



GARY L. PRYOR
DIRECTOR
(858) 694-2962

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

January 4th, 2002

Jerry Backoff
Director of Planning
City of San Marcos
Development Services Department
1 Civic Center Drive
San Marcos, CA 92069-2949

**Re: SAN MARCOS HIGHLANDS SEIR 90-13, SPECIFIC PLAN
MODIFICATION (MOD)/SP 89/16 (98MOD) AND TENTATIVE
SUBDIVISION MAP TSM408/ND 99-503**

Dear Mr. Backoff,

Route Locations and environmental staff have reviewed the Supplemental Environmental impact Report (SEIR) for the San Marcos Highlands project. This project includes a specific plan modification and a Tentative Subdivision Map for 230 single-family homes. There are several issues that need to be addressed before this project proceeds. Our comments are as follows:

- Figures, 3.1, 3.2 and 3.3 show that an extension up to San Marcos Road will be annexed as part of this project. The purpose and need of this extension should be clearly identified and discussed in the SEIR. It appears to be for a road extension to Buena Creek Road.
- The current General Plan Circulation Element for the County of San Diego indicates that the extension of Los Posas Road to Buena Creek Road is planned, yet the alignment is undetermined. It is unlikely that the alignment proposed in this project would be acceptable under the current General Plan. This extension of Los Posas Road may be removed from the GP2020 Circulation Element.
- On pages 4.4-4 and 4.4-5 under emergency access it is stated that further extension of Las Posas Road to the north would be County circulation

improvements. The extension of Las Posas Road to the north would not be a County improvement if the extension to San Marcos Road is annexed as part of the project. Annexation to this area would allow the project to construct emergency access to the north to Buena Creek Road. Near term construction of this road for emergency access for the proposed project should be evaluated as an alternative in the SEIR.

- It is also stated that emergency access from the north may be taken to Buena Creek Road via private road easements. The SEIR should specify which easements would allow this and what emergency access is provided at this time.
- Open space easements are located along each side of the Las Posas Road as it traverses the proposed project and as it extends northward to Buena Creek Road. These open space easements serve as potential wildlife corridors. Bisecting the open space with be inconsistent with objective 2 (page 3-6 of the San Marcos Highlands Specific Plan Amendment which is to "preserve and wherever possible enhance the existing riparian woodland, freshwater marsh pond and wildlife corridors." An alternative that does not bisect the open space/wildlife corridor should be identified and evaluated. This would include the elimination of Las Posas Road through street with possible use only as a secondary emergency access corridor. In the 2005 traffic analysis it was stated that this road extension would not be needed (roads would operate as LOS C or better) and elimination would not result in traffic impacts.
- The current General Plan for the County of San Diego shows that dwelling unit density in this area should be one dwelling unit (du) per ten (10) acres. The proposed project far exceeds this goal with a planned range of 2.9 - 5.5 du/ac.
- **Section 3.7 Required Approvals of the SEIR is considered inadequate at this time as there will be a need for a Habitat Loss Permit from the US Fish & Wildlife Service and approval for the use of the County of San Diego 5% coastal sage scrub loss allotment. The latter is required as the City of San Marcos has exhausted its 5% coastal sage scrub loss allotment. It is stated in Section 4.3.4 that the proposed project would result in the loss of 76 acres of coastal sage scrub.**
- The vegetation onsite consists of primarily undisturbed Diegan coastal sage scrub. The current project design would severely impact wildlife movement through the corridor of pristine habitat the trends to the northwest by bisecting the corridor. It is staff opinion that this project should be redesigned so that wildlife movement would be unimpeded from the southeast to the northwest. It is also recommended that an alternative to this project be included that would located the impacts to the southwest

area of the site, within the current City of San Marcos boundaries, to minimize detrimental environmental effects by not losing as great a quantity of coastal sage scrub habitat and also retaining the current wildlife corridor.

- The proposed project requires the 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 riparian and coastal sage scrub habitats that support a range of wildlife species. The development of a plan to protect these sensitive resources is currently underway; the Multiple Species Conservation Program (MSCP) North County Subarea Plan. The current planning process addresses many issues related to lands contained in the lands proposed for annexation, including protection of the sensitive natural resources, potential configurations of connections to other natural areas, and reconciliation with development and community plans. The SEIR should adequately address the impact that this annexation and associated habitat loss and blockage of a viable wildlife corridor would have to the North County MSCP Subarea Plan.

If you should have questions or comments, please contact Bob Goralka (Route locations staff) at (858) 694-3728 or Maeve Hanley (staff biologist) at (858) 495-5254.



MAEVE HANLEY
Environmental Management Specialist

cc: Nancy Gilbert, US Fish and Wildlife Service, 2730 Loker Avenue West, Carlsbad Ca, 92008
William E. Tippetts, CA Department of Fish & Game, 4949 Viewridge Avenue, San Diego, CA 92122
Twin Oaks Valley Sponsor Group, P.O. Box 455, San Marcos, CA 92079-0455
Mary H. Clarke, Friends of Hacienda Creek, 1529 El Paseo Drive, San Marcos CA 92069
Michael Beck, San Diego Director, Endangered Habitats League, P.O. Box 1509, Julian, CA 92036