CAMPUS PARK WEST PROJECT

APPENDIX A

NOTICE OF PREPARATION (NOP) AND COMMENTS ON THE NOP

PDS2005-3813-05-001(SPA); PDS2005-3800-05-003(GPA);
PDS2005-3600-05-005(REZ); PDS2005-3100-5424(TM);
Log No. PDS2005-3910-05-02-009(ER);
State Clearinghouse No. 2009061043

for the

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

June 18, 2014

ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/dplu

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

June 11, 2009

NOTICE IS HEREBY GIVEN that the County of San Diego, Department of Planning and Land Use will be the Lead Agency and will prepare an Environmental Impact Report in accordance with the California Environmental Quality Act for the following projects. The Department is seeking public and agency input on the scope and content of the environmental information to be contained in the Environmental Impact Report. A Notice of Preparation document, which contains a description of the probable environmental effects of the project, can be reviewed on the World Wide Web at **http://www.sdcounty.ca.gov/dplu/ceqa_public_review.html**, at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and at the public libraries listed below. Comments on the Notice of Preparation document must be sent to the DPLU address listed above and should reference the project number and name.

SPA 05-001, GPA 05-003, REZ 05-005, TM 5424, STP 05-014, LOG NO. 05-02-009; CAMPUS PARK WEST. The Proposed Project uses include a total of 355 residential units, 400,000 square feet of commercial development, 347,000 square feet of industrial uses, 50,000 square feet of office development, 11 acres of common open space, and 27 acres of natural open space. Of these totals, a mixed use center is proposed to integrate 50,000 square feet of neighborhood commercial, 50,000 square feet of office and 48 residential units. The project is located east of Interstate 15 (I-15) near State Route 76 (SR-76), also known as Pala Road. The majority of the site, approximately 99.7 acres, is located north of SR-76/Pala Road and approximately 18.6 acres are located south of SR-76/Pala Road. The project is located within the Fallbrook Community/Regional Planning Area within the unincorporated area of San Diego County. Comments on this Notice of Preparation document must be received no later than July 10, 2009, at 4:00 PM (a 30 day public review period). This Notice of Preparation can also be reviewed at the Fallbrook Library, located at 124 S. Mission Rd. Fallbrook, CA 92028. For additional information, please contact Dennis Campbell at (858) 505-6380 or by e-mail at Dennis.Campbell@sdcounty.ca.gov.

PUBLIC SCOPING MEETING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments on the EIR. The meeting will be held on June 22, 2009, at 6:00 PM until 8:00 PM, at the Live Oak Elementary School, Multi-purpose Room located at 1978 Reche Road, Fallbrook, CA, 92028.

NOTICE OF PREPARATION DOCUMENTATION

DATE: June 11, 2009

PROJECT NAME: Campus Park West

PROJECT NUMBERS: SPA05-001, GPA05-003, REZ05-005, TM5424, STP05-014

PROJECT APPLICANT: Thad Johnson
Pappas Investments
2020 L Street, 5th Floor
Sacramento, CA 95814

ENV. REVIEW NUMBER: ER 05-02-009

PROJECT DESCRIPTION:

Campus Park West is a proposed mixed-use development located on 118.3 acres in the community of Fallbrook within unincorporated San Diego County. The project site is part of the previously approved Sycamore Springs Specific Plan (SP 81-01) and subsequently the Campus Park Specific Plan (SP 83-01). A Final EIR was certified for the original Sycamore Springs Specific Plan in 1980 and a Final EIR for the Campus Park Specific Plan was certified in 1983.

Proposed uses include a total of 355 residential units, 400,000 square feet of commercial development, 347,000 square feet of industrial uses, 50,000 square feet of office development, 11 acres of common open space, and 27 acres of natural open space. Of these totals, a mixed use center is proposed to integrate 50,000 square feet of neighborhood commercial, 50,000 square feet of office, and 48 residential units. The site is presently vacant with the exception of a small citrus grove and an interim private radio-controlled model aircraft use.

The project proposes grading over approximately 91.4 acres (77%) of the site. The grading would involve an estimated 700,000 cubic yards of balanced cut and fill. The maximum cut and fill height will be 22 feet and 28 feet, respectively.

Access to the project site would be from Pankey Road which connects with State Route 76 (SR-76). Secondary access would be available from Pala Mesa Drive which crosses over Interstate 15 (I-15) near the central portion of the project site.

Implementation of the proposed project would require a County of San Diego General Plan Amendment (GPA), Specific Plan Amendment, Tentative Map, and Rezone. The GPA would change the Regional Category assigned to the property from Special Study Area (SSA) to Current Urban Development Area (CUDA). The land use designation

would remain (21) Specific Plan Area but the allowed residential density would be increased from 0.81 to 3.0 dwelling units per acre. In addition, the proposed Circulation Element amendments would be amended to delete the extension of Pankey Road, north of Pala Mesa Drive and to realign the designated community collector over Horse Ranch Creek, to connect to Horse Ranch Creek Road, to a more southerly alignment, which is north of and parallel to SR 76. The Campus Park Specific Plan also would be amended to allow the proposed development in lieu of the current provision for a 336-unit mobile-home park, a 150-dwelling unit condominium development, and a 10.5-acre commercial center. The Tentative Map would subdivide the property into 51 lots. The Rezone would change the Holding Area Use Regulations (S90) to Specific Planning Area Use Regulations (S88).

Implementation of the proposed project also would require annexation into the San Diego County Water Authority service area for water service, and a special district to provide for the project's water and sewer needs. Potential water and sewer providers include the Valley Center Municipal Water District and the Rainbow Municipal Water District.

It is anticipated that the project will be served either by a wastewater treatment plant located in proximity to the project site or on-site, within the project's designated commercial area located south of SR-76.

PROJECT LOCATION:

The Campus Park West Project is located east of Interstate 15 (I-15) near State Route 76 (SR-76), also known as Pala Road. The majority of the site, approximately 99.7 acres, is located north of SR-76/Pala Road and approximately 18.6 acres are located south of SR-76/Pala Road. The main access to the project site will be from Pankey Road, which will be improved to extend north from SR-76 and connect to Pala Mesa Drive which provides access to the west side of Interstate 15.

PROBABLE ENVIRONMENTAL EFFECTS:

The probable environmental effects associated with the project are detailed in the attached Environmental Review Update Checklist Form. Based on the analysis contained in this document, the following major issues will be addressed in the EIR:

Aesthetics
Air Quality
Biological Resources
Cultural Resources
Geology/Soils
Hazards/Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Mineral Resources

Noise
Population/Housing
Public Services
Transportation/Traffic
Utilities/Service Systems

PUBLIC SCOPING MEEING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments on the EIR. The meeting will be held on June 22, 2009 @ 6:00 pm until 8:00 pm at the Live Oak Elementary School, Multi-purpose Room located at 1978 Reche Road, Fallbrook, CA, 92028.

Attachments:

Project Regional Location Map
Project Detailed Location Map
Specific Plan Map
Environmental Review Update Checklist for Projects with Previously Approved Environmental Documents

ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ • SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. • SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

June 11, 2009

Environmental Review Update Checklist Form For projects with Previously Approved Environmental Documents

FOR PURPOSES OF CONSIDERATION OF CAMPUS PARK WEST

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for a subsequent discretionary action.

Specifically, the subsequent discretionary action involves the Campus Park West proposed project, located in the Fallbrook Community Planning Area of unincorporated San Diego County. It is comprised of approximately 118.3 acres located east of Interstate 15 (I-15) near State Route 76 (SR-76). The majority of the proposed project site, approximately 99.7 acres, is located north of SR-76/Pala Road, and approximately 18.6 acres are located south of SR-76/Pala Road.

The Campus Park West proposed project includes the following discretionary applications:

- A Tentative Map (TM 5424) to subdivide the property into 51 lots;
- A Specific Plan Amendment (SPA 05-001) to amend the previously approved (1983) Hewlett-Packard Specific Plan for the Campus Park West portion of the plan to provide for a mixed-use land use plan and create planning areas;
- A Rezone (REZ 05-005) from S90 (Holding Area) to S88 (Specific Planning Area); and
- A General Plan Amendment (GPA 05-003) to change the Regional Category from Special Study Area (SSA) to Current Urban Development Area (CUDA), to

change the maximum density from 0.81 to 3.0 dwelling units per acre, and to amend the Circulation Element to delete the planned extension of Pankey Road north of Pala Mesa Road, and to realign the existing connection over Horse Ranch Creek, to Horse Ranch Creek Road, to a more southerly alignment, and which is just north of SR 76.

In addition, the Specific Plan and Zoning Ordinance may require the preparation and submission of site plans.

It is anticipated that the project will be served either by a wastewater treatment plant located in proximity to the project site or on-site, within the project's designated commercial area located south of SR-76.

1. Background on the previously certified EIRs:

   An EIR was prepared in 1980 for the Sycamore Springs Specific Plan, LSP79-06, TM4173, P80-65, P80-66, R80-56, EAD Log # 79-2-197, SCH 80082008. The Board of Supervisors certified the Sycamore Springs Specific Plan Final EIR on February 2, 1981. In the CEQA Findings, the Board of Supervisors concluded that the Sycamore Spring Specific Plan would result in significant effects on biological resources, dark skies, hydrology, air quality, noise, and community services (police protection, water, wastewater disposal).

   In addition, an EIR was prepared in 1982, for the Campus Park Specific Plan, LSP 82-06, EAD Log #82-2-95. This EIR analyzed the same area as the currently proposed Campus Park West project, but this former EIR addressed different land uses. The Board of Supervisors certified the Campus Park Specific Plan Final EIR in 1983. In the CEQA Findings, the Board of Supervisors concluded that the Campus Park Specific Plan would result in significant effects to air quality, biological resources, dark sky, hydrology, geological, noise, public services (fire protection and schools), utilities (water and sewer), and traffic.

   Table 1 contains a comparison of the conclusions of each of the EIRs with respect to significant impacts and the mitigation to reduce the impacts to below a level of significance.

Table 1
Comparison of Significance Conclusions in Previous EIRs

Environmental Issue	Sycamore Springs Specific Plan (1980)	Campus Park Specific Plan (1983)
Aesthetics	LS	LS
Agriculture	LS	LS
Air Quality	SU	SM
Biological Resources	SU	SM
Cultural Resources	LS	LS
Dark Sky	SU	SM
Energy	SM	SM
Fire Protection	SM	SM
Geological Hazard	LS	SM
Growth Induction	SU	LS
Hazardous Waste	N/A	LS
Hydrology	N/A	SM
Land Use	LS	LS
Mineral Resources	N/A	N/A
Noise	SM	SM
Paleontology	LS	N/A
Police Protection	SM	N/A
Population and Housing	N/A	N/A
Sewer	SM	SM
Schools	SM	SM
Traffic Circulation	LS	SM
Water	SM	SM
Water Quality	SU	LS

LS: Less than Significant
SM: Significant but mitigable
SU: Significant and unmitigable
N/A: Not Addressed

2. Lead Agency name and address:
   County of San Diego, Department of Planning and Land Use
   5201 Ruffin Road, Suite B,
   San Diego, CA 92123-1666

   a. Contact: Dennis Campbell, Project Manager
   b. Phone number: (858) 505-6380
   c. E-mail: dennis.campbell@sdcounty.ca.gov

3. Project applicant's name and address:

   Thad Johnson
   Pappas Investments
   2020 L Street, 5th Floor
   Sacramento, CA 95814

4. Summary of the activities authorized by present permit/entitlement application(s):

   The proposed project would allow up to 355 multi-family homes, 400,000 square feet of commercial development on approximately 29 acres, 347,000 square feet of industrial uses on approximately 20 acres, 100,000 square feet of mixed-use development (up to 50,000 square feet of neighborhood commercial uses and up to 50,000 square feet of office development) on approximately 6.7 acres, 11 acres of HOA maintained open space, and 26.9 acres of natural open space. Up to 307 multi-family units would be allowed within the designated residential area comprising 15.4 acres of the project site. Another 48 multi-family units would be located within the mixed-use area.

   The project site (APNs 108-121-14, 125-061-01, 125-063-01, 125-063-07, and 125-063-08) is primarily located north of SR-76/Pala Road, with approximately 19 acres situated south of SR-76/Pala Road, within unincorporated County of San Diego. The site is in the Fallbrook Community Planning Area. The zone is S90, with a density of 0.05 and a minimum lot size of 20 acres.

   The site is primarily undeveloped with some minor outbuildings associated with the former Pankey Ranch, as well as shade structures and fencing associated with the radio-controlled model airplane flying club that utilizes a portion of the site, as well as citrus orchards south of SR-76/Pala Road and east of Pankey Road.

5. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES	NO
☒	☐

   Table 2 compares the development proposals from a plan-wide perspective as well as with respect to the subject Campus Park West proposed project site. As this table indicates, the overall Specific Plan area started out as a golf course-oriented development within the Sycamore Springs Specific Plan. With adoption of the Campus Park Specific Plan, the primary use changed from golf course/residential to research and development, which was planned to be occupied by the Hewlett Packard Company. With the end of Hewlett Packard's involvement, the Campus Park Specific Plan is in the process of being amended by a series of landowners.

The Sycamore Springs Specific Plan covered a total of 442 acres, including the proposed Campus Park West project. As indicated in Table 2, the Sycamore Springs Specific Plan included an 18-hole golf course, 1,152 mobile-home units, a planned residential development, and a small amount of commercial use.

The 442-acre Sycamore Springs property (including the proposed Campus Park West project) was subsequently acquired by Hewlett-Packard, and an EIR was prepared for the Campus Park Specific Plan. The Campus Park Specific Plan included a research, development, and light manufacturing facility for the Hewlett-Packard Company, a 336-unit mobile-home park, a 150-unit condominium development, and a 10.5-acre commercial center.

As indicated in Table 2, the uses on the subject property have always included residential development; the Campus Park Specific Plan also allows commercial development. However, the proposed project would reduce the residential development, increase the commercial development, and add industrial uses. The Campus Park West proposed plan would result in less residential units (355 vs. 486). It would increase the acreage dedicated to general commercial from 10.5 to 29.16 acres. This results largely from the designation of approximately 8 acres of land south of SR-76/Pala Road for commercial use; the previous Specific Plans identified this area as a "Future Use Area." In addition, the Campus Park West proposed project would designate approximately 20 acres of land for industrial development; previous Specific Plans did not propose any industrial uses on the subject property.

Table 2.
Land Use Comparison

	Res. (MH)	Res. MFD	Golf Course	Comm. Neighborhood	Comm. General	Comm. Office	Ind.	Future Planning Area
Plan-Wide								
Sycamore Springs	1,152	None	88 acres	6.5 acres	None	None	NA	21.7 acres
Campus Park	336	150	None	10.5 acres	None	None	323 acres	None
Subject Property								
Sycamore Springs	336	None	None	None	None	None	None	21.7 acres
Campus Park	336	150	None	10.5 acres	None	None	None	None
Proposed Project	None	355	None	50,000 SF	29 acres	50,000 SF	20 acres	NA

6. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR**. The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☐ NONE

☑ Aesthetics	☐ Agriculture Resources	☑ Air Quality
☑ Biological Resources	☑ Cultural Resources	☑ Geology/Soils
☑ Hazards & Haz. Materials	☑ Hydrology/Water Quality	☑ Land Use/Planning
☑ Mineral Resources	☑ Noise	☑ Population/Housing
☑ Public Services	☐ Recreation	☑ Transportation/Traffic
☑ Public Services	☐ Recreation	☑ Transportation/Traffic
☑ Utilities/Service Systems		

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DETERMINATION:

On the basis of this analysis, the Department of Planning and Land Use has determined that:

☑ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT EIR is required.

Signature — June 11, 2009 (Date)

Dennis Campbell (Printed Name) — Project Manager (Title)

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted ND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when a ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project, which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or Negative

Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
    b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

YES	NO
☒	☐

The findings adopted for the Sycamore Springs and Campus Park EIRs concluded that aesthetic impacts would not be significant.

The Sycamore Springs EIR evaluated the effect of transitioning the property from agriculture and open space to an urban-type land use development. The findings adopted for the Sycamore Springs EIR concluded that aesthetic impacts related to development of the subject property would not be significant.

The findings for the Campus Park EIR also concluded that the aesthetic impacts would not be significant.

The Campus Park West proposed project would result in a different land use on the central and northern portion of the subject property than was assumed in the two previous EIRs. The previous EIRs assumed the central and northern portions of the subject property would be developed with all residential development. The Campus Park West proposed project would result in a mixed-use development consisting of residential, commercial, and industrial uses in the central portion of the site, and industrial uses in the northern portion of the site. Thus, the visual appearance of the proposed project would be different than the land uses evaluated in the previous EIRs.

In addition to the change in the visual character of the proposed development, more detailed direction for future site development has resulted from the adoption of the Fallbrook Design Guidelines in 1989 and the I-15 Corridor Scenic Guidelines, as well as updates to the Fallbrook Community Plan, which occurred in 1988.

As a result of the changes in character of the development proposed for the subject property and the existence of new design guidelines, a discussion of aesthetics is required to determine whether the aesthetic impacts would be less than significant with the Campus Park West proposed project.

II. AGRICULTURAL RESOURCES -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agricultural resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and/or conflicts with existing zoning for agricultural use or Williamson Act contract?

YES	NO
☐	☒

The findings adopted for the Sycamore Springs and Campus Park EIRs concluded that agricultural impacts would not be significant.

The findings adopted for the Sycamore Springs EIR concluded that the impact of development would be below a level of significance. The analysis concluded that economic factors outweighed the fact that the Specific Plan area included important farmland and had been used in the past for agriculture. The findings concluded that this portion of the County would not support agriculture in the long-run because of environmental constraints related to winter frosts, soil alkalinity, and adverse economic factors (*e.g.*, high cost of water).

The findings for the Campus Park EIR, relying in part on prior studies and the findings adopted for the Sycamore Springs EIR, also determined that, due to environmental factors combined with economic factors, which limit continued agricultural production on the site, development of the subject property would not have a significant impact on agriculture. Additional information/clarification relating to soils designations, recent crop types, percentage of business loss compared to County-wide agricultural resources, overall County agricultural preservation efforts and policies as well as potential impacts on adjacent agricultural areas resulting from project implementation were included in the Campus Park EIR in the form of responses to comments. The responses were based on information provided by Tom Escher, County Department of Agriculture. Mr. Escher noted "[d]espite the presence of prime soils, the proposed project will not impact the preservation of agricultural land in San Diego County. Because the site is virtually surrounded by proposed urban development, and is adjacent to I-15, this land is no longer regarded as prime agricultural land by the County's Department of Agriculture." It was also noted that other projects surrounding the site have committed additional acreages to urban development. The steeply-sloped mountains to the east were regarded as a natural buffer protecting agricultural activities east of the mountains from development from the west. For these reasons, project implementation on these rich, alluvial soils was not considered a significant impact."

Consistent with the two previous EIRs, development of the Campus Park West proposed project would not result in a significant impact on agriculture. The only agriculture currently taking place on the subject property is a small citrus orchard south of SR-76/Pala Road. The environmental constraints related to climate and soil alkalinity remain present and the economic factors are even less favorable in the existing condition due to the continued development in the area and increases in water costs. Thus, no further analysis need be conducted with respect to agriculture because the proposed Campus Park West project would not result in any additional impacts to agricultural resources no already considered in the previous EIRs.

III. AIR QUALITY -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality,

including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES	NO
☒	☐

The findings adopted for the Sycamore Springs and Campus Park EIRs concluded that air quality impacts would be significant but mitigable.

The findings adopted for the Sycamore Springs EIR concluded that the project would have significant impacts with respect to short- and long-term air quality. Short-term impacts were attributed to construction dust and construction equipment emissions. Long-term impacts were related to vehicles, electricity generation, and wood-burning fireplaces. The discussion of mitigation measures included consideration of possible mitigation, but no specific mitigation measures were applied to future development within the Sycamore Springs Specific Plan.

The findings adopted for the Campus Park EIR also concluded that the development of the subject property would result in significant short- and long-term impacts to air quality. The discussion of mitigation included possible measures, but no specific mitigation measures were applied to future development within the Campus Park Specific Plan.

Development of the proposed Campus Park West project would likely result in comparable short-term impacts due to the similar area of grading. However, substantial changes have occurred with respect to regulations governing air quality in the region. In addition, on April 15, 2004, the San Diego Air Basin was designated a basic nonattainment area for the eight-hour NAAQS for O_3. Since certification of the Sycamore Springs and Campus Park EIRs, the importance of construction-period emissions, as well as additional categories of pollutants (*e.g.*, particulate matter less than 2.5 microns in diameter, or $PM_{2.5}$) emissions have become better understood. Even more recently, the issue of climate change/greenhouse gases (GHGs) has become an emerging issue.

The changes in the circumstances related to air quality require the need for a new analysis of air quality impacts associated with development of the Campus Park West proposed project.

IV. BIOLOGICAL RESOURCES -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to

biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; adverse effects to federally-protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES	NO
☒	☐

The findings adopted for the Sycamore Springs and Campus Park EIRs concluded that biological impacts would be significant but mitigable.

The findings in the Sycamore Springs EIR concluded that development of the site would have a significant impact on riparian woodland, aquatic areas, and associated upland disturbed grassland habitat. No sensitive plant or animal species were noted on the site. Mitigation measures included preserving riparian vegetation in open space, maintaining ponds related to the golf course, and revising the grading plans for the golf course.

The findings in the Campus Park EIR concluded that development of the site would have a significant impact on riparian woodland, aquatic areas, and associated upland disturbed grassland habitat. Mitigation was specified for wetlands habitat—both in terms of preservation and creation of acreage lost at a greater than 1.1 ratio, along with preservation of open space, a landscape plan that specified rehabilitation to natural riparian woodland and freshwater marsh, and a specific plan resolution to limit clearing, mowing, and other vegetation removal from the wetland rehabilitation areas.

It is anticipated that the extent and character of biological resources on the subject property is different than identified in the two previous EIRs. The riparian woodland (southern riparian forest) has expanded. Furthermore, a large portion of the site is now considered non-native grassland rather than fallow field. Least Bell's vireo, coastal California gnatcatcher, orange-throated whiptail, yellow breasted chat and yellow warbler, as well as a sensitive plant species, have been noted on the site in a recent survey.

In addition to changes in on-site biological resources since the early 1980s, a number of changes have occurred in terms of review requirements. The County MSCP was implemented in 1997, and the County RPO was enacted in 1991. The coastal California gnatcatcher has been federally listed as threatened and as a California Species of Special Concern and the Least Bell's vireo has been listed at both the state and federal levels as endangered.

Based on the changes in extent and type of on-site habitats, as well as the presence of sensitive plant and animal species not previously present and subject to review and regulation, these issues lead to the need for a new biological resource analysis for the subject property.

V. CULTURAL RESOURCES -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES	NO
☒	☐

The Sycamore Springs and Campus Park EIRs identified cultural resource impacts as less than significant. Paleontological issues were included in the Sycamore Springs EIR and found less than significant based on the assessment of on-site alluvial deposits. Paleontological resources were not addressed in the Campus Park EIR.

Two isolates (one mano and one mano fragment) were discovered in the course of past surveys of the Specific Plan area. However, no maps are available to determine whether these isolates occurred with the boundary of the subject property. In addition, past surveys considered the potential for subsurface resources to be high enough to warrant monitoring grading.

Neither of the two previous EIRs evaluated the significance of a horse facility, known as the Charles Cooper Rancho San Luis Rey thoroughbred facility, that previously existing on the subject property. A concrete slab and one outbuilding remain on the proposed project site and warrant analysis. In the absence of information related to the horse facility, a historic evaluation should be conducted.

As granite rock, colluvium, and alluvial soils underlie the subject property, no additional paleontological analysis need be conducted.

VI. GEOLOGY AND SOILS -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on

expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

YES	NO
☒	☐

The findings adopted for the Sycamore Springs EIR concluded that geology and soils impacts would not be significant. The findings for the Campus Park EIR concluded that the impacts to geology and soils would be significant but mitigable.

The Sycamore Springs EIR acknowledged that the project site would be subject to ground shaking due to earthquakes and that the effects would be minimized by adhering to the Uniform Building Code. It also stated that the likelihood of liquefaction would be relatively remote.

The Campus Park EIR identified geological impacts to developed uses as significant but mitigable. It indicated potential impacts related to liquefaction, groundwater seepage, and surficial sloughing of fill slopes. Mitigation recommendations included various techniques for reducing liquefaction, additional study to determine final surcharge heights and settlement patterns, inspections of cut slopes, and backrolling and compacting slopes at maximum four-foot height intervals.

As the geology and soils conditions on the subject property remain unchanged from that evaluated in the two previous EIRS, the conclusions of the previous geotechnical studies remain applicable. A review of the geology map indicates that the subject property is not underlain by the younger alluvial soils, which are prone to liquefaction. However, the soils on the site are considered to have a high to moderate potential for expansion. The geological investigation requires supplemental applicable information/conclusions from the current geotechnical studies to reflect updated technical methodologies (e.g., seismicity analysis), industry standards, and regulatory requirements.

VII. HAZARDS AND HAZARDOUS MATERIALS -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public

use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

YES	NO
☒	☐

The Sycamore Springs EIR did not discuss hazards and hazardous materials. The Campus Park EIR stated that hazardous material impacts would not be significant.

The Campus Park EIR concluded that identified the handling and storage of chemicals associated with the Hewlett-Packard portion of the project to be less than significant due to appropriate handling procedures. Hazardous materials associated with the Hewlett Packard operation involved chemicals used for processes, plant maintenance, and waste from plant operations.

Since the previous EIRs were certified, there have been changes in the circumstances under which the project was undertaken related to hazards. The project site is located within the declared Urban-Wildland Interface (UWI) area. This combined with the recent major fires that have affected the County, results in the need for the EIR to discuss the potential risk to future development from wildfires.

In addition, a potential public safety risk exists due to the potential exposure to pesticides and herbicides, which may have accumulated in the soil due to past agricultural operations. As agriculture has occurred on the subject property, the potential for this public safety risk must be addressed in the EIR.

VIII. HYDROLOGY AND WATER QUALITY -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding,

including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

YES	NO
☒	☐

The findings for the Sycamore Springs concluded that the development would have a significant cumulative impact on water quality, which could not be reduced below a level of significance. The Sycamore Springs EIR did not address hydrology. The findings for the Campus Park EIR concluded that the development would result in significant but mitigable impacts with respect to hydrology; water quality impacts were determined to be not significant.

The Sycamore Springs EIR concluded that construction could result in a decrease in water quality due to erosion and sedimentation. Mitigation included erosion control measures and runoff baffling devices to serve as mini-siltation basins.

The Campus Park EIR identified potential flood impacts for future development located in the 100-year floodplain of the San Luis Rey River and/or Horse Ranch Creek. Portions of Pankey Road, Pala Mesa Drive, and access roads also were determined to be within the limits of the 100-year floodplain. Mitigation for impacts associated with flooding included elevating all building pads and roadways above the 100-year floodplain and no development within the floodway. As stated in the Campus Park EIR document, water quality would be impacted by runoff from primarily pesticides and fertilizers associated with agricultural use of the property, as well as petroleum products and detergents associated with urban land uses. The property also would be subject to erosion and increased sedimentation. However, the Campus Park EIR concluded that these factors would not represent a significant impact to water quality.

Since the time when these two EIRs were certified, the regulatory framework related to water quality has changed. A Water Quality Control Plan for the San Diego Basin was adopted by the San Diego RWQCB in 1994. National Pollutant Discharge Elimination System (NPDES) requirements for municipal, construction, and groundwater effects have been established. Pursuant to the NPDES Municipal Permit requirements, the County now addresses storm water management under the Standard Urban Storm Water Mitigation Plan (SUSMP; most recently updated in March 2008). New ordinances are in effect as well as design practices.

In accordance with these new regulations, the applicant's consultant has prepared a Stormwater Management Plan (SWMP), which identifies potential construction and post-construction pollutants that may result from the proposed project and the BMPs to address the pollutants. With implementation of these measures, the proposed project is not anticipated to result in any substantial increase in polluted runoff or any significant adverse effects to water quality. Therefore, although there are changes in circumstances, these changes are not likely to result in new significant environmental effects related to hydrology and water quality. Nonetheless, the proposed project's impacts on hydrology and water quality will be addressed.

IX. LAND USE AND PLANNING -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

YES	NO
☒	☐

The findings for the Sycamore Springs and Campus Park EIRs identified impacts to land use to be not significant.

The Sycamore Springs EIR noted that the project was consistent with the Fallbrook Community Plan and with existing land use designations.

The Campus Park EIR concluded that the proposed project would be consistent with the Fallbrook Community Plan by creating a good balance of land uses and encouraging light research and development of industrial uses. The project was found to be consistent with the goal of preserving the area's natural amenities through retention of freshwater marsh in the southern portion of the project site as part of a proposed recreation area.

The Campus Park West proposed project proposes different land uses than those proposed in the Sycamore Springs and Campus Park EIRs. In addition, many of the governing plans and ordinances have been amended or approved since certification of the previous EIRs; including the General Plan (amended in 2002) and the Fallbrook Community Plan (amended in 1988). The Fallbrook Community Guidelines also post-date the previous EIRs.

The changes in use and new applicable land use plans lead to the need for a new analysis of land use.

X. MINERAL RESOURCES -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES	NO
☒	☐

The topic of minerals was not addressed in either the Sycamore Springs or Campus Park EIRs.

Due the potential for mineral resources to be associated with subject property, a Mineral Resource Technical Report will be required to evaluate the potential impact of the Campus Park West proposed project on mineral resources.

XI. NOISE -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

YES	NO
☒	☐

The findings for the Sycamore Springs and Campus Park EIRs identified traffic-generated noise impacts to residential uses as significant but mitigable. The Campus Park EIR identified noise impacts related to the heating and ventilation equipment associated with industrial uses as significant but mitigable.

The Sycamore Springs EIR concluded that planned residential uses would be significantly impacted from noise generated by I-15 and SR-76/Pala Road. Mitigation measures included construction of sound walls and/or incorporating noise attenuation into the residences.

The Campus Park EIR concluded that proposed residential areas would be significantly impacted by traffic noise generated from I-15 and SR-76/Pala Road. In addition, the EIR cited the potential for residents adjacent to industrial areas to experience noise from heating and ventilation equipment that could exceed the County's Noise Ordinance, which sets limits for noise generated by industrial uses at residential property lines. Mitigation measures for traffic noise included construction of sound walls and/or incorporating noise attenuation into the residences. Mitigation for heating and ventilation equipment focused on building enclosures or sound barriers to attenuate noise.

Since the two previous EIRs were certified, the traffic on I-15 and SR-76/Pala Road has increased. As a result, the noise contours predicted in the earlier EIRs are no longer valid. In addition, major roadways within the project site may carry sufficient traffic to warrant noise attenuation to protect adjacent residential areas. Thus, new noise

analysis is required to accurately predict the anticipated traffic noise and appropriate noise attenuation measures.

XII. POPULATION AND HOUSING -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

YES	NO
☒	☐

The findings for the Sycamore Springs and Campus Park EIRs did not address population and housing.

In order to assure that this topic is addressed, a discussion of population and housing will be required.

XIII. PUBLIC SERVICES -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES	NO
☒	☐

The findings for the Sycamore Springs and Campus Park EIRs identified that public service impacts would be significant but mitigable.

The Sycamore Springs EIR concluded that significant impacts would occur with respect to police services. The EIR suggested that that impacts to police services could be reduced by promoting security in residential areas through night lighting, installation of locks, and providing off-street parking.

The Campus Park EIR concluded that the development would have significant impacts with respect to fire protection and schools. Payment of fees to the affected agencies was identified as adequate to reduce the impacts to below a level of significance. The Campus Park EIR did not address police services.

Since preparation of the previous EIRs, population in the area has changed, which is the basis for assessment of services impacts. Therefore, information regarding public services is outdated. Thus, the EIR must contain updated information on public services required for the proposed development.

XIV. RECREATION -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES	NO
☐	☒

The Sycamore Springs and Campus Park EIRs did not address recreation.

Although the previous EIRs did not address recreation, no analysis is warranted for the Campus Park West project because it includes recreation amenities for future residents.

XV. TRANSPORTATION/TRAFFIC -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or

dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

YES	NO
☒	☐

The findings for the Sycamore Springs concluded that traffic impacts would not be significant. The Campus Park EIR concluded that traffic impacts would be significant but mitigable.

The Sycamore Springs EIR analyzed trips generated by the golf course, mobile-home park, condominiums, and commercial uses. Combined, these uses were projected to total 9,072 ADT at buildout. The Sycamore Springs EIR concluded that the existing roadway would be capable of handling this additional traffic assuming that SR-76/Pala Road, west of the intersection of Pankey Road, would be widened to provide two travel lanes, left-turn lanes and paved shoulders. Although not identified as mitigation measures, the EIR recommended one travel lane in each direction along with left-turn, right-turn and acceleration lanes at SR-76/Pala Road and Pankey Road.

The Campus Park EIR analyzed trips generated by employees associated with the Hewlett-Packard facility as well as trips related to the mobile-home park, condominiums, golf course and commercial uses. Combined, these uses were projected to total 22,486 ADT at buildout. The Campus Park EIR concluded that the project would have significant impacts to Pankey Road, SR-76/Pala Road, and the intersection of SR-76/Pala Road and Pala Mesa Drive.

Traffic volumes on area roads have changed since completion of traffic studies for the previous EIRs. In addition, the County has adopted a new ordinance to help finance the roadway network needed to serve future development within the unincorporated area. This program includes the adoption of a Transportation Impact Fee (TIF) program to fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. This program is based on a summary of projections method contained in an adopted planning document, as referenced in the State CEQA Guidelines Section 15130 (b)(1)(B), which evaluates regional or area wide conditions contributing to cumulative transportation impacts. Based on SANDAG regional growth and land use forecasts, the SANDAG Regional Transportation Model was utilized to analyze projected build-out (year 2030) development conditions on the existing circulation element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies will be corrected through improvement projects funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's Regional Transportation Plan (RTP). This plan, which considers freeway buildout over the next 30 years, will use funds from TransNet, state, and federal funding to improve freeways to projected level of service objectives in the RTP.

As a result of the change in traffic volumes and the existence of new mitigation approach, an updated traffic study is required to be prepared and included in an EIR.

XVI. UTILITIES AND SERVICE SYSTEMS -- Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

YES	NO
☒	☐

The findings for the Sycamore Springs and Campus Park EIRs conclude that impact to utilities would be significant but mitigable.

The Sycamore Springs EIR concluded that significant impacts would occur with respect to the following utilities: water and sewer. Mitigation for water impacts included supplementing potable water with water generated from on-site wells and using recycled water to irrigate the golf course. Similarly, impacts to sewer service would be mitigated through recycling and the use of recycled water for irrigation.

The Campus Park EIR concluded that the development would have significant impacts with respect to water and sewer. The Campus Park EIR required the applicant to pay annexation fees to RMWD with regard to water service, and to incorporate water conservation measures. Payment of sewer annexation and collection fees, combined with a report to determine the impact to RMWD and identification of necessary facility impacts to RMWD, were identified as mitigating sewer-related impacts.

Unresolved issues over the ultimate water and sewer service providers require further evaluation. Thus, the EIR must contain updated information on water and sewer issues related to the proposed development.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIRs were certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

YES	NO
☒	☐

With the expected occurrence of sensitive animal species, which were not addressed in the previous EIRs, implementation of the Campus Park West proposed project could have a greater potential to reduce the number or restrict the range of rare, threatened, or endangered species.

XVIII. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW UPDATE CHECKLIST FORM

California Department of Fish and Game. Fish and Game Code, Section 1600 *et. seq.*

California Environmental Quality Act, CEQA Guidelines

California Environmental Quality Act. 2001. California Code of Regulations, Title 14, Chapter 3, Section 15382.

California Integrated Waste Management Board, Title 14, Natural Resources, Division 7

California Integrated Waste Management Board, Title 27, Environmental Protection, Division 2, Solid Waste

California Public Resources Code, CPRC, Sections 40000-41956

Campus Park Draft EIR, County of San Diego, December 2, 1982

Campus Park Final EIR, County of San Diego, January 6, 1983

County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3

County of San Diego Public Facility Element of the General Plan (Section 6-Solid Waste, XII-6-1)

County of San Diego Scenic Highway Element of the General Plan

County of San Diego Zoning Ordinance (Agricultural Use Regulation, Sections 2700-2720)

County of San Diego. Resource Protection Ordinance, Article II (16-17). October 10, 1991

County of San Diego. 1997. Multiple Species Conservation Program, County of San Diego Biological Mitigation Ordinance

County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO) (Ordinance Nos. 9424 and 9426, County Codes §§ 67801 et seq.)

Farmland Mapping and Monitoring Program, California Department of Conservation, Division of Land Resource Protection

Order No. 2001-01, NPDES No. CAS 0108758, California Regional Water Quality Control Board, San Diego Region

Ordinance 8334, An Ordinance to amend the San Diego County Code of Regulatory Ordinances relating to Flood Damage Prevention, Adopted by the Board of Supervisors on 12/7/93

Public Resources Code Sections 4290 and 4291

San Diego County Light Pollution Code (San Diego County Code Section 59.101)

Sycamore Springs Specific Plan Draft EIR, County of San Diego, August 1980

Sycamore Springs Specific Plan Final EIR, County of San Diego, October 23, 1980

The Importance of Imperviousness from *Watershed Protection Techniques* Vol. 1, No. 3 - Fall 1994 by Tom Schueler Center for Watershed Protection

The Resource Conservation and Recovery Act (RCRA), 1976

Uniform Fire Code, Article 9 and Appendix II-A, Section 16

Water Quality Control Plan for the San Diego Basin (9), California Regional Water Quality Control Board, San Diego Region

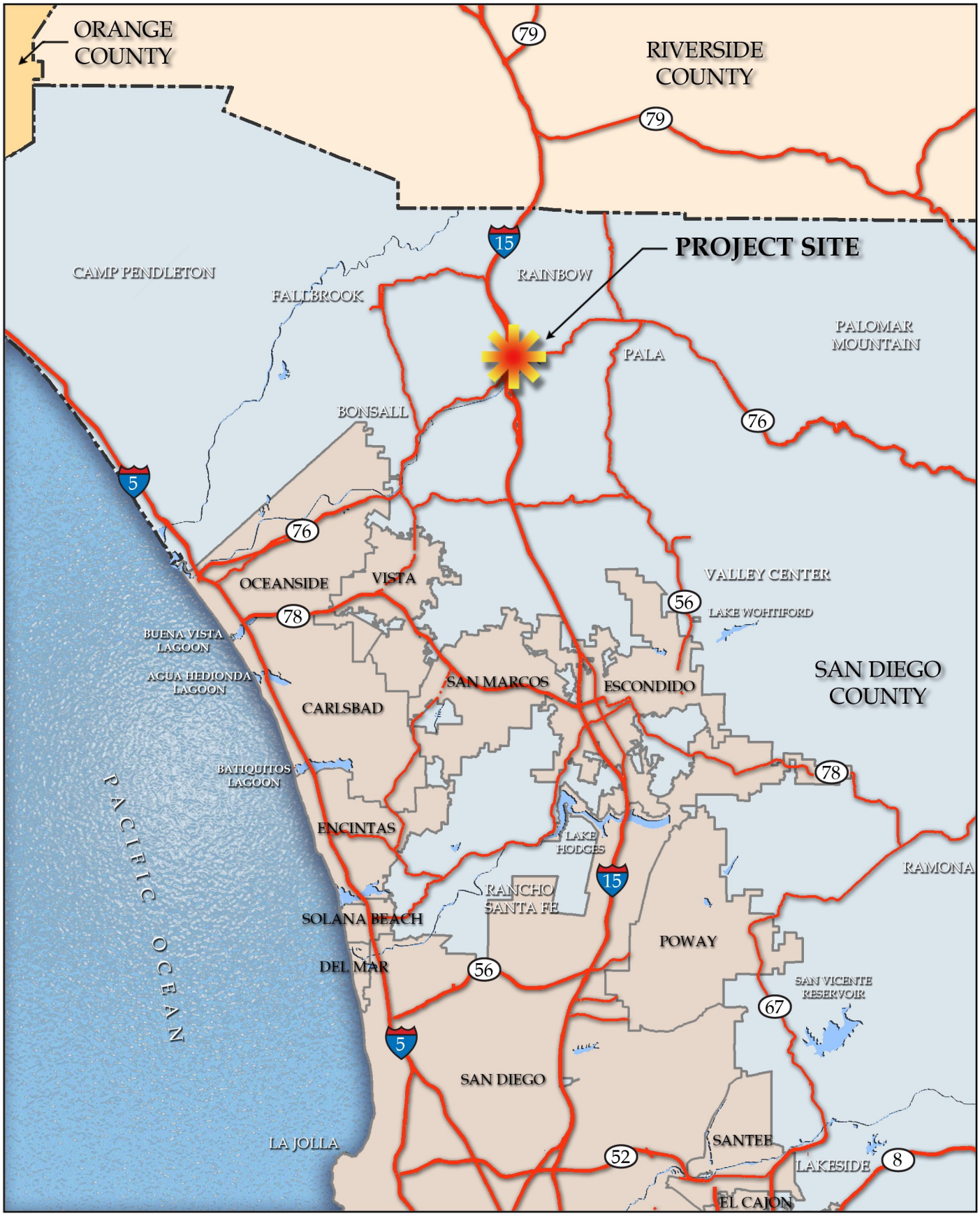

Figure I-1

Campus Park West

Specific Plan

Regional Map

0' 15,000' 30,000'

PROJECT DESIGN CONSULTANTS

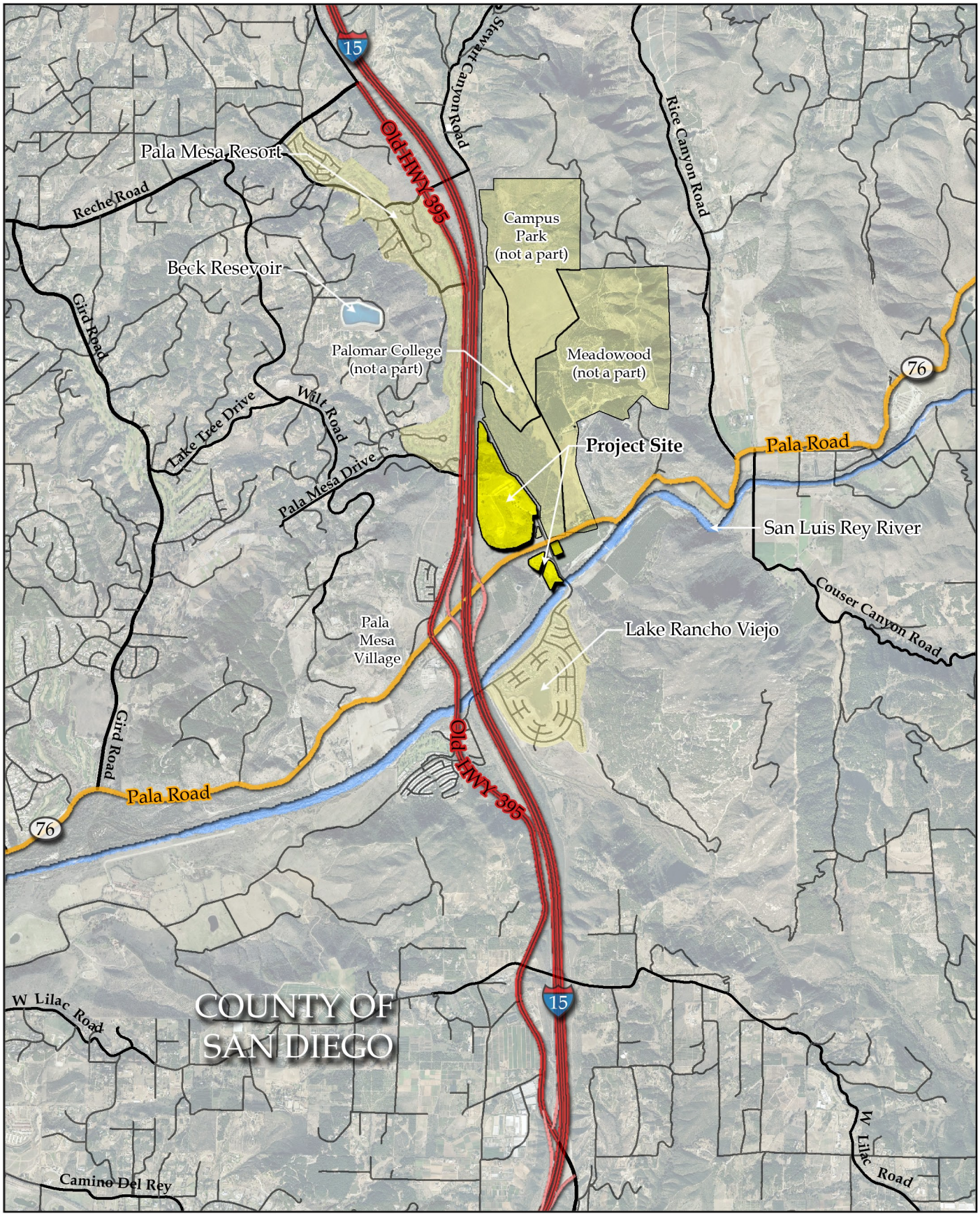

Figure I-2

Campus Park West

Specific Plan

Vicinity Map

0' 2,000' 4,000'

PROJECT DESIGN CONSULTANTS

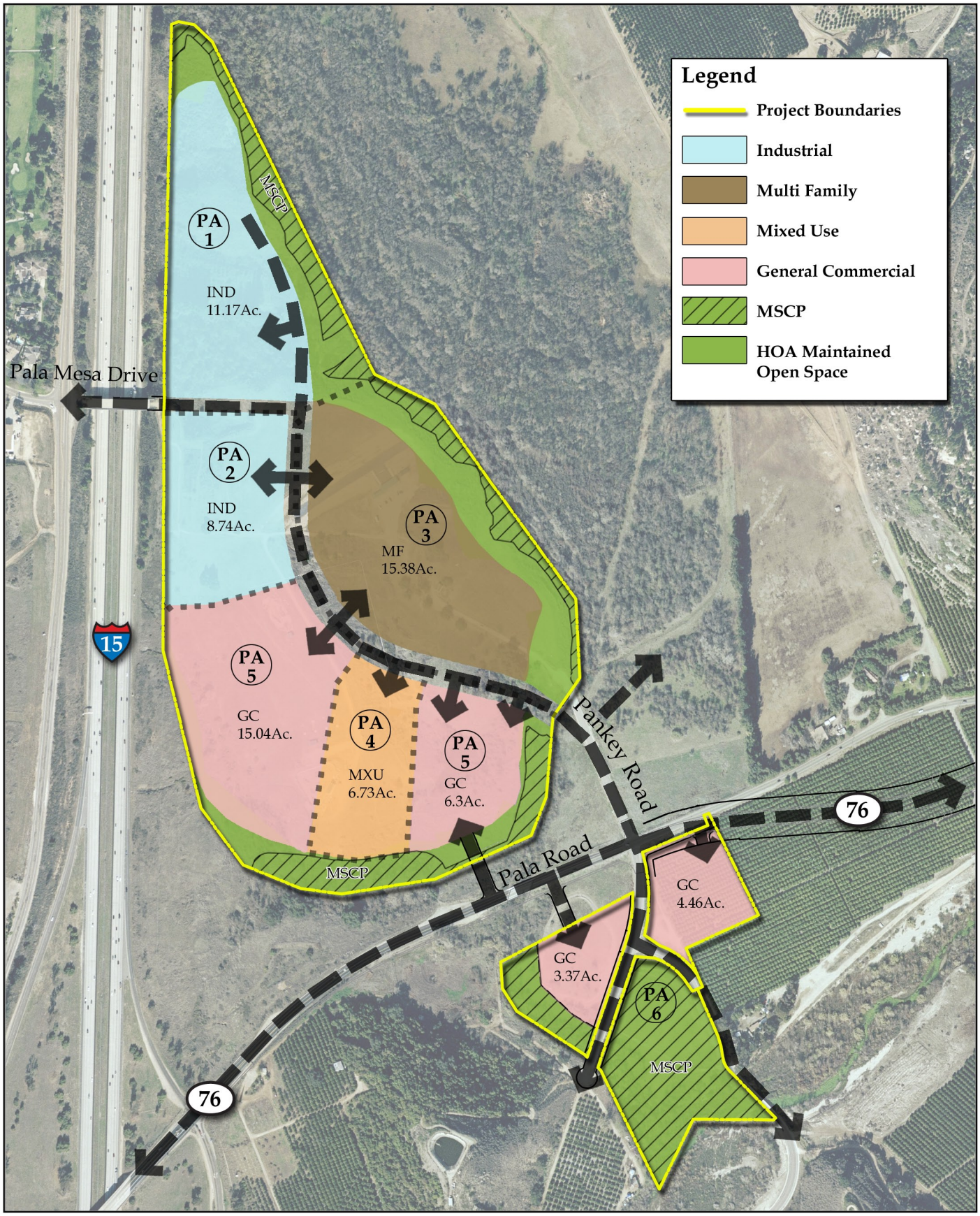

Figure II-7

Campus Park West

Specific Plan

Land Use Plan

0' 300' 600'

PROJECT DESIGN CONSULTANTS

COMMENTS RECEIVED IN RESPONSE TO THE NOP

Linda S. Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

Maziar Movassaghi, Acting Director
5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

July 7, 2009

Mr. Dennis Campbell
San Diego County
5201 Ruffin Road, Suite B
San Diego, California 92104
Dennis.Campbell@sdcounty.ca.gov

NOTICE OF PREPARATION FOR A DRAFT ENVIRONMENTAL IMPACT REPORT CAMPUS PARK WEST PROJECT (SCH# 2009061043), SAN DIEGO COUNTY

Dear Mr. Campbell:

The Department of Toxic Substances Control (DTSC) has received your submitted Initial Study and Notice of Preparation (NOP) for a subsequent draft Environmental Impact Report (EIR) No. 507 for the above-mentioned Project. The following project description is stated in your document: "Campus Park West is a proposed mixed-use development located on 118.3 acres in the community of Fallbrook within unincorporated San Diego County. The proposed uses include a total of 355 residential units, 400,000 square feet of commercial development, 347,000 square feet of industrial uses, 50,000 square feet of office development, 11 acres of common open space, and 27 acres of natural open space. Access to the project site would be from Pankey Road which connects with State Route 76 (SR-76). The Campus Park West Project is located east of Interstate 15 (I-15), also known as Pala Road. The site is presently vacant with the exception of a small citrus grove and an interim private radio-controlled model aircraft use." DTSC has the following comments:

1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances, and any known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the pertinent regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

- Envirostor: A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).

- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.

- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.

- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.

- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No. 11 below for more information.

3) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

4) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.

5) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

6) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

7) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

9) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented.

10) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project

11) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/ SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact Mr. Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov or by phone at (714) 484-5491.

Sincerely,

Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
nritter@dtsc.ca.gov

CEQA# 2624

From: gerald WALSON [rhbcal@sbcglobal.net]
Sent: Thursday, July 09, 2009 11:03 AM
To: Campbell, Dennis
Subject: NOP Campus Park West

Issues for Campus Park West NOP 9
July 2009

1)Pappas is not in the Rainbow Municipal Water District. How will water and sewage be addressed? SDCWA does not have any extra water to support this development---PERIOD! Without the guarantee that sustainable water is available this project should not be allowed to continue.
2) The I-15 corridor plan requires that the four corners at the SR 76 and I-15 intersection be processed in concert as an integrated master plan.
3) The issue of schools between the Fallbrook and Bonsall district must be resolved.
4) the EIR must address the project with respect to the current general plan and not the proposed amended general plan. The EIR response must be identically addressed in the current general plan and the proposed amended general plan.
5) The EIR must address the issue of a second fire road route clearly and the safe use of the access road to rice Canyon
6) There is a big disconnect between the County's perception of what developer proposals can be processed and the County's perception of realistic land plan use.
The developers concept of land use zoning and the Community concepts as embodied in the Community Plan are vastly different. The County's perception of allowable developers land use is unrealistic and unrealistic land-use proposals by developers should not be processed.
Developers and the County ignore the recommendations of the Community planning areas and the County allow the developers to pursue unrealistic and Community trashing

project.
7) What criteria will be applied when considering the availability of water to support the project?
8) What restrictions from the I-15 corridor plan will be applied?
9)This project constitutes Urban sprawl how will this be addressed?
10) The proposed densities exceed those allowed by the General Plan.
11) What provisions are being made for Fire Safety ?
12) How is development in the area West of I-15 being addressed collectively in an integrated manner?
13)The traffic generated by the proposed development in the area exceed the existing and planned roads capacity. How will traffic on the secondary roads in the area be addressed ?

Gerald Walson
30545 Via Maria Elena
Bonsall. CA 92003

LAFCO
San Diego Local Agency Formation Commission

1600 Pacific Highway • Room 452 • San Diego, CA 92101
(619) 531-5400 • FAX (619) 557-4190
Website: www.sdlafco.org

July 8, 2009

TO: Project Processing Control Center
Department of Planning and Land Use (O650)

FROM: Chief, Governmental Services
Local Agency Formation Commission (A216)

SUBJECT: Notice of Preparation of an Environmental Impact Report for Campus Park West: SPA 05-001; GPA 05-003; REZ 05-005; TM 5424; STP 05-014; LOG NO. 05-02-009

Thank you for the opportunity to provide comments on the Notice of Preparation of an Environmental Impact Report for the above-referenced project. As you know, LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any related sphere of influence actions. Since jurisdictional changes would be required to implement the proposed project, LAFCO will have discretion over those proposed governmental structure changes and will be a responsible agency for the associated environmental review. All proposed jurisdictional changes should be identified both in the project description and on the list of discretionary actions contained in the summary section of the environmental review document.

Moreover, environmental documents should contain a discussion of the following: (1) a description of proposed public facilities; (2) the manner in which public services (i.e., water, sewer, fire protection, etc.) are proposed to be provided to the project area; (3) the ability of subject agencies to provide service to additional territory; (4) the growth inducing impacts associated with a service area expansion; (5) impacts to open space and agricultural lands; and (6) an evaluation of all direct, indirect, and cumulative environmental impacts associated with the proposed boundary and sphere of influence changes to local government agencies.

The proposed 118-acre project involves a mixed-use development, which includes the construction of 355 residential units, industrial and commercial facilities, common open space, and natural open space. Most of the site is vacant with the exception of a citrus grove and a temporary private radio-controlled model aircraft area. Therefore, we offer the following comments:

Public Services

- Water, Sewer, and Recycled Water

While the project area is in the San Luis Rey Municipal Water District (SLRMWD) and its sphere of influence, SLRMWD provides services limited to groundwater protection and property owner advocacy. With the District lacking legal authority to furnish water, sewer, or recycled water, the entire project footprint needs to be in an agency that is entitled to deliver those services. This need is acknowledged in the NOP, which mentions that potential providers include the Rainbow and Valley Center Municipal Water Districts. At this time, the appropriate agency to provide water, sewer, and recycled water to the Campus Park West site has not yet been identified because a Municipal Service Review and Sphere of Influence (MSR/SOI) Update Study to determine the most logical provider in that geographic region was never finalized. Thus, LAFCO needs to complete the MSR/SOI Update Study prior to annexation of the area to a water, sewer, and recycled water purveyor.

In addition, access to imported water in San Diego County is restricted to member agencies of the San Diego County Water Authority (CWA), which purchases water from the Metropolitan Water District of Southern California (Metropolitan). Consequently, to receive water, property must be located in the boundary of a CWA member. At this time, none of the Campus Park West territory is in the boundary of a member agency and thus is not eligible to obtain imported water. Therefore, water service is contingent upon the following actions: (1) inclusion within a CWA member agency; (2) concurrent annexation to CWA and Metropolitan; and (3) inclusion in all affected agencies' spheres of influence.

- Fire Protection and Emergency Medical Services

The project site consists of APNs 108-121-14; 125-061-01; 125-063-01, -07, and -08. Our research verified that four of the parcels already are in the North County Fire Protection District (FPD) for fire and emergency medical services. However, we were unable to locate information relative to APN 125-063-07. Thus, the document should address whether the entire project area is in the FPD or if a portion may require annexation. If annexation of the parcel is necessary, environmental review must address the effects of annexation on the FPD and the District's ability to provide an adequate level of service.

Open Space and Agricultural Lands Preservation Policy

According to Government Code Sections 56001 and 56301, LAFCOs have been directed by the State Legislature to preserve open space and agricultural lands and to establish local policies to do so. Moreover, San Diego LAFCO Policy L-101 (see attachment) 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. Since LAFCOs were established to oversee the efficient extension of government services, consideration of how spheres of influence and/or changes of local governmental organization could affect open space and prime agricultural lands is required when the Commission considers proposed jurisdictional changes. Since the project area contains a citrus grove, the environmental document must contain a discussion regarding the proposed conversion of agricultural and open space resources in the context of State Law and Policy L-101.

Should you have any questions, or if LAFCO may be of any further assistance, please contact me at (619) 531-5400.

Ingrid E. Hansen

INGRID E. HANSEN
Chief, Governmental Services

IEH/ieh
Attachment (Policy L-101)
cc: Chief Metcalf, North County FPD

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 prezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;

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

June 30, 2009

Mr. Dennis Campbell
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Dennis:

Thank you so much for making the long trip to Fallbrook to discuss the Notice of Preparation for the EIR for Campus Park West. As you suggested at that meeting on June 22, we are submitting the attached comments for the preparation of the EIR. You will note that the final page is a copy of the Planning Group's 2005 motion on this subject which includes the same items we are repeating now. The Planning Group supported these items in 2005 and presumably continues to support them today, although there was not sufficient time for a vote on the attached document before your July 10 deadline.

We will also send to you, by U.S. mail, a copy of this submission with our signatures.

Thank you so much.

Harry Christiansen, Chair, Circulation Committee
976 Ridge Height Drive, Fallbrook, CA 92028

Jack Wood, Chair, Land Use Committee
3191 Los Verdes Drive, Fallbrook, CA 92028

Anne Burdick, Chair, Public Facilities Committee
PO Box 217, Fallbrook, CA 92088
Fallbrook Community Planning Group

Attachment
Submission by three individual members of the Fallbrook Community Planning Group
Topics for inclusion in the EIR
Ways the Proposed Project Violates the Current Fallbrook Community Plan-1988
FCPG Motion - 2020 Plans for the Northeast Quadrant of I-15/76 Adopted at the Special Meeting on May 2, 2005
cc: Kristin Blackson

Submission by three individual members of the Fallbrook Community Planning Group

Harry Christiansen, Chair, Circulation Committee
Jack Wood, Chair, Land Use Committee
Anne Burdick, Chair, Public Facilities Committee

to

County of San Diego, Department of Planning and Land Use
Attention: Dennis Campbell, Project Manager
dennis.campbell@sdcounty.ca.gov
cc: Kristin Blackson
kristin.blackson@sdcounty.ca.gov

in

Response to the Notice of Preparation of an EIR for Campus Park West
SPA 05-001, GPA 05-003, REZ 05-005, TM 5424, STP 05-014, LOG NO. 05-02-09

We wish to submit the following topics for inclusion in the preparation of the Environmental Impact Report for Campus Park West:

The overriding need to create a comprehensive master plan for the entire area east of Highway 15 at Highway 76 regardless of the specific ownership of individual parcels;

Need to develop sequential phasing for roads, water, and sewer since all the proposed developments will be dependent on each other. Most critical is an east-west road connecting Highway 395 from Pala Mesa Drive eastward to Horse Ranch Creek Road, which must be completed prior to development in Campus Park and/or Meadowood;

Impact of development on the Fallbrook Community Character
Impact on aesthetics and the adverse effect on scenic vista

Densities (**Please see Planning Group motion dated May 2, 2005, attached**)
- Residential
- Commercial
- Industrial

The **location, the type, and the quantity** of commercial and industrial facilities being planned and/or permitted (All commercial development should be located on Highway 76 on the Pappas property, not further north or east in the center of a residential area.)

Impact of Commercial and Industrial on proposed residential areas
Impact of Commercial and Industrial on the viability of downtown Fallbrook

Parking and Access Roads

Transportation and traffic/Road Network
- Cumulative impacts of all developments plus a quarry, landfill, casinos, etc, on:
  - Highway 76
  - Highway 76/I-15 Interchange
  - Highway 395
  - Stewart Canyon/Canonita
  - I-15/East Mission Road Interchange

Future inability of local residents to access their own community from I-15 in a timely manner

The development of a road network as a cohesive plan for the entire area with easy access both to and from this area, including the construction of Pala Mesa Road all the way to Gird Road

Consider the effect on traffic circulation if Pala Mesa Road were constructed westward through to Gird Road and whether the projects in the quadrant should participate in these construction costs.

The avoidance of additional impacts on existing freeway access (at both Mission Road and Highway 76) by creating a third access to Interstate15 at Canonita Road;
If Caltrans is not interested in creating this Interchange, it needs to become a County project based on TIF fees from all the projects in the quadrant.

Creation of an east-west roadway through the center of the quadrant

The development and location of the transit node and the "Park and Ride" in Campus Park West

Fire Evacuation

Need for all-weather secondary access for Meadowood

Grading - 77% of the site, 700,000 cubic yards, cut=22', fill=28'

Inconsistent with Community Plan
Inconsistent with environment

Structures

Adhere to Fallbrook Design Review Guidelines and I-15 Corridor DR Guidelines
Adhere to height limits established by the County and the Fallbrook Community Plan

Schools

Resolution of boundary and jurisdictional issues with the two elementary districts
Set aside land for second high school for Fallbrook area

Water supplies/Hydrology and Water Quality
Sewer and Waste treatment facilities
Air Quality
Dark Skies - of special concern because of the Palomar Observatory
Noise

WAYS THE PROPOSED PROJECT VIOLATES THE CURRENT FALLBROOK COMMUNITY PLAN (1988)

Interstate 15/Highway 76 Master Specific Plan Area (MSPA)

(Excerpts from Appendix B of Fallbrook Community Plan, 1988)

(Page 31) ...; therefore a final land use plan should not be adopted until further studies are carried out to identify the detailed needs of the plan area and the appropriate methods to support those needs."

(Page 31) The Master Specific Plan process is suggested because it appears to be a logical vehicle for an integrated planning approach .....and is often used for planning of large blocks of land where control beyond the General Plan level is appropriate.

(Page 32) Additional studies need to be conducted for the properties within the Master Specific Plan Area before the recommended land use designations are finalized by the Board of Supervisors. These studies include the following:

1) traffic analysis
2) facilities financing plan
3) market analysis
4) San Luis Rey River Plan
5) detailed dark sky policy implementation procedures
6) more detailed design guidelines developed in conformance with the I-15 Corridor Scenic Preservation Guidelines; and
7) a park and open space/trails plan.

...The studies may indicate that some of the land uses suggested here [in the Master Specific Plan] have unacceptable impacts on the infrastructure and environment and may recommend that this proposed plan be modified. These modifications would be considered by the Planning Commission and Board of Supervisors in adopting the final master Specific Plan and its component Specific Plan.

FCPG MOTION *2020 Plans for the Northeast Quadrant of I-15 /SR76*
ADOPTED AT SPECIAL MEETING - MAY 2, 2005 (14 yes, 1 no)

1. We prefer the total land use density for dwelling units proposed by the "College Alternative" Plan, except that an additional 100 home sites should be included in the Pappas property.

2. We recommend continued work on the College Plan alternative to refine the allowed densities, with a targeted total, maximum yield of dwelling units to actually be built of not more than 1,400 residential dwelling units distributed as follows: Passerelle = 650, Pardee = 650, Pappas = 100.

The current County concept is on a General Plan Amendment level, which produces the "raw" number of allowable lots. It does not account for the density reductions that occur later in "project planning". Minimum lot sizes in each land use designation, setbacks, slopes, school and park areas, environmental restrictions, and other factors will normally reduce the number of lots in the Land Use Designations to the number of yielded (actual) lots to roughly 60 – 70% of the "raw number" density.

3. We recommend a maximum Floor Area Ratio of 40% of total land designated for Office Professional/ Light Industrial land. The sixty acres of office / industrial space proposed by Passerelle would then be limited to approximately one million square feet of building space.

4. We recommend that the Transit Node facilities should be located in the Pappas property, as follows: It should be located as close as possible to SR 76; It should be at least twenty acres in size, with parking for at least 1,500 cars; It should be landscaped with trees and bushes; And, it should be paid for by TransNet (the new ½ cent sales tax) or with gas tax or other public funds.

5. We recommend that only 100 home sites should be on the easterly part of the Pappas property, and there should not be any condos or apartments. The Commercial site (A) should not be more than eight acres, and (B) should be designed and designated as being "Neighborhood Serving Commercial", with no "regional" shopping characteristics, and (C) should have Floor Area Ratios that permit no more than 100,000 square feet of total building space, which will allow a commercial center substantially equivalent to the Major Market shopping center – with the addition of a drug store.

The balance of the Pappas property north of SR 76 (after portions used for commercial and Transit Node facilities) should be limited to Office Professional / Light Industrial uses with a Floor Area Ratio of not more than 40% of total designated land use. This motion does not address Pappas' property south of SR 76.

6. We strongly recommend the creation of a new Freeway interchange at the Canonita / Stewart Canyon crossing to relieve future traffic impacts at our two existing Freeway interchanges. A significant portion of these costs should be borne by the proposed developments.

7. We recommend that the road arrangement within the Pappas property should include a connection northeasterly to the central area of the Passerelle / Pardee projects.

8. We recommend that any "phasing plan" for actual development and construction in this quadrant should take into account the infrastructure improvements then in place on SR 76, both east and west of I-15.

California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
http://www.dfg.ca.gov

ARNOLD SCHWARZENEGGER, Governor
DONALD KOCH, Director

July 6, 2009

Mr. Dennis Campbell
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Campus Park West Project (SCH# 2009061043)

Dear Mr. Campbell:

The Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Campus Park West Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq.

The proposed project is located on a 118.3-acre site within the community of Fallbrook, within unincorporated San Diego County. The project site is specifically located immediately east of Interstate 15 (I-15) and north of State Route 76 (SR-76), also known as Pala Road. Approximately 99.7 acres of the property is located north of SR-76 and 18.6 acres is located south of SR-76. The Project proposes to construct up to 355 residential units, 400,000 square feet of commercial development, 347,000 square feet of industrial development, and 50,000 square feet of office development. In addition, 11 acres of common open space and 27 acres of natural open space are included in the development plan. Two previous County-certified EIRs have included the project property, but both were completed in the early 1980s. Because of changes in regulations, land use planning, and on-site conditions since the times of these previous EIRs, new baseline studies and environmental analyses are proposed by the County to assess the potential impacts of the current project. The Department concurs with the County's assessment on the need for a new analysis of the biological resources on-site, and in the vicinity of the project, and on the potential project impacts from this new proposed project. The project Initial Study indicates that the site supports sensitive habitats, such as riparian woodland, coastal sage scrub and annual grassland; and sensitive species, including the least Bell's vireo (*Vireo bellii pusillus* – state and federal endangered) and the California gnatcatcher (*Polioptila californica californica* – federal threatened). In addition, the southern portion of the site abuts the San Luis Rey River, a documented location for the federal endangered arroyo toad (*Bufo californicus*)

The Department offers the following comments and recommendations to assist the County in avoiding or minimizing potential project impacts to biological resources:

Specific Comments

1. The project site is included within the Preliminary Public Review Draft Multiple Species Conservation Program North County Plan (NCMSCP), dated February 19, 2009, as a "hardline development project" (NCMSCP – Appendix E). Figure 1, Appendix E of the NCMSCP, illustrates the proposed authorized take and open space areas of the property. These areas appear to correspond with the development design proposed in the NOP. The DEIR should confirm the project's consistency with the hardline development and habitat preserve areas within the draft NCMSCP to assure that the project design does not preclude the establishment of the habitat preserve system of the NCMSCP. The DEIR should include a discussion of the significance of this project and its proposed open space to the NCMSCP preserve system and species coverage.

2. The DEIR should identify locations for any off-site biological mitigation, whether they are site specific acquisitions or mitigation/conservation banks.

3. The DEIR should include detailed revegetation plans for any on- or off-site properties requiring habitat restoration as a mitigation measure. This would be particularly important for arroyo toad aestivation habitat on the project property south of SR-76, adjacent to the San Luis Rey River, and riparian habitat occupied or adjacent to habitat occupied by the least Bell's vireo.

4. Updated biological surveys should be completed where needed for federal and state-listed threatened or endangered species, including the least Bell's vireo, California gnatcatcher, Stephens' kangaroo rat (*Dipodomys stephensi*), and arroyo toad.

5. The project proposes to set aside approximately 27 acres of natural open space on-site as a portion of its mitigation obligation for impacts to biological resources. In addition, the project will likely require additional off-site biological mitigation in the form of acquisition and/or restoration. The DEIR should include a detailed discussion on the long-term management of all mitigation sites, including a management plan(s), the identification of a qualified land manager, an estimate of management costs, and a mechanism for management funding.

6. The proposed project should be designed to incorporate building design features that reduce the threat of wildlife fire impacts to the project. Appropriate defensible space should be designed into the project such that no fuel management is required to encroach into the natural open space areas on-site.

General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation

measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

a) The project area supports riparian and wetland habitats; therefore, a jurisdictional delineation of these habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.[1] Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b) Unless the proposed project avoids (*e.g.*, spans the riparian corridor), it will require a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, prior to the commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a SAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. 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 the SAA.[2]

2. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. 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 a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the following information is requested:

   a) Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

   c) Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

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

---

[1] Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

[2] A notification package for a SAA may be obtained by writing to: Department of Fish and Game, 4949 Viewridge Avenue, San Diego, CA 92123, by calling (858) 636-3160, or by accessing the Department's web site at www.dfg.ca.gov/1600 .

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) A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should 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.

Biological Resources within the Project's Area of Potential Effect

4. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DEIR should include the following information.

   a) Per CEQA Guidelines, § 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.

   b) A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.

   c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 322-2493 or www.dfg.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.

   d) An inventory of rare, threatened, and endangered, and other sensitive species 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, Section 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.

   a) A discussion of impacts associated with increased lighting, noise, human activity, changes in drainage patterns, changes in water volume, velocity, and quality, soil erosion, and /or sedimentation in streams and water courses on or near the project site, with mitigation measures proposed to alleviate such impacts should be included.

b) 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 Natural Community Conservation Plan). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion 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. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater.

c) 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. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d) A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities (Attachment 2) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction 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 and therefore 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.

8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 15 through September 15 (as early as January for some raptors). If project construction is necessary during the bird breeding

season, a qualified biologist should conduct a survey for nesting birds, within three days prior to the work in the area, and 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 impacted by the project.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation 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.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to David Lawhead at (858) 627-3997.

Sincerely,

Edmund J. Pert
Regional Manager
South Coast Region

cc: David Lawhead (CDFG-San Diego
Randy Rodriguez (CDFG-San Diego)
Michelle Moreno (USFWS-Carlsbad)
State Clearinghouse, Sacramento (fax)

STATE OF CALIFORNIA Arnold Schwarzenegger, *Governor*

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax

June 29, 2009

~~Dennis Campbell~~
San Diego County
5201 Ruffin Road, Suite B
San Diego, CA ~~92104~~ 92123

RE: SCH# 2009061043 Campus Park West; San Diego County.

Dear Mr. Campbell:

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 archaeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064 (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 Information Center for a record search to determine:
  - If all or a part of the 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 measurers 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 NAHC for a Sacred Lands File Check (SFL).
  - SLF Check Completed, 06/26/09, indicates potential impact to "Gird ROAD Rock Art Site", (Bonsall USGS quadrangle, township 10 south, range 3.
  - Please contact the Rincon San Luiseno Band, Ruth Calac, P.O. Box 1083, Pauma Valley, CA 92061, telephone (760) 749-7827 to determine if your project will impact this site. Also attached is the Native American Contact list for San Diego county.

The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

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- ✓ Contact the NAHC for 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.
    The NAHC makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received. If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information.
- ✓ Lack of surface evidence of archaeological resources does not preclude their subsurface existence. Lead agencies should include in their mitigation plan:
  - Provisions for the identification and evaluation of accidentally discovered archaeological resources, per CEQA Guidelines 15064.5 (f).
  - Provisions for monitoring all ground-disturbing activities in areas of identified archaeological sensitivity by an archaeologist meeting the professional qualifications as defined in the *Secretary of Interior's Standards and Guidelines* for archaeology and a culturally affiliated Native American monitor.
  - Provisions for the curation of recovered artifacts, per CEQA Guidelines 15126.4 (5)(b)(3)(C), in consultation with culturally affiliated Native Americans.
  - Provisions for the discovery of Native American human remains. Health and Safety Code 7050.5, CEQA Guidelines 15064.5 (e), and Public Resources Code 5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

Native American Contact
San Diego County
June 29, 2009

Pala Band of Mission Indians
Robert H. Smith, Chairperson
12196 Pala Mission Road, PMB 50 Luiseno
Pala , CA 92059 Cupeno
(760) 891-3500
(760) 742-1411 Fax

Pauma & Yuima
Christobal C. Devers, Chairperson
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resource Center
P.O. Box 1477 Luiseno
Temecula , CA 92593
pmacarro@pechanga-nsn.gov
(951) 308-9295 Ext 8106
(951) 676-2768
(951) 506-9491 Fax

Rincon Band of Mission Indians
Angela Veltrano, Rincon Culture Committee
P.O. Box 68 Luiseno
Valley Center , CA 92082
council@rincontribe.org
(760) 749-1051
(760) 749-8901 Fax

Soboba Band of Mission Indians
Robert Salgado, Chairperson
P.O. Box 487 Luiseno
San Jacinto , CA 92581
dhill@soboba-nsn.gov
(951) 654-2765
(951) 654-4198 - Fax

San Luis Rey Band of Mission Indians
Henry Contreras, Most Likely Descendant
1763 Chapulin Lane Luiseno
Fallbrook , CA 92028
(760) 728-6722 - Home
(760) 908-7625 - Cell

San Luis Rey Band of Mission Indians
Russell Romo
12064 Old Pomerado Road Luiseno
Poway , CA 92064
(858) 748-1586

Pauma Valley Band of Luiseño Indians
Bennae Calac, Tribal Council Member
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
bennaecalac@aol.com
(760) 617-2872
(760) 742-3422 - FAX

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

Distribution of this list does not relieve any person of 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 local Native Americans with regard to cultural resources for the proposed SCH# 2009061043 Campus Park WEst; San Diego County.

Native American Contact
San Diego County
June 29, 2009

Pauma & Yuima
ATTN: EPA
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
kymberli_peters@yahoo.com
(760) 742-1289
(760) 742-3422 Fax

San Luis Rey Band of Mission Indians
Mark Mojado, Cultural Resources
1889 Sunset Drive Luiseno
Vista , CA 92081 Cupeno

Rincon Band of Mission Indians
Bo Mazzetti, Interim Chairperson
P.O. Box 68 Luiseno
Valley Center , CA 92082
council@rincontribe.org
(760) 749-1051
(760) 749-8901 Fax

Kupa Cultural Center (Pala Band)
Shasta Gaughen, Assistant Director
35008 Pala-Temecula Rd.PMB Box 445 Luiseno
Pala , CA 92059
cupa@palatribe.com
(760) 742-1590
(760) 742-4543 - FAX

Rincon Band of Mission Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 68 Luiseno
Valley Center , CA 92082
council@rincontribe.org
(760) 749-1051
(760) 749-8901 Fax

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula , CA 92593
tbrown@pechanga-nsn.gov
(951) 676-2768
(951) 695-1778 Fax

San Luis Rey Band of Mission Indians
Carmen Mojado, Co-Chair
1889 Sunset Drive Luiseno
Vista , CA 92081
cjmojado@slrmissionindians.org
(760) 724-8505
(760) 724-2172 - FAX

La Jolla Band of Mission Indians
ATTN: Rob Roy,Environmental Director
22000 Highway 76 Luiseno
Pauma Valley , CA 92061
lajolla-sherry@aol.com and
(760) 742-3790
(760) 742-1704 Fax

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

Distribution of this list does not relieve any person of 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 local Native Americans with regard to cultural resources for the proposed SCH# 2009061043 Campus Park WEst; San Diego County.

To: San Diego County
5201 Ruffin Road, Suite B
San Diego, California 92104
Attn: Dennis Campbell

Re: Campus Park West
SCH # 2009061043
Notice of Preparation (NOP)

After review of above referenced document, Consideration One: Project needs to comply with Title 14 specifically PRC 4290, 4291, and Uniform Fire Code. The document does not provide enough information to determine if the afore mentioned is addressed. Consideration Two: I would recommend and strongly encourage that all wires and other service lines be placed under ground. This action would greatly enhance firefighter safety in the event of a wild land fire and also allow access which typically is compromised because of burnt poles and down lines, which are indicative of overhead applications.

Mark Ostrander
CAL FIRE
San Diego Unit
Environmental Coordinator
(619) 894-1464 cell
(619) 590-3100 office
Mark.Ostrander@fire.ca.gov

JUL 13 '09 PM 1:37

SANDAG

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

July 10, 2009

7000300

Mr. Dennis Campbell
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Dennis:

SUBJECT: Notice of Preparation of an EIR for SPA 05-001, GPA 05-003, REZ 05-005, TM 5424, STP 05-014, Log No. 05-02-009, Campus Park West

Thank you for the opportunity to comment on the Campus Park West project. We recently received the Notice of Preparation of an Environmental Impact Report that indicates this project includes a total of 355 residential units, 400,000 square feet of commercial development, 347,000 square feet of industrial uses, 50,000 square feet of office development, 11 acres of common open space, and 27 acres of natural open space.

Our comments, which are based on policies included in the Regional Comprehensive Plan (RCP), Regional Transportation Plan (RTP), and the Congestion Management Program (CMP), are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth principles. It should be noted that the San Diego region may not be subject to compliance with the State CMP process pending action of local jurisdictions to elect to be exempt.

State law gives SANDAG the authority to determine whether a project or plan will need to be reviewed for regional significance. SANDAG staff has reviewed this project and determined that it is regionally significant due to the amount of traffic anticipated to be generated. Therefore, environmental review of this project should include consideration of applicable policy objectives contained in the RCP, CMP, and the RTP.

Smart Growth Opportunity Areas. A key goal of the RCP is to focus growth in smart growth opportunity areas. The proposed project appears to be located within a Smart Growth Special Use Center Area.

Although more information is needed, it appears that this project would contribute to meeting the density and intensity targets of the Special Use Center place types. The Special Use Center employment target is 45 employees per acre; there is no residential density target. We recommend that, in designing this project, that you use SANDAG's new guidelines for smart growth areas entitled, *Designing for Smart Growth: Creating Great Places in the San Diego Region,* available on our Web site.

MULTI-MODAL TRANSPORTATION ANALYSIS

The 2030 Regional Transportation Plan provides a multi-modal approach to meet the region's transportation needs. As such, it is requested that the traffic analysis for this project also consider balancing the needs of motorists, transit riders, pedestrians, and bicyclists, and include the following impact analysis.

Freeway Impacts. Analysis of potential impacts to Interstate 15 and State Route 76 should be performed according to the Traffic Impact Study Guidelines included as Appendix D in the 2008 CMP Update (attached).

Transit Impacts. Address potential impacts to existing and planned transit by identifying the transit mode share (bus and light rail) as a share of total project trips, existing or planned transit stop locations within/adjacent to the proposed project, and quantify any traffic delay on bus service resulting from the proposed project. This analysis is desired as a reference to help quantify potential impacts on the transit system.

The North County Transit District (NCTD) currently does not operate any fixed route bus service near this proposed development site and has no current plans or funding to operate transit service to it in the foreseeable future. The closest existing NCTD bus service to this site is in either downtown Fallbrook or northern Escondido.

Should the County or developer desire that local bus service be operated to this currently remote location at some point in the future, then a new mechanism will need to be devised to have the developer and/or future home/business owners fund such a service, as well as having appropriate bus stop infrastructure in place to meet transit's needs. Specifically, the developer should consider a mechanism through the homeowners' association, whereby residents pay a small fee for provision of a bus pass upon move-in. In addition, the street network should be designed to be transit friendly in the event that future service is planned.

Resident Access To Transit. If residents of this future development wish to access transit service to Fallbrook, Escondido, and the greater San Diego area, they will be required to either walk, drive, or bike. Therefore, the developer is asked to consider the following for the benefit of future residents, and to minimize traffic impacts resulting from trips generated by a large development of this size:

- Providing funding for construction of an onsite park-and-ride lot;
- Funding a direct shuttle to Escondido; and
- Providing bike trails throughout the development leading to proposed potential bus stops throughout the development.

Street Cross-Sections Built to Withstand the Weight of Transit Vehicles and Accommodate Their Turning Radii. All streets and intersections in this development should be constructed to standards that would not preclude the future operation of transit vehicles. Essentially, all roadways should be built to withstand the weight of a typical 40-foot long transit vehicle and all intersections should be built with large enough turning radii such that buses could make all necessary turns to circulate through the development.

Transportation Demand Management (TDM). Please consider promoting alternatives to driving alone during peak periods, such as carpooling, vanpooling, telecommuting, flexible work hours for employees, and the potential of a Transportation Demand Management (TDM) plan as a part of this project to help mitigate regional transportation impacts. We recommend contacting SANDAG's RideLink to explore transit options, the regional vanpool program, ridematching services, a guaranteed ride home program, regional bicycle lockers, and SchoolPool services. RideLink also provides free consulting services to help local businesses implement employee commute programs.

Bicycle/Pedestrian Access. In general, the project should provide appropriate connectivity and facility integration to nearby local residences and businesses. Improved bicycle and pedestrian access to local destinations can help mitigate the traffic effects of projects and provide mobility options for residents. Access between neighborhood residential and commercial should be designed to encourage easy pedestrian and bicycle access to reduce dependence on vehicle trips. (See SANDAG's *Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region* available on our Web site.)

Consult with NCTD and Caltrans. It is advised that the project applicant also consult with the North County Transit District (NCTD), the transit service provider within the project area, and also with Caltrans to coordinate planned transit and/or highway improvements, if any.

Additionally, when analyzing future (2030) traffic conditions, SANDAG recommends using the transportation network included in the RTP Reasonably Expected funding scenario.

NATURAL ENVIRONMENT

A key RCP objective is to preserve and maintain natural areas in urban neighborhoods, such as canyons and creeks, and provide access for the enjoyment of the region's residents. Please consider this criteria if applicable to your project.

CONCLUSION

We appreciate the opportunity to comment on this project. If you have any questions or concerns regarding my comments on this project, please contact me at 619-699-1943 or sba@sandag.org.

Sincerely,

Susan D Bald

SUSAN BALDWIN
Senior Regional Planner

SBA/RSA/cda

Attachments:
1. CMP Land Use Analysis Program
2. Traffic Impact Study (TIS) Guidelines

CHAPTER 4
LAND USE ANALYSIS PROGRAM

CHAPTER 4
LAND USE ANALYSIS PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) requires that all jurisdictions in the State of California evaluate the potential environmental impacts caused by new development or projects. If impacts are identified, then potential mitigation measures are evaluated and recommended. CMP enabling legislation requires that SANDAG develop a process to evaluate and mitigate the impacts of new development on the CMP system that is based on the existing CEQA review process. This process, called the Enhanced CEQA Review, is presented in this chapter along with a discussion of available resources to identify and mitigation current and future congestion.

ENHANCED CEQA PROJECT REVIEW

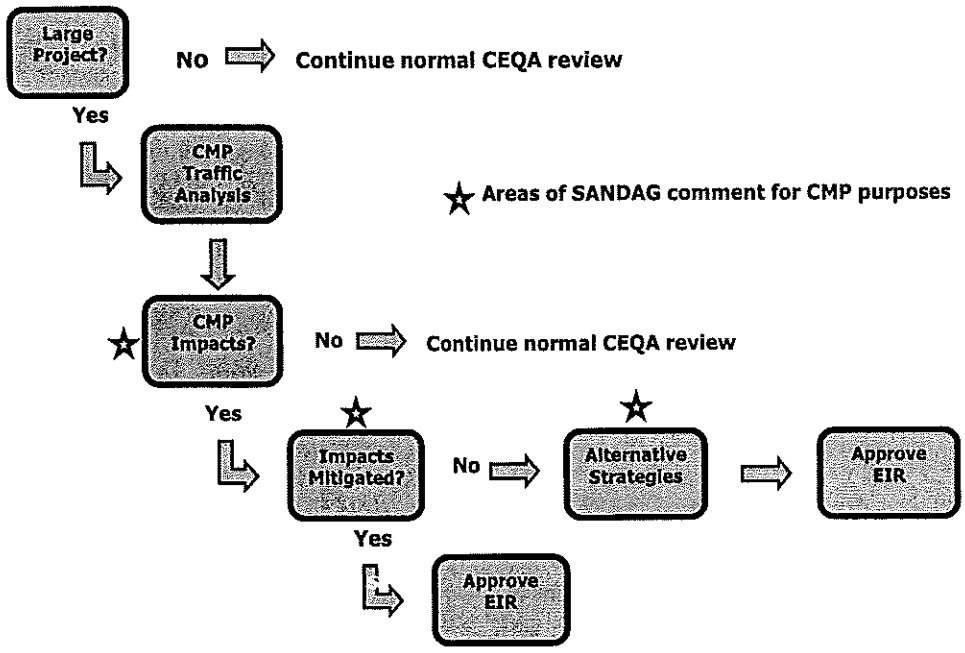
An enhanced CEQA review process has been established for use by local jurisdictions and/or project sponsors to conduct traffic impact studies and provide mitigation for *new* large project impacts on the CMP transportation system. Local agencies are required to adopt and continually implement this enhanced CEQA review process. The key features of this process include:

- A large project is defined as generating, upon its completion, an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak-hour vehicle trips.
- The review is to include a traffic impact analysis (Traffic Impact Study - TIS) and mitigation for project impacts to the regional transportation system. The current Traffic Impact Study guidelines are provided in Appendix D.
- The traffic impact analysis must identify the project's impacts on the CMP transportation system, their associated costs, and appropriate mitigation.
- Early project coordination with affected public agencies and transportation operators is required.
- Local agencies are to coordinate with the Metropolitan Transit System and the North County Transit District to ensure that transit operators evaluate the impact of new development on CMP transit performance measures.

State regulation requires that all environmental documents prepared for projects in the San Diego region be submitted to the State Clearinghouse, and the State Clearinghouse in turn advises SANDAG of documents it has received. In many instances projects sponsors also send a copy of environmental documents directly to SANDAG. Under its regional intergovernmental review program, SANDAG reviews and comments on environmental documents submitted by various agencies. As part of that process, the documents are reviewed to ensure that the enhanced CEQA

review process is followed for large projects, and the results of the required traffic analyses and identified mitigation measures are adequate. Comments, when appropriate, are submitted to the lead agency for the environmental review. The overall CMP Enhanced CEQA Review Process in summarized below.

Exhibit 4-1
CMP Enhanced CEQA Review Process



It is the goal of the CMP to ensure appropriate mitigation of significant new large project impacts on the CMP system through use of congestion management strategies (CMP roadway or transit improvements and/or non-traditional approaches, such as Transportation Demand Management) contained within the CMP, including specific strategies identified in adopted Deficiency Plans. For the purpose of meeting CMP requirements, these guidelines do not apply to mitigation which would necessitate construction of freeway improvements, including interchanges until such time that Deficiency Plans have been prepared and adopted identifying specific improvements necessary to bring the freeway segments into conformance with the CMP LOS standard. Mitigation of project impacts may include demand management strategies and/or fair share contributions toward future improvements to be identified with the Deficiency Plan. The Deficiency Plans will identify potential funding sources to implement the recommended improvements including, but not limited to federal, state, local, and private funding sources. The preceding restriction regarding freeway improvements applies only to the CMP project review process and is not intended to limit a local jurisdiction's responsibility under CEQA for ongoing review and mitigation for projects that would impact freeways.

The following guidelines are provided to assist in meeting this goal.

New Large Project – A new development project generating, upon its completion, an equivalent of 2,400 or more new average daily vehicle trips, or 200 or more new peak-hour vehicle trips.

Significant Impacts – An increase in traffic on the CMP system generated by the project that exceeds the standards summarized below which are provided in the Traffic Impact Studies Guidelines (See Table D-1 in Appendix D for a further explanation on how to use these standards).

Level of Service with Project	Allowable Change due to Project Impact					
	Freeways[1]		Roadway Segments		Intersections	Ramp Metering[1]
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
D, E, & F (or ramp meter delays above 15 min.)	0.01	1	0.02	1	2	2

[1] *These guidelines apply only to freeways with adopted Deficiency Plans.*

Project Mitigation – Actions necessary to reduce the project impacts on the CMP system to or below the standards summarized. The following section provides additional guidance on project mitigation strategies.

RESOURCES TO ADDRESS CONGESTION

One of the ways in which the CMP can address congestion is to provide the tools necessary to identify, quantify, and mitigate current and future congestion. This section summarizes a number of tools currently available to address congestion and provides information on how to obtain more information in the following categories:

- Traffic Impact Study Guidelines
- Project Design Guidelines
- Congestion Mitigation Strategies

Traffic Impact Study Guidelines

SANDAG, in cooperation with the San Diego Traffic Engineer's Council, SANTEC, has developed Traffic Impact Studies (TIS) Guidelines to assist local agencies and private developers in evaluating the traffic and transit impacts a development will have on the existing and future circulation infrastructure. The purpose of the TIS is to assist engineers in both the development community and public agencies in making land use and other development decisions. A TIS quantifies the changes in traffic levels and translates these changes into transportation system impacts in the vicinity of a project.

TIS requirements are usually outlined as part of any environmental (CEQA) project review process; and, in order to monitor effects by these requirements, Notices of Preparation must be submitted to all affected agencies. In addition, the Land Use Analysis Program of the Congestion Management Program requires that an "enhanced CEQA review" be undertaken to evaluate the impacts of large projects on the regional transportation system. These guidelines are intended to provide guidance to local jurisdictions and/or project sponsors in meeting these CMP requirements. The most current TIS guidelines are provided in Appendix D.

Project Design Guidelines

In support of the CMP and other planning activities, project design guidelines to promote alternative travel modes including walking, bicycle, ridesharing, and public transit have been prepared. The available guidelines are listed below and are available for local agency use in mitigating the impacts of new development projects and in preparing CMP Deficiency Plans.

- "Designing for Transit" (Metropolitan Transit Development Board – July 1993)
- "Urban Form Chapter – Regional Comprehensive Plan" (San Diego Association of Governments – July 2004)
- "Tools for Reducing Vehicle Trips Through Land Use Design" (San Diego County Air Pollution Control District – January 1998)
- "Bikeway Planning and Design – California Highway Design Manual" (Caltrans – February 2001)
- "Planning and Designing For Pedestrians" (San Diego Association of Governments – June 2002)
- "Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities: An ITE Proposed Recommended Practice" (Institute of Transportation Engineers – 2006)

Congestion Mitigation Strategies

In 2003 SANDAG conducted a study (Congestion Mitigation Strategies Research) to identify additional strategies for use in mitigating congestions. The research focused on the three following areas:

- Congestion Mitigation Toolbox
- Model Trip Reduction Ordinance Framework
- Trip Reduction Guidelines

The results of the Congestion Mitigation Strategies research are summarized below. Full copies of the final report are available on the SANDAG website (http://www.sandag.org) or by contacting SANDAG (619) 699-1900.

Congestion Mitigation Toolbox – Provides a compendium of transportation related strategies designed to assist local agencies in mitigating the impacts of congestion due to growth in population, employment, and traffic and as a result of new developments. The Toolbox contains 40 strategies for potential use in reducing traffic congestion based upon national research and local agency input. The manner in which these strategies can be used to address congestion is illustrated in Exhibit 4-1. A list of the strategies is provided in Exhibit 4-3 and includes a wide range of

strategies allowing local agencies to choose, at their own discretion, the best strategy or combination of strategies suitable to local congestion issues and agency resources. The strategies are grouped into five broad categories (transit, land use, Transportation Demand Management (TDM), Transportation Systems Management (TSM), and capital) and support at least one of the following objectives:

- Increase transportation system capacity.
- Increase transportation system performance.
- Encourage use of other travel modes.
- Shift peak-period trips to other time periods.
- Reduce vehicle trips.

For each strategy, information is provided on strategy effectiveness, local applicability, implementation requirements, costs, and other related strategies. References also are provided, should additional research be needed. These strategies will be updated based upon actual use and additional strategies may be added in the future.

Exhibit 4-2
Overview of Mitigation Toolbox

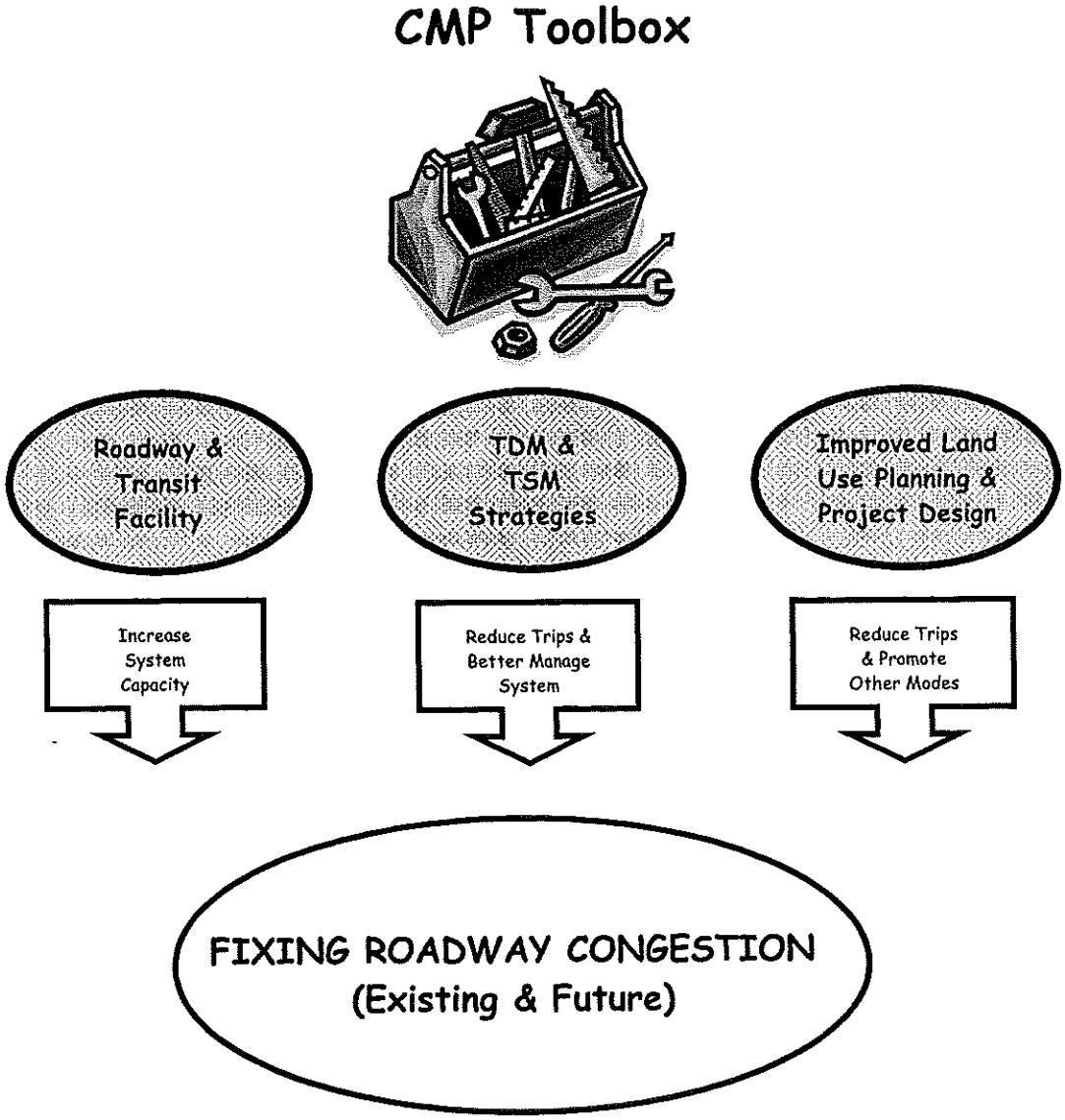


Exhibit 4-3
Summary of Congestion Mitigation Strategies

Category	No.	Strategy	Congestion Mitigation Objective				
			Increasing the Transportation System Capacity	Improving the Transportation System Performance	Electing a Mode Shift Away From Drive Alone	Shifting Trips to Other Time Periods	Vehicle Trip Reductions
Transit	1-1	Access to Light Rail/Commuter Rail/ Bus Rapid Transit (BRT)			X		
	1-2	Transit System/Service Expansion • Local • Express	X		X		
	1-3	System/Service Operational Improvements • Increased Service Frequency • Decreased Travel Time	X	X	X		
	1-4	Subscription Services	X		X		
	1-5	Car Sharing			X		
	1-6	Station Amenities & Public Transit Facility Improvements			X		
Land Use	2-1	Development Along Transit Corridors			X		
	2-2	Development Around Transit Nodes			X		
	2-3	Mixed-Use Developments					X
	2-4	Locally Serving Commercial					X
	2-5	Interconnected Street Networks & Pedestrian Facilities					X
Travel Demand Management (TDM)	3-1	On-Site Child Care/Cafeteria/Deli/ Gym/Fitness Facilities			X		X
	3-2	Transit/Alternative Modes Marketing			X		X
	3-3	Trip Reduction Programs & Ordinances					X
	3-4	Transportation Management Associations			X	X	X
	3-5	Bicycle/Pedestrian Allowances			X		X
	3-6	Distributed & Remote Work Centers/ Video Conferencing				X	X
	3-7	Alternative Work Schedules/Telework/ Work-at-Home				X	X
	3-8	Carpool/Vanpool/Transit Programs			X		
	3-9	Carpool/Vanpool Subsidies			X		
	3-10	Parking Restrictions/Reduced Minimums and Maximums/Areawide Caps			X		X
	3-11	Parking Charges & Carpool/Vanpool Preferential Parking			X		X
	3-12	Transit Pass Subsidies			X		
	3-13	Guaranteed Ride Home Program			X		

Exhibit 4-3 (Cont.)
Summary of Congestion Mitigation Strategies

Category	No.	Strategy	Congestion Mitigation Objective				
			Increasing the Transportation System Capacity	Improving the Transportation System Performance	Electing a Mode Shift Away From Drive Alone	Shifting Trips to Other Time Periods	Vehicle Trip Reductions
Traffic Systems Management (TSM)	4-1	Improved Traffic Control Devices • Traffic Signal Coordination • Adaptive Signal Control • Signage Improvements		X			
	4-2	Local Traffic Management (Monitoring and Control) & Arterial Monitoring		X			
	4-3	Special Event Management		X			
	4-4	Incident Management		X			
	4-5	Commercial Vehicle Restrictions		X			
	4-6	Advanced Traveler Information		X			
	4-7	Value/Congestion Pricing		X			
	4-8	Peak Period On-Street Parking Restrictions	X	X			
Capital	5-1	Park & Ride Lots (Transit)			X		
	5-2	HOV/HOT Lanes/Access			X		
	5-3	Roadway Widening	X				
	5-4	Intersection Improvements	X				
	5-5	Bicycle Facilities			X		
	5-6	Pedestrian Facilities			X		
	5-7	Bus Priority Treatments on Surface Streets			X		
	5-8	Grade Separation/Urban Interchange		X			

Model Trip Reduction Ordinance Framework – The purpose of the Model Trip Reduction Ordinance (TRO) Framework is to provide local agencies with a consistent process and format to prepare and adopt a TRO. Research has shown that TROs are effective in helping reduce trips generated by new development. The general process to prepare a TRO, along with two sample model TRO approaches, mandatory and voluntary, is provided in the full report. The model TROs are structured so that local agencies can modify each document as local needs and conditions dictate. Exhibit 4-4 summarizes the eleven (11) step process to develop a TRO. A decision whether to prepare a TRO is solely at the discretion of local agencies.

Trip Reduction Guidelines – The current CMP Traffic Impact Analysis (TIS) Guidelines provide a consistent methodology for evaluating the traffic impacts of new development projects on the CMP system. However, additional guidance is needed to evaluate smart growth developments and alternative project mitigation measures. The new Trip Reduction Guidelines provide supplemental methodologies and specific guidelines for incorporating selected Congestion Mitigation Toolbox strategies into the traffic impact assessment process and estimating their effectiveness in terms of associated trip reduction potential. Trip Reduction Guidelines are intended for use for the following categories of Congestion Mitigation Toolbox strategies:

- Development near transit stations and transit corridors.
- Mixed-use developments.
- Transit service and operational enhancement strategies.
- Travel Demand Management (TDM) programs.

Local jurisdictions may use the Trip Reduction Guidelines in a similar manner as they use the existing SANDAG CMP TIS Guidelines. The relationship between the new Trip Reduction Guidelines and the existing Traffic Impact Study Guidelines is shown in Exhibit 4-5. When combined with the other components of the CMS Project, a local jurisdiction can use the Trip Reduction Guidelines to provide incentives for developers to include congestion mitigation strategies into their proposed developments, or to recognize successful existing Travel Demand Management (TDM) programs. The Trip Reduction Guidelines also include options for local jurisdictions to require ongoing traffic monitoring as a condition of project approval and use of congestion mitigation strategies. Ongoing monitoring of applied congestion mitigation strategies is important to help build a solid database of local information about the effectiveness of congestion mitigation strategies applicable to the San Diego region. The Trip Reduction Guidelines can be revised in the future, as needed, to more accurately reflect local experience and traffic conditions.

In addition, it should be noted that the local agencies and the California Department of Transportation (Caltrans) may use different trip reduction rates. For projects that may impact the state highway system early consultation by a project developer with local agencies and Caltrans is strongly recommended. Caltrans and lead agencies should agree on the specific methods using traffic impact studies involving any state highway facilities, including metered and unmetered freeway ramps.

Exhibit 4-4
Step-wise Approach for Creating a Local Trip Reduction Ordinance

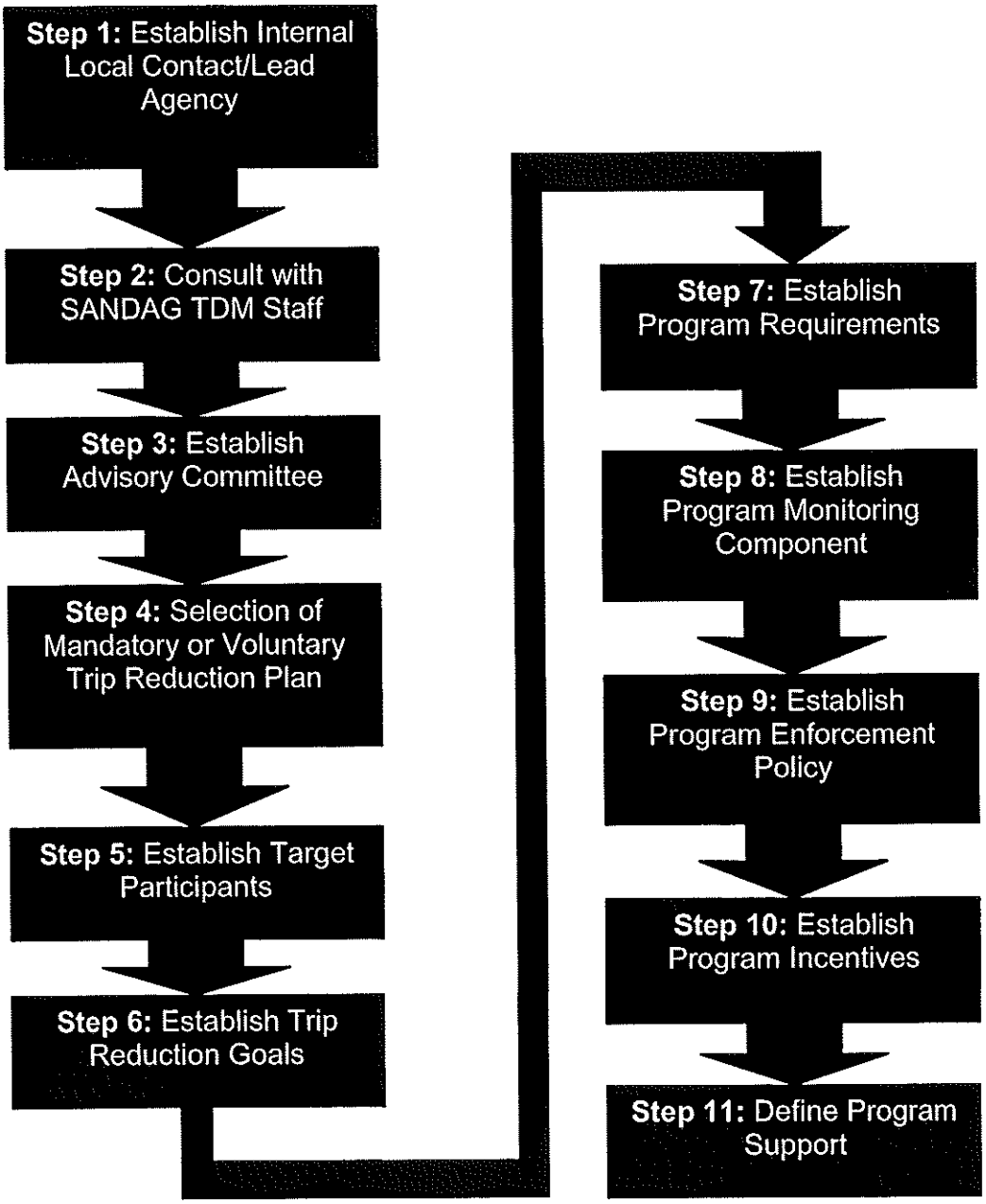
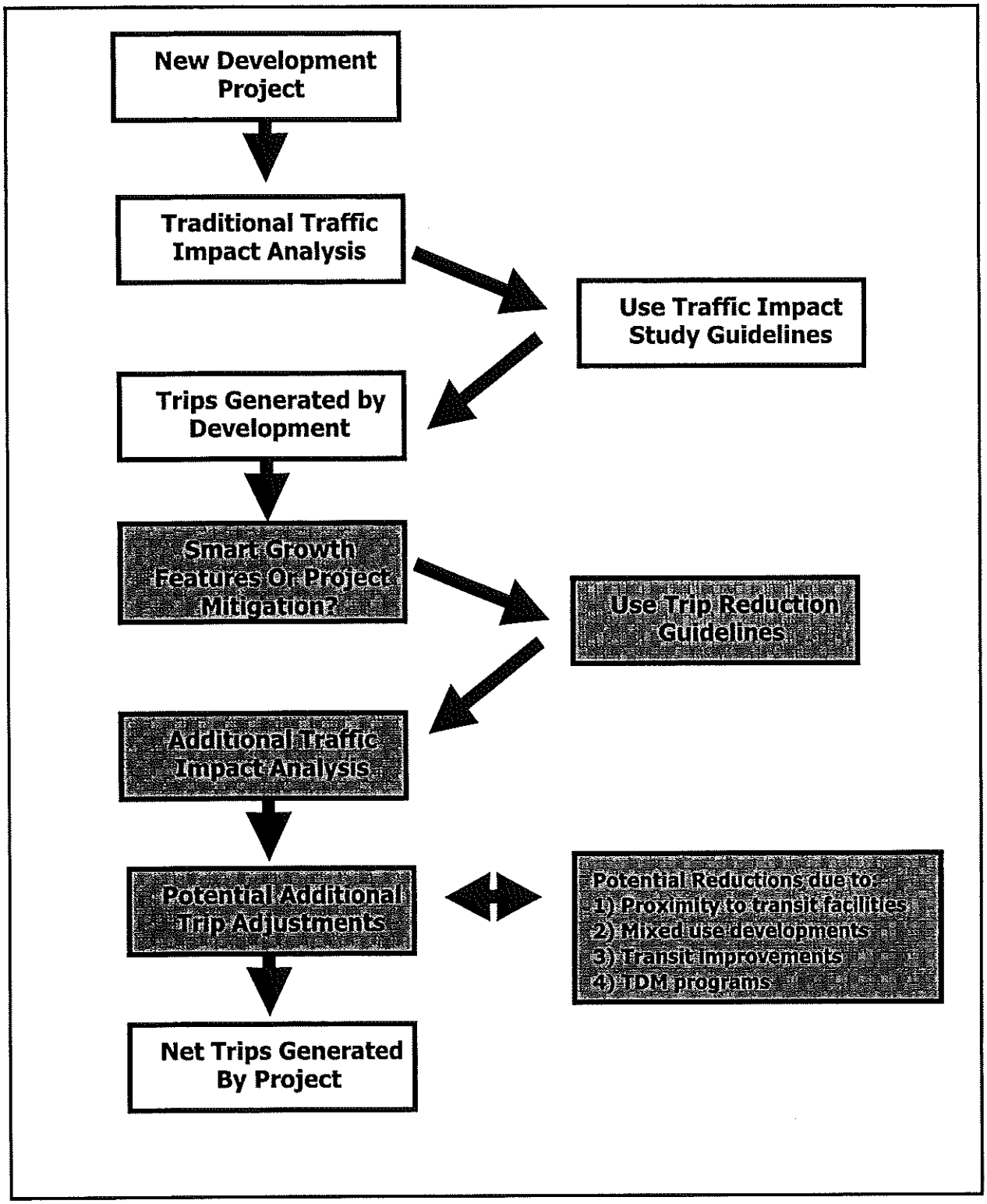


Exhibit 4-5
Incorporating the Trip Reduction Guidelines Into the Development Review Process



APPENDIX D
TRAFFIC IMPACT STUDY (TIS) GUIDELINES

APPENDIX D
TRAFFIC IMPACT STUDY (TIS) GUIDELINES

1.0 BACKGROUND

In September 1998, the San Diego Regional Traffic Standards Task Force gathered for the first time to promote "cooperation among the cities, Caltrans, and the County of San Diego to create a region-wide standard for determining traffic impacts in environmental reports." Ultimately the San Diego Traffic Engineers' Council (SANTEC) and the Institute of Transportation Engineers (ITE – California Border Section) were requested to prepare guidelines for traffic impact studies (TIS) that could be reviewed by the Task Force and other appropriate groups. The primary documents used to help prepare these guidelines were SANDAG's *Congestion Management Program* and *Traffic Generators* manual, City of San Diego's *Traffic Impact Study Manual* and *Trip Generation Manual*, and Caltrans' Draft *Guide for the Preparation of Traffic Impact Studies*.

2.0 PURPOSE OF TRAFFIC IMPACT STUDIES (TIS)

Traffic impact studies forecast, describe, and analyze the traffic and transit effects a development will have on the existing and future circulation infrastructure. The purpose of the TIS is to assist engineers in both the development community and public agencies when making land use and other development decisions. A TIS quantifies the changes in traffic levels and translates these changes into transportation system impacts in the vicinity of a project.

TIS requirements are usually outlined as part of any environmental (CEQA) project review process; and, in order to monitor effects by these requirements, Notices of Preparation must be submitted to all affected agencies. In addition, the Land Use Analysis Program of the Congestion Management Program requires that an "enhanced CEQA review" be undertaken to evaluate the impacts of large projects on the regional transportation system. These guidelines are intended to provide guidance to local jurisdictions and/or project sponsors in meeting these CMP requirements.

Note: These guidelines are subject to continual update, as future technology and documentation become available. Local jurisdictions should be consulted regarding their preferred or applicable procedures.

3.0 OBJECTIVES OF TIS GUIDELINES

The following guidelines were prepared to assist local agencies throughout the San Diego region in promoting consistency and uniformity in traffic impact studies. All Circulation/Community Element roadways, all State routes and freeways (including metered and unmetered ramps), and all transit facilities that are impacted should be included in each study.

In general, the region-wide goal for an acceptable level-of-service (LOS) on all freeways, roadway segments, and intersections is "D." For undeveloped or not densely developed locations, as determined by any local jurisdiction, the goal may be to achieve a level-of-service of "C." Individual local jurisdictions, as well as Caltrans, have slightly different LOS objectives. For example, the Regional Growth Management Strategy for San Diego has a level-of-service objective of "D;" while the Congestion Management Program has established a minimum level-of-service of "E", or "F" if that is the existing 1990 base year LOS. In other words, if the existing LOS is "D" or worse, preservation of the existing LOS must be maintained or acceptable mitigation must be identified. Definitions of LOS currently used by Caltrans are provided in Exhibit D-1.

These guidelines do not establish a legal standard for these functions, but are intended to supplement any individual TIS manuals or level of service objectives for the various jurisdictions. These guidelines attempt to consolidate regional efforts to identify when a TIS is needed, what professional procedures should be followed, and what constitutes a significant traffic impact.

The instructions outlined in these guidelines are subject to update as future conditions and experience become available. Special situations may call for variation from these guidelines. Caltrans and lead agencies should agree on the specific methods used in traffic impact studies involving any State Route facilities, including metered and unmetered freeway ramps.

4.0 NEED FOR A STUDY

A TIS should be prepared for all projects which generate traffic greater than 1,000 total average daily trips (ADT) or 100 peak-hour trips. If a proposed project is not in conformance with the land use and/or transportation element of the general or community plan, use threshold rates of 500 ADT or 50 peak-hour trips. Early consultation with any affected jurisdictions is strongly encouraged since a "focused" or "abbreviated" TIS may still be required – even if the above threshold rates are not met.

Currently, a Congestion Management Program (CMP) analysis is required for all large projects, which are defined as generating 2,400 or more average daily trips or 200 or more peak-hour trips. This size of study would usually include computerized long-range forecasts and select zone assignments. Please refer to the following flow chart (Figure D-1) for TIS requirements.

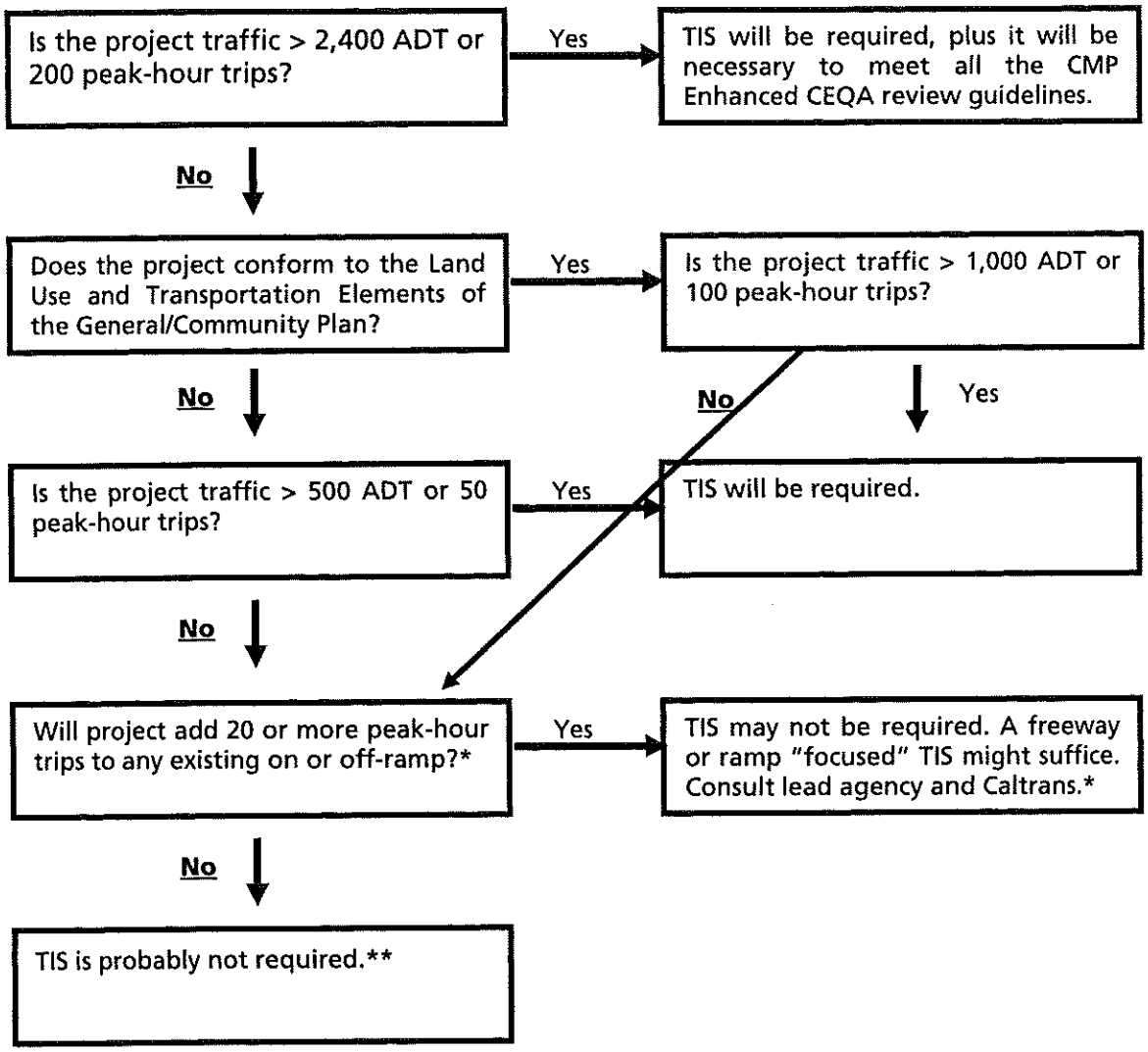
The geographic area examined in the TIS must include the following:

- All local roadway segments (including all State surface routes), intersections, and mainline freeway locations where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic.

- All freeway entrance and exit ramps where the proposed project will add a significant number of peak-hour trips to cause any traffic queues to exceed ramp storage capacities (refer to Figure D-1). (NOTE: Care must be taken to include **other** ramps and intersections that may receive project traffic **diverted** as a result of already existing, or project causing congestion at freeway entrances and exits.)

The data used in the TIS should generally not be more than 2 years old, and should not reflect a temporary interruption (special events, construction detour, etc.) in the normal traffic patterns unless that is the nature of the project itself. If recent traffic data is not available, current counts must be made by the project applicant/consultant.

Figure D-1
Flow Chart For Traffic Impact Study (TIS) Requirements



* Check with Caltrans for current ramp metering rates and ramp storage capacities. (See Exhibit D-2 – Ramp Metering Analysis)

** However, for health and safety reasons, and/or local and residential street issues, an "abbreviated" or "focused" TIS may still be requested by a local agency. (For example, this may include traffic backed up beyond an off-ramp's storage capacity, or may include diverted traffic through an existing neighborhood.)

5.0 PROJECT COORDINATION VIA STAFF CONSULTATION

Early consultation between the development community, local and lead agencies, and Caltrans is strongly recommended to establish the base input parameters, assumptions, and analysis methodologies for the TIS.

It is critical that the TIS preparer discuss the project with the lead reviewing agency's staff engineer/planner at an early stage in the planning process. An understanding of the level of detail and the assumptions required for the analysis should be reached. While a pre-submittal conference is highly encouraged, it may not be a requirement. For straightforward studies prepared by consultants familiar with these TIS procedures, a telephone call or e-mail, followed by a fax verifying key assumptions, may suffice. Always check with the local jurisdictions for their concerns.

6.0 SCENARIOS TO BE STUDIED

After documenting existing conditions, both near-term (within approximately the next five years) and long-term (usually for a 20-year planning horizon or build-out of the area), analyses are needed.

All of the following scenarios should be addressed in the TIS (unless there is concurrence with the lead agency or agencies that one or more of these scenarios may be omitted):

- Existing (roadway infrastructure)
- Existing + Near-term Cumulative Projects (approved and pending)
- Existing + Near-term Cumulative Projects + Proposed Project (each phase when applicable)
- Horizon Year (typically Year 2020 or twenty years in the future)
- Horizon Year + Proposed Project (if different from General/Community Plan)

Scenario definitions:

Existing Conditions – Document existing traffic volumes and peak-hour levels of service in the study area. The existing deficiencies and potential mitigation should be identified.

Existing + Near-term – Analyze the cumulative condition impacts from "other" approved and "reasonably foreseeable" pending projects (application on file or definitely in the pipeline) that are expected to influence the study area. This is the baseline against which project impacts are assessed. The lead agency should provide copies of the traffic studies for the "other" projects. If data is not available for near-term cumulative projects, an ambient growth factor should be used.

Existing + Near-term + Proposed Project – Analyze the impacts of the proposed project on top of existing conditions and near-term projects (along with their committed or funded mitigation measures, if any).

Horizon Year – Identify Year 2020 traffic forecasts or 20-year future conditions through the output of a SANDAG model forecast (currently TRANPLAN) or other computer model approved by the local agency. For the CMP analysis, the model must be approved by SANDAG. If the proposed project is consistent with the land uses represented in the model, the TIS may only need to use this condition.

Horizon Year + Proposed Project – If the project land uses are more traffic intense than what was assumed in the horizon year model forecasts, analyze the additional project traffic impacts to the horizon year condition. When justified, and particularly in the case of very large developments or new general/community plans, a transportation model should be run with, and without, the additional development to show the net impacts on all parts of the area's transportation system.

In order to use LOS criteria to measure traffic impact significance, proposed model or manual forecast adjustments must be made to address scenarios both with and without the project. Refer to Table D-1 for guidance on measuring significant project impacts and Table D-2 for guidance on Level of Service and Average Daily Traffic parameters. Model data should be carefully verified to ensure accurate project and "other" cumulative project representation. In these cases, regional or subregional models conducted by SANDAG need to be reviewed for appropriateness.

Note: Project trips can be assigned and distributed either manually or by the computer model based upon review and approval of the local agency Traffic Engineer. The magnitude of the proposed project will usually determine which method is employed.

If the manual method is used, the trip distribution percentages should be derived from a computer generated "select zone assignment" or optionally (local agency approval) by professional judgment.

If the computer model is used, the centroid connectors should accurately represent project access to the street network. Preferably the project would be represented by its own traffic zone. Some adjustments to the output volumes may be needed (especially at intersections) to smooth out volumes, quantify peak volumes, adjust for pass-by and diverted trips, and correct illogical output.

7.0 TRAFFIC GENERATION

Use of SANDAG (*Traffic Generators* manual and *(Not So) Brief Guide...)* or City of San Diego (both of the City's *Traffic Impact Study Manual* and *Trip Generation Manual*) rates should first be considered. Next, consider rates from ITE's latest *Trip Generation* manual or ITE Journal articles. If local and sufficient national data do not exist, conduct trip generation studies at sites with characteristics similar to those of the proposed project. If this is not feasible due to the uniqueness of the land use, it may be acceptable to estimate defensible trip rates – only if appropriate documentation is provided.

Reasonable reductions to trip rates may also be considered: (a) with proper analysis of pass-by and diverted traffic on adjacent roadways, (b) for developments near transit stations and transit corridors, and (c) for mixed-use developments. (Note: Caltrans and local agencies may use different trip reduction rates. Early consultation with the reviewing agencies is strongly recommended.)

For potential reductions to trip rates for developments near transit stations and transit corridors and mixed-use developments, the Trip Reduction Guidelines (available from SANDAG) should be followed. The Guidelines provide standard methodologies for estimating the vehicle trip reductions associated with specific congestion mitigation strategies identified in the CMS Toolbox, including developments near transit stations and along transit corridors, and mixed-use developments.

Site traffic distribution, assignment, necessary model adjustments, and Congestion Management Program (CMP) concerns should all follow current SANDAG and local lead agency procedures.

8.0 TRAFFIC IMPACT STUDY (TIS) ANALYSIS

The TIS analysis shall determine the effect that a project will have for each of the previously outlined study scenarios. Peak-hour capacity analyses for freeways, roadway segments (ADTs may be used here to estimate V/C ratios), intersections, and freeway ramps must be conducted for both the near-term and long-term conditions. The methodologies used in determining the traffic impact are not only critical to the validity of the analysis, they are pertinent to the credibility and confidence the decision-makers have in the resulting findings, conclusions, and recommendations.

The following methodologies for TIS analysis should be used (unless early consultation with the lead agency and Caltrans has established other methods), along with some suggested software packages and options:

1. **Arterials, Multi-lane and Two-lane Highways, and all other Local Streets** – current Highway Capacity Manual (HCM): w/Highway Capacity Software (HCS)

2. **Signalized Intersections –** HCM: w/HCS, TRAFFIX, SigCinema, and SYNCHRO acceptable to Caltrans; and, HCS, TRAFFIX, SIGNAL 94, and NCAP acceptable to local jurisdictions.

3. **Unsignalized Intersections** – HCM

4. **Freeway Segments –** HCM or Caltrans District 11 freeway LOS definitions (see Attachment C): w/HCS

5. **Freeway Weaving Areas –** Caltrans Highway Design Manual (Chapter 500)

6. **Freeway Ramps –** Caltrans District 11 Ramp Metering Analysis (Attachment B), and Caltrans Ramp Meter Design Guidelines (August 1995), HCS (for ramp design only)

7. **Freeway Interchanges –** HCM: for diamond interchanges where the timing and phasing of the two signals must be coordinated to ensure queue clearances, consider Passer III-90

8. **Transit, Pedestrians, and Bicycles** – HCM

9. **Warrants for Traffic Signals, Stop Signs, School Crossings, Freeway Lighting, etc.** – Caltrans' Traffic Manual

10. **Channelization and Intersection Geometry –** Caltrans' Traffic Manual and Guidelines for Reconstruction of Intersections, City of San Diego's Traffic Impact Study Manual -Appendix 4

Note: Neither local jurisdictions nor Caltrans officially advocate the use of any special software packages, especially since new ones are being developed all the time. However, consistency with the Highway Capacity Manual (HCM) is advocated in most cases. The above-mentioned software packages have been utilized locally. Because it is so important to have consistent end results, always consult with all affected jurisdictions, including Caltrans, regarding the analytical techniques and software being considered (especially if they differ from above) for the TIS.

9.0 SIGNIFICANCE OF TRAFFIC IMPACTS TO CONSIDER MITIGATION

The following Table D-1 indicates when a project's impact is significant and mitigation measures are to be identified. That is, if a project's traffic impact causes the values in this table to be exceeded, it is determined to be a significant project impact. (Mitigation for all identified significant impacts should be provided for any project requiring CEQA analysis.)

Note: It is the responsibility of Caltrans, on Caltrans-initiated projects, to mitigate the effect of ramp metering, for initial as well as future operational impacts, on local streets that intersect and feed entrance ramps to the freeway. Developers and/or local agencies, however, should be required to mitigate any impact to existing ramp meter facilities, future ramp meter installations, or local streets, when those impacts are attributable to new development and/or local agency roadway improvement projects.

Table D-1
Measure of Significant Project Traffic Impacts

Level of Service with Project*	Allowable Change due to Project Impact**					
	Freeways		Roadway Segments		Intersections	Ramp*** Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
D, E, & F (or ramp meter delays above 15 min.)	0.01	1	0.02	1	2	2

Notes:

* All level of service measurements are based upon HCM procedures for peak-hour conditions. However, V/C ratios for Roadway Segments may be estimated on an ADT/24-hour traffic volume basis (using Table D-2 or a similar LOS chart for each jurisdiction). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped or not densely developed locations per jurisdiction definitions). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

**If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. These impact changes may be measured from appropriate computer programs or expanded manual spreadsheets. The project applicant shall then identify feasible mitigation (within the Traffic Impact Study report) that will maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see above * note), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating significant impact changes.

*** See Exhibit D-2 for ramp metering analysis.

KEY:
- V/C = Volume to Capacity ratio
- Speed = Speed measured in miles per hour
- Delay = Average stopped delay per vehicle measured in seconds for intersections, or minutes for ramp meters
- LOS = Level of Service

Table D-2
Roadway Classifications, Levels of Service (LOS), and Average Daily Traffic (ADT)

STREET CLASSIFICATION	LANES	CROSS SECTIONS* (APPROX.)	LEVEL OF SERVICE W/ADT**				
			A	B	C	D	E
Expressway	6 lanes	102-160/122-200	30,000	42,000	60,000	70,000	80,000
Prime Arterial	6 lanes	102-108/122-128	25,000	35,000	50,000	55,000	60,000
Major Arterial	6 lanes	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial	4 lanes	78-82/98-102	15,000	21,000	30,000	35,000	40,000
Secondary Arterial/ Collector	4 lanes	64-72/84-92	10,000	14,000	20,000	25,000	30,000
Collector (no center lane) (continuous left-turn lane)	4 lanes 2 lanes	64/84 50/70	5,000	7,000	10,000	13,000	15,000
Collector (no fronting property)	2 lanes	40/60	4,000	5,500	7,500	9,000	10,000
Collector (commercial-industrial fronting)	2 lanes	50/70	2,500	3,500	5,000	6,500	8,000
Collector (multi-family)	2 lanes	40/60	2,500	3,500	5,000	6,500	8,000
Sub-Collector (single-family)	2 lanes	36/56	---	---	2,200	---	---

LEGEND:

* Curb to curb width (feet)/right of way width (feet): based upon the City of San Diego Street Design Manual and other jurisdictions within the San Diego region.

** Approximate recommended ADT based upon the City of San Diego Street Design Manual.

Notes:

[1] The volumes and the average daily level of service listed above are only intended as a general planning guideline.

[2] Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Not all mitigation measures can feasibly be "hard" (new lanes or new capacity) improvements. A sample mitigation measure might include financing toward a regional ITS (Intelligent Transportation System) project, such as improved or "dynamic" ramp metering with real-time delay information available to motorists. The information can be accessed on either home or in-vehicle computers, or even by telephone (each ramp could have its own phone number with delay information) so the motorist can make a driving decision long before she or he arrives at a congested on-ramp. This sample mitigation would allow a project applicant (especially with a relatively small project) to meet mitigation by paying into a regional ramp meter fee, providing the fee can be established in the near future. In identifying potential mitigation measures, the CMP *Toolbox of Mitigation Strategies* and any adopted Deficiency Plans in the study area should also be consulted.

Other mitigation measures may include Transportation Demand Management recommendations – transit facilities, bike facilities, walkability, telecommuting, traffic rideshare programs, flex-time, carpool incentives, parking cash-out, etc. Additional mitigation measures may become acceptable as future technologies and policies evolve.

To determine potential trip reductions associated with Transportation Demand Management mitigation measures, the Trip Reduction Guidelines (available from SANDAG) should be followed. The Guidelines provide standard methodology for estimating the vehicle trip reductions associated with specific congestion mitigation strategies as identified in the CMS Toolbox, including TDM strategies.

10.0 SCREEN CHECK

As part of the first draft of a TIS, the preparer must ensure that all required elements have been included. This screen check procedure will help reduce the number of submittals, and will encourage early dialogue between the reviewer and the preparer. The local agency reviewer will check the study for completeness, and strive to return all incomplete submittals within seven working days. A pre-submittal conference is encouraged to determine which elements are not required for the TIS.

Exhibit D-3 contains the TIS Screen Check.

Exhibit D-1
Level of Service (LOS) Definitions
(Generally used by Caltrans)

The concept of Level of Service (LOS) is defined as a qualitative measure describing operational conditions within a traffic stream, and their perception by motorists and/or passengers. A Level of Service[1] definition generally describes these conditions in terms of such factors as speed, travel time, freedom to maneuver, comfort and convenience, and safety. Levels of Service definitions can generally be categorized as follows:

LOS	D/C[2]	Congestion/Delay	Traffic Description
(Used for freeways, expressways and conventional highways[3])			
"A"	<0.41	None	Free flow.
"B"	0.42-0.62	None	Free to stable flow, light to moderate volumes.
"C"	0.63-0.79	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
"D"	0.80-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
"E"	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
(Used for conventional highways)			
"F"	>1.00	Considerable	Forced or breakdown. Delay measured in average flow, travel speed (MPH). Signalized segments experience delays >60.0 seconds/vehicle.
(Used for freeways and expressways)			
"F0"	1.01-1.25	Considerable 0-1 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go.
"F1"	1.26-1.35	Severe 1-2 hour delay	Very heavy congestion, very long queues.
"F2"	1.36-1.45	Very severe 2-3 hour delay	Extremely heavy congestion, longer queues, more numerous breakdown points, longer stop periods.
"F3"	>1.46	Extremely severe 3+ hours of delay	Gridlock.

[1] Level of Service can generally be calculated using "Table 3.1. LOS Criteria for Basic Freeway Sections" from the latest Highway Capacity Manual. However, contact Caltrans for more specific information on determining existing "free-flow" freeway speeds.

[2] Demand/Capacity ratio used for forecasts (V/C ratio used for operational analysis, where V = volume)

[3] Arterial LOS is based upon average "free-flow" travel speeds, and should refer to definitions in Table 11.1 in the HCM.

Exhibit D-2
Ramp Metering Analysis

Ramp metering analysis should be performed for each horizon year scenario in which ramp metering is expected. The following table shows relevant information that should be included in the ramp meter analysis "Summary of Freeway Ramp Metering Impacts."

LOCATION	DEMAND (veh/hr)[1]	METER RATE (veh/hr)[2]	EXCESS DEMAND (veh/hr)[3]	DELAY (min)[4]	QUEUE (feet)[5]

Notes:

[1] DEMAND is the peak hour demand expected to use the on-ramp.

[2] METER RATE is the peak hour capacity expected to be processed through the ramp meter. This value should be obtained from Caltrans. Contact Carolyn Rumsey at (619) 467-3029.

[3] EXCESS DEMAND = (DEMAND) – (METER RATE) or zero, whichever is greater.

[4] DELAY = EXCESS DEMAND ÷ METER RATE X 60 MINUTES/HOUR

[5] QUEUE = (EXCESS DEMAND) X 29 feet/vehicle

Note: Delay will be less at the beginning of metering. However, since peaks will almost be more than one hour, delay will be greater after the first hour of metering. (See discussion on next page.)

Summary of Freeway Ramp Metering Impacts
(Lengthen as necessary to include all impacted meter locations)

LOCATIONS	PEAK HOUR	PEAK HOUR DEMAND D	FLOW (METER RATE) F	EXCESS DEMAND E	DELAY (MINUTES)	QUEUE Q (feet)
	AM PM					
	AM PM					
	AM PM					

Exhibit D-2 (Cont.)
Ramp Metering Analysis

A. CAUTION: The ramp metering analysis shown in Attachment B may lead to grossly understated results for delay and queue length, since important aspects of queue growth are ignored. Also, the draft guidelines method derives **average** values instead of **maximum** values for delay and queue length. Utilizing average values instead of maximum values can lead to obscuring important effects, particularly in regard to queue length.

Predicting ramp meter delays and queues requires a storage-discharge type of analysis, where a pattern of arriving traffic at the meter is estimated by the analyst, and the discharge, or meter rate, is a somewhat fixed value set by Caltrans for each individual metered ramp.

Since a ramp meter queue continues to grow longer during all times that the arrival rate exceeds the discharge rate, the maximum queue length (and hence, the maximum delay) usually occurs after the end of the peak (or highest) one hour. This leads to the need for an analysis for the entire time period during which the arrival rate exceeds the meter rate, not just the peak hour. For a similar reason, the analysis needs to consider that a substantial queue may have already formed by the beginning of the "peak hour." Traffic arriving during the peak hour is then stacked onto an existing queue, not just starting from zero as the draft analysis suggests.

Experience shows that the theoretical queue length derived by this analysis often does not materialize. Motorists, after a brief time of adjustment, seek alternate travel paths or alternate times of arrival at the meter. The effect is to approximately minimize total trip time by seeking out the best combinations of route and departure time at the beginning of the trip. This causes at least two important changes in the pattern or arriving traffic at ramp meters. First, the peak period is spread out, with some traffic arriving earlier and some traffic arriving later than predicted. Second, a significant proportion of the predicted arriving traffic will use another ramp, use another freeway, or stay on surface streets.

It is acceptable to make reasonable estimates of these temporal and spatial (time and occupying space) diversions as long as all assumptions are stated and that the unmodified, or theoretical values are shown for comparison.

B. Additional areas for study include being able to define acceptable levels of service (LOS) and "significant" thresholds (e.g., a maximum ramp meter delay of 15 minutes) for metered freeway entrance ramps.

Currently there are no acceptable software programs for measuring project impacts on metered freeway ramps nor does the Highway Capacity Manual (HCM) adequately address this issue. Hopefully in the near future a region-wide study will be initiated to determine what metering rate (at each metered ramp) would be required in order to guarantee that traffic will flow (even at LOS "E") on the entire freeway system during peak-hour conditions. From this, the ramp delays and resultant queue lengths might then be calculated. Overall, this is a very complex issue that needs considerable research and refinement in cooperation with Caltrans.

Exhibit D-3
Traffic Impact Study Screen Check

To be completed by Staff:
Date Received _____
Reviewer _____
Date Screen Check _____

To be completed by consultant (including page #):
Name of Traffic Study _____
Consultant _____
Date Submitted _____

Indicate Page # in report:		Satisfactory YES	Satisfactory NO	NOT REQUIRED
pg. _____	1. Table of contents, list of figures and list of tables.	☐	☐	
pg. _____	2. Executive summary.	☐	☐	
pg. _____	3. Map of the proposed project location.	☐	☐	
	4. General project description and background information:			
pg. _____	a. Proposed project description (acres, dwelling units....)	☐	☐	
pg. _____	b. Total trip generation of proposed project.	☐	☐	
pg. _____	c. Community plan assumption for the proposed site.	☐	☐	
pg. _____	d. Discuss how project affects the Congestion Management Program, if applicable	☐	☐	
pg. _____	5. Parking, transit and on-site circulation discussions are included.	☐	☐	
pg. _____	6. Map of the Transportation Impact Study Area and specific intersections studied in the traffic report.	☐	☐	
pg. _____	7. Existing Transportation Conditions:			
	a. Figure identifying roadway conditions including raised medians, median openings, separate left and right turn lanes, roadway and intersection dimensions, bike lanes, parking, number of travel lanes, posted speed, intersection controls, turn restrictions and intersection lane configurations.	☐	☐	
	b. Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
	c. Figure or table showing level of service (LOS) for intersections during peak hours and roadway sections within the study area (include analysis sheets in an appendix).	☐	☐	
	8. Project Trip Generation:			
pg. _____	Table showing the calculated project generated daily (ADT) and peak hour volumes.	☐	☐	
pg. _____	9. Project Trip Distribution using the current TRANPLAN Computer Traffic Model (provide a computer plot) or manual assignment if previously approved. (Identify which method was used.)	☐	☐	
	10. Project Traffic Assignment:			
pg. _____	a. Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
pg. _____	b. Figure showing pass-by-trip adjustments, and, if cumulative trip rates are used.	☐	☐	☐
pg. _____	c. Appropriate documentation and justification provided for any additional trip reductions associated with strategies from the CMS Toolbox, as outlined in the Trip Reduction Guidelines (available from SANDAG).	☐	☐	☐

Indicate Page # in report:		Satisfactory YES	NO	NOT REQUIRED
	11. Existing Near-term Cumulative Conditions:			
pg. _____	a. Figure indicating the daily (ADT) and peak-hour volumes.	☐	☐	
pg. _____	b. Figure or table showing the projected LOS for intersections during peak hours and roadway sections within the study area (analysis sheets included in the appendix).	☐	☐	
pg. _____	c. Traffic signal warrant analysis (Caltrans Traffic Manual) for appropriate locations.	☐	☐	
	12. Existing Near-term Cumulative Conditions + Proposed Project (each phase when applicable)			
pg. _____	a. Figure or table showing the projected LOS for intersections during peak hours and roadway sections with the project (analysis sheets included in the appendix).	☐	☐	
pg. _____	b. Figure showing other projects that were included in the study, and the assignment of their site traffic.	☐	☐	
pg. _____	c. Traffic signal warrant analysis for appropriate locations.	☐	☐	
	13. Horizon Year Transportation Conditions (if project conforms to the General/ Community Plan):			
pg. _____	a. Horizon Year ADT and street classification that reflect the Community Plan.	☐	☐	☐
pg. _____	b. Figure or table showing the horizon LOS for intersections during peak hours and roadway sections with and without the project (analysis sheets included in the appendix).	☐	☐	☐
pg. _____	c. Traffic signal warrant analysis at appropriate locations.	☐	☐	☐
	14. Horizon Year Transportation Conditions + Proposed Project (if project does not conform to the General/Community Plan):			
pg. _____	a. Horizon Year ADT and street classification as shown in the Community Plan.	☐	☐	☐
pg. _____	b. Horizon Year ADT and street classification for two scenarios: with the proposed project and with the land use assumed in the Community Plan.	☐	☐	☐
pg. _____	c. Figure or table showing the horizon LOS for intersections during peak hours and roadway sections for two scenarios: with and without the proposed project and with the land use assumed in the Community Plan (analysis sheets included in the appendix).	☐	☐	☐
pg. _____	d. Traffic signal warrant analysis at appropriate locations with the land use assumed in the General/Community Plan.	☐	☐	☐
pg. _____	15. A summary table showing the comparison of Existing, Existing + Near-term Cumulative, Existing + Near-term Cumulative + Proposed Project, Horizon Year, and Horizon Year + Proposed Project (if different from General/Community Plan), LOS on roadway sections and intersections during peak hours.	☐	☐	
pg. _____	16. A summary table showing the project's "significant traffic impacts."	☐	☐	
	17. Transportation Mitigation Measures:			
pg. _____	a. Table identifying the mitigations required that are the responsibility of the developer and others. A phasing plan is required if mitigations are proposed in phases.	☐	☐	
pg. _____	b. Figure showing all proposed mitigations that include: intersection lane configurations, lane widths, raised medians, median openings, roadway and intersection dimensions, right-of-way, offset, etc.	☐	☐	
pg. _____	c. Appropriate documentation and justification provided for any mitigation measures taken from the CMS Toolbox, as outlined in the Trip Reduction Guidelines (2002 CMP, Appendix J).	☐	☐	☐

Indicate Page # in report:		Satisfactory YES	NO	NOT REQUIRED
pg. _____	18. The Highway Capacity Manual Operation Method or other approved method is used at appropriate locations within the study area.	☐	☐	
pg. _____	19. Analysis complies with Congestion Management Program requirements.	☐	☐	☐
pg. _____	20. Appropriate freeway analysis is included.	☐	☐	☐
pg. _____	21. Appropriate freeway ramp metering analysis is included.	☐	☐	☐
pg. _____	22. The traffic study is signed by a California Registered Traffic Engineer.	☐	☐	

THE TRAFFIC STUDY SCREEN CHECK FOR THE SUBJECT PROJECT IS:

_____ Approved

_____ Not approved because the following items are missing:

_____

_____

_____

_____

_____

San Diego County Archaeological Society, Inc.

Environmental Review Committee

15 June 2009

To: Mr. Dennis Campbell
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

Subject: Notice of Preparation of a Draft Environmental Impact Report
Campus park West
SPA 05-001, GPA 05-003, REZ 05-005, TM 5424, STP 05-014,
Log No. 05-02-009

DearMr. Campbell :

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s). Given the passage of over 25 years since the previous archaeological surveys of the property, a full resurvey is clearly required.

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

JUN 17 '09 AM 10:29

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

DEPARTMENT OF TRANSPORTATION
District 11
Planning Division
4050 Taylor Street, MS 240
San Diego, CA 92110
PHONE (619) 688-6960
FAX (619) 688-3338

Flex your power!
Be energy efficient!

July 9, 2009

11-SD-76
PM 17.87
NOP SCH 2009061043
Campus Park West

Mr. Dennis Campbell
County of San Diego, DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123-4310

Dear Mr. Campbell:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation (NOP) Campus Park West (SCH 2009061043) to be located east of Interstate 15 (I-15) and north of State Route 76 (SR-76). We have the following comments on the NOP and based on the previous meetings and correspondences in regards to traffic analysis:

- Pass-by trips reductions are not applicable on SR-76 to the Campus Park West development.
- Access on SR-76 will only be allowed at Pankey Road and Horse Ranch Creek Road.
- The 30% internal capture rate is only applicable to the build out scenario, and is contingent on the approval and timing of the Campus Park and Meadowood developments.
- The appropriate internal capture will need to be determined for each project phase using only land use assumptions from other developments that will be in place within a reasonable time frame of the Campus Park West project phase.
- A traffic impact study is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the *Caltrans Guide for the Preparation of Traffic Impact Studies*). Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide.

  The LOS for operating State highway facilities 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" on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D". For undeveloped or not densely developed locations, the goal may be to achieve LOS "C".

All State-owned signalized intersections affected by this project should be analyzed using the intersecting lane vehicle (ILV) procedure from the Caltrans Highway Design Manual, Topic 406, page 400-33.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in the traffic impact analysis. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be included towards the I-15/SR-76 interchange with Caltrans concepts.

The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable Level of Service (LOS). Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

- Grading for this proposed project which would modify existing drainage and increase runoff to State facilities will not be allowed.

- Caltrans will not be held responsible for any noise impacts to this development, including from the ultimate configuration of SR-76.

- Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by the Department. Furthermore, the applicant's environmental documentation must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to State Highway R/W. Environmental documentation should include studies or letters from qualified specialists or personnel which address the potential, or lack of potential, for impacts to the following resources in state right-of-way:

  Biological resources
  Archaeological and historic resources
  Visual quality
  Hazardous waste
  Water quality & stormwater
  Pre-historic resources
  Air quality
  Noise levels

  Copies of all project-related environmental documentation and studies which address the above-cited resources should be included with the project proponent's encroachment permit application to Caltrans for work within State R/W. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Encroachment permit submittals that are incomplete can result in significant delays in permit approval. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.

  When a property owner proposes to dedicate property to a local agency for Caltrans use in conjunction with a permit project, Caltrans will not issue the encroachment permit until the dedication is made and the property has been conveyed to the Department.

  Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. The Department's Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

  Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions regarding this project, please contact Trent Clark, Development Review Branch, at (619) 688-3140.

Sincerely,

JACOB M. ARMSTRONG, Branch Chief
Development Review Branch