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

RE-. Notice of Preparation, Supplemental Environmental Impact Report,
San Marcos Highlands Specific Plan Amendment (SP 89-16[01 -MOD])

Dear Mr. Backoff:

I am commenting on the above-referenced Notice of Preparation (NOP) on behalf of the Friends of Hedionda Creek. We are a group of residents and concerned citizens who are dedicated to the environmental conservation of the San Marcos Mountains and the Hedionda Creek Valley and the preservation of the quality of life of the residents of that area.

COMMENT #1 -. A Supplemental Environmental Impact Report is not sufficient for this project, under CEQA requirements. A full EIR is required.

On several occasions, we have requested that the City of San Marcos require a new EIR for the Highlands Project. Most recently, in our response of Feb. 22, 2001, to the Re-Circulated Mitigated Negative Declaration (RMND) for the San Marcos Highlands project, we stated:

"Throughout the RMND, the developer compares the currently proposed development to one that was originally approved in 1990 and which received several time extensions. ...(The Tentative Subdivision Map, TSM 346, expired in 1998.) The developer also compares the current environmental situation to the one described in the Final Environmental Impact Report for the earlier development, which was certified in September, 1990 (EIR 90-13).

We find these comparisons erroneous and invalid because both the conditions under which the current project is proposed and the laws, rules, and regulations in effect today have changed from those that existed in 1990. Environmental conditions in San Diego County have deteriorated in the last eleven years, with significant loss of open space and habitat for wildlife, including coastal sage scrub and wetlands, due to

development pressures. Rapid growth in the region has contributed to poor air quality, scarcity of vital public services, and significant traffic congestion, among other problems. Consequently, laws, rules and regulations have become more stringent to attempt to counteract the negative impacts of rapid development...

Because eleven years have elapsed since the EIR for the first Highlands project was certified, and conditions, laws, rules and regulations have significantly changed over that period of time, a new EIR for the currently proposed project is required. A complete Environmental Impact Report, as required under CEQA, will benefit all parties in the decision making process. This EIR must include alternatives to the currently proposed project, including the 'No Project' alternative."

In addition to our request for a new EIR for the Highlands Project, Gary Pryor, Director of the Department of Planning and Land Use, County of San Diego, in his letter to the City of San Marcos dated February 23, 2001, called for a new EIR for the Highlands Project, because of the environmental issues involved in the area of the project. He also noted that the extension of Las Posas Road through sensitive habitats would necessitate the preparation of an Environmental Impact Report. His letter of February 23, 2001, is incorporated by reference into this Letter of Comment on the Notice of Preparation, Supplemental Environmental Impact Report, San Marcos Highlands Specific Plan Amendment (SP 89-16 [01 -MOD]). His letter is included as Attachment A to this Letter of Comment.

The City of San Marcos also received a letter from Craig B. Jones, Principal, DDOT Planning Systems, dated February 20, 2001, commenting on the Draft Mitigated Negative Declaration, San Marcos Highlands. In his letter, Mr. Jones pointed out specifically that a new EIR is needed for the Highlands project and quoted the CEQA Guidelines, Sec. 15162, which state the circumstances under which a Subsequent (not Supplemental) EIR would be required, including changes in the project, changes in the circumstances under which the project is undertaken, and new information of substantial importance to the project becomes available. All of these circumstances have occurred in relation to the Highlands project: the project has changed, the circumstances under which the project is being undertaken has changed, and new information has become available. Therefore, a new EIR should be prepared. This letter will discuss all of the "Environmental Factors Potentially Affected" for which the circumstances have changed and new information has become available since the original EIR was certified. Since this involves all of the Environmental Factors on the CEQA checklist except for "Mineral Resources" and possibly, "Geology and Soils," we urge the City of San Marcos to require a new EIR for the Highlands Project.

The letter of February 20, 2001, from Craig B. Jones to the City of San Marcos is incorporated by reference into this Letter of Comment on the Notice of Preparation of a Supplemental Environmental Impact Report, San Marcos Highlands Project, and is included as Attachment B.

The Twin Oaks Valley Community Sponsor Group wrote a letter of comment to the City of San Marcos on February 21, 2001, regarding the San Marcos Highlands Recirculated Mitigated Negative Declaration. In that letter, they discussed all of the Environmental Factors on the CEQA checklist and requested a new Environmental Impact Report. The Twin Oaks Valley Community Sponsor Group's letter of February 21, 2001, is incorporated by reference into this Letter of Comment on the Notice of Preparation of a Supplemental Environmental Impact Report, San Marcos Highlands Project, and is included as Attachment C.

In COMMENT #4, which follows, we will discuss each of the items from the Environmental Analysis Checklist for which circumstances have changed and/or new information has become available since the original EIR was certified.

COMMENT #2: As approximately 33.7 acres of the Highlands project are outside the sphere of influence of the City of San Marcos, the City of San Marcos has no authority to plan for this area. The County of San Diego is the proper land use planning agency for this area. In his letter of Feb. 23, 2001, Gary Pryor requested a greater role for the County in planning land uses on this property. He also suggested a collaborative process between the County and the City of San Marcos in planning for this area, similar to the process that the County and the City of Chula Vista used in the Otay Ranch area. We urge the City of San Marcos to work with the County on planning land uses for this area.

COMMENT #3: On page 1 of the NOP, under "Project Location," current conditions in and around the land on which the Highlands project is proposed are discussed. It should be noted that Las Posas Road does not pass through the site, as is stated in the last sentence on page 1. Las Posas Road terminates some distance south of the Highlands property line. Development of the Highlands property will require extension of Las Posas Road from its current terminus, across Hedionda Creek. This extension of Las Posas Road to the Highlands property line will impact sensitive wetland habitat, including southern willow riparian forest, coast live oak riparian woodland, mule fat scrub, and unvegetated Waters of the U.S. It will also impact a recognized wildlife corridor along Hedionda Creek.

COMMENT #4: As stated above, in COMMENT #1, since the original EIR for the Highlands project was certified in 1990, circumstances have changed and/or new information has become available in all of the 'Environmental Factors Potentially Affected' on the CEQA checklist, with the exception of "Mineral Resources" and possibly, 'Geology and Soils.' Following is a discussion of the circumstances that have changed and/or new information that has become available, factor by factor. Also included are comments regarding inadequacies in the analysis of environmental factors in the 1990 EIR that should be corrected.

1. AESTHETICS.

a) The 1990 EIR failed to address the Highlands impacts on scenic vistas because it did not show pictorially the project's visual impacts to the site. All observations and conclusions were vague.

Since the 1990 EIR, several new estate homes have been built in the areas adjacent to the Highlands, as well as 1,695 homes to the south in the Santa Fe Hills/Paloma development. Adjacent to the Highlands, new estate homes, horse properties and recently planted groves have replaced older orchards, thus altering views of the area.

Due to the proliferation of high-density suburban dwellings and the loss of open space in San Diego County, conditions have changed and homes in rural areas now command premium prices for their scenic views and rural lifestyle. The view of a rural countryside, now becoming increasingly rare in San Diego County, is considered a valuable property asset.

Visual inspection from Esplendido Ave. on the ridge to the west of the Highlands project indicates that all of the houses on the south side of that street from Entrada to the westernmost portion of Esplendido Ave. will have a clear view of this project. In addition, homes in the Robin Hood Ranch along J Street, B Street and on the hillsides will have clear views of the Highland development. Two homes on the end of Esplendido and homes in the Robin Hood Ranch area will be the most impacted since the views they currently have are of rural countryside only. The Highlands would decrease view assets of existing homes by replacing rural views with a high-density development visually characterized by stucco walls and tile roofs.

Dwellings on the eastern portion of the site will be seen from Buena Creek Road, a designated scenic County road.

Overall, the Highlands development would create a mass of dwellings with a visual appearance and impact similar to the existing Emerald Heights development, a project that is now considered the definition of poor planning.

In addition, the new proposed Highlands project design has changed dramatically. It has gone from a single-story, large lot, ranch style design to a two-story, small lot, Mediterranean design. The new design will have more of a visual impact than the project as originally proposed.

Finally, new technologies, such as the 3-D computer imaging techniques used today to accurately represent the visual impact of a project of this magnitude to a site, were either not available or not affordable in 1990. Computer modeling should be used to ensure that this project's design minimizes its visual impacts to the surrounding rural areas.

c) The largest cut slope of 75 feet in height by 450 feet in length significantly impacts views from lots in planning area 2 of the Highlands, as well as from adjacent homes presently being built in the adjacent Santa Fe Hills/Paloma development and some of the homes in the Robin Hood Ranch area. The surrounding conditions have changed since the 1990 EIR with the development of Santa Fe Hills/Paloma. Also, the location of the grading cut has changed since the 1990 EIR. Therefore, the 1990 EIR (p. 4-9, Fig. 4-8) is inaccurate and obsolete. It should be noted that both the Santa Fe Hills/Paloma project and the Highlands project have undergone design and density changes since the 1990 EIR, and now visual impacts of grading cuts will impact a significantly greater number of homes. These impacts need to be analyzed in a new EIR.

d) The addition of 230 homes and a major roadway into a completely undeveloped valley will create new sources of substantial light and glare which will adversely affect day and nighttime views in the area. A new EIR should address the latest technologies available to

diminish the impact on the neighboring communities of artificial light and glare from this development.

11. AGRICULTURAL RESOURCES.

Most of the land in this project is in the County and falls under the purview of the Twin Oaks Community Sponsor Group. Preservation of agricultural resources is a goal of the Twin Oaks Community Sponsor Group, as stated in their community plan. The introduction of 230 homes adjacent to the existing livestock and avocado groves creates the possibility of increased human disturbance of agricultural resources. Introduction of root rot fungus, which can be carried on clothing and shoes, into adjacent avocado groves is a major concern for growers in the area. This potential impact to adjacent agricultural resources was not addressed in the 1990 EIR,

111. AIR QUALITY.

Air quality in the San Diego region has deteriorated in the last 11 years and, as a result, new air pollution control regulations and measures have been put into effect. These need to be addressed in a new EIR and the cumulative increases to air pollution caused by the development of the Highlands area need to be thoroughly analyzed.

Please refer to Attachment C, page 3, item III. AIR QUALITY, for additional comments.

IV. BIOLOGICAL RESOURCES.

a) Since 1990, several changes in conditions, laws and regulations have occurred. First, the Coastal California gnatcatcher was listed in 1992 as a federally threatened species. Its habitat is coastal sage scrub. Since 205.7 acres of the 224-acre Highlands property consists of coastal sage scrub, it is not surprising that gnatcatchers reside on and adjacent to the property, as stated in the URS Biological Resources Report of January 2001, for the Highlands project. The Highlands project proposes to impact 76 of the 205.7 acres (36.9%) of coastal sage scrub on the property.

As the Biological Resources Report of January, 2001, points out, "The primary cause of this species' [California gnatcatcher] decline is the cumulative loss and fragmentation of coastal sage scrub vegetation to urban and agricultural development."

The report continues, "Initial studies suggest that the coastal California gnatcatcher may be highly sensitive to the effects of habitat fragmentation and development activity (Atwood, 1990). The territory of size requirements of the gnatcatcher varies with habitat quality. Documented home ranges have varied from 6 to 45 acres in San Diego County (Preston et al., 1998). Typical long distance dispersal distances range for 6 to 10 miles, although the majority of natal dispersal is probably less than 2 miles depending on the local availability of unoccupied habitat and potential mates (Bailey and Mock, 1998)."

The gnatcatcher needs relatively large contiguous areas of coastal sage scrub to survive and procreate. It appears from the Master Land Use Plan map of the Highlands project that about half of its habitat on the west side of the proposed extension of Las Posas Road will be destroyed. This is bound to have a substantial adverse effect on the species.

The whole issue of destruction of coastal sage scrub where the coastal California gnatcatcher resides needs to be addressed in detail in a new EIR. The gnatcatcher was not identified as located on or adjacent to the Highlands property in the 1990 EIR. Apparently, they have moved into the area since 1990. This is a change of condition since the 1990 EIR. A change of law has occurred also: the 1992 listing of the gnatcatcher as a federally threatened species. Another change of condition is the continuing loss of coastal sage scrub habitat in San Diego County. According to the URS Biological Resources Report, in 1991 the US Fish and Wildlife Service estimated that coastal sage scrub habitat had been reduced by 70 to 90 percent of its historical value. Since 1991, more coastal sage scrub has been lost, This change in condition needs to be addressed in a new EIR.

Secondly, the URS Biological Resources Report (2001) states that the Cooper's hawk uses the site. Cooper's hawk is a California Dept. of Fish and Game "Species of

Special Concern." According to the "Biological Goals, Standards, and Guidelines for Multiple Habitat Preserve Design," prepared for SANDAG by Ogden Environmental in 1998, its habitat includes dense stands of oak or riparian woodland, and threats to its survival include habitat loss. Loss of riparian habitat will significantly impact this species.

As discussed in a later section, new information about sensitive species such as the gnatcatcher and the Cooper's hawk and their habitats has arisen during the process of developing the Multiple Habitat Conservation Program (MHCP) over the last decade. The City of San Marcos has been a participant in the MHCP process. Results of this major effort as they relate to the Highlands project, which will impact sensitive and threatened species and their habitats, need to be addressed in a new EIR.

b) Coastal sage scrub is a sensitive natural community, and has been identified as such in the regional MHCP plan and in regulations by the US Fish and Wildlife Service. Restrictions on impacts to coastal sage scrub were imposed with the listing of the gnatcatcher in 1992. The Highlands project proposes to destroy 36.9% of the coastal sage scrub on the property. As a mitigation measure, 12 acres of coastal sage scrub shall be acquired offsite. This results in a net loss of 31.1 % of coastal sage scrub, a significant amount. This amount of destruction of coastal sage scrub needs to be fully addressed in a new EIR.

Secondly, the destruction of .87 acres of riparian habitat, also a sensitive species, is not unsubstantial. Loss of wetlands due to development is a major issue in California. Wetlands have continued to be destroyed in the last 11 years, since the 1990 EIR was prepared. This is a change in condition, and needs to be fully addressed in a new EIR.

During the MHCP process, standards were developed for wetlands. These standards and guidelines are discussed in the "Public Review Draft MHCP Plan," Volume 1, page 3-21.

These standards are new regulations that have occurred since the 1990 EIR. They need to be fully analyzed in a new EIR.

c) The Highlands project proposes to impact 80% of the unvegetated wetlands on the site. Again, the standards developed for wetlands in the MHCP process need to be addressed in a new EIR. (See previous paragraph.)

d) New information has arisen since the 1990 EIR about the value of the Hedionda Creek valley as a wildlife corridor. In a letter dated August 5, 1999, to Jerry Backoff regarding the first Mitigated Negative Declaration (6/30/99) for the new Highlands project, the US Fish and Wildlife Service and the California Department of Fish and Game stated:

'One of the key tenants of habitat conservation planning is to maintain, viable habitat linkages between larger blocks of natural habitat. The San Marcos Highlands project is located at a 'pinch point' of remaining natural lands between a large block of undeveloped land to the south and east within the City, and another large block of undeveloped land to the northwest within the County's jurisdiction. It appears that the proposed development would completely block this connection. The proposed housing development in Area I would likely preclude any significant wildlife movement. Therefore, we cannot concur that this project is consistent with the goals and objectives of the MHCP or the Natural Community Conservation Planning (NCCP) Program. To make this project consistent with regional habitat planning efforts, this project would need to redesign to maintain a natural east-west habitat linkage through the development.'

In her letter of February 22, 2001, commenting on the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project, Sandra Farrell commented on the discrepancies between the proposed Highlands project and the requirements of the MHCP, which are new requirements since the 1990 EIR. She stated:

The project has not been redesigned to maintain a natural east-west habitat linkage through the development. The only additional design features related to wildlife movement are an oversized culvert of at least 48 inches in diameter installed under street "A" and the reduction of housing units along the west border of Planning Area 1. The proposed housing units will block wildlife access to the waterway, which is essential for wildlife survival. Planning Area I in particular blocks access to the waterway, as does the major roadway, Las Posas Road, which runs along the west side of the wetlands. The design of the project will significantly and substantially interfere with wildlife movement.

Additionally, The Biological Resources Report states that, in addition to smaller mammals such as coyote, bobcat, rabbit and woodrat, mule deer inhabit the property. According to the Biological Goals, Standards, and Guidelines for Multiple Habitat Preserve Design (Ogden, 1998), page 6A, "Bridges are the preferred type of wildlife underpass; box and pipe culverts are infrequently used by deer (Ogden 1992a) but may be used by some smaller animals." Also, "Underpasses targeted for deer movement should be at least 20 feet high." No accommodation has been made in the project design to allow mule deer to cross the roadways. This is a hazardous situation for both the deer and drivers of vehicles on the roads.

In addition to making no accommodation for deer to safely cross the roadways, the Highlands development violates other MHCP Design Guidelines for wildlife corridors and habitat linkages (see pages 6-2, 6-3, and 6A of the above-referenced document). On page 6-3, item 4. states, "For canyon situations, the corridor should extend from rim-to-rim, if possible." On page 6A, item 7. states, "Corridors should have a minimum amount of human disturbance, especially at night, and have low ambient noise levels during the time (nighttime) that the target species are expected to use the corridor. Corridors should be shielded from artificial lighting from adjacent development."

Item 8. on page 6A states, "Minimize barriers such as major roads. Roads that cross corridors should provide underpasses allowing large mammals and other animals to cross. Roads crossing the corridor should be fenced by at least a 10-foot fence that channels animals toward the wildlife underpass. ...The length-to-width ratio of wildlife underpasses should be less than 2.'

Major conservation efforts have been initiated since the 1990 EIR for the Highlands project. These include the State of California's Natural Community Conservation Planning Act of 1991 and the Multiple Habitat Conservation Program for North San Diego County. Also included is the 4(d) rule, which went into effect in the 1993-94 time frame.

Major changes in conservation planning have occurred since the 1990 EIR because of the continuing loss of coastal sage scrub (CSS) and the possible extinction of the threatened gnatcatcher. In San Diego County, the Wildlife Agencies have initiated a major planning program under the State of California's Natural Community Conservation Planning Act of 1991. Seven cities in North San Diego County have joined together to create a Multiple Habitat Conservation Program. San Marcos is a participant in this program, which is reaching its final stages. Most of the cities involved, including San Marcos, are developing subarea plans which will detail how they plan to preserve valuable habitat and wildlife corridors. These subarea plans have not yet been made public, except for Carlsbad's.

While the MHCP is being developed, projects involving destruction of gnatcatcher habitat, i.e., coastal sage scrub, are being reviewed by the Wildlife Agencies under Section 4(d) of the federal Endangered Species Act. Under the 4(d) rule, development during this interim planning period is restricted to removing no more than 5% of all CSS habitat in the range of the gnatcatcher. (The Highlands project will remove 36.9% of the CSS on the site.) The 4(d) rule went into effect after the 1990 EIR.

It is clear that conditions involving the gnatcatcher and its habitat, coastal sage scrub, have changed dramatically since 1990. The gnatcatcher was listed as a threatened species in 1992.

It is also clear that laws and regulations regarding removal of CSS have changed since the 1990 EIR for the Highlands project, and a new EIR is required to address this major issue in depth.

Additionally, the Highlands project is not consistent with the goals of the regional Multiple Habitat Conservation Program (MHCP). The MHCP identifies this area as a "habitat linkage"

which provides habitat and opportunities for wildlife movement. (Biological Goals, Standards, and Guidelines for Multiple Habitat Preserve Design, prepared for SANDAG by Ogden Environmental, Feb. 1998, pages 6-1, 6-2.)

As stated in the M14CP Goals, Standards and Guidelines document (page 6-2), the goals of the MHCP with regard to habitat linkages are:

- " 1. Maintain **local** habitat linkages (i.e., within the MHCP area) by conserving/enhancing natural connections to allow access to necessary resources that otherwise may be impeded by development.
2. Provide the opportunity for regional habitat linkages (i.e., between regions and subregions) by adequately conserving natural connections between large areas of conserved native habitat inside and outside of the MHCP area.
3. Where regional habitat linkages are not possible, maintain local movement corridors between habitat patches where feasible."

The gighlands project violates the above goals by placing a high-density residential development in the middle of a wildlife corridor and bisects the wildlife corridor with a roadway along the wetlands. The proposed mitigation measures are totally inadequate to protect this area as a wildlife corridor, as discussed previously.

The leghlands development also violates the Design Guidelines for wildlife corridors and habitat linkages (pages 6-2, 6-3, and 64 of the above-referenced document). These MHCP design guidelines were detailed in the preceding discussion of Section IV. d).

The two culverts under the roadways in the proposed project are woefully inadequate to meet the goals of the MHCP relating to preservation/conservation of wildlife corridors. The blocking of access to the waterway by the housing development, especially in Planning Area 1, and by Las Posas Road will destroy the wildlife corridor. This is a highly significant environmental impact and one which the MHCP, through its goals and guidelines, is trying to prevent.

Lastly, we are unable to comment on how the Highlands project relates to the MHCP plan for the City of San Marcos, since the subarea plan has not yet been made available to the public.

V. CULTURAL RESOURCES.

The Twin Oaks Valley Community Sponsor Group has brought up new information that was not addressed in the 1990 EIR. Please refer to Attachment C, page 7.

VII. HAZARDS AND HAZARDOUS MATERIALS.

The Highlands project proposes to construct residences in a wildlands area, where there is a significant risk of loss, injury or death involving wildland fires.

In their letter of August 5, 1999, the Wildlife Agencies requested clarification Of the fuel modification plan for the Highlands project. They felt that it was unclear whether fuel modification zones adjacent to development are included in the footprint of development or not. They stated, "We consider all loss of vegetation to fuel management a direct impact requiring full mitigation. Please clarify this issue and calculate impacts to vegetation accordingly." This issue needs to be addressed in a new EIR.

VIII. HYDROLOGY AND WATER QUALITY.

The following comments are from the letter written by Sandra Farrell to Jerry Backoff on Feb. 22, 2001, regarding the Re-circulated Mitigated Negative Declaration for the San Marcos Highlands project.

Conditions of water quality of the San Diego region, the area of the proposed Highlands, and the regulations governing water quality have changed since the 1990 EIR 90-13.

Since the 1990, due to urban runoff caused by increased development of the San Diego Region, the number of Clean Water Act section 303D listed water bodies has increased from 16 listed in 1990 to 36 listed in 1998.(Draft Status of Co-permittee Compliance,p.2,4) New storm water management procedures, not in effect in 1990 are now required to bring the San Diego Region in compliance with the Clean Water Act.

Stringent regulations are now in place due to the declining quality of the Region's receiving waters. This loss in water quality resulted in changes to The New Municipal Storm Water Permit Order No. 2001-01 that replaced the 1990 MSWP Order No. 90-42. This new MSWP requires new development to meet new water quality criteria not addressed in 1990 EIR 90-13. The previous MSWP Order No. 90-42 failed to address numeric effluent limits.

Although the 1990 EIR 90-13 identified impacts to water quality, it did not do so in respect to changes that have occurred over the past eleven years. New conditions not present in 1990 now show urban runoff as the principal reason why 303(d) listed water bodies do not meet their beneficial uses even when existing storm water pollution prevention practices are used. Today we know that urbanization upstream cumulatively and significantly impacts water quality downstream. The 1990 EIR 90-13 fails to identify the impact that the Highlands project has on the water quality of Agua Hedionda Lagoon, an impaired water body listed under 303(d) in April of

1990 (WO-2). Section 303(d) is a state "anti-degradation policy" and instructs RWQCB to not permit projects that will further impair a listed water body (40 CFR Section 131-12). No detail is given in either the 1990 EIR 90-13 or the RNUQJD as to specific mitigation measures used to ensure that the water quality of Agua Hedionda Creek is not further degraded.

The Regional Water Quality Element of SANDAG's Regional Growth management Strategy lists an objective in the water quality element aim to "*Consider water quality impacts from*

urbanization in the development planning and environmental review processes". This condition occurred after 1990 EIR 90-13.

http://www.sandag-cog-ca.us/projects/regional_Planningwatershed.html

The long-term costs to the public associated with meeting water quality are an important issue and not addressed in 1990 EIR 90-13. The implementation of the Highlands project in such an environmentally sensitive area and the costs associated with meeting environmental laws may place such an unrealized burden on the taxpayer to make the project inappropriate. The 1990 EIR 90-13 failed to show how environmental interests would affect long-term economics for those who will bear the costs.

The conditions of the areas including and adjacent to the Highlands project have changed since the 1990 EIR 90-13. Properties adjacent to the proposed project on the northern edge have changed from groves to ranching activities, changing the quality of the runoff into the Pond. Property along J Street, adjacent to the Highlands, cleared in 1990, (view A, figure 4-7, p 4-17, ERC, FEIR), is now a horse ranch with two mobile homes and an additional residence. The original water samples taken from the pond on April 3, 1990, as shown in Appendix B, San Marcos Highlands Pond Water Sampling Report are therefore no longer valid.

Comments a)

The design of the Highlands project has changed significantly since its approval and the 1990 EIR 90-13. In the RMND it is unclear how storm water and urban runoff from this project will be managed. In section a) the RMND states on p. 4- 10 *"that drainage... will be ultimately discharged in the City's storm drain system "*. In d) in the RMND on p.4-11 it states that *11 ... most development drainage "*. would be discharged, *"to a release point below the pond to prevent contaminated water from entering the pond"*. The at a release point below the pond appears to feed back into Agua Hedionda Creek, thus contaminating the Creek.

Clarification is needed in this matter. Without proper processing to remove contaminants water from the site introduced to Agua Hedionda Creek will be polluted. This would be unacceptable mitigation since it puts pollution into a tributary of Agua Hedionda lagoon, an impaired water body listed under section 303 (d), Clean Water Act. Order No. 2001-01, (9), p 14 states *"For new development... the post development rates water velocities from a site shall not exceed the pre-development runoff rates and velocities from the same site ... Post-development runoff discharges into a Clean Water Act section 303(d) water body shall not contain any pollution (for which the water body is already impaired) exceeding pre-development levels (for those same, pollutants) "*. If, however, the water is removed from the site, then the wetlands will be significantly degraded which would have an effect on water quality since wetlands act as a filter of pollutants. Down stream, adjacent to the Santa Fe FERCs/Paloma development runoff has been allowed to run directly into Agua Hedionda, in direct violation of water quality laws. None of these issues is adequately addressed in EIR 90-13.

The change of the design of the Highlands also impacts the percent imperviousness of the site. According to p. 2 of Order No. 2001 -0 1, #5., *"Significant declines in biological integrity and physical habitat of streams and other receiving water have been known to occur with as little as a 10% conversion from natural to impervious surfaces. Developments of medium density*

single-family homes range between 25-60% impervious No data was supplied to ensure that this new project adequately mitigated for this impact.

Finally, the initial hydrology report fails to identify a drainage tributary to Agua Hedionda that runs from the northwest portion of the property, across the San Diego Aqueduct easement, across Planning A and into Agua Hedionda Creek just below the earthen dam.

Comments b)

b) 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?)

We disagree that there will be no impact to groundwater supplies or recharge from the Highlands development. Since the project as proposed to be built on a wetlands and its watershed, it will disrupt current patterns of groundwater supplies. According to the RMND, page 4-8, under item iii) "Seismic-related ground failure, including liquefaction," it is stated that canyon subdrains will be placed to preclude buildup of groundwater. These will disrupt the natural pattern of groundwater supplies and may act to reduce the level of the aquifer. Also, in the developed areas the natural drainage pattern from the watershed of Hedionda Creek will be destroyed and replaced with engineered drainage. The RMND states that runoff from the developed areas will go through the storm drain system to connect with the Paloma storm drain south of the site. This may also disrupt the natural pattern of groundwater supplies and act to reduce the level of the aquifer.

These issues need to be fully addressed in an EIR that assesses current conditions, rather than referring back to the FEIR which is over 10 years old.

Although the RMND states no significant ground water resources are known as per EIR 90-13 the Agua Hedionda Valley area within the Community College Area historically contained two wells and at least two homesteads. One of the wells and a homestead were mentioned in the Cultural Resources section of the EIR 90-13. The other is known to be located just south along the creek in the Santa Fe Hills/Paloma plan area. This well was in operation during the 60's and 70's and supplied water to the Millick homestead. (EIR07-87p.79) The EIR 90-13 failed to find water because they only went down 9.5 feet below grade and did not investigate pre-existing on site wells.(EIR 90-13, p 4-80) In addition, the Hydrology Report dated August 1989, would have evaluated the site during a dry year when the water table would have been at a much lower level. The on site well located in the Santa Fe Hills/Paloma project area was of significant depth since Mr Millick often had to transport water in during unusually dry summers. (SF- 1) A new ER properly done, would identify the true ground water resources present on the site.

Comments c)

The **design** of the site has changed substantially since the EIR 90-13, altering all grading data originally presented. The proposed project is a new project with new grading impacts. A new EIR would address the proposed projects impacts to the site using existing conditions.

Comments d)

Due to significant design changes the ' the Highlands design., drainage impacts are different. It is unclear as to where the excess runoff will be diverted, how much runoff would be generated since the data in the EIR 90-13 is no longer accurate.

Comments e)

As presented in (Comments a) new water quality regulations will alter mitigation measures. Measures presented may longer be valid.

Comments f)

Contribution of pollution of any amount to an impaired water body is in violation of existing water regulations.(WQ,CaliforniaWaterCode13241,p.3-1) Agua Hedionda Creek is a tributary to Agua Hedionda Lagoon, an impaired water body and therefore cannot be used as a storm drain for urban development.

IX. LAND USE PLANNING.

The following comments are from the letter written by Sandra Farrell to Jerry Backoff on Feb. 22, 2001, regarding the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project.

Comments: a)

The Highlands, if approved, would separate and isolate a portion of the Twin Oaks Community Sponsor Group planning area. Rural homes adjacent to two sides of the Highlands project have been part of existing communities since early 60's and lie within the boundaries of the Twin Oaks Community Sponsor Group planning area.

Comments:b)

Of the total acreage of the Highlands, **600/0** is located in the unincorporated area of San Diego County and presently zoned Estate Residential, I du/2-4 acres-A-70. Approximately **90%**of the proposed development is within the County jurisdiction. Although the property falls within the City of San Marcos "sphere of influence", there is no consideration, coordination, or communication with County staff regarding this project. Under County Policy 1-55, Sphere of Influence Policies, cities lack land use authority until annexation occurs, thus they can only implement their advance plans on a piecemeal basis, as annexation occurs. All approvals on the Highlands project are presently wishful thinking.

In addition, the Highlands as proposed, is not compatible with adjacent unincorporated rural County areas and thus fails County Policy 1-55, C. Annexation Policies, (f) The community

identity of the adjacent area is compatible with the city. The 1990 EIR 90-13 did not address the cumulative impacts the Highlands will have on County existing land use policies and anticipated growth of the area.

Comments: c)

We strongly disagree that there is no impact in this area. As stated in our comments under section IV. Biological Resources, item f), the Highlands development conflicts with the State of California's Natural Community Conservation Planning Act of 1991. Our comments under section IV. f) detail the conflicts involved, which are highly significant. These issues need to be fully addressed in a new EIR.

Changes in habitat conservation planning have occurred since 1990 EIR 90-13. To ensure that San Diego County meets conservation requirements as specified under the Endangered Species Act, two major regional habitat conservation plans have been implemented. The Highlands lies within San Diego County Multiple Species Conservation Plan (N4SCP) planning area as well as the Multiple Habitat Species Conservation Plan (MHSCP) planning area. The site contains the northwest portion of the San Marcos Mountains, a County protected Resource Conservation Area as specified in the North County Metropolitan Subregional Plan (p A-a). The Highlands' impacts to these plans were not addressed in the 1990 EIR 90-13 and would have a profound impact on conservation plans presently in process for this area.

Due to changes in land use planning that will be occurring with the General Plan update, any development that straddles jurisdictions in land use and/or several conservation area designations and varies greatly from existing adjacent land use should be properly evaluated in a new EIR, and an effort should be made among jurisdictions to work towards common goals.

XI. NOISE.

The following comments are paraphrased from the letter written by Sandra Farrell to Jerry Backoff on Feb. 22, 2001, regarding the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project.

This project will significantly increase ambient noise levels both temporarily and permanently. In particular, it will severely impact the residents who live adjacent to the site in the unincorporated area. The noise level will increase significantly in this rural area.

Currently, the area is extremely quiet during all times of the day and night. One hears only the sounds of wildlife, such as frogs, coyotes and birds. The Highlands will add a significant amount of noise from cars, heating and cooling systems, barking dogs, human voices, and will dramatically change the quiet, rural nature of the site.

Significant temporary and permanent increases in ambient noise levels is contrary to the MHCP guidelines for habitat linkages. On page 6-4 of the Goals, Standards and Guidelines document, previously referenced, it states, "Corridors should have a minimum amount of human disturbance, especially at night, and have low ambient noise levels during the time that the target species are expected to use the corridor."

These MHCP Goals, Standards and Guidelines have been developed since 1990, and constitute a change in information and in requirements. A new EIR is needed to address these changed requirements and information.

Changes in the design of Highlands project have occurred in addition to changes in the San Marcos area that make the initial noise study and findings no longer accurate.

Comments a)

The design of the Project has changed significantly from what was studied in the 1990 EIR 9013. The design has changed from having larger lots, with a more spread out design in SP 89-16 to the tightly clustered, smaller lot design. Although the number of dwellings has decreased, so has the size of side yards and open space within the development that would have allowed for sound attenuation in the form of trees, dense shrubs, staggered architectural surfaces which

would either deflect or absorb sound. The smaller lot design and use of stucco building surfaces, as proposed, will create dwellings to be comprised of simple rectangles which will act like rock canyons to amplify sound within the development. This will be particularly acute between buildings. In the original design SP 89-16, the Acoustical Analysis noted that the exterior noise level would exceed the maximum compatible exterior noise level for residential development of 60 DB-A as established in the San Marcos, Noise Element of the General Plan, (I 989 Acoustical Analysis Appendix D, page 4).

Comments a) and c)

In addition, the Acoustical Analysis did not address the impact of noise generated from the Highlands to adjacent rural farms and agricultural operations. Noise level limits as per San Diego County Noise Ordinance (section 36404) for properties A-70 land use, states "*an hourly average sound level limit does not exceed the 47.5 decibel threshold at the property line.*" Conditions have changed in property adjacent to the Highlands. This area shown as an avocado grove in EIR 90-13 is now a horse ranch. Horses are susceptible to noise and yet there is no data done to mitigate the impacts the Highlands and Las Posas will have on this equestrian operation.

In order to reduce noise impacts below the ' level of significance, Acoustical Analysis recommended that lots adjacent to Las Posas be built to allow for closed-window condition and equipped with mechanical ventilation systems (p I 1). This is a preposterous suggestion in today's world where energy supplies are low and prices are high. To approve development that requires this type of sound attenuation in an existing rural community is shocking. Sound attenuation wall only blocks sound for those on one side of the wall. These walls only add additional hard surfaces, which will merely act to deflect sound into the open space of the pond, resulting in significant wildlife disturbance.

The change in design put the bulk of the development in Planning Area I on a flatter portion of the site. The topography surrounding Area I is of higher elevation, thus placing Area I in a

depression. The result of this type of design that will put large amounts of hard-scape in a depression may act to amplify sound. The overall ambient noise would than be significant and exceed all acceptable levels.

Xi. POPULATION AND HOUSING.

The following comments are paraphrased from the letter written by Sandra Farrell to Jerry Backoff on Feb. 22, 2001, regarding the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project.

Comments a)

We strongly disagree that there would be no impact in this area from the Highlands development. It will introduce 230 new homes into an undeveloped area and require extension of roads (Las Posas Road, especially) and other infrastructure into an undeveloped area. The extension of a road into undeveloped areas is the first step to induce growth and this project represents the worst kind of urban sprawl. A recent City of San Marcos newsletter featured "Smart Growth." Putting a 230-unit housing development in an undisturbed wetlands area and

destroying sensitive habitat, severing an important wildlife corridor, and bringing all the impacts of urbanization to a rural area is the antithesis of Smart Growth.

A significant portion of the Highlands project falls within the County and is zoned A-70. Urbanization of this area is not supported by present land use policies of either the Twin Oaks Community Plan or the North County Metropolitan Subregional Plan. Under the North County Metropolitan plan, this project fails to meet environmental goals because it urbanizes scenic rugged terrain and puts population in a designated County resource conservation area (Ch 2, Goals, p. 3, and Appendix A, p. A-1). In addition, the portion of the Highlands site located in the County is presently part of a General Plan Update that will further reduce densities in sensitive habitat areas.

If Las Posas Road is not to be extended beyond the Highlands project, as the project documents claim, R needs to be reduced in size to accommodate only the traffic flow from the Highlands area. Even if Las Posas Road is not extended beyond the Highlands project, its extension from its current terminus to the Highlands site will open up undeveloped land, particularly on the west side of the road (i.e., the Murai property), to development.

These growth-inducing impacts to both the City of San Marcos and the County need to be fully analyzed in a new EIR.

Xiii. PUBLIC SERVICES.

The following comments are paraphrased from the letter written by Sandra Farrell to Jerry Backoff on Feb. 22, 2001, regarding the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project.

Comments re: Fire Protection

A letter dated Sept. 6, 1989, from Senior Fire Inspector Jay R. Butler to Patrick Atchison noted concerns and mitigation requirements necessary for approval of the Highlands project. He stated, "...residential fire sprinkler systems will be required to be installed in all structures..." At that time, the design of the Highland project was far different from the present design. It relied on a fire station's being built in the adjacent Santa Fe Hills/Paloma development as well as different design standards for Las Posas Road. In addition, growth in San Marcos has changed the area's requirements for fire protection and response times, compared to those that existed at the time of the 1990 EIR. Due to changes both in the conditions in the San Marcos area and changes in the project design, a new EIR should fully analyze these issues to ensure that public safety can be guaranteed.

Comments re: Schools

The Re-Circulated Mitigated Negative Declaration (RMND) for the Highlands project stated that the elementary school in the Paloma Specific Plan Area is overcrowded because it is accepting the overflow from other over crowded SMUSD schools. It states that when students from the Highlands development arrive, they will displace, rather than add to the number of students attending this elementary school. The consequence is that the school will still be overcrowded, and other schools in the SMUSD will be even more over crowded because they must accommodate the displaced students.

The current situation of school overcrowding in the SMUSD schools and the additional impact of the Highlands development on this situation needs to be fully addressed in a new EIR. The analysis needs to state exactly how the school mitigation fees paid by the development will be used to reduce school overcrowding.

XIV. RECREATION.

This project proposes two parks on the site, which will attract human activity to the pond area and to an overlook park. Twenty-two parking spaces, a tot lot, turfed play and picnic area, picnic benches, and a restroom are proposed. Coastal sage scrub at the north half of this park will be modified.

An active use park next to a riparian habitat that functions as a critical part of the existing wildlife corridor violates the MHCP Guidelines for habitat linkages. As stated on page 6-4 of that document, "Corridors should have a minimum amount of human disturbance..."

The information, standards and guidelines developed as part of the MHCP were not in existence at the time the 1990 EIR was prepared. They constitute changes in the situation surrounding the Highlands project. How the Highlands project relates to the MHCP needs to be fully addressed in a new EIR.

XV. TRANSPORTATION RTRAFFIC.

The following comments are paraphrased from the letter written by Sandra Farrell to

Jerry Backoff on Feb. 22, 2001, regarding the Re-Circulated Mitigated Negative Declaration for the San Marcos Highlands project.

Conditions have changed in the City of San Marcos since the 1990 EIR 90-13. Since the completion of the traffic study in EIR 90-13 several regional changes have occurred that need to be addressed in a new EIR. Rapid growth both within San Marcos and in the San Diego area in general within the past 10 years has lead to major traffic congestion in the area. Chronic traffic congestion impacts quality of life, including human health, safety, and has a profound economic impacts on the community.

A local newspaper recently stated "San Marcos has been the fastest-growing city in San Diego County for the past decade." (NCT-1) This same article stated that "Construction was so rapid last year that by mid-1999 the value of projects that received building permits was up 72 percent from the previous time in 1998." These projects have yet to impact traffic in the area.

The 1990 EIR did not consider how residents of the Highlands would need to move through the community to reach destinations. Many of the roads residents will use are not identified. It also failed to address the impacts of traffic created by the following changes that have occurred since 1990:

1. California State University - San Marcos has grown from 500 students in 1990 to 6,200 in 2000, adding 62,000 ADT. The school is projected to have 23,000 students in 2020. (SDUT-1)
2. Between the years 1990 and 2000, San Marcos grew by 16,918 people. Since the typical dwelling unit at this time contained approximately 3 people, San Marcos added about 5,639 dwelling units. Using 10 trips per day per dwelling, the total impact would be 56,390 trips per day. In addition, there are another 7,100 housing units that are either in progress or approved with another 1,681 pending. San Elijo Hills alone would add 3,398 homes. Major developments such as Discovery Hills, Santa Fe Hills/Paloma, which have been recently added, were not present in 1990.
3. Impacts of future population on existing roads. SANDAG forecasts population growth in San Marcos to reach 91,557 by 2020. Using the three-person-per dwelling unit times 10 trips per day, this would put the traffic in San Marcos at 305,190 average trips per day (SANDAG-1).
4. The growth in business resulting in San Marcos' daytime population increases. SANDAG forecasts show that the City's daytime population in 1995 grew by 13,088 and will continue to grow to 25,146 in 2010 and 29,498 in 2020. (SANDAG-1)
5. The location of key employment centers in Carlsbad, Rancho Bernardo and San Diego and the traffic impacts associated with those centers would have on the City and the residents of the Highlands. Many residents of the Highlands will commute down either San Marcos Blvd. or Rancho Santa Fe Road to reach key business centers in Carlsbad. Other commuters,

who work in San Diego, either use 1-78 or 1-15 or take Rancho Santa Fe Road to 1-5 near La Costa. Traffic in the evenings on Rancho Santa Fe Road from El Camino Real to the San Marcos city limits approaches stop-and-go driving conditions.

6. The additional through traffic on 1-78 and San Marcos streets from outside the city. San Marcos' location between 1-15 and 1-5 put it in the middle of major east-west traffic flow. Commuters from new residential developments north of Escondido use 1-78, Twin Oaks, and Deer Springs, as well as San Marcos' surface streets, to reach the coast.

7. Many of the roads which residents of the Highlands will use are shown at future build-out levels of service in categories E or F unless major improvements are made. This E or F level of service is expected for sections of Twin Oaks Valley Road, Mission Road, San Marcos Blvd., and Deer Springs. (Traffic Study, ---)

8. SANDAG forecast (SANDAG-1). Developed acres in San Marcos (including residential, industrial, commercial, office, and schools) will change from 12,477 acres (in 1995) to 18,628 acres projected in 2010 and 22,552 acres projected in 2020. With all this growth, acreage dedicated for roads will grow from 1,699 acres in 1995 to 1,810 acres projected for 2020. (SANDAG-1)

The 1990 EIR 90-13, 4-67, par 2, stated "*AU location would operate at LOS C or better.* This is no longer true as many of these roads are heavily congested during rush hour. In 1998, the California Department of Transportation sent a letter to the City of San Marcos that recommended a new traffic report be done due to the congestion on the connection ramps from Rancho Santa Fe Road to State Route 78 and Las Posas Road. (see attachment) In a February

15 the letter to Scott Morgan, State Clearinghouse, states that "*A new Traffic Impact Analysis is needed to analyze impact and proposed mitigation to freeway segments, interchanges and ramp meter queues.* " (see attachment)

The traffic study in the 1990 EIR 90-13 only addressed streets within a limited area of the project and did not account for roads residents would likely use to access work and shopping.

Currently during peak traffic times roads such as San Marcos blvd., Grand, Rancho Santa Fe, Mission Road, Deer Springs and Twin Oaks are heavily congested. Route 78 as well cannot handle the existing traffic. I have personally spent 15 minutes trying to drive from Rancho Santa Fe and San Marcos Blv. - to San Marcos Blvd and 78 during evening rush hour traffic, a distance of approximately 2.5 miles. Other areas are equally congested as commuters Use San Marcos surface streets to by-pass a congested 78. Residents often try to adjust schedules to avoid near grid-lock conditions.

Due to the lack of market and support services close to this development residents will either need to drive to the Vons market at Rancho Santa Fe Road and San Marcos Blvd (approx. 4 miles the Highlands) or to the Albertson's on the corner of mission and Woodland Parkway (approx. 3.5 miles the Highlands). To find stores such as Target or a Walmart, residents of the

Highlands will need to drive on 78 or Mission to Nordal (approx. 5 miles the Highlands) or Sycamore (approx. 4 miles the Highlands).

San Marcos, A Charter City, has not been bound by law in the past to follow its General Plan until the passage of a ballot proposition in November 2000. This ballot initiative, a direct result of public concern over growth and its impacts on traffic in the San Marcos area, now requires the City to follow its General Plan. Residents are concerned that San Marcos (known as boomtown") will become unlivable.

The 1990 EIR did not address the above current conditions and probable negative impacts. A new EIR is required that addresses traffic impacts of the Highlands project using present day conditions and cumulative future conditions.

XIV. UTILITIES AND SERVICE SYSTEMS.

a) As regards the impact of the Highlands project on the wastewater treatment system, it is necessary to state what the current level of usage of the treatment plant and exactly how much wastewater will be added by the Highlands project before it can be concluded that there will be no impact to the system.

b) It is necessary to know what the current usage level of the wastewater treatment system is before one can conclude that there will be no impact from the Highlands development. Referring back to an analysis that is over 10 years old is a faulty analysis. The public needs to know what the current situation is and how the Highlands project will impact the system. This should be fully analyzed in a new EIR.

d) Project documents have stated that the two water districts involved are guaranteed a supply of water, but they do not state how much. The public needs to know what the current situation is regarding water supplies in this area and exactly how the Highlands development will impact them. Referring back to a specific plan that is over 10 years old ignores all the changes that have occurred in the last decade, including rampant development in this area and drought conditions. A full EIR is required to address these changes in conditions.

e) Project documents do not state how much solid waste will be generated by the Highlands project. This information is required, along with the current capacity of the subject landfill(s) before an analysis can be made regarding the impact on landfills of this project. This needs to be addressed in a full EIR.

XVIII MANDATORY FINDINGS OF SIGNIFICANCE

a) This proposed project will degrade the quality of the environment by placing 230 clustered dwelling units in an undeveloped, undisturbed valley. The valley includes riparian habitat, which will be disturbed. It also includes habitat (coastal sage scrub) for a threatened species, the coastal California gnatcatcher. The proposed development will destroy 36.90% of the coastal sage scrub on the property. This area is officially recognized as a wildlife corridor

and one of the few relatively large blocks of natural open space remaining in the region. Placing a high-density development in the middle of this wildlife corridor, along with a major road along the waterway, will destroy its environmental value. These are major impacts. The proposed mitigation measures will not reduce the environmental impact to a "less than significant " level.

b) The impacts of this proposed project are cumulatively considerable. Neighboring development activity has already removed a tremendous amount of natural vegetation and degraded the waterway through construction and urban runoff. More development, such as the Highlands project, will further destroy the valley and waterway, causing severe and irreversible environmental damage.

Although some impacts of this project are expected to be less than those of the previously adopted Specific Plan, as identified in EUL 90-13, which is eleven years old, conditions and laws, rules and regulations have changed dramatically in the past eleven years. As far as conditions are concerned, one of the major changes has been the development of neighboring areas, as discussed above. The fifth cumulative environmental and social impacts of the Highlands development need to be analyzed in a new EM based on current conditions and laws, rules and regulations.

c) The project has environmental effects which will cause adverse effects on human beings, both directly and indirectly. First, it will introduce a high-density development into an area surrounded by large-lot residences and agricultural uses. It will degrade the quality of life the people who live around the Hedionda Creek valley, in the unincorporated area. It will affect their property values. The extension of Las Posas Road, upon which this development depends, is growth-inducing and will no doubt lead to more development in the valley and hillsides, resulting in more environmental degradation, more population, air pollution, noise, traffic congestion, school overcrowding, water contamination, strain on water supplies and facilities, and strain on the waste water treatment systems and other public facilities. To say that these impacts are "less than significant" or that they can be satisfactorily mitigated is false.

In conclusion, we believe that the case for the City of San Marcos to require a new EIR for the Highlands project is compelling. We urge the City to provide its citizens and neighbors the tools necessary to adequately assess the impact of this development on their lives.

Yours truly,

Mary H. Clarke
for Friends of Hedionda Creek

Attachments

Sources:

PartXXV, North County Metropolitan Subregional Plan, San Diego County General Plan, adapted Jan., 3, 1979, GPA 78-03

San Diego County Policy 1-55

City of San Marcos, 1988 Topographic Survey, 2004-6270, 1 0 and 2004-6276

City of San Marcos, November 198 1, Final Environmental Impact Report, *Colle-@3 e- - Area*
Community Plan, Figure 7, Slope Analysis

City of San Marcos, College Area Community Plan, revised February 1998,

Part XXV, North County Metropolitan Subregional Plan, San Diego County General Plan, 90-04

1990 EIR 90-13, San Marcos Highlands

EIR07-87: Supplemental EM Neighborhood One Specific Plan, College Area Community
Architectural Treatments, San Marcos Highlands, 11/21/98

San Diego County Resolution No. 94-64, Adoption of the Comprehensive Land Use Plan For
McClellan-Palomar Airport

Region 9, Regional Water Quality Control Board, Permits Comparison (Draft), Comparison
Between the Requirements of Tentaive Order No. 200 1 -01 and Order No. 90-42

San Diego Regional Water Quality Control Board Region 9, Draft Status of Coperrnittee
Compliance, Dec. 13, 2000

WQ-: Water Quality Control Plan for San Diego Basin (9)

WQ-2 Impaired Water Body fact sheet taxed from Stacy Bicowski, Regional Water Quality
Control Board Region (9) dated 9/18/2000

NCT-1: North County Times - ----- -A rural hamlet grows up, Gary Warth,

SDUT- 1: San Diego Union Tribune, Feb. 15, 200 1, Alexander Gonzalez,

NCT-2: San Marcos voter to consider zoning control initiative, Nov. 5, 2000, John Berhman

SF- 1: Sandra Farrell, a resident in the area from 1961 knew Mr. Mffick and had several conversations with him during the years 1965 to aprox. 1972.

SANDAG-1: www.sandag.ca.us/data_services/forecasts/profiles/samn.html Population 1990 =37,900 to 53,938 in 2000; Total occupied housing units:31,436 units in 1995 to 49,028 units in 2010 and 60,262 units in 2020. Of this Growth in Single family housing units grew from 15,718 in 1995 to estimated 30,181 in 2020

CDF-1: Copied from City of San Marcos: California Department of Finance and development Resource Unit, shows population 1990=37,020:and 2000=53,938 Single family homes: 1990=14,658, 2000=18,119

Growth in single family housing has increased 3,461 units between the years 1990 to 2000 but there was a decrease in mobile homes and multi family homes due to miscounts of unexplained, etc.

(SM- 1) : City of San Marcos, Current Subdivisions, updated 1/25/01