

GARY L. PRYOR
DIRECTOR
(619) 694-2962



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

6201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (619) 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

February 23, 2001

Jerry Backoff
Director of Planning
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

RE: COMMENTS ON THE SAN MARCOS HIGHLANDS MITIGATED
NEGATIVE DECLARATION

Dear Mr. Backoff:

The following comments concern the Mitigated Negative Declaration for the proposed San Marcos Highlands Specific Plan dated January 22, 2001. The County of San Diego received the draft Mitigated Negative Declaration on February 5, 2001 and was informed that the public review period ended on February 22, 2001. There are several issues that we feel need to be addressed before this project goes forward. Furthermore, because there is a potential for significant impacts associated with the project, the County Department of Planning and Land Use feels that an Environmental Impact Report should be prepared for this project. These issues involve the status of Las Posas Road, the status of environmental resource protection under the Multiple Habitat Conservation Program for the City of San Marcos and Multiple Species Conservation Program for the County, and the County General Plan revisions.

Las Posas Road

Regarding Las Posas Road, any improvement project to construct the extension would be subject to environmental studies. Sensitive habitats are located in the area and the need for the Las Posas Road extension would likely be compared

with the need for protection of the biological habitat. This would likely necessitate the preparation of an Environmental Impact Report. Las Posas Road is currently built within the City of San Marcos's jurisdiction and the County Circulation Element Plan includes a four-lane Major road extension of Las Posas Road to Buena Creek Road. However, the planned roadway extension of Las Posas Road is not part of the County's current Capital Improvement Program (1998-2003).

The Mitigated Negative Declaration indicates that the project will not be constructing the road to Buena Creek Road, but it will have alternative fire access routes that may alternatively extend to Buena Creek Road on private easements. However, though it states that the road will be terminated at the northern boundary of the project, that termination point is not clearly identified in the Mitigated Negative Declaration. Furthermore, the question arises regarding whether or not the road is still planned to be annexed into the City of San Marcos. If the road is not to be constructed, is it necessary to be annexed?

The County performed a preliminary review of the traffic flow and circulation impacts if Las Posas Road (SA 505.1) was deleted from the County Circulation Element Plan. According to the SANDAG Series 9 2020 Traffic data, the segment of Las Posas Road within the unincorporated area is projected to carry between 11,000 to 13,000 trips per day. If the roadway extension were not constructed, the 11,000 to 13,000 trips per day projected to use Las Posas Road would redistribute onto other parallel routes in the vicinity such as Buena Creek Road and Twin Oaks Valley Road. The preliminary traffic analysis indicates that redistribution of trips from the Las Posas Road corridor would not cause a significant impact to these parallel routes.

Two factors should be considered with the Series 9 2020 traffic projections. The first factor is that the Series 9 2020 forecast data used for this preliminary traffic analysis were based on buildout of the County's existing General Plan, not the County Target/General Plan 2020 population projections. In general, the County target population projections are a more conservative assumption for future development in the unincorporated area than is the existing General Plan, due to their lower population estimates for the year 2020. If the County target population projections were adopted, the reduction in the future population of the Twin Oaks Valley area would likely lessen any potential impacts of deleting Las Posas Road.

The second factor is that a significant portion of the area surrounding Las Posas Road is within the City of San Marcos's and City of Vista's sphere of influence. A forecast projection based on buildout of the other jurisdictions's General Plans and Circulation Element (CE) Plans could alter the results of future-year traffic analysis. There are some differences between the County's General Plan and the General Plans of the neighboring jurisdictions. For example, the County's CE Plan includes a Major road connection (SA510) from Las Posas Road to Twin

Oaks Valley Road, but SA 510 is not part of the City of San Marcos's CE Plan. Any proposed deletion of Las Posas Road by the County should be coordinated with the Cities of San Marcos and Vista. Likewise, any major development proposals in the area that would construct and utilize Las Posas Road should be coordinated with the County of San Diego, particularly if the projects that are proposed would involve annexation of unincorporated land.

Our recommendation is that more in-depth traffic analysis be performed on Las Posas Road in conjunction with the County General Plan 2020 proposal. The General Plan 2020 update will provide an opportunity for a more comprehensive assessment of all factors that will determine the status of Las Posas Road and whether it is in fact necessary. The majority of the Circulation Element roads in the Twin Oaks Valley area are classified four-lane roads. A more comprehensive analysis would address the issue that several of these roads have been proposed for reclassification by the local sponsor group and property owners. All of these proposed changes as well as implementation of the proposed land uses and existing Circulation Elements of the County and the cities of San Marcos and Vista should be cumulatively evaluated as either part of the General Plan 2020 update or a separate study.

Relationship of Project to County of San Diego Multiple Species Conservation Planning

The proposed project requires annexation of County lands into the City of San Marcos. The land under consideration is a relatively large block of habitat containing sensitive biological resources including Coastal sage scrub, Riparian habitat, Oak woodlands and the species that depend upon those habitats. The protection of these habitats and resources in the public trust is the responsibility of the County of San Diego.

The development of a plan addressing the protection of these resources in the Unincorporated Area is in process at this time. That plan is referred to as the North-County Subarea of the County Multiple Species Conservation Program (MSCP). The planning process has several components specifically related to the land within the project proposed for annexation that currently lies within the jurisdiction of the County of San Diego including:

- (1) a systematic examination of on-site biological resources in the context of the North-County MSCP Subarea,
- (2) an evaluation of strategic significance of these lands including linkages, corridors and other issues related to wildlife movement and potential configuration of connections into the areas that may be identified as important resource areas in the North-County MSCP Subarea,
- (3) reconciliation with County land uses, development patterns and community plans, and

(4) reconciliation with the adopted south-county Subarea of the County MSCP, (5) the need to address potentially significant issues relative to the California Environmental Quality Act (CEQA) that are associated with potential biological impacts, land use, traffic circulation and other regional impacts.

In addition, as was described above under the section on traffic circulation, the County is currently engaged in the process of major revisions to the General Plan. Any potential development of this site should be evaluated with consideration toward potentially significant issues relative to the County's General Plan 2020 Revision that is currently underway.

Negative Declaration

The Negative Declaration is deficient in that it does not make any reference to the County MSCP plan or process. Furthermore, there needs to be a better explanation of the issues of the proposed development with the Multiple Habitat Conservation Program (MHCP) that is under preparation for the City of San Marcos and the adjacent incorporated cities. Planning by the City of San Marcos under the assumption of annexation of these Unincorporated lands into the City of San Marcos does not reconcile the outstanding CEQA and planning issues. The MHCP process involving the City of San Marcos does not cover these issues, nor does the negative declaration and associated documents, including the URS Corporation Biological Resources Report. Because of the environmental issues involved in the area of this project there is sufficient evidence that an Environmental Impact Report needs to be prepared for this project. The issues that need to be addressed include the multiple species planning, the potential for the proposed project to cause significant and unmitigable impacts to the on-site habitats as well as potential impacts from the project on the ability to create a coordinated and viable preserve system. An additional issue is the effect of the construction of Las Posas Road as a result of the project. Furthermore, because of the regional open space planning that is currently in process in the City of San Marcos and the County, the County requests a greater role in planning land uses on this property.

In contrast, a process by which the County of San Diego and the City of Chula Vista jointly planned MSCP resource protection for county lands in the Otay Ranch anticipated to be annexed by Chula Vista would provide for County input on land that is under County jurisdiction. Both agencies negotiated and reconciled land use and resource protection to insure compatibility with General Plans and the MSCP. The result was a coordinated plan for both jurisdictions. County lands annexed by the City of Chula Vista must comply with the County MSCP subarea plan. In the areas in which subarea plans have been completed, annexations must include an agreement between the jurisdictions that addresses

the requirements of the subarea plan. The County requests that such a collaborative process be performed in the area of San Marcos Highlands.

If you have any questions, please contact Thomas Oberbauer at (858) 694-3700.

Sincerely,



GARY L. PRYOR, Director
Department of Planning and Land Use

TAO:to

Attachment:

cc: Robert Goralka, Department of Public Works, County of San Diego