

LETTER

RESPONSE



Letter A7

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www.sandag.org

July 28, 2014

File Number 3330300

Mr. Mark Slovick
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Dear Mr. Slovick:

SUBJECT: SANDAG Comments on Lilac Hills Ranch Revised Environmental Impact Report

Thank you for the opportunity to comment on the Lilac Hills Ranch project. SANDAG previously provided a comment letter dated August 19, 2013, on the Lilac Hills Ranch Master Planned Community Specific Plan, Draft Environmental Impact Report, and General Plan Amendment for this project. **Please note that the comments herein have not changed substantially since then, and express largely the same concerns and recommendations.**

Our comments are based on policies included in the Regional Comprehensive Plan (RCP), 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 project consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program.

SANDAG has the following comments regarding the Lilac Hills Ranch Lilac Hills Ranch Revised Environmental Impact Report (REIR):

Please take into consideration consistency with guiding plans for the region. In 2011, SANDAG supported the vision and goals of the San Diego County General Plan Update, which shifted "20 percent of future growth from eastern backcountry areas to western communities...reflect[ing] the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting natural resources and protection of existing community character in its extensive rural and semi-rural communities."

A7-1

A7-2

A7-3

A7-1

The County acknowledges receipt of the August 19, 2013 comment letter and that the 2013 comments and 2014 comments are substantially similar. Please see the County's responses to the 2013 comments, included as an attachment to this letter.

A7-2

The comment is an introduction to comments that follow, and expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

A7-3

It should also be noted that SANDAG's SCS, including the forecasted development pattern, is not intended to regulate the use of land, as explicitly provided by the California Legislature when enacting SB 375. Rather, pursuant to Government Code section 65080(b)(2)(K), the SCS does not regulate the use of land; does not supersede the exercise of the land use authority of cities and counties within its region; and, does not require that a city's or county's land use policies and regulations, including its general plan, be consistent with it. SANDAG is required to update its planning documents every four years based upon the local jurisdiction's adopted general plan. Therefore, the county has the authority to approve this project if it determines appropriate and the project would be incorporated into the next updated SANDAG SCS.

Additional information was added to subchapter 3.1.4.1 of the Final EIR, to include a project consistency analysis with relevant policies of SANDAG's Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS). Information was also added to subchapter 3.1.4.1 pertaining to the Regional Comprehensive Plan (RCP) adopted by the SANDAG Board of Directors in 2004, which serves as a blueprint for the region's future growth and development. SANDAG is currently working on an effort to merge the RCP with the 2050 RTP and the SCS. This effort is known as San Diego Forward: The Regional Plan and is scheduled for adoption in 2015. As explained in subchapter 3.1.4.1, the project would not be in conflict with the objectives of the 2050 RTP/SCS and RCP. Potential impacts associated with plans or policies would thus be less than significant.

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	<p>A7-3 (cont.)</p> <p>Although the commenter is correct in that the General Plan has directed growth to certain areas within the County, General Plan Policy LU-1.2 provides for the establishment of new villages that were not included in the General Plan when it was adopted in 2011. The General Plan allows for future amendments to the Land Use Map and Regional Categories Map and is intended to be a dynamic document and provides that amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public, health, safety, and welfare. (General Plan, page 1-15). The project is amending the General Plan by adding a new Village that meets the criteria of Policy LU-1.2. The project is a new Village whose structure, design and function are based on the Community Development Model. (FEIR, subchapter 3.1.4.2, Land Use Planning, p. 3-87-89; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G, pp. II-38-40.)</p> <p>Actual development in any city or county is a result of market forces, population growth (including birth rates and immigration) as well as physical constraints, availability of resources and other federal , state and local regulations. The County has only limited control over growth and cannot control external factors such as market demands and the intent of individual property owners, businesses and citizens. While population growth and associated development through the horizon year of the General Plan can be considered reasonably foreseeable, the County's population forecast is regional in scale and potential development on any particular parcel can not be certain at a general plan level. (See General Plan Update FEIR, Chapter 1.0, pp 1-17 and 1-20, which pages are incorporated herein by reference.) Thus it is reasonably anticipated that as the General Plan is amended over time, housing forecasts can be adjusted appropriately. The 2050 RTP/SCS also contemplates that implementing the RTP/SCS will require close collaboration among and between SANDAG, local jurisdictions, member agencies and regional stakeholders. It is anticipated that with each RTP (every four years) amendments would be made to reflect current conditions and new opportunities to help reduce GHG emissions.</p>
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<p>SANDAG supports the goals and objectives that are currently laid out in the 2011 San Diego County General Plan, as it encourages smart, sustainable growth and reinforces the principles set forth in the Regional Comprehensive Plan (RCP). In evaluating the environmental impacts of the Lilac Hill Ranch project, please consider whether this project is consistent with the goals of the San Diego County General Plan and of the RCP.</p> <p>The County of San Diego has not identified this area on the SANDAG Smart Growth Concept Map (SGCM) as an opportunity area for smart growth. Although the County of San Diego has identified a number of smart growth opportunity areas on the Smart Growth Concept Map (mostly Rural Villages with an average density of 10.9 du/ac) in the unincorporated area, the Lilac Hills Ranch project proposes to add density in an area not currently on the SGCM. Smart growth opportunity areas are identified by County planning staff as areas that have either existing or future plans to accommodate additional growth, and help to guide an overall strategy for sustainable development in our region by supporting the goals of the RCP and encouraging growth to occur compactly in areas where there is existing and planned transportation infrastructure and other public services. Please make sure to coordinate with SANDAG on future updates of the SGCM to ensure that the map accurately reflects the County's vision for future growth.</p> <p>The density proposed in this project was not included in the Series 13 Growth Forecast prepared for San Diego Forward: The Regional Plan. The growth forecast is used to project where growth will occur in the region from the present to 2050, and helps guide the development of the regional transportation network. Since the land use inputs for the forecast are based on local planning documents, the current growth forecast (Series 13) is reflective of the land uses laid out by the 2011 adopted County General Plan, which did not account for the proposed project. Please coordinate with SANDAG on the next Regional Growth Forecast to support the continuing development of our region's transportation network.</p> <p>Please consider how the proposed project will connect to the regional transit network and nearby communities, especially for the expected senior residents. Currently, there are no planned transit services identified in the adopted 2050 RTP/SCS for the proposed project area. Since the project includes senior housing and assisted living (including facilities for memory-impaired patients), it is important to ensure that these residents (many of whom may not have access to private vehicles) will have access to transit. While paratransit services can often help alleviate transit needs in areas not served by local buses, ADA paratransit pick-up locations are required to be within a ¼-mile distance from a transit stop or station. The proposed project is currently outside of the ¼-mile Americans with Disabilities Act (ADA) paratransit boundary and may be ineligible for such services.</p> <p>Please consider strategies to provide Senior and ADA mobility options to potential future residents. SANDAG transit planning staff is available as a resource to learn more about paratransit programs in the region. SANDAG also encourages coordination with North County Transit District (NCTD), Riverside County Transportation Commission (RCTC), and Riverside Transit Authority (RTA) regarding existing and planned transit service.</p> <p>Please consider TDM strategies to address cumulative impacts to local roads and freeway facilities. Due to the size of this project, please consider developing a TDM plan. Although efforts have been made to create a pedestrian friendly and mixed-use environment to reduce the need for auto travel within the development, motorized travel will still be heavily relied upon to reach</p>	<p>A7-4 cont.</p> <p>A7-4</p> <p>A7-5</p> <p>A7-6</p> <p>A7-7</p> <p>A7-8</p> <p>A7-4</p> <p>The comment is noted. The project is not subject to SANDAG's SGCM, however, in the event the County of San Diego approves the proposed General Plan Amendment (GPA), the County will coordinate with SANDAG on future updates of the SGCM to ensure that the map accurately reflects the County's vision for future growth.</p> <p>Please see Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for additional information responsive to this comment.</p> <p>A7-5</p> <p>The comment is noted. In the event the County of San Diego approves the proposed General Plan Amendment (GPA), the County will coordinate with SANDAG on the next Regional Growth Forecast to support the continuing development of our region's transportation network. Please also see Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W for additional information responsive to this comment.</p> <p>A7-6</p> <p>Portions of the project site would be located approximately one-quarter mile from the I-15 corridor. To facilitate resident access to I-15 transit services and Transportation Demand Management facilities, the project would provide project residents, including seniors, with an interim private on-demand transit service to nearby transit hubs at build-out of the project. (See Lilac Hills Ranch Specific Plan (June 2014) Section III, Development Standards and Regulations (Specific Plan), pp. III-11 to III-12.) This privately operated transit service would be funded through homeowner association (HOA) fees, would be available to all project residents, and would provide residents with a connection between the project site and nearby transit hubs.</p> <p>The service would operate on an as-needed basis, with pick-ups and drop-offs scheduled at a central location within the project site, such as the Town Center or community park-and-ride area. The service would be provided upon build-out of the community and would terminate when transit is provided by the local transit district.</p>
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	<p>A7-6 (cont.)</p> <p>The service could be supplemented by providing subsidized transit passes, and/or providing coordination/support of a car-sharing system or shuttle services with volunteer drivers similar to the designated drivers sponsored by the Independent Transportation Network.</p> <p>Additional opportunities for transit are discussed in FEIR subchapter 1.2.1.4. As the project is built out, the NCTD may adjust routes and services to meet the needs of the growing community. The project would allocate a site for a transit stop within the Town Center.</p> <p>A7-7</p> <p>The County concurs the project should provide senior and ADA mobility options. As noted in response to comment A7-6, the project proposes to provide a private on-demand transit service that would be available to all project residents, including senior and ADA mobility residents. The comment regarding the availability of SANDAG transit planning staff as a resource regarding paratransit programs is noted.</p> <p>A7-8</p> <p>As part of the Specific Plan, resolution of approval, the TDM program will be a condition of approval. To reduce the number of vehicle trips generated by the proposed project, the project includes a requirement that a TDM program be implemented to foster alternative modes of transportation. (Specific Plan, pp. III-11 to III-12; see also FEIR Table 1-3, Additional Project Design Considerations.) As detailed in the Specific Plan, the TDM is to include the following aspects:</p> <ul style="list-style-type: none"> • Implement a ride-share program with transit vouchers or other options that may be determined by the HOA. • Implement bicycle circulation improvements to improve internal bicycle circulation and encourage the usage of bicycles to include requiring provision of bicycle parking facilities, including the secured bicycle parking facilities in specific locations as specified in this Specific Plan. • Promote carpool/vanpool programs, which may include a senior transportation service. • Promote available websites providing transportation options for residents and businesses. • Create and distribute a "new resident" information packet addressing alternative modes of transportation.
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<p>destinations beyond village boundaries. Additionally, the commercial uses identified in the REIR are not proposed until Phase 2 of the development, which will require residents to travel off-site for all services with no options other than auto travel. TDM measures to consider for the development include:</p> <ul style="list-style-type: none"> • Subsidized transit passes for tenants • Shuttle service to commercial areas and to the Escondido transit center • Promotion of iCommute services (Ridematching, Vanpool Program, Guaranteed Road Home, SchoolPool, etc.) for tenants <p>The SANDAG iCommute program can provide input on the development and implementation of a TDM plan that can assist future residents and employees with reducing both commute and non-commute single occupancy vehicle trips.</p> <p>Although bicycle and pedestrian facilities have been included in the project, bicycle parking and other supportive amenities can further support multi-modal transportation.</p> <p>The number of parking spaces available suggests that the development will be auto-oriented. Please consider parking strategies that can reduce auto travel demand. Please refer to the SANDAG publication Parking Strategies for Smart Growth.</p> <p>SANDAG also advises coordination with the RCTC and RTA to determine whether inter-regional transportation solutions and/or services may be available.</p> <p>Existing transit services and TDM facilities that may provide opportunities for coordination include:</p> <ul style="list-style-type: none"> • RTA Route 217 commuter express service between Hemet, Temecula and Escondido • RTA Route 202 commuter express service between Temecula and the Oceanside Transit Center, existing Interstate 15 (I-15) at State Route 76 (SR 76); Route 202 makes a stop at the Park and Ride Lot located at the Nessie's Burgers • The Caltrans operated Park and Ride located at I-15 and Gopher Canyon Road <p>Traffic Impact Study</p> <p>Section 1, Figure 1-2: The project location is not within a designated Smart Growth Opportunity Area and needs to strongly consider alternatives to vehicular travel; otherwise, the project will significantly impact the transportation network. Please coordinate efforts with NCTD and Metropolitan Transit System regarding potential transit/shuttle services. The Route 610 peak period service is phased for the year 2018 within the 2050 RTP/SCS; coordination with this service should be considered.</p> <p>Section 2 Analysis Methodology, 2.7 Ramp Metering Analysis, Page 22: The San Diego region opted out of the California state Congestion Management Program in October 2009. Please refer to Technical Appendix 20 of the 2050 RTP which provides the federal Congestion Management Process; and please refer to the Regional Transportation Multimodal Analysis and update all components of the Traffic Impact Study (TIS) accordingly.</p>	<ul style="list-style-type: none"> • Promote programs to encourage workplace peak hour trip reduction, including staggered work hours, regional ride-matching services, and tele-commuting. • When transit routes are extended to the community, participate in providing the necessary transit facilities, such as bus pads, shelters, signs, lighting, and trash receptacles. • Coordinate with NCTD as to the future sighting of transit stops/stations within the project site. As the project is built-out, the NCTD may adjust routes and services to meet the needs of the growing community. The project would allocate a site for public transportation within the Town Center. The applicants will continue to coordinate with NCTD and MTS regarding potential transit options for the project site. <p>(Specific Plan, pp. III-11 to III-12.) In addition, as described in response to comment A7-6 above, an interim private transit service that would provide transit connections between the community and the transit center would be provided upon build-out of the community.</p> <p>A7-9 As part of the TDM program, the project would implement bicycle circulation improvements to improve internal bicycle circulation and encourage the use of bicycles, and also provide secured bicycle parking facilities as specified in the Specific Plan. (See Specific Plan, p. III-11.) With respect to vehicle parking, the comment that the development will be "auto-oriented" is incorrect. The project is designed to meet the minimum standards for parking pursuant the County Zoning Ordinance and the County's Parking Manual. In addition, on-street parking provided in the town center is a traffic calming method which increases pedestrian safety.</p> <p>Most streets in new projects allow on-street parking. On-street parking is known to slow passing vehicular traffic and parked vehicles also serve to establish a buffer between the moving vehicles and pedestrians. On-street parking along one or more sides of the street, usually parallel parking, is the normal street condition. On-street parking serves to both slow the adjacent vehicular traffic and to provide a buffer between the non-motorist and the motorist. The beneficial aspects of on-street parking are also generally recognized: "[o]n-street auto parking is permitted and provided for along many of the best streets, far more than where there is [no on-street parking]..."(Quoted from Jacobs, Allan B. <i>Great Streets</i>.</p>
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	<p>A7-9 (cont.)</p> <p>Cambridge, MA Massachusetts Institute of Technology. 1993, pg. 306, which page is incorporated by reference.) The Lilac Hills Ranch Specific Plan design objectives for creating the Town Center include "create a pedestrian friendly environment with activity, enclosure, and comfort in specific areas," and "balance parking and vehicle access needs of commercial uses with the pedestrian focus within the village." (Specific Plan, III-31.) The Specific Plan also includes Site Planning and Building Orientation, which states the following:</p> <ul style="list-style-type: none">i. Wherever possible, parking should be of secondary priority within the Town Center. The paramount goal is the coherence of the Town Center as the heart and soul of the Community serving both commercial and cultural needs. Buildings aid in the reading and understanding of the Town Center as a viable urban village form.ii. Parking (except for on street parking), service, and utilitarian uses should be located internally to the sites or where they can be screened from public view. <p>The Specific Plan further explains that "one of the more important aspects of the planning for Lilac Hills Ranch was to prioritize pedestrian activity. Pedestrian safety is essential to achieving this goal and that requires multiple approaches to traffic calming. The community has implemented traffic calming features including: roadway design (such as roundabouts, one-way streets and slightly curved streets), road features (such as bulb-outs and on-street parking) and landscaping (such as landscaping areas for trees to be planted close to the curb) to cause automobile drivers to reduce their travel speeds without resorting to less effective measures (such as speed bumps or posted speed limits)." (Specific Plan, III-3 to III-4.</p> <p>Thus, parking will be provided, in part, as a traffic calming measure intended to facilitate pedestrian (i.e., non-auto) activity. Parking also is provided on-site in conjunction with each proposed land use consistent with County parking standards. As to additional strategies to reduce auto travel demand, please see Responses to Comments A7-6 and A7-8 regarding the interim on-demand transit service, and TDM program.</p>
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	<p>A7-10 As noted in response to comment A7-6 above, the project would include an interim private transit service to transport residents to existing transit centers. In addition, as the comment suggests, the County will coordinate with RCTC and RTA to determine whether inter-regional transportation solutions and/or services may be available.</p> <p>A7-11 As noted above in responses to comments A7-6 and A7-8, the proposed project would include interim transit services and a TDM program to facilitate resident use of alternatives to vehicular travel. In implementing these programs, efforts will be coordinated with NCTD and the Metropolitan Transit System in the provision of transit/shuttle services.</p> <p>A7-12 The ramp metering analysis was conducted using the SANTEC/ITE guidelines; however, the 2008 Congestion Management Program was the latest document that cited the ramp metering analysis methodology. In response to the comment, the TIS will be revised to clarify that the ramp metering analysis was conducted based upon the SANTEC/ITE guidelines.</p>
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All intersection and facility impacts to SR 76 and I-15 should be coordinated with Caltrans District 11, including fair share contributions. Please also coordinate with the RCTC as necessary on significant and unmitigable impacts that cross the Riverside County boundary.

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Natural Environment and Resources

Please coordinate with SANDAG on any adjacent land acquired through the Environmental Mitigation Program. SANDAG recorded a conservation easement over 902-acres of land as part of an open space preserve near the proposed project (see Road 3 of the TIS), and should be consulted appropriately regarding impacts to this property.

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Lastly, please provide the timing of the five phases of development. SANDAG would appreciate a description of the intended timing for each phase of the proposed development, to the extent feasible.

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Again, we appreciate the opportunity to comment on the REIR for the proposed Lilac Hills Ranch project. We encourage the County of San Diego, where appropriate, to consider the following tools in evaluating this update based on the following SANDAG publications, which can be found on our website at www.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 EIRs
- (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

A7-16

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

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

SBA/SST/fwe

A7-13 The County coordinated preparation of the TIS with Caltrans District 11 and continues to coordinate with Caltrans. As to coordination with RCTC, the TIS did not identify significant impacts within Riverside County and, therefore, coordination with RCTC is not necessary. With respect to fair-share contributions, please see Global Response: I-15 Mitigation Infeasible, for information regarding the subject.

A7-14 The comment is noted. The County will coordinate with SANDAG as requested.

A7-15 The approximate timing for each phase of the proposed development is provided in Chapter 4 of the project TIS. Specific phasing, as well as the construction timeline, depends on numerous factors, including the date of project approval, market demand, and other factors.

A7-16 The comment is noted; the County will consider the referenced documents as necessary. No further response is required. As contained within the Specific Plan, Section(s) III.N (Green Building Standards); Section V (General Plan Conformance); and the EIR Appendix "W", the project has considered and implemented many smart growth tools, including:

1. Sustainable Site Design
2. Compact community design
3. Mixed Use zoning
4. Vehicle Miles Travelled (VMT) reductions
5. Traffic Demand Management Plans
6. An integrated pedestrian trail system
7. Complete Streets
8. Transit opportunities
9. Shared Parking Planning
10. Integrated Bike Planning



Letter A7a

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August 19, 2013

File Number 3330300

Mr. Mark Slovick
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Dear Mr. Slovick:

SUBJECT: San Diego Association of Governments Comments on Lilac Hills Ranch Master Planned Community Specific Plan, Draft Environmental Impact Report, and General Plan Amendment

Thank you for the opportunity to comment on Lilac Hills Ranch project. The San Diego Association of Governments (SANDAG) previously provided a Comment Letter dated July 27, 2012, on the Notice of Preparation for this project.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP), the 2050 Regional Transportation Plan (2050 RTP) and its Sustainable Communities Strategy (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 and SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the project consider the needs of motorists, transit riders, pedestrians, and bicyclists and the implementation of a robust Transportation Demand Management (TDM) Program.

SANDAG has the following comments regarding the Lilac Hills Ranch Master Planned Community Draft Environmental Impact Report, Master Planned Community Specific Plan, and General Plan Amendment.

1. Although the County of San Diego has identified a number of smart growth areas (mostly Rural Villages with an average density of 10.9 du/ac) in the unincorporated area, this project is not identified on the Smart Growth Concept Map as a Smart Growth Opportunity Area. The County should evaluate this project and find it consistent with the goals and principles in its general plan (which SANDAG supported) and the 2050 Regional Transportation Plan and Sustainable Communities Strategy (2050 RTP/SCS and in the RCP. The density proposed in this

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A7a-1 The comment provides introductory comments to the letter. The commenter's opinion and discussion of project concerns is acknowledged and included in the project's FEIR for the decision makers to consider.

A7a-2 See response to comment A7-8.

A7a-3 The County acknowledges that the density proposed in this project was not identified on the Smart Growth Concept Map as a Smart Growth Opportunity Area. The County also acknowledges the project was not included in the 2050 Regional Growth Forecast associated with the 2050 RTP/SCS. The project proposes a General Plan Amendment pursuant to the restrictions included in General Plan Land Use Policy LU-1.2. Please see global response: General Plan Consistency with Land Use Policy LU-1.2.

MEMBER AGENCIES

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<p>project was not included in the 2050 Regional Growth Forecast associated with the 2050 RTP/SCS. The 2050 Regional Growth Forecast included the land use inputs that are consistent with the adopted County General Plan.</p> <p>2. The project should address how it will connect to the regional transit network and nearby communities. Since the development includes senior housing and assisted living, it will be important to ensure that these residents (many of whom may not have access to vehicles) will have access to transit. Please coordinate with North County Transit District regarding existing and planned transit service.</p> <p>3. Transportation and Traffic: The project should indicate how cumulative impacts to local roads and freeway facilities will be addressed. Due to the size of this project, please consider developing a TDM plan. Although efforts have been made to create a pedestrian friendly and mixed-use environment that reduces the need for auto travel within the development, motorized travel will still be heavily relied upon to reach other destinations beyond village boundaries. Also, the commercial uses are not proposed until Phase 2 of the development requiring residents to go off-site for all services with no options other than auto travel. TDM measures to consider for the development include:</p> <ul style="list-style-type: none"> o Subsidized transit passes for tenants o Shuttle service to commercial areas and to the Escondido transit center o Promotion of iCommute services (Ridematching, Vanpool Program, Guaranteed Ride Home, SchoolPool, etc.) for tenants. <p>Please note that the 2050 RTP/SCS does not include investments in transit to serve this community. The SANDAG iCommute program can provide input on the development and implementation of a TDM plan that can assist future residents and employees with reducing both commute and non-commute single occupancy vehicle trips.</p> <p>Although bicycle and pedestrian facilities have been included, bicycle parking and other supportive amenities have not been addressed.</p> <p>The number of parking spaces available suggests that the development will be auto-oriented. Please consider parking strategies that can reduce auto travel demand. Please refer to the SANDAG publication <i>Parking Strategies for Smart Growth</i>.</p> <p>Lilac Hills Traffic Impact Study</p> <p>Section 1, Figure 1-2: The project location is not within a designated Smart Growth Area and needs to strongly consider alternatives to vehicular travel; otherwise the project will significantly impact the transportation network. Please coordinate efforts with North County Transit District and Metropolitan Transit System regarding potential transit/shuttle services. The Route 610 peak period service is phased for the year 2018 within the 2050 RTP, coordination with this service should be considered.</p>	<p>A7a-3 cont.</p> <p>A7a-4 Please see response to comments A7-6 and A7-7.</p> <p>A7a-5 Please see response to comment A7-8.</p> <p>A7a-6 Please see response to comment A7-8.</p> <p>A7a-7 Please see response to comment A7-9.</p> <p>A7a-8 Please see response to comment A7-9.</p> <p>A7a-9 Please see response to comment A7-11.</p>
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Section 2.0 Analysis Methodology, Page 7: The San Diego region opted out of the California state Congestion Management Program in October 2009. Please refer to Technical Appendix 20 of the 2050 RTP which provides the federal Congestion Management Process; and please refer to the Regional Transportation Multimodal Analysis and update all components of the TIS accordingly.

A7a-10

The study states that no ramp metering analysis is justified. Please provide justification. Please also provide the timing of the five phases of development.

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Please coordinate all intersection and facility impacts to State Route 76 and Interstate 15 with Caltrans District 11, including fair share contributions.

A7a-12

Again, we appreciate the opportunity to comment on Lilac Hills Ranch Master Planned Community Specific Plan and Traffic Impact Study. We also encourage the County of San Diego, where appropriate, to consider the following tools in evaluating this update based on the following SANDAG publications, which can be found on our Web site at www.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 EIRs*
- (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*

A7a-13

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

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

SBA/bga

A7a-10 Please see response to comment A7-12.

A7a-11 All ramps within the study area are currently unmetered; therefore, it was not possible to provide ramp metering analysis. The agency with jurisdiction, Caltrans, will determine when and if ramp meters would be installed in the future.

A7a-12 Please see response to comment A7-13.

A7a-13 Please see response to comment A7-16.