



County of San Diego
PLANNING & DEVELOPMENT SERVICES

MARK WARDLAW
Director

DARREN GRETLER
Assistant Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcountry.ca.gov/pds

August 19, 2013

Norm Pedersen
Planning Division
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

Via email to npedersen@san-marcos.net

COMMENTS ON THE REQUEST FOR A SPECIFIC PLAN AMENDMENT AND TENTATIVE SUBDIVISION MAP FOR 198 SINGLE-FAMILY LOTS, 3 MINI-PARKS, AND OPEN SPACE ON 262 ACRES WITHIN THE SAN MARCOS HIGHLANDS SPECIFIC PLAN AREA (SPA) AND ANNEXATION OF 69.4 ACRES FROM THE COUNTY

Dear Mr. Pedersen:

The County of San Diego has received and reviewed the proposed Tentative Subdivision Map (TSM 408-Revised) for 198 single family lots, 3 mini-parks, and open space located within the San Marcos Highlands Specific Plan Area and unincorporated County lands dated May 30, 2013 and appreciates this opportunity to comment. The County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an effect on the unincorporated lands of San Diego County. In addition, the comments may identify reasonable alternatives and mitigation measures that should be explored in the environmental document.

County Planning & Development Services (PDS) and Department of Public Works (DPW) have completed their review and have the following comments regarding the content of the above documents.

GENERAL COMMENTS

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the County of San Diego. Potentially significant impacts within the unincorporated County and/or affecting County facilities should be evaluated using the County's Guidelines for Determining Significance, available online at: <http://www.sdcounty.ca.gov/dplu/procguid.html#guide>.
2. A majority of the proposed development area is located in a portion of the unincorporated County with a Semi-Rural 10 (SR10) Land Use Designation. The SR10 designation was adopted by the Board of Supervisors on August 3, 2011 based on the existing site constraints related to steep slopes, wetlands, habitat value, and fire hazards. Development of the project site at the proposed intensity would be inconsistent with the County's General Plan and overall planning principles.
3. The proposed project would result in annexation of 69.4 acres of unincorporated territory into the City of San Marcos and a proposed boundary realignment that would result in all of the development being located within the City of San Marcos and most of the open space being located in the County of San Diego. The annexation and proposed development would impact regional conservation planning, as discussed further below.

BIOLOGICAL RESOURCES

4. The environmental document should evaluate the project's impacts on the County's proposed North County Plan. The proposed project is located within a large block of habitat with sensitive biological resources including riparian and coastal sage scrub habitats that support diverse wildlife and plant species, including the federally listed threatened coastal California gnatcatcher. The portion of the property that is in the County's jurisdiction is designated in the Draft North County Plan as Pre-approved Mitigation Area (PAMA), which includes high quality habitats that will create the ultimate preserve system in the North County Plan area. Though development is allowed in the PAMA, developers are encouraged to build outside the PAMA and preserve lands inside the PAMA. The proposed PAMA extends to the northwest in the County's jurisdiction and to the southeast it links to the Northern Focused Planning Area of the City's Draft Natural Community Conservation Plan. The proposed project would compromise the efficacy of the PAMA in this block of habitat.

5. The property provides habitat important to the coastal California gnatcatcher, a species that will be covered by the County's Plan. Other sensitive wildlife species known to exist on the project site based on 1999 surveys include the Black-shouldered Kite, Red Diamond Rattlesnake, Bell's Sage Sparrow, and several raptor species, including Turkey Vulture, Cooper's Hawk, Red-shouldered Hawk, and Red-tailed Hawk. Medium to large mammals, such as bobcat, coyote, and mule deer, as well as small mammals also use the property. Wart-stemmed Ceanothus (*Ceanothus verrucosus*) is a sensitive plant species known to occur on the property. An updated survey should be conducted to determine what species currently occur on the property. The environmental document should assess the impacts of habitat loss and fragmentation, and the blockage of the wildlife corridor, for these species.
6. The project plans state, "The Following APN's: 184-101-15, 184-102-18, 32, & 44, are contiguous ownership to the project, but are not a part of the tentative map. The parcels are to be permanent open space and represent part of the open space mitigation under the following permits: Army Corps of Engineers SPL-2001-00479 (404 Permit), and California Department of Fish and Game #R5-2002-0445 (1603 Permits)." The environmental document needs to include an analysis of all impacts and mitigation associated with these agency permits, in addition to the impacts and mitigation associated with the development footprint. The environmental document should discuss resource management of all biological resource mitigation areas and identify who the resource manager would be.
7. The environmental document should evaluate how the proposed project would affect the regional habitat conservation planning efforts of the County. County staff are concerned that the proposed project is inconsistent with conservation principles that form the basis of regional conservation plans. The conservation principles are:
 - Conserve target species throughout the Plan Area: Species that are well-distributed across their native ranges are less susceptible to extinction than are species confined to small portions of their ranges.
 - Create larger preserves: Large blocks of habitat containing large populations of the target species are superior to small blocks of habitat containing small populations.
 - Keep preserve areas close: Blocks of habitat that are close to one another are better than blocks of habitat far apart.
 - Keep habitat contiguous: Habitat that occurs in less fragmented, contiguous blocks is preferable to habitat that is fragmented or isolated by

urban lands. Contiguous habitat also minimizes deleterious edge effects of urban lands.

- Link blocks of habitat: Interconnected blocks of habitat serve conservation purposes better than isolated blocks of habitat. Corridors or linkages function better when the habitat within them resembles habitat that is preferred by target species.
- Create diverse preserves: Blocks of habitat should contain a diverse representation of physical and environmental conditions.
- Protect preserves from encroachment: Blocks of habitat that do not have road access or are otherwise inaccessible to human disturbance serve to better conserve target species than accessible habitat blocks.
- Maintain natural processes: Preserves that are designed to maintain natural processes will sustain native biodiversity better than preserves in which such processes are disrupted.

The proposed project would impact multiple species, fragment a large block of habitat and lead to adverse edge effects on the isolated piece of property and the proposed on-site mitigation.

POLICE SERVICES

8. The plans provided include a note that police protection would be provided by the County of San Diego Sheriff's Department. Please ensure that the County of San Diego Sheriff, San Marcos Station is consulted regarding police protection.

FIRE PROTECTION

9. The proposed project is located in a very high fire hazard severity zone per the CALFIRE Fire Resource Assessment Program (FRAP) mapping. Development at the proposed density may not be appropriate given the site constraints related to fire protection and lack of existing access from the north. Specifically, the project design has the following fire safety issues:
 - a. There are dead end road lengths that exceed the 800 foot maximum dead end road length per the Consolidated Fire Code;
 - b. The lot sizes and locations cannot meet the San Marcos Fire Protection District's 150 foot fuel modification zone requirement per Section 4707.2 of the County Consolidated Fire Code; and
 - c. The project design includes pockets of dense housing, interspersed with and surrounded by biological open space which is a fuel source and is difficult to manage for fire safety and is inconsistent with policies of the County General Plan.

10. The plans provided show only one public access point into the project site from the south going north on Las Posas Road. There is a proposed secondary access proposed along the southerly property boundary called secondary emergency access Lot Q, however there are no details as to whether this would be public, unobstructed access and what kind of improvements it would have. Improvements details should be provided on the plans to assess the adequacy of this secondary access point.

TRAFFIC AND TRANSPORTATION

11. Based on the Tentative Map (TSM 408-Revised), the proposed project would generate 1,980 trips (198 single family units x 10 trips/ unit). A Traffic Impact Study (TIS) should be conducted per the County's Guidelines for Determining Significance and Report Format and Content Requirements to ensure the proposed project's traffic impacts are reflective of the current traffic conditions in the area.
12. The TIS should note the existing, near-term and future plans for Las Posas Road. The proposed San Marcos Highlands project would increase the allowable development within the current unincorporated area significantly. The current County General Plan would allow 1 dwelling unit per 10 acres, or a total of 12 units on the portion of the project currently within the County. The proposal to add 198 single family units on this project site would significantly increase trips on county roadways compared to what would be allowed under existing County plans. The project TIS should provide a comparative General Plan (City Specific Plan vs. County General Plan) assessment of the project's buildout impacts to future Las Posas Road.
13. The proposed project and plans for Las Posas Road will have a significant impact on the County's Mobility Element network in the area. The County's Mobility Element currently classifies Las Posas Road as a 2.2C Light Collector road that would provide an additional north-south link between the Twin Oaks community and the City of San Marcos. The proposed increase in density may warrant a roadway design with a higher classification (i.e. increased capacity). At a minimum, the design and construction of Las Posas Road within the County's jurisdiction should meet the County's Public Road Standards for a 2.2C Light Collector road.
14. The TIS/EIR must provide an assessment of the project's cumulative impacts. Payment to the County's Transportation Impact Fee (TIF) program should be

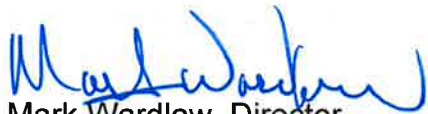
Mr. Pederson
August 19, 2013
Page 6

provided to mitigate local and regional cumulative traffic impacts to facilities located within the unincorporated area of San Diego County.

15. San Marcos staff should coordinate with County staff on the cumulative project list for the analysis of cumulative traffic conditions.
16. County staff may provide additional comments upon submittal of the project's Environmental Impact Report and Traffic Impact Study.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Jennifer Domeier, Land Use Environmental Planner at (858) 495-5204 or email jennifer.domeier@sdcounty.ca.gov.

Sincerely,



Mark Wardlaw, Director
Planning & Development Services

e-mail cc:

Eddie Sprecco, Policy Advisor, Board of Supervisors, District 5
Megan Jones, Group Program Manager, LUEG
Michael Ott, Executive Officer, LAFCO
Jody Mays, County of San Diego Sheriff
Richard Chin, Associate Transportation Specialist, Department of Public Works
Nick Ortiz, Land Development Project Manager, Planning & Development Services
Julia Quinn, Environmental Planning Manager, Department of Public Works
LeAnn Carmichael, Group Program Manager, Department of Public Works
James Pine, Deputy Fire Marshall, San Diego County Fire Authority
Twin Oaks Valley Community Sponsor Group
Hidden Meadows Community Sponsor Group
Jennifer Domeier, Land Use Environmental Planner, Planning & Development Services