



June 15, 2015

File Number 3330300

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Ms. Beth Ehsan
County of San Diego
Planning and Development Services
Project Processing Counter
5510 Overland Ave, Suite 110
San Diego, CA, 92123

Dear Ms. Ehsan:

SUBJECT: Comments on PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2013-STP-13-003, PDS2014-MUP-019, HLP XX-XXX, LOG NO. PDS2013-ER-13-08-002; SCH NO. 2013061042 Valiano Specific Plan.

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 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:

Multimodal Transportation Options

Given the project's proximity to the Nordahl transit station to the North and the Escondido Transit Center to the East, SANDAG suggests that the project roadways consider including pedestrian and bicycle facilities to help support multi-modal access to such transit amenities. By 2050, the Escondido Transit Center will continue to grow as one of the region's main transit centers.

Transportation Demand Management

In considering mitigation for regional transportation impacts that result from the Valiano Specific Plan, please also consider promoting available TDM programs and services to residents such as the Regional Vanpool Program, online ride-matching, Park & Ride facilities and Guaranteed Ride Home. Information on these programs can be accessed through

D-1

D-2

D-3

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- San Diego County Water Authority
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- Mexico

D-1

SANDAG's 2014 publication, Smart Growth in the San Diego Region, which was developed with the Smart Growth Concept Map as part of the implementation of SANDAG's 2004 publication, *Regional Comprehensive Plan*, defines smart growth as:

"...a compact, efficient, and environmentally-sensitive urban development pattern. It focuses future growth and infill development close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources. Smart growth is characterized by more compact, higher density development in key areas throughout the region that is walkable, near public transit, and promotes good community design. Smart growth results in more housing and transportation choices for those who live and work in smart growth areas."

The Project would represent infill development between the Village Residential, Semi-Rural Residential and mixed uses of Harmony Grove Village, and the urban development of the surrounding cities of Escondido and San Marcos. The Specific Plan area is near four Smart Growth Opportunity Areas (SGOA) identified in the SANDAG Smart Growth Concept Map – North County, including within approximately 1 mile of ES-8 (Potential Special Use Center associated with the SPRINTER Station and the Escondido Research and Technology Center [ERTC]), and within approximately 3 miles of ES-2 (Mixed-Use Transit Corridor along Mission Road), SM-2 (California State University, San Marcos Campus), and SM-1 (District mixed-use area [a Town Center]). The Project's location is consistent with regional plans to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure. The Project is also located near the 2035 Potential Transit Priority Project Areas that run along Citracado Parkway and the SPRINTER line. While the Project is not located within the "walkable" 0.25 to 0.5 buffer zone of a transit hub that defines a SGOA, it would place residences within a very short commute of nearby employment centers, thus reinforcing and complementing the local economy on a sustainable basis. In addition, the farthest Project

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- D-1
cont. site ingress/egress at the southern end of Neighborhood 5 is within approximately 2 miles driving distance of the Nordahl SPRINTER rail station (which links to the COASTER rail and BREEZE buses). Placing infill residential uses near transportation, employment, shopping and service centers would help minimize travel times and vehicle miles traveled (VMT) by comparison with developments in more distant areas, and would be consistent with the goals of the RCP, 2050 RTP/SCS, County General Plan Housing Element, and Senate Bill (SB) 375 regarding greenhouse gas reduction.
- The Project also proposes a trail network to encourage non-vehicular forms of mobility to reduce emissions and promote health. The Project traffic analysis addresses the potential for significant hazards to pedestrians, bicyclists or equestrians, per County significance guidelines.
- D-2 The comment indicates that the Project should consider pedestrian and bicycle facilities to help support multi-modal access to transit amenities such as Nordahl transit station. The Project would add a sidewalk on the north side of Country Club Drive and a decomposed granite (DG) pathway on the south side between the existing industrial park and Auto Parkway to facilitate pedestrian access to the transit centers, employment opportunities, and other activities. In addition, due the proximity of the site to the Nordahl and Escondido transit hubs, Project residents are likely to take advantage of the park-and-ride facilities at these locations to use the SPRINTER, COASTER and BREEZE transit services, thus reducing regional VMT. The Project also proposes a system of public and private trails and pathways for pedestrians, bicyclists, and equestrian users within the Project site, as described in Subsection 1.2.1.2 of the EIR.
- D-3 The comment indicates that in considering mitigation for regional transportation impacts, the Project should promote available TDM programs and services. The Project has been and will continue to be marketed to the public as being located in close proximity to employment, shopping and transit infrastructure, including the park-and-ride facilities at the Escondido Transit Center and the Nordahl SPRINTER station, thus attracting future residents who would be likely to use TDM programs and these transit hubs.

D-3
cont.

iCommuteSD.com, and the SANDAG TDM division can assist with the integration of these measures as part of this project.

Other Considerations

We appreciate the opportunity to comment on the Valiano Specific Plan and related documents.

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):

D-4a
D-4b
D-4c
D-4d
D-4e
D-4f
D-4g

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. SANDAG staff is available to meet with City staff and/or the project applicant to discuss our comments in more detail.

Sincerely,



SUSAN BALDWIN
Senior Regional Planner

D-4a

The comment encourages the use of *Designing for Smart Growth, Creating Great Places in the San Diego Region and Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region* when evaluating the Project. The 10 major Smart Growth design elements discussed in *Designing for Smart Growth, Creating Great Places in the San Diego Region* were considered and incorporated into the Project design, where feasible, as discussed below. These elements are: Mixed Land Uses; Compact Development; Range of Housing Opportunities; Open Space and Farmland Preservation; Development in Existing Communities; Walkable and Bikeable Neighborhoods; Distinctive, Attractive Communities; Transportation Choices; Predictable Development Decisions; and Community and Stakeholder Collaboration

Mixed Land Uses

The Project places residential development in close proximity to stores, offices, employment centers, hospitals, and residences (i.e., the cities of Escondido and San Marcos, as well as the Harmony Grove Village commercial core).

Compact Development

The Project is designed in a compact manner, to allow over 60 percent of the Specific Plan Area to be preserved as open space and for recreation.

Range of Housing Opportunities

The Project includes a variety of housing types, densities and levels of affordability (e.g., conventional lots, as well as detached condominiums (courtyard homes), with average lot sizes ranging from 8,300 square feet (s.f.) to 17,200 s.f. to meet the needs of families, singles, and households of varying income levels and needs.

Open Space and Farmland Preservation

The Project includes approximately 31.2 acres protected within a biological open space easement, and a 35.4-acre agricultural easement.

Development in Existing Communities

D-4a
cont.

The Project provides the transition between the communities of Eden Valley and Harmony Grove (existing/under construction) and the cities of Escondido and San Marcos, reducing sprawl into undeveloped areas of the County, and conserving open space and agricultural land. The Project takes advantage of existing services and infrastructure, including transit, highway and employment infrastructure.

Walkable and Bikeable Neighborhoods

The Project neighborhoods are designed for pedestrians, bicyclists and equestrians, providing a network of well-connected streets, sidewalks and paths, which also connect to the multi-use paths on the adjacent Harmony Grove Village site.

Distinctive, Attractive Communities

The Project includes neighborhoods with distinctive characters that fit into the topographic and climatic contexts, and are compatible with the character of the nearby Harmony Grove Village development.

Transportation Choices

The Project provides a broad range of mobility options to allow all residents to enjoy comfortable, independent lifestyles. Bicycle and equestrian facilities and pedestrian-oriented streets are located throughout the community. The frequent, convenient public transit services provided at the Escondido and Nordahl transit hubs, with their park-and-ride facilities, are just a few miles away, and provide a desirable alternative to long-distance commuting by single-occupancy vehicles (SOVs). These features of the Project can lead to improvements in community health and energy conservation, as well as reductions in VMT and greenhouse gas emissions.

Predictable Development Decisions

The Project proponent and the County are working together to develop a project that is consistent with local jurisdictions' regulatory frameworks and development approaches, as well as the philosophy of the SANDAG RTP/SCS.

Community and Stakeholder Collaboration

The Project developers held over 20 community outreach meetings to involve residents of the surrounding area in the development process.

The Project also incorporates many of the relevant elements recommended in *Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region*, focusing on pedestrian-friendly street design, intersection design, sight distances, pedestrian crossings, sidewalks, and lighting. For instance, roadway intersections on the Project site are made pedestrian friendly by designing minimal crossing distances and ensuring visibility for both the pedestrian and the driver.

- D-4b The comment encourages the use of Trip Generation for Smart Growth when evaluating the Project. The Project Traffic Impact Analysis (TIA; Appendix H of the EIR) uses standard trip generation methodologies in accordance with County and SANDAG guidance as a conservative estimate. Nevertheless, as discussed in the publication Trip Generation for Smart Growth, the Project's multi-use trail system and proximity to transit hubs may result in lower trip generation than would be expected to occur for typical suburban developments. Most Project residents are still likely to drive on nearby roadways to access the Escondido and Nordahl transit stations, because the Project is more than 0.5 mile away from these stations. Therefore, it is expected that the results of the TIA for local roadways would be accurate. For more distant roadways and highways, where Project-related VMT may be reduced because Project residents choose public transit instead of driving, the TIA provides a conservative estimate of Project traffic impacts.
- D-4c The comment encourages the use of *Trip Generation for Smart Growth* when evaluating the Project. The Project Traffic Impact Analysis (TIA; Appendix H of the EIR) uses standard trip generation methodologies in accordance with County and SANDAG guidance as a conservative estimate. Nevertheless, as discussed in the publication Trip Generation for Smart Growth, the Project's multi-use trail system and proximity to transit hubs may result in lower trip generation than would be expected to occur for typical suburban developments. Most Project residents are still likely to drive on nearby roadways to access the Escondido and Nordahl transit stations, because the Project is more than 0.5 mile away from these stations. Therefore, it is expected that the results of the TIA for local roadways would be accurate. For more distant roadways and highways, where Project-related VMT may be reduced because Project residents choose public transit instead of driving, the TIA provides a conservative estimate of Project traffic impacts.
- D-4d The comment encourages the use of *Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports* when evaluating the Project. This document has been reviewed, and it is concluded the Project traffic analysis provided results in a conservative estimate of the regional traffic impacts of the Project. The availability of pedestrian, bicycle, equestrian and transit facilities, and the proximity of employment, shopping and other activity centers in Escondido, San Marcos, and Harmony Grove Village would likely reduce the regional traffic impacts of the Project by comparison with typical suburban developments.

COMMENTS

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- D-4e The comment encourages the use of *Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities* when evaluating the Project. This is discussed in Response D-3.
- D-4f The comment encourages the use of *Riding to 2050, the San Diego Regional Bike Plan* when evaluating the Project. The plan was consulted in the development of the Project. The Project includes on-site multi-use paths that would serve as bike paths complementing those proposed in the regional bike plan and would connect to the multi-use paths on the adjacent Harmony Grove Village site, thus providing an extended network of dedicated bicycle facilities.
- D-4g The comment encourages the use of the *SANDAG Regional Parking Management Toolbox* when evaluating the Project. This document has been reviewed, and it is concluded the parking provided by the Project would be appropriate for the Project location; the availability of pedestrian, bicycle, equestrian and transit facilities; and the proximity of employment, shopping and other activity centers in Escondido, San Marcos, and Harmony Grove Village.