

I-241 Betsy and Todd Landers

I -241-1 The commenter explains that they live at the west end of Buena Creek Road and in the last several years, traffic has become unbearable.

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I -241-2 The commenter explains that they found Section 2.13, Transportation and Traffic difficult to understand and stated that the section did not mention the North County Transit District, which was a glaring omission. The comment states that the road classifications were ambiguous and sometimes misclassified. The comment states that it was not clear which mitigation would be implemented before, during, or after the Project, who would fund the mitigation, and what agency is accountable for the mitigation.

The County does not agree with this comment. The North County Transit District is mentioned in Section 2.13, Transportation and Traffic. As stated on page 2.13-25, Section 2.13, Transportation and Traffic, of the Draft EIR:

“There are no public transit services which stop at or within the immediate vicinity of the project Site. Service could potentially be provided in the future by the North County Transit District (NCTD).”

Additionally, page 2.13-56, Section 2.13, Transportation and Traffic, of the Draft EIR, states:

“The project includes features to encourage alternative transportation, reducing project trips and the need to widen existing roadways. The project would consist of a substantial TDM program, including an electric bike-share program, coordination of a ride share/shuttle system, a park-and-ride lot, subsidized transit passes for residents and employees, mobility hubs as a means of resident outreach and education, and continued coordination with SANDAG and NCTD for the siting of future transit infrastructure. The applicant is actively working with Caltrans to expand the existing park-and-ride facility and to incorporate the design of the facility into the Town Center concept plan. Furthermore, the applicant is working with NCTD to design the facility to accommodate future transit use. The design of the expanded park-and-ride would include bicycle lockers.”

Comment Letter Responses

Mitigation measures in Section 2.13, Transportation and Traffic describe when an improvement shall be implemented, by describing the certificate of occupancy per equivalent dwelling unit, and the entity responsible for the improvement. The commenter does not provide a specific example of which mitigation measure does not describe this information. This comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required. (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -241-3** The commenter requests that the Draft EIR describe the responsible jurisdiction for the traffic mitigation measures, the schedule for the mitigation, and if the mitigation is funded.

Mitigation measures in Section 2.13, Transportation and Traffic describe when an improvement shall be implemented, by describing the certificate of occupancy per equivalent dwelling unit, and the entity responsible for the improvement. The commenter does not provide a specific example of which mitigation measure does not describe this information. This comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required. (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -241-4** The comment states that Buena Creek Road is described as a two lane rural road and LOS E in the Existing Conditions section of the EIR. The comment states that another study from June 2002 indicates that the road operated at LOS F. The comment states that the Project would increase the ADT on Buena Creek Road by more than double, which would make it very unsafe. The commenter asks the County to update the Draft EIR with the correct LOS designation.

The County does not agree with this comment. Section 2.13, Transportation and Traffic and the Traffic Impact Analysis (TIA) (Appendix R) describes the current LOS designation. Traffic counts were conducted by LLG during April 2015. Therefore the counts provided in the Draft EIR are more up to date than a 2002 report, which is described by the commenter.

Comment Letter Responses

I -241-5 The comment states that the EIR is listed as a 4.1B Major Road and it appears that this designation was the basis for not classifying Buena Creek Road as a failing segment. The comment states that the EIR is stating that Buena Creek Road would remain as an unimproved 2 lane road at least through 2035. The comment states that the EIR analysis assumes that Buena Creek Road would be built out to the 4.1B standard, but the EIR discussion states that no improvements are anticipated. The commenter requests that the County clarify what designation was used when calculating the LOS for Buena Creek Road.

As described in Section 2.13, page 2.12-43, the County recognizes that the County General Plan Mobility Element classifies Buena Creek Road as a 4.1B Major Road; however, this road is currently constructed as a two-lane rural collector. As described in Table 2.13-2, Buena Creek Road currently operates at LOS D and is considered a 2 lane collector.

I -241-6 The comment states that Buena Creek Road is assumed to become a 4.1B Major Road, however the community has been working with County engineers to begin expansion of the roadway, and based on the community's findings the General Plan did not take into account the financial and environmental issues that must be addressed before expansion can occur. The comment states that there would be impacts to sensitive stream habitat, and plant, bird, mammal and reptile species. The comment states that there are significant Eminent Domain issues with the expansion. The comment states that the County is considering removing the expansion from the General Plan for these reasons. The comment states that the Army Corps of Engineers is required to survey and approve any changes to the flood channels. The commenter requests that the County update the EIR to include a scenario in which Buena Creek Road remains unimproved or provide evidence that the County is proceeding with the expansion.

As described in Section 2.13, page 2.12-43, the County recognizes that the County General Plan Mobility Element classifies Buena Creek Road as a 4.1B Major Road; however, this road is currently constructed as a two-lane rural collector. For the "Alternative Horizon Year" Analysis, it was assumed that the improvement to a 4.1B Major Road would not be completed. Therefore the Draft EIR considered a scenario in which Buena Creek Road would not be widened and improved to a 4.1A Major Road Classification.

I -241-7 The comment states that there is no discussion of the Sprinter Station at the intersection of Buena Creek and South Santa Fe, which impacts traffic in the surrounding community. The comment states that the NTCD plans to double the

Comment Letter Responses

number of trains in the next 5-7 years which would further impact the traffic in the surrounding community. The commenter requests that the EIR be expanded to include the impact of the rail crossing on traffic on Buena Creek Road, South Santa Fe, and Robelini.

Although the Sprinter light rail station was not explicitly mentioned in Section 2.13, Transportation and Traffic of the Draft EIR, existing delays associated with the Sprinter were accounted for during traffic counts conducted by LLG in April 2015. As stated in Section 2.13, Transportation and Traffic, the Horizon Year analyses of City of San Marcos roadways were conducted using City of San Marcos guidelines. The intersections and segments located within the jurisdiction of the City were analyzed separately in this section using SANDAG's Series 12 Year 2035 buildout scenario for the City of San Marcos. One analysis assumes full buildout of the road network whereas a separate analysis assumes certain planned road improvements will not be implemented due to lack of funding and/or significant environmental constraints. Therefore, the Horizon Year analysis of the Buena Creek Road and South Santa Fe Avenue intersection were consistent with the City of San Marcos guidelines. The commenter does not provide any documentation that demonstrates the Sprinter would experience an increase in light rail trips; therefore, no further response can be provided. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -241-8** The comment states that during discussion with NTCD, the community requested that turn lanes be installed at the intersection, but the community was told that turn lanes were not safe and this was not pursued further. The comment states that the EIR implies that right turn lanes would be installed at this intersection, which is in conflict with what NTCD has stated previously. The commenter requests that the EIR include evidence that mitigation is funded and achievable prior to completion of the Project.

As stated in Section 2.13, Transportation and Traffic, MM-TR-7 would involve the following:

- M-TR-7** Prior to the issuance of the certificate of occupancy for the 273th equivalent dwelling unit, the project applicant, or its designee, shall improve the Buena Creek Road/ S. Santa Fe Avenue intersection to provide dedicated right and left turn lanes on southbound Buena Creek Road. As the S. Santa Fe Avenue intersections with Buena Creek Road and Robelini Drive operate under a single traffic controller, as additional mitigation, the signal timing plan would be modified and the intersection signal equipment would be upgraded.

Comment Letter Responses

Upon implementation of MM-TR-7, impacts at the Buena Creek Road/S. Santa Fe Avenue Intersection would be less than significant. However the S. Santa Fe Avenue intersections with Buena Creek Road and Robelini Drive operate under a single traffic controller. The improvements at the Buena Creek Road/S. Santa Fe Avenue intersection identified in Mitigation Measure M-TR-7 would partially mitigate the project's impacts to the Robelini Drive/S. Santa Fe Avenue intersection, however, M-TR-7 would not fully mitigate the impact. Therefore, this impact to the Robelini Drive/S. Santa Fe Avenue intersection is considered significant and unavoidable.

The commenter does not provide any documentation that demonstrates that NTCD finds MM-TR-7 infeasible or unsafe; therefore, no further response can be provided. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -241-9** The comment states that the EIR does not provide a schedule or details for mitigation in the South Santa Fe area. The comment states that the EIR claims that impacts are indirect, and because of undefined right of way constraints there is no feasible mitigation. The comment reiterates that Buena Creek has become the favored east-west corridor from Riverside County, with unbearable traffic. The commenter requests that the County clarify these contradictions and provide detailed planning information including schedules, details, and funding sources for mitigation.

Mitigation measure MM-TR-7 includes improvements to the Buena Creek Road and South Santa Fe Avenue intersection.

- M-TR-7** Prior to the issuance of the certificate of occupancy for the 273th equivalent dwelling unit, the project applicant, or its designee, shall improve the Buena Creek Road/ S. Santa Fe Avenue intersection to provide dedicated right and left turn lanes on southbound Buena Creek Road. As the S. Santa Fe Avenue intersections with Buena Creek Road and Robelini Drive operate under a single traffic controller, as additional mitigation, the signal timing plan would be modified and the intersection signal equipment would be upgraded.

As described in the mitigation measure, the Buena Creek Road/ S. Santa Fe Avenue intersection would need to be improved prior to the issuance of the certificate of occupancy for the 273th equivalent dwelling unit. Additionally, as specified in the mitigation measure, the applicant, or tis designee, shall be responsible for payment of these improvements.

As described in page 2.13-108, improvements at the Robelini Drive/S. Santa Fe Avenue intersection are considered infeasible. The County will include the comment

Comment Letter Responses

as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I -241-10 The commenter thanks the County for response to their comments and the answers would likely lead to the conclusion that the Project will severely impact Buena Creek Road and the community's quality of life, unless major infrastructure is added before approving the Project.

The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.