDM methods by encouraging land use planning and infrastructure improvements that better accommodate pedestrians, bicyclists, and transit users. In addition, the County can also offer incentives that encourage projects to implement TDM programs.



## GOALS AND POLICIES

### GOAL M-9

**Effective Use of Existing Transportation Network.** Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the County.

#### Policies

- M-9.1 Transportation Systems Management.** 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.
- M-9.2 Transportation Demand Management.** Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.
- M-9.3 Preferred Parking.** Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. [Refer also to Policy COS-16.3 (Low-Emission Vehicles) in the Conservation and Open Space Element.] Encourage parking cash out programs to reimburse employees for the cost of “free” on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements (see also Policy M-10.5).
- M-9.4 Park-and-Ride Facilities.** Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.



*Park-and-ride facility at Jamacha Boulevard in Spring Valley*





## Parking

### CONTEXT

Parking is an essential component of an efficient transportation system that includes accommodation for automobiles, motorcycles, and bicycles. Parking requirements have an ability to alter transportation choices. Excess free parking promotes an auto-oriented community, discourages high-frequency transit, and can negatively affect walkability. Yet as land becomes scarcer and construction costs increase, so do the costs of providing parking. If an insufficient number of vehicular parking spaces are provided, additional travel is required to find a



*Parking in a commercial area in Fallbrook*

parking space, causing congestion and delays. If too much vehicular parking is provided, a larger portion of the site is unnecessarily paved, causing degradation in community character and excess stormwater run-off.

The provision of a sufficient quantity of bicycle parking, that is both secure and convenient, will contribute to increased bicycle usage. In addition, a multi-modal transportation network that reduces the reliance on single-occupant vehicles reduces the number of parking spaces needed.

Parking spaces are either provided on the street or within a project site as parking lots. Parking regulations address off-street parking in an effort to provide functionally adequate, safe, convenient, and aesthetically pleasing parking and loading facilities for motor vehicles. On-street parking is allowed within the road shoulder, unless the County imposes a parking prohibition. If a parking prohibition is in place, the shoulder is available for use as a bike facility.

### GOALS AND POLICIES

#### GOAL M-10

**Parking for Community Needs.** Parking regulations that serve community needs and enhance community character.

#### Policies

**M-10.1 Parking Capacity.** Require new development to:

- Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity
- Provide parking facilities for motorcycles and bicycles
- Provide staging areas for regional and community trails

**M-10.2 Parking for Pedestrian Activity.** Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity

## GOALS AND POLICIES

by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.

**M-10.3 Maximize On-street Parking.** Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.

**M-10.4 Shared Parking.** Support town center plans, when desired by the community, that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.

**M-10.5 Reduced Parking.** Accommodate appropriate reductions in on-site parking requirements in situations such as:

- Development of low-income and senior housing
- Development located near transit nodes
- Employment centers that institute Transportation Demand Management programs
- Development that integrates other parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions

*Transportation Demand Management programs are described in the previous section.*

**M-10.6 On-Street Parking.** Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low-intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character. [See applicable community plan for possible relevant policies.]

**M-10.7 Parking Area Design for Stormwater Runoff.** Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.

## Bicycle, Pedestrian, and Trail Facilities

### CONTEXT

The Mobility Element recognizes that a well planned and designed multi-modal road network, complete with non-motorized travel options that include bicycle and pedestrian facilities as well as hiking, horseback riding, and mountain biking trails and pathways, offers an important alternative to motor-vehicle use. These modes of travel also reduce traffic congestion, dependency on motorized vehicles, roadway noise, and air pollution. A safe and enjoyable walk, hike, bike ride, or horseback ride experience provides many health benefits and encourages more people to walk or bicycle rather than drive their vehicles.



*Bike path in the Sweetwater Regional Park*



The California Highway Design Manual defines a "Bikeway" as a facility that is provided primarily for bicycle travel. The County Public Road Standards include provisions to allow the construction of Class I, Class II, or Class III bikeways as defined in the California Highway Design Manual, which are described below.

- (1) Class I Bikeway (Bike Path). Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- (2) Class II Bikeway (Bike Lane). Provides a striped lane for one-way bike travel on a street or highway.
- (3) Class III Bikeway (Bike Route). Provides for shared use with pedestrian or motor vehicle traffic.

SANDAG is in the process of developing a regional bicycle plan update that seeks to encourage development of a unified regional bicycle system that will serve the needs of bicycle riders by identifying the best ways to provide connections to local and regional activity centers, transit facilities, and regional trail systems. The County's Bicycle Transportation Plan, the County's near term plan for constructing bicycle facilities, is coordinated with the regional plan, and guides the development and maintenance of a bicycle network, support facilities, and other programs for the unincorporated portions of the County. Completing gaps in the bicycle network is a consideration, among other priorities as well, for allocation of funds and the inclusion of a project. Careful consideration is given when weighing the use of limited funds to build Class I Bikeways. In corridors that could be treated with Class II or Class III bicycle facilities by way of minimal investment, options that would complete bicycle networks in the near-term are pursued.

In addition to bicycle lanes and routes, the County Trails Program provides an extensive natural surface trails system that supplements the road network as an alternative off-road travel mode for County residents. Trails are primarily designed for the purpose of recreation and significantly enhancing the quality of life and health benefits associated with walking, hiking, mountain biking, and horseback riding throughout the County's varied environments. The more urban and populated communities have few accessible trails. Most of the existing trails are in the mountains and deserts, and when located within or adjacent to biological preserves are guided by ecological principles and the County's MSCP, which require mitigation of impacts to biological resources. Additional trails are needed closer to population centers in the western portion of the County to provide residents with convenient access and opportunities to enjoy the recreational, health and transportation benefits associated with these facilities. The two types of regional trail facilities are identified below.

- *Trails*, typically located away from vehicular roads, are primarily recreational in nature but can also serve as an alternative mode of transportation. They are soft-surface facilities for single or multiple uses by pedestrians, equestrians, and mountain bicyclists. Trail characteristics vary depending on location and user types.
- *Pathways* are facilities located within a parkway or road right-of-way. A riding and hiking trail located in the road right-of-way is considered a pathway. They are typically soft-surfaced facilities intended to serve both circulation and recreation purposes. Pathways help make critical connections and are an integral part of a functional trail system.



*Pathway in Blossom Valley in Lakeside*

## GOALS AND POLICIES

A regional trails map is included as Figure M-2 (Regional Trails), which identifies approved general alignment corridors for regional trails in the San Diego region. In addition, regional trails are shown on the community level maps in Figure M-A-1 through Figure M-A-23 of the Mobility Element Network Appendix. These trails have characteristics and conditions that serve a regional function by covering long linear distances, transcending community and/or municipal borders, having state, national, or historical significance, or providing important connections to existing parks, open space preserves, and other public lands. Additional



*Pine Valley trail*

existing trail segments and proposed reroutes for portions of some of the regional trails are identified in the Community Trails Master Plan (CTMP), the implementation tool for the County Trails Program.

## GOALS AND POLICIES

### GOAL M-11

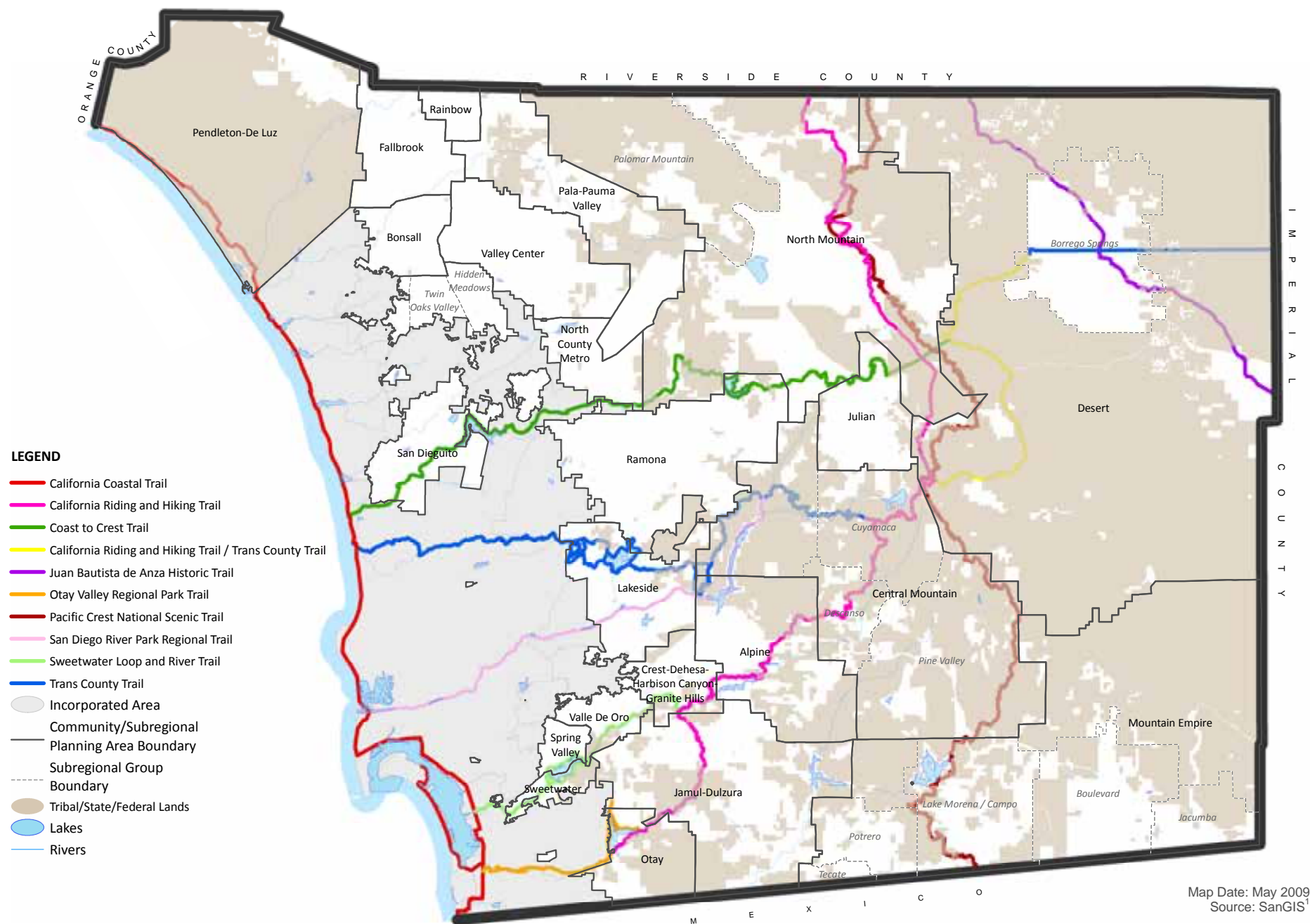
**Bicycle and Pedestrian Facilities.** Bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options as well as recreational opportunities for County residents.

*See also Goals and Policies in the Conservation and Open Space Element, Biological Resources section, which address the protection of sensitive biological resources and habitat areas.*

### Policies

- M-11.1 Bicycle Facility Design.** Support regional and community-scaled planning of pedestrian and bicycle networks.
- M-11.2 Bicycle and Pedestrian Facilities in Development.** Require development and Town Center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.
- M-11.3 Bicycle Facilities on Roads Designated in the Mobility Element.** Maximize the provision of bicycle facilities on County Mobility Element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.
- M-11.4 Pedestrian and Bicycle Network Connectivity.** Require development in Villages and Rural Villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and countywide networks.





## REGIONAL TRAILS PLAN

San Diego County General Plan

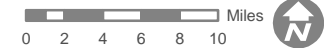


Figure M-2

## GOALS AND POLICIES

### M-11.5 Funding for Bicycle Network Improvements.

Seek outside funding opportunities for bicycle and pedestrian network improvement projects, particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, park-and-ride facilities, and major transit stops.



*Bike lane in shoulder of Old Highway 80 in the Central Mountain Subregion*

### M-11.6 Coordination for Bicycle and Pedestrian Facility Connectivity.

Coordinate with Caltrans to provide alternate connections for past, existing, or planned bicycle and pedestrian routes that were or would be severed by State freeway and highway projects that intersect pathways or divide communities.

*Caltrans endeavors to provide safe mobility for all users, including bicyclists, pedestrians, transit riders, and motorists appropriate to the function and context of the facility. Caltrans is committed to working with the County to complete bicycle and pedestrian facilities.*

**M-11.7 Bicycle and Pedestrian Facility Design.** Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

**M-11.8 Coordination with the County Trails Program.** Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways.

## GOAL M-12

**County Trails Program.** A safe, scenic, interconnected, and enjoyable non-motorized multi-use trail system developed, managed, and maintained according to the County Trails Program, Regional Trails Plan, and the Community Trails Master Plan.

### Policies

**M-12.1 County Trails System.** Implement a County Trails Program by developing the designated trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan.

**M-12.2 Trail Variety.** Provide and expand the variety of trail experiences that provide recreational opportunities to all residents of the unincorporated County, including urban/suburban, rural, wilderness, multi-use, staging areas, and support facilities.

**M-12.3 Trail Planning.** Encourage trail planning, acquisition, development, and management with other public agencies that have ownership or jurisdiction within or adjacent to the County.

**M-12.4 Land Dedication for Trails.** Require development projects to dedicate and improve trails or pathways where the development will occur on land planned for trail or pathway segments shown on the Regional Trails Plan or Community Trails Master Plan.

**M-12.5 Future Trails.** Explore opportunities to designate or construct future trails on County-owned lands, lands within the Multiple Species Conservation Program (MSCP), or other lands already under public ownership or proposed for public acquisition.



- M-12.6 Trail Easements, Dedications, and Joint-Use Agreements.** Promote trail opportunities by obtaining easements, dedications, license agreements, or joint-use agreements from other government agencies and public and semi-public agencies.
- M-12.7 Funding for Trails.** Seek funding opportunities for trail acquisition, implementation, maintenance and operation.
- M-12.8 Trails on Private Lands.** Maximize opportunities that are fair and reasonable to secure trail routes across private property, agricultural and grazing lands, from willing property owners.
- M-12.9 Environmental and Agricultural Resources.** Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors, and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.
- M-12.10 Recreational and Educational Resources.** Design trail routes that meet a public need and highlight the County's biological, recreational and educational resources, including natural, scenic, cultural, and historic resources.

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## Background Material

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### Level of Service

Level of service (LOS), a qualitative measure describing operational conditions within a traffic stream and the motorists' perceptions of those conditions, provides a measure of how well a road is able to meet the demands or volume of traffic. The capacity threshold of a road is the maximum number of vehicles that can traverse a uniform section of road within a specified timeframe. Road capacity for County roads is measured according to average daily traffic (ADT), while State facilities are measured according to Caltrans criteria based on peak-hour volumes that a roadway could accommodate.



*San Dieguito Trail*

Six LOS capacity thresholds are defined for each type of roadway, with letters A through F used to establish the LOS measure. Criteria for each LOS threshold include: speed, travel time, freedom to maneuver, traffic interruptions, comfort, convenience, and safety. For example, LOS A represents free flow, almost complete freedom to maneuver within the traffic stream. LOS F represents forced flow where more vehicles are attempting to use the road facility than can be served resulting in stop and go traffic. Table M-3 (Level of Service Descriptions) provides definitions for the various LOS categories based upon typical peak traffic periods. LOS D is the standard to maintain for Mobility Element roads, unless the criteria presented in Policy M-2.1 preclude improving roads beyond LOS E/F.



Table M-3 Level of Service Descriptions	
LOS	Description
A	This LOS represents a completely free-flow conditions, where the operation of vehicles is virtually unaffected by the presence of other vehicles and only constrained by the geometric features of the highway and by driver preferences.
B	This LOS represents a relatively free-flow condition, although the presence of other vehicles becomes noticeable. Average travel speeds are the same as in LOS A, but drivers have slightly less freedom to maneuver.
C	At this LOS the influence of traffic density on operations becomes marked. The ability to maneuver within the traffic stream is clearly affected by other vehicles.
D	At this LOS, the ability to maneuver is notably restricted due to traffic congestion, and only minor disruptions can be absorbed without extensive queues forming and the service deteriorating.
E	This LOS represents operations at or near capacity. LOS E is an unstable level, with vehicles operating with minimum spacing for maintaining uniform flow. At LOS E, disruptions cannot be dissipated readily thus causing deterioration down to LOS F.
F	At this LOS, forced or breakdown of traffic flow occurs, although operations appear to be at capacity, queues forms behind these breakdowns. Operations within queues are highly unstable, with vehicles experiencing brief periods of movement followed by stoppages.

SOURCE: Highway Capacity Manual, 2000

The LOS for operating on State highways is based upon Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained.



SANDAG and the County elected to be exempt from the State Congestion Management Plan (CMP) program, which includes selected freeways, state highways, and regional arterials in the County. Existing CMP monitoring, threshold levels, guidelines and mitigation strategies will be incorporated into other SANDAG plans and/or programs as a result.

## Accepted Road Classifications with Level of Service E / F

As described under Goal M-2, there are instances where the County considers it more appropriate to retain a road classification that could result in a LOS E / F rather than increase the number of travel lanes. These instances are based on criteria established under Policy M-2.1. Table M-4 (Road Segments Where Adding Travel Lanes is Not Justified) identifies the County segment where the County has determined that the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity.

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	Classification	From	To
<b>State Highways<sup>a</sup></b>			
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 <sup>th</sup> Street (Ramona)	Pine Street/SR-78 (Ramona)
SR-76/Pala Rd. <sup>b</sup>	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)
<b>County Mobility Element Roads</b>			
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)

## BACKGROUND MATERIAL

<b>Table M-4 Road Segments Where Adding Travel Lanes is Not Justified</b>			
<b>Road</b>	<b>Classification</b>	<b>From</b>	<b>To</b>
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)



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	Elkelton 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 <sup>th</sup> 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)	Karibu Ln. (Valley Center)
Woodside Ave.	4.2A Boulevard w/ Raised Median	SR-67 NB Off Ramp (Lakeside)	Riverford Rd. (Lakeside)

- a. The cross-sections for State Highway reflect the design in the Project Authorization/Environmental Document (PA/ED), which are different from those of the County Mobility Element road classifications.
- b. Roads noted are on the Congestion Management Program (CMP). Acceptable LOS for roads on the CMP is LOS E or better.