

Comment Letter A - California Department of Transportation,
October 18, 2007

OCT 19 2007 10:33 FR

TO 917687613506 P.02/05

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

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October 18, 2007

11-SD-76
PM 17.9
Pankey Road
Palomar College
DEIR SCH 2007011136

Ms. Kelly Hudson-MacIsaac
Palomar Community College District
1140 West Mission Road
5201 Ruffin Road, Suite B
San Marcos, CA 92069-1487

Dear Ms. Hudson-MacIsaac:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Draft Environmental Impact Report (DEIR) SCH 2007011136 for the Palomar Community College – North Education Center, to be located immediately east of Interstate 15 (I-15) and north of State Route 76 (SR-76). We have the following comments:

A-1

- It is strongly advised that the Palomar Community College District coordinate with the applicants for the neighboring Campus Park West, Campus Park, and Meadowood developments. This action would help facilitate these projects providing a consistent traffic evaluation for the study area roadway system, that includes both I-15 and SR-76.

A-2

- The traffic impact analysis should use as a guideline the Caltrans Guide for the Preparation of Traffic Impact Studies (TIS), dated December 2002. Minimum contents of the TIS are listed in Appendix "A" of the TIS guide. Additionally, all State-owned signalized intersections affected by this project will be analyzed using the intersecting lane vehicle (ILV) procedure from the Caltrans Highway Design Manual Topic 406, page 400-21, using the year 2030 traffic forecast. Furthermore Caltrans requires Level of Service (LOS) "C" or better at State owned facilities, including intersections. If an intersection is currently below LOS "C", any increase in delay from project generated traffic must be analyzed and mitigated.

A-3

- Documentation is required regarding how a student population of 8,500 students equals 2,833 full time students per semester. The proposed project's trip generation assumptions must account for all students enrolled at the Palomar North Education Center.

A-1

Comment noted. The District understands the important interconnection between the proposed project and the Campus Park West, Campus Park, and Meadowood developments, and the potential effect that these projects could have on the existing roadway system once buildout occurs. The District has coordinated with these developers in preparation of the traffic analysis, particularly with regard to cumulative impacts and roadway improvements required for mitigation. The District has worked in particular with the owners of the Campus Park project to ensure that the alignment of proposed Horse Ranch Creek Road and the associated improvements are understood and reflected in the project designs. Refer to Appendix B of the EIR for the traffic analysis. This comment did not result in changes to the Draft EIR.

A-2

The District concurs with this comment. Intersecting Lane Vehicle (ILV) analysis has been conducted for the 2030 without and with project conditions based on the 2030 traffic forecast for all State-owned signalized intersections affected by the project (intersections located along SR-76).

The traffic study has been revised to integrate the necessary language and tables referencing Caltrans' guidelines and criteria into the report and analysis for State-owned facilities and intersections. The results of the ILV analysis have been added to Section 2.2 of the EIR.

A-3

The District acknowledges and appreciates this comment.

RBF met with County DPLU, DPW and Caltrans to negotiate an approach to appropriately calculating project trip generation rates. Per direction from the County and Caltrans, RBF revised the trip generation rate to more closely reflect current trip generation rates that occur at the existing Palomar Education Center in Escondido.

The SANDAG trip generation rate for a Junior College (2 years) is 1.2 daily trips per student. Due to the size, location, and concentration in providing courses based on community needs, the proposed project is not anticipated to function the same as or attract the same type of attendance experienced at a typical junior college. The Palomar Community College District intends to build the education center as community interests and needs grow. Therefore, full buildout of the college may never be realized.

Due to the unique characteristics of the project, a trip generation study was performed at the Palomar Community College Escondido

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Education Center in February 2008. The purpose of the trip generation study was to establish the correlation between daily trips per student to the number of enrolled students at a campus similar to the proposed project. The trip generation study was conducted at the Palomar Community College Escondido Education Center. The Escondido Educational Center was selected for the study because it is associated with the Palomar Community College District, is located approximately 15 miles south of the proposed project site, and serves a comparable population to the proposed campus. Differences between the Escondido Campus and the proposed Fallbrook campus include availability of services and residential density surrounding the campuses. As Escondido is a more developed and populated area than the Fallbrook community, availability to and proximity of urban services such as employment, retail, and public transportation may be greater. These characteristics may result in a higher number of students visiting the campus multiple times per day than what may be expected at the Fallbrook campus.

Daily traffic volumes were collected over a five-day (Monday through Friday) period in February 2008 to capture the average daily traffic experienced on campus. It should be noted that counts were collected at the beginning of the quarter when attendance is typically higher than towards the end of the quarter. The data collection revealed an ADT of 4,269 daily trips on the Escondido campus, or 55 percent of total enrollment (7,715 enrolled students). Therefore, the trip generation study resulted in a recommended trip generation rate of 0.55 trips per student for the analysis of the Fallbrook Educational Center. Refer also to the table below. This would result in an estimated 1,870 ADT for Phase I traffic, and an estimated 4,675 ADT (total) at project buildout.

Potential traffic impacts as a result of additional vehicular trips that will be generated from the proposed project have been analyzed to include project vehicle trips, and mitigation has been proposed in the EIR to reduce potential impacts; refer to Section 2.2 of the Final EIR. Revisions were made to the Draft EIR to reflect the above discussion regarding project trip generation.

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- A-4
- The project proposes 2500 parking spaces. At other similar projects (colleges) parking spaces tend to fill up during the morning peak period. This would generate 2500 am peak hour trips entering the campus. Also, conceivably there would be trips leaving the campus during the am peak period when students are finished with classes. Therefore, show a realistic traffic select zone analysis in the TIS.
- A-5
- In the TIS the select zone analysis shows 20% of the project trips in the immediate local area, however, this area is vacant land. Provide justification to support this assumption. Also, provide justification regarding the select zone analysis showing 10% of the trips going to Reche Road.
- A-6
- Table S-1: It is stated that impacts to SR-76 are significant and unavoidable since the campus will be opened before the proposed widening of SR-76 is completed. It should be understood that a statement of overriding findings will be required if the proposed project's impacts are considered significant and unmitigated. The Palomar College District is responsible for any and all direct and cumulative impacts to State facilities caused by the proposed project, and therefore responsible for the appropriate mitigation.
- A-7
- A-8
- Page 2-41 Impacts TR-18 through TR-22 and Impacts TR-23 through TR-25: The three named intersections will be significantly impacted at 1) Pala Road (SR-76)/Sage Road, 2) Pala Road (SR-76)/I-15 Northbound Ramps, and 3) Pala Road (SR-76)/Horse Creek Road. As noted previously the Palomar College District is responsible for any and all direct and cumulative impacts to State facilities caused by the proposed project, and therefore responsible for the appropriate mitigation.
- A-9
- Page 2-53 Roadways Mitigation Measures TR-26, Mitigation Measures TR-27, Mitigation Measures TR-28, and Mitigation Measures TR-29: Caltrans recommends that the fairshare funds collected be used towards the widening of SR-76 to 6 lanes between Horse Ranch Creek Road and I-15.
- A-10
- Figure 2.2-11 Horizon Year 2030 Without Project Average Daily Trips (ADT) Volumes: Project volume east of I-15 on SR-76 is stated to have a volume of 27,102. Caltrans numbers indicate this is a low volume and should be more in the vicinity of 40,000 to 50,000 ADT.
- A-11
- Figure 2.2-13 Horizon Year 2030 With Project ADT Volumes: Project volume east of I-15 on SR-76 is stated to have a volume of 28,564. Caltrans numbers indicate this is a low volume and should be more in the vicinity of 40,000 to 50,000 ADT.
- A-12
- If the proposed project is to be developed in phases, the DEIR needs to identify what transportation improvements will be in place prior to the completion of each development phase in order to mitigate the project's impacts.

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Project Traffic – Comparison of Trip Generation Rates

	Project Trip Generation Rate	Vehicle Trips Generated
Previously Analyzed Project	1.2 (SANDAG)	3,400
Proposed Revised Project		
Phase I	0.55	1,870
Phase II	0.55	4,675

- A-4
- The District does not concur with this comment. Trip generation does not have a direct correlation to parking spaces. Classes at community colleges are typically dispersed, often beginning on the hour and half hour throughout the day to disperse trips and duration on campus. Trip generation is used to determine the peak one-hour traffic volumes. Parking begins to accumulate on campus before the peak occurs, and many vehicles remain for several hours. There is not a direct correlation between parking spaces on campus and peak hour trip generation. This comment did not result in changes to the Draft EIR.
- A-5
- As advised by Caltrans, the Palomar Community College District is coordinating with the applicants for the adjacent Campus Park and Meadowood developments. Although the area considered for development is currently vacant, it is anticipated that Campus Park will be developed to some extent at the same time the college is constructing facilities on site. Therefore, it is likely and probable that some users will remain the immediate area amongst the neighboring projects.
- The select zone analysis was provided by SANDAG. The analysis is based on location and land use of the project zone. The select zone model generates the trip dispersion based on these inputs, existing and future roadways, and approved land uses in the area. The model shows only 14% of traffic going to Reche Road. This comment did not result in changes to the Draft EIR.
- A-6
- Comment noted. The District understands that a Statement of Overriding Conditions will be required for significant and unmitigable impacts to SR-76. The District shall prepare these findings and adopt them with the project. This comment did not result in changes to the Draft EIR.

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- A-7 Comment noted. The District accepts responsibility for the project impacts identified through the EIR analysis. The District understands that it will be responsible for any and all direct and cumulative impacts to State facilities resulting from the proposed project, and if feasible, will implement the mitigation measures recommended in the EIR to reduce such impacts. Refer to Section 2.2 of the EIR for discussion of traffic impacts and mitigation proposed. This comment did not result in changes to the Draft EIR.
- A-8 Comment noted. The District accepts responsibility for the project impacts identified through the EIR analysis. The District understands that it will be responsible for any and all direct and cumulative impacts to the identified intersections resulting from the proposed project, and if feasible, will implement the mitigation measures recommended in the EIR to reduce such impacts. Refer to Section 2.2 of the EIR for discussion of traffic impacts and mitigation proposed. This comment did not result in changes to the Draft EIR.
- A-9 The District acknowledges and appreciates this comment. Per the direction of the County and Caltrans, project mitigation measures have been revised to state that the District will contribute fair share funds for the future widening of SR-76. In addition, improvements are currently underway on the portion of SR-76 to the east of I-15 to widen the roadway to four lanes. These improvements are being undertaken as mitigation for the Palomar Aggregates Quarry project, located to the east of the project site. This comment resulted in changes to the Draft EIR.
- A-10 The District concurs with this comment. Horizon Year 2030 volumes in the traffic study were revised. The SANDAG Series 10 Subarea traffic model was used to evaluate the 2030 Horizon Year conditions. Both the SANDAG Series 10 and the model runs conducted for the Caltrans project include General Plan 2020 land use updates and Circulation Element recommendations including the extension of Horse Ranch Creek Road from SR-76 to Stewart Canyon Road. Traffic volumes along the SR-76 corridor were cross-referenced with traffic volumes for the corridor as reported in the Regional Transportation Plan (RTP) 2005 update. Traffic volumes east of SR 76 between SR 76 and Pankey Road were revised to reflect a volume of 39,896 ADT for the Horizon Year 2030 Without Project Average Daily Trips; refer to Figure 2.2-11 of the EIR.

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- A-13
 - It should be noted that Caltrans is in the process of finalizing plans to improve SR-76 to four lanes. This widening will take place from I-15 to approximately 1.5 miles east. However, it should be understood that the proposed Palomar Community College – North Education Center development will be responsible for any additional improvements to SR-76 in order to accommodate the additional vehicle trips generated by this project. Improvements may include, but are not limited to, widening and intersectional improvements to SR-76.
- A-14
 - The TIS must address the widening of Horse Ranch Creek Bridge.
- A-15
 - Caltrans encourages that the proposed project provide internal traffic circulation that allows access to other proposed adjacent developments without having to travel on SR-76.
- A-16
 - Given the importance of mobility options, the DEIR should provide a more detailed assessment of how various transportation options will be incorporated into the project. Specifically, pedestrian and bicycle access to and through the project should be provided, and Transportation Demand Management (TDM) strategies such as carpools, vanpool formation, and parking should be addressed as well. Transit and shuttle service should also be investigated.
- A-17
 - It must be determined if grading would modify the existing drainage from this proposed project and cause increased runoff to State facilities.
- A-18
 - All lighting (including reflected sunlight) within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on I-15 and SR-76.
- A-19
 - All signs visible to traffic on I-15 and SR-76 need to be constructed in compliance with State regulations.
- A-20
 - Caltrans is not responsible for any noise impacts to this development. If there is a noise impact, the developer has the responsibility to provide the mitigation.
- A-21
 - Improvement plans for construction within the State right of way must include: typical cross sections, adequate structural section, traffic handling plans, and signing and striping plans stamped by a professional engineer.
- A-22
 - Any work performed within Caltran's right of way will require an encroachment permit. For those portions of the project within Caltran's right of way, the permit application must be stated in English units. Information regarding encroachment permits may be obtained by contacting our Permits Office at (619) 688-6158. Early coordination with our agency is strongly advised for all encroachment permits.

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- A-11 The District concurs with this comment. Horizon Year 2030 volumes in the traffic study were revised. The SANDAG Series 10 Subarea traffic model was used to evaluate the 2030 Horizon Year conditions. Both the SANDAG Series 10 and the model runs conducted for the Caltrans project include General Plan 2020 land use updates and Circulation Element recommendations including the extension of Horse Ranch Creek Road from SR-76 to Stewart Canyon Road. Traffic volumes along the SR-76 corridor were cross-referenced with traffic volumes for the corridor as reported in the Regional Transportation Plan (RTP) 2005 update. Traffic volumes east of SR 76 between SR 76 and Pankey Road were revised to reflect a volume of 40,738 ADT for the Horizon Year 2030 With Project – Phase I and 42,000 ADT for the Horizon Year 2030 With Buildout (Phase II); refer to Figures 2.2-13 and 2.2-16 of the EIR, respectively.
- A-12 The District concurs with this comment. The traffic analysis has been revised to provide a phased analysis. All physical roadway and intersection improvements proposed as mitigation will be constructed with initial grading activities and construction of Horse Ranch Creek Road. No phasing of the proposed roadway or intersection improvements will occur; however, the District will delay fair share payments as appropriate to the time when project traffic is sufficient to create a significant impact.
- A-13 Comment noted. The District understands that it will be responsible for fair-share mitigation for impacts along SR-76 resulting from the proposed project and will implement the mitigation measures recommended in the EIR to reduce such impacts, if feasible. To reduce the project's contribution to cumulative impacts along SR-76, the District will construct and signalize the intersection of SR-76/Horse Ranch Creek Road. The District will also contribute a fair-share payment to the County's Transportation Impact Fee (TIF) fund for planned improvements along the SR-76. Refer to Section 2.2 of the EIR for discussion of traffic impacts and mitigation proposed. Mitigation measures given on Section 2.2 of the EIR were revised to reflect that the District will provide fair share contributions to the TIF fund for project impacts, per the direction of the County and Caltrans.

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- A-14 Comment noted. It is assumed that this comment is referring to the portion of the SR 76 that spans Horse Ranch Creek. Neither the proposed project or proposed mitigation measures propose any physical improvements or widening that would affect this crossing. This comment did not result in changes to the Draft EIR.
- A-15 The District acknowledges and appreciates this comment. The EIR is a programmatic EIR and specific building layout and internal street design will be determined in the future, based on educational program needs of the North Education Center. However, the proposed project will consider providing access to other proposed adjacent developments without requiring travel on SR-76, as requested. The District will construct Horse Ranch Creek Road, which will provide a north-south connection from Pankey Road to SR-76. This roadway will be accessible for use by residents of the proposed Campus Park project, as well as other future developments adjacent to the roadway and in the surrounding area. This comment did not result to changes to the Draft EIR.
- A-16 Comment noted. The EIR prepared is a programmatic EIR, and therefore, provides for future development of the site on a programmatic level, rather than providing specific design details. The District is willing to work with NCTD in the future to consider integrating alternative means of transportation into the school's program in the future; however, at this time, only a Conceptual Site Plan for development of the site has been prepared, which does not offer interior street design or features such as bus stops or bike lanes. As noted, the NCTD does not currently operate fixed route bus service near the proposed site, and has no current plans or funding to operate transit service in the foreseeable future. The District is willing to consider alternative transportation programs for the transport of students and staff to and from the North Education Center, as appropriate, and as funding is made available.

In addition, the North Education Center will be developed over the next several decades as student demand for educational programs increases. As such, future demand for and accessibility to alternative means of transportation speculative at this time. Initial construction would consist of approximately 75,000 to 150,000 square feet (s.f.) of development and related parking. The remaining development of the site would occur over several decades, with an estimated total building square footage of approximately 380,000 s.f., at full buildout around the

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year 2030. However, due to the limited capacity of the initial development and the uncertainty as to the extent of future demand for educational services at the North Education Center, the provision of mass transit or funding for alternative transportation or construction of bus stops with the proposed project would not be merited or feasible for the District at this time. This comment did not result to changes to the Draft EIR.

- A-17 As stated in Response to Comment A-16, above, the EIR provides a programmatic level analysis for future development of the site. A Stormwater Management Plan and hydrology analysis were prepared for the project to address stormwater runoff and drainage issues; refer to Appendices K and L of the EIR. With implementation of the proposed project, drainage from the site will not result in increased runoff to SR-76. Although drainage plans may need to be adjusted slightly as development of the proposed project evolves, no increase in runoff to SR-76 as the result of the project improvements would occur. This comment did not result to changes to the Draft EIR.
- A-18 The District concurs with this comment. As stated in Section 2.1 of the EIR, the proposed project would include onsite lighting to ensure the security and safety of the students and faculty. Outdoor lighting would consist of low-impact, shielded lighting around buildings and walkways. Parking areas would also have lighting for security and safety. Where feasible, lighting bollards would be used to minimize light spillover and visibility from offsite areas. No lighting is proposed for the athletic fields. Any lighting required adjacent to the Native Area would be shielded and directed away from the area to reduce potential conflicts with wildlife or adjacent land uses. With implementation of these design measures, the proposed project would not create a new source of substantial light or glare that would potentially adversely affect day or nighttime views in the area, including views SR-76 or I-15. Offsite, lighting installed along Horse Ranch Creek Road, or where intersection improvements would occur, would be consistent with County of San Diego lighting standards and the County's dark sky policy to minimize potential lighting impacts. This comment did not result to changes to the Draft EIR.
- A-19 The District acknowledges and appreciates this comment. Signs associated with the North Education Center and visible to traffic on I-15 and SR-76 will be constructed in compliance with State regulations, as requested. This comment did not result to changes to the Draft EIR.

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- A-23
- If a developer proposes any work or improvements within Caltrans's right of way, the project's environmental studies must include such work. The developer is responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.
- A-24
- The Department strongly encourages close coordination between all interested parties regarding the impacts to both State and County transportation facilities. Consequently, the Department is willing to meet with the County of San Diego and the developers who have proposed projects in this area, to discuss issues such as access to SR-76 and mitigation to transportation facilities.

If you have any questions, please contact Al Cox at (619) 688-6003.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

Cc: Scott Morgan State Clearinghouse, OP&R
Nael Areigat County of San Diego, DPW
Susan Hoang County of San Diego, DPW

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- A-20 The District concurs with this comment. Caltrans will not be responsible for noise impacts resulting from the development of the proposed project. Potential noise impacts resulting from the project will be mitigated to less than significant by the District as proposed in Section 3.3 of the EIR. This comment did not result to changes to the Draft EIR.
- A-21 The District acknowledges and appreciates this comment. Improvement plans for construction within the State right-of-way will include typical cross sections, adequate structural section, traffic handling plans, and signing and striping plans stamped by a professional engineer, as requested. This comment did not result to changes in the Draft EIR.
- A-22 The District acknowledges and appreciates this comment. The District will coordinate with Caltrans to obtain an encroachment permit for any worked performed in the Caltrans right-of-way, and understands the permitting requirements. The advisory statement regarding early coordination with Caltrans for encroachment permits has also been noted. This comment did not result to changes in the Draft EIR.
- A-23 The District acknowledges and appreciates this comment. The analysis within the EIR has included all offsite areas affected by the proposed project, including those required within the Caltrans right-of-way. The EIR evaluates such potential impacts and provides mitigation to reduce project-related impacts to less than significant, with the exception of traffic impacts. The District also assumes the responsibility for procuring any permits and approvals from the appropriate agencies for the required improvements. This comment did not result to changes in the Draft EIR.
- A-24 The District concurs with this comment. Coordination between all interested parties regarding the impact to both State and County transportation facilities has been ongoing throughout preparation of the EIR, and will continue throughout the planning and design phases of the proposed project. As appropriate, the District will continue to meet with the Department of Transportation, the County of San Diego, and other area developers to discuss traffic-related issues with regard to SR-76 improvements. This comment did not result to changes to the Draft EIR.



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Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92011
(760) 431-9440
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In Reply Refer To:
FWS-SDG-5205.2

Ms. Kelley Hudson-MacIsaac
Palomar Community College District
1140 West Mission Road
San Marcos, California 92069

Subject: Draft Environmental Impact Report for the Palomar Community College - North
Education Center, Facilities Master Plan

Dear Ms. Hudson-MacIsaac:

B-1

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter referred to as the Wildlife Agencies, have reviewed the Draft Environmental Impact Report (DEIR) for the above-referenced project, dated August 29, 2007. The Wildlife Agencies have identified potential effects of this project on wildlife and regional conservation planning. The comments provided herein are based on the information provided in the DEIR, the Wildlife Agencies' knowledge of sensitive and declining vegetative communities, and our participation in regional conservation planning efforts.

B-2

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA). Sections 15386 and 15381, respectively, and is responsible for the conservation of the State's biological resources, pursuant to the California Endangered Species Act, and California Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program.

B-3

The proposed project involves development of a new community college campus to serve the northern San Diego County area on an 85-acre parcel. The project site is located east of Interstate 15 (I-15), between Pala Road/State Route 76 (SR 76) and Pala Mesa Heights Drive, in

Fallbrook, an unincorporated area of San Diego County. The proposed project would include a parking lot, classroom and administration buildings, open space, and athletic fields. Off-site improvements would include; improvements to Pankey Road from Stewart Canyon Road to the project site and along SR 76, construction of Horse Ranch Creek Road to the east and a borrow



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- B-1 The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- B-2 The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- B-3 The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.

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B-4 Comment noted. This comment did not result in changes to the Draft EIR. However, minor revisions were made to Table 3.1-2 of the EIR for the sake of consistency between the biological technical report and the EIR. In addition, all impacts to habitat will be mitigated for offsite; no onsite mitigation for such impacts is proposed. Please also note that Table 1 (Table 3.1-2 in the EIR) has been revised in the document to provide mitigation at a 2:1 ratio for coyote brush scrub, per request of the Wildlife Agencies. Minor revisions have also been to Table 3.1-2 to reflect minor design changes to Horse Ranch Creek Road, which resulted in a slight increase in impacts to several habitats; refer to Section 3.1 of the EIR for additional discussion.

B-5 Comment noted. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR. It should be noted that improvements to the Old Highway 395/Stewart Canyon Road – Canonita Drive intersection are no longer required. Therefore, project impacts to California gnatcatcher at this intersection will no longer occur. Direct impacts to California gnatcatcher will be less than significant.

B-3
cont'd

Ms. Hudson-McIsaac (FWS-SDG-5205.2) (SCH# 2007011136)

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pit to provide additional soil for site development located near the northern property boundary, across Horse Ranch Creek Road.

The proposed project site contains 11 vegetation communities including: coastal sage scrub (CSS), coyote brush scrub (CBS), non-native grassland (NNG), alkali meadow (AM), coastal freshwater marsh (CFM), southern cottonwood-willow riparian forest (SCWRF), southern willow scrub (SWS), disturbed (DIST), ornamental (ORN), agriculture (AG), and developed (DEVL). Proposed project impacts and associated proposed mitigation ratios are included below in Table 1. Habitat to be impacted will be mitigated on and off site as approved by the County and Wildlife Agencies.

Table 1: Proposed project impacts (all measurements in acres)

Habitat	Impacts Onsite	Impacts from Road Improvements	Impacts off-site	Total project impacts	Mitigation ratio	Total mitigation
CSS	0.04	0.5	2.93	3.47	2:1	6.94
CBS	21.63	0.0	0.0	21.63	1.5:1	32.45
NNG	33.94	0.0	39.02	72.96	0.5:1	36.48
AM	0.0	0.0	0.26	0.26	3:1	0.78
CFM	0.0	0.0	0.15	0.15	3:1	0.45
SCWRF	0.0	0.0	0.07	0.07	3:1	0.21
SWS	0.0	0.0	0.31	0.31	3:1	0.93
DIST	0.0	0.43	2.28	2.71		
ORN	0.93	0.0	2.17	3.1		
AG	0.0	0.04	3.96	4.0		
DEVL	0.0	0.26	3.16	3.42		
Total	56.54	1.23	54.31	112.08		78.24

B-4

B-5

Protocol-level coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher) and least Bell's vireo (*Vireo bellii pusillus*; vireo) surveys were conducted within the proposed project area in 2007. Two pairs of gnatcatchers were detected off-site within the area of the off-site road improvements for the intersection of Stewart Canyon Road and Highway 395. No gnatcatchers were detected on the project site. A total of 15 vireo individuals were detected within the SCWRF habitat off-site. None of the vireo detected occurred on the project site; however, five individuals occur within 500 feet of the project area. In addition to gnatcatcher and vireo, the following sensitive species were detected on the project site: white-faced ibis (*Plegadis chihi*), white-tailed kite (*Elanus leucurus*), Cooper's hawk (*Accipiter cooperii*), San Diego cactus wren (*Campylorhynchus brunneicapillus*), yellow warbler (*Dendroica petechia*), and yellow-breasted chat (*Icteria virens*).

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B-6

We offer our more comprehensive recommendations and comments in the Enclosure to assist the Palomar Community College District in minimizing and mitigating project impacts to biological resources, and to assure that the project is consistent with ongoing regional habitat conservation planning efforts.

B-7

In summary, we have the following comments: 1) the proposed Native Area should be placed within a dedicated biological open space easement (BOSE) and preserved in perpetuity; 2) impacts to coyote brush scrub should be mitigated at a minimum 2:1 ratio; 3) a formal section 7 consultation, pursuant to the Act, may be required to address the potential effects of the proposed project on designated and proposed gnatcatcher critical habitat; 4) all off-site mitigation areas should be agreed to by the Wildlife Agencies and the County, and should be purchased and placed within a biological open space easement prior to impacts occurring on the project site and managed in perpetuity; 5) temporary fencing should be required prior to construction where proposed grading or clearing is within 100 feet of the biological open space; 6) permanent fencing should be installed between the impact area and the Native Area; 7) open space signs should be placed at 100-foot intervals along permanent fencing separating the development from the native habitat area; 8) the FEIR should discuss any fuel modification on or adjacent to the project site as required by the local fire authorities; 9) all construction and post-construction best management practices (BMPs) should be located within the development footprint; 10) the applicant should submit final wetland creation/restoration/enhancement plans to the Wildlife Agencies for approval prior to initiating project impacts; 11) a management and monitoring plan (MMP), including a funding commitment, should be developed for any on- and/or off-site biological open space easements, and implemented in perpetuity to protect the existing biological functions and values; 12) the final EIR should include the provision for a biological monitor to be present during construction and to oversee the mitigation activities; and 13) landscaping adjacent to native habitat should not use plants that are invasive, or require intensive irrigation, fertilizers, or pesticides.

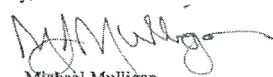
B-8

The Wildlife Agencies appreciate the opportunity to comment on this DEIR. If you have any questions, please contact L. Breck McAlexander (Department) at (858) 467-4229, or Michelle Moreno of the Service at (760) 431-9440.

Sincerely,



Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Michael Mulligan
Deputy Regional Manager
California Department of Fish and Game

Enclosure

cc: State Clearinghouse

Ms. Hudson-McIsaac (FWS-SDG-5205.2) (SCH# 2007011136)

4

Enclosure

cc: State Clearinghouse

**Comment Letter B – California Department of Fish and Game / U.S.
Fish and Wildlife Service, October 12, 2007**

B-6

The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.

B-7

This comment provides a summary of comments and recommendations discussed in greater detail in the attachment to this letter. The comments included herein in Comment B-7 are therefore addressed in Responses to Comments B-9 through B-21.

B-8

Comment noted. The District acknowledges and appreciates this comment. This comment did not result in changes to the Draft EIR.

**WILDLIFE AGENCY
COMMENTS AND RECOMMENDATIONS
ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE PALOMAR COMMUNITY COLLEGE-NORTH EDUCATION CENTER
FACILITIES MASTER PLAN**

- B-9 1. The DEIR states that the proposed project would include a Native Area of approximately 25 acres in the southern portion of the property. The Native Area would consist of a mixture of NNG and wetland habitats. The DEIR states that no development is proposed in this area as part of the proposed project, but that development of this area may occur at a future point in time as part of a separate action. Because the Native Area is composed of sensitive wetland habitat types, is known to support sensitive species such as the yellow-breasted chat and yellow warbler, and is located adjacent to an extensive riparian area known to be occupied by the federally listed endangered vireo, we recommend that the proposed Native Area be placed within a dedicated BOSE and preserved in perpetuity. If this area is not placed within a BOSE, this area should be considered impacted and mitigated for appropriately.
- B-10 2. Page 3.1-16 of the DEIR states that impacts to 21.63 acres of coyote brush scrub would be mitigated at a 1.5:1 ratio. We recommend that impacts to coyote brush scrub be mitigated at a minimum 2:1 ratio.
- B-11 3. Our review of the designated and proposed gnatcatcher critical habitat maps indicates that the proposed project site is located within designated and proposed gnatcatcher Critical Habitat Unit 3. Therefore, if the applicant is required to obtain a section 404 permit from the U.S. Army Corps of Engineers for the proposed project, it is anticipated that a formal section 7 consultation, pursuant to the Act, would be required to address the potential effects of the proposed project on designated and proposed gnatcatcher critical habitat.
- B-12 4. All off-site mitigation areas should be agreed to by the Wildlife Agencies and the County, and should be purchased and placed within a BOSE prior to impacts occurring on the project site and managed in perpetuity.
- B-13 5. Temporary fencing should be required in all locations of the project where proposed grading or clearing is within 100 feet of proposed biological open space. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction.
- B-14 6. Permanent fencing should be installed between the impact area and the Native Area and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals. We recommend that the permanent fencing should have only lockable gates (for

**Comment Letter B – California Department of Fish and Game / U.S.
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B-9 The project does not propose development of the onsite (approximately) 25 acres identified as the Native Area. The site will be developed over the next several decades as the student population demands, and as appropriate to address changing needs for academic programs. The District does not propose the dedication of an open space easement over this acreage to preserve the land in perpetuity, thereby prohibiting future development of all or a portion of this area if needed in the future. If the District determines at a time in the future that additional land is needed to support academic program, acreage within the Native Area could be used as such, and additional environmental analysis would be required to assess potential impacts to sensitive resources within the Native Area, prior to development. The appropriate environmental documentation would be prepared, consistent with the requirements of CEQA, to identify potential impacts and propose appropriate mitigation measures to reduce such impacts to the extent possible.

Per comments received from the agencies, Mitigation Measure B-8(f) in the EIR was added to require the District to install permanent signage along the northerly boundary of the Native Area to restrict entry into this portion of the property. Signage will be installed every 100 feet to indicate that the area contains sensitive resources. Per Response to Comment B-15, signage shall be corrosive resistant, a minimum of six inches by nine inches in size, not less than three feet in height above ground surface, and state the following: "Sensitive Environmental Resources; Disturbance Beyond this Point is Restricted." Refer to Section 3.1.6 of the EIR.

B-10 Comment noted. The District concurs with this comment. Section 3.1.6 (Mitigation Measure B-1b), Table 3.1-2, and elsewhere as appropriate in the EIR, have been revised to reflect that mitigation for coyote brush scrub will occur at a 2:1 ratio. Therefore, mitigation for impacts to 21.63 acres of coyote brush scrub will require offsite purchase of 43.26 acres of similar habitat, as approved by the Wildlife Agencies and the County.

B-11 Comment noted. The District concurs with this comment. The District is required to obtain a Section 404 Permit. Therefore, the project would be subject to a formal Section 7 consultation to address project impacts on designated and proposed gnatcatcher critical habitat. The District will comply with this requirement.

No gnatcatchers were identified within the project boundaries. As the project site has previously been disturbed and presently supports

- B-14
cont'd access only by the land manager) and be designed to minimize intrusion by pets, especially cats.
- B-15 7. Open space signs should be placed at 100-foot intervals along permanent fencing separating the development from the native habitat area. The signs should be corrosion resistant, a minimum of 6 inches by 9 inches in size, not less than three feet in height from the ground surface, and state the following: "Sensitive Environmental Resources; Disturbance Beyond this Point is Restricted by Easement."
- B-16 8. The final EIR should discuss any fuel modification on or adjacent to the project site as required by the local fire authorities. Any required fuel modification should be included within the impact calculations and mitigated for appropriately. The proposed project should be designed so that all required fuel modification would occur outside of the on-site Native Area.
- B-17 9. All construction and post-construction best management practices (BMPs) should be located within the development footprint (i.e., included in the impact analysis as loss of habitat). The final EIR should include a figure depicting the location of BMPs in relation to the development footprint.
- B-18 10. The applicant should submit final wetland creation/restoration/enhancement plans to the Wildlife Agencies for approval prior to initiating project impacts. The final plans should include the following information and conditions:
- All final specifications and topographic-based grading, planting and irrigation plans (with 0.5-foot wetlands contours and typical cross-sections) for the creation/restoration/enhancement sites. All graded areas should be left in a rough grade state with microtopographic relief (including channels for wetlands) that mimics natural topography, as directed by the Wildlife Agencies. Topsoil and plant materials salvaged from the impacted areas (including live herbaceous, shrub and tree species) should be transplanted to, and/or used as a seed/cutting source for, the riparian/wetland creation and enhancement areas to the maximum extent practicable as directed by the Wildlife Agencies. Planting and irrigation should not be installed until the Wildlife Agencies have approved of the mitigation site grading. All plantings should be installed in a way that mimics natural plant distribution, and not in rows;
 - Planting palettes (plant species, size and number/acre) and seed mix (plant species and pounds/acre). The multitude of plant palettes proposed in the draft plans will include native species specifically associated with the habitat type(s). Unless otherwise approved by the Wildlife Agencies, only locally native species (no cultivars) available from as close to the project area as possible

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livestock grazing activities, the habitat mapped onsite is not considered to be high quality habitat for gnatcatcher occupation. Although the project site is identified as Critical Habitat, with consideration for the individual characteristics of the specific site, rather than as part of a larger area or region, the value of the habitat onsite can be more closely evaluated and realized. This comment did not result in changes to the Draft EIR.

- B-12 No new impacts were identified with regard to this comment. Language has been added to Mitigation Measures B-1 and B-2 to require that all offsite mitigation areas be approved by the County of San Diego and the Wildlife Agencies, dedicated within an open space easement, and managed in perpetuity. Refer to Section 3.1.6 of the EIR.
- B-13 Comment noted. Mitigation Measure B-7(a) requires that temporary fencing be installed along the limits of grading. Language has been added to Mitigation Measure B-7(a) to clarify that fencing shall be inspected prior to grading to ensure that no loss of habitat occurs, due to installation, and that the fencing shall be temporary and shall only be removed upon the completion of grading, clearing, and construction. The boundary of the Native Area already includes a 50-foot buffer from sensitive resources (wetlands), thereby providing additional protection during short-term construction and long-term operational activities. Refer to Section 3.1.6 of the EIR.
- B-14 Comment noted. Refer to Response to Comment B-9, above, and Section 3.1.6 of the EIR.
- B-15 Comment noted. Refer to Response to Comment B-9, above, and Section 3.1.6 of the EIR.
- B-16 Comment noted. Refer to Response to Comment Letter I from the North County Fire Protection District (NCFPD).

Language has been added to Section 3.1.4 of the EIR to address brush clearing requirements for the proposed project, consistent with that requested by the NCFPD. The project footprint includes the area impacted by onsite and offsite brush clearing activities; refer to Figures 3.1-1 and 3.1-2 of the EIR. As the project does not propose improvements or development within the designated Native Area, sensitive resources within the Native Area will not be disturbed by brush clearing activities. The Native Area also includes a 50-foot buffer from sensitive resources, thereby distancing such resources from areas where improvements or brush clearing activities will occur. Mitigation

should be used. The source and proof of local nativeness of all plant material and seed should be provided;

- c. Container plant survival should be 80% of the initial plantings for the first 5 years. At the first and second anniversary of plant installation, all dead plants should be replaced unless their function has been replaced by natural recruitment;
- d. A final implementation schedule that indicates when all riparian/wetland impacts, as well as riparian/wetland creation grading, planting and irrigation will begin and end. Necessary site preparation and planting should be completed during the concurrent or next planting season (i.e., late fall to early spring) after receiving the Wildlife Agencies' approval of grading. Any temporal loss of habitat caused by delays in creation/restoration/enhancement should be offset through creation/restoration/enhancement at a 0.5:1 ratio for every 6 months of delay (i.e., 1:1 for 12 months delay, 1.5:1 for 18 months delay, etc.). In the event that the project applicant is wholly or partly prevented from performing obligations under the final plans (causing temporal losses due to delays) because of unforeseeable circumstances or causes beyond the reasonable control, and without the fault or negligence of the project applicant, including but not limited to natural disasters (e.g., earthquakes etc.), labor disputes, sudden actions of the elements (e.g., further landslide activity), or actions by Federal or State agencies, or other governments, the project applicant will be excused by such unforeseeable cause(s);
- e. Five years of success criteria for creation/restoration/enhancement areas including: separate percent cover criteria for herbaceous understory, shrub midstory, and tree overstory; evidence of natural recruitment of multiple species for all habitat types; 0 percent coverage for Cal-IPC List A and B species, and no more than 10 percent coverage for other exotic/weed species;
- f. Monitoring should include protocol surveys for vireo;
- g. A vegetation monitoring plan with a map of proposed sampling locations. Stratified-random sampling should be used for all quantitative surveys;
- h. Contingency measures in the event of mitigation failure;

B-18
cont'd

Comment Letter B – California Department of Fish and Game / U.S. Fish and Wildlife Service, October 12, 2007

measures proposed to reduce project impacts on sensitive resources therefore address potential onsite and offsite impacts resulting from required brush clearing; refer to Section 3.1.6.

A Fire Protection Plan was prepared for the proposed project to identify site design measures to minimize the potential for wildfire. Brush clearing will be required at a distance of 100 feet inward from the edge of the project boundaries to maintain an appropriate width between offsite areas and the proposed development to reduce the risk of damage caused by wildfire to people and property. The District will be responsible for brush clearing and maintenance of such areas. In addition, brush clearing will be required along Horse Ranch Creek Road, approximately 10 feet to either side, to reduce the potential for wildfire to occur or spread.

B-17 Comment noted. All pre-construction and post-construction BMPs as proposed in the EIR are located within the development footprint. As such, the resulting impacts are considered as part of the impact analysis for biological resources, and addressed within the proposed mitigation measures. Refer to Section 4.1.5 and Appendix L of the EIR. This comment did not result in any changes to the EIR.

B-18 Comment noted. No new impacts were identified with regard to this issue; however, Mitigation Measure B-2e has been added, as requested by the Wildlife Agencies, to require the District to prepare a wetland creation/restoration/enhancement plan (as appropriate) for the mitigation of project impacts to jurisdictional wetland habitat and for ongoing maintenance requirements. The District shall submit the plan to the County of San Diego and the Wildlife Agencies for approval, prior to initiating project impacts. Refer to Section 3.1.6 of the EIR.

B-19 Comment noted. No new impacts were identified with regard to this issue; however, Mitigation Measures B-1d and B-2f were added to the EIR, as requested by the Wildlife Agencies, to state that the District will be required to prepare a Management and Monitoring Plan (MMP), subject to approval by the Wildlife Agencies and the County. Refer to Section 3.1.6 and Table S-1 of the EIR.

B-20 Comment noted. No new impacts were identified with regard to this issue; however, Mitigation Measure B-7(b) requires a biological monitor during construction activities and for oversight of the proposed mitigation activities, as requested by the Wildlife Agencies. Language was added to Mitigation Measure B-7(b) for clarification. Refer to Section 3.1.6 and Table S-1 of the EIR.

**Comment Letter B – California Department of Fish and Game / U.S.
Fish and Wildlife Service, October 12, 2007**

B-21 Comment noted. No new impacts were identified with regard to this issue; however, Mitigation Measure B-7(e) has been amended, as requested by the Wildlife Agencies, to include prohibition of the use of invasive plants or vegetation that requires intensive irrigation, fertilizers, or pesticides adjacent to native habitat (Native Area). In addition, water used for landscaping shall be directed away from adjacent habitat and contained and/or treated within the development footprint. The District does not concur that planting stock should be inspected for certain insect pests prior to use on the site. The site is adjacent to agricultural areas used for livestock and orchards. Recent uses onsite include animal grazing and other agricultural uses. These existing uses are known to attract insectivorous pests. Therefore, pest inspection of container stock plants is not required. Refer to Section 3.1.6 and Table S-1 of the EIR.

Ms. Hudson-Melisaac (FWS-SDG-5205.2) (SCH# 2007011136)

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B-18
cont'd

- i. Annual mitigation maintenance and monitoring reports should be submitted to the Agencies after the maintenance and monitoring period and no later than December 1 of each year;
- j. A wetland delineation should be done to confirm that Corps jurisdictional wetlands have been successfully created prior to final approval of the creation sites.

B-19

- 11. A management and monitoring plan (MMP), including a funding commitment, should be developed for any on- and/or off-site areas to be used as project mitigation, and implemented in perpetuity to protect the existing biological functions and values. The applicant should identify an appropriate natural lands management organization, subject to approval by the County and Wildlife Agencies. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. The applicant should complete a Property Analysis Record (PAR) to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. The applicant should demonstrate how the proposed funding mechanism would ensure that adequate funds would be available on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Wildlife Agencies for review and approval prior to initiating construction activities. The organization should submit the final plan to the Wildlife Agencies, and transfer the funds for implementing the MMP within 90 days of receiving approval of the draft plan. We recommend that the County implement the MMP once the North County MSCP is finalized.

B-20

- 12. The draft EIR should include the provision for a Wildlife Agency-approved biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of the biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the County and the Wildlife Agencies.

B-21

- 13. Landscaping adjacent to native habitat should not use plants that require intensive irrigation, fertilizers, or pesticides. Water runoff from landscaped areas should be

Comment Letter B – California Department of Fish and Game / U.S.
Fish and Wildlife Service, October 12, 2007

Ms. Hudson-Melsaac (FWS-SDG-5205.2) (SCH# 2007011136)

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B-21
cont'd

directed away from adjacent habitat and contained and/or treated within the development footprint. In addition, to avoid the addition of non-native insect pests, particularly Argentine ants (*Iridomyrmex humil*) and fire ants (*Solenopsis invicta*), any planting stock to be brought onto the project site for landscaping should be first inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas. Infested stock should not be allowed on the project site and should be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats.

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 857-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



September 10, 2007

Ms. Kelly Hudson-MacIsaac
Palomar School District
1140 West Mission Road
San Marcos, CA 92069

Re: SCH#200701136, CEQA Notice of Completion, draft Environmental Impact Report (DEIR) for North Education Center Project - Facilities Master Plan, Fallbrook Area, San Diego County, California

Dear Ms. Hudson-MacIsaac:

The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

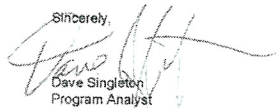
- ✓ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/853-7278)/ <http://www.ohp.parks.ca.gov/1066/files/C%20Roster.pdf>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- ✓ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
 - CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

**Comment Letter C – Native American Heritage Commission,
September 10, 2007**

- C-1 Comment noted. A literature search for the project was conducted at the South Coastal Information Center (SCIC) of the California Archaeological Inventory at San Diego State University in 2007. The current listings of the National Register of Historic Places, the California Inventory of Historic Resources (State of California 1976), and the California Historical Landmarks (State of California 1992) were checked for historic resources. The records search indicated that the project area had been nearly completely covered by four surveys in the past and that two cultural resources (CA-SDI-682 and CA-SDI-16890) were previously recorded within the Area of Potential Effect (APE) or within a one-mile perimeter of the project site. This information is included and considered in the Cultural Resources Survey and Testing Report prepared for the Palomar College site (Tierra Environmental, August 2007); refer to Appendix D of the EIR. This comment did not result in changes to the Draft EIR.
- C-2 The District concurs with this comment. The final draft of the report, "Cultural Resources Survey and Testing Report," dated August 2007 and revised November 2007, was prepared by Tierra Environmental and submitted to the SCIC. A Confidential Appendix was submitted as part of the review of this project to identify site locations. No human remains or funerary objects were identified during the survey. This comment did not result in changes to the Draft EIR.
- C-3 The District concurs with this comment. A Sacred Lands check was initiated in October 2007. The NAHC provided the District with a list of Native American organizations/individuals in a letter dated September 10, 2007. The District contacted the listed organizations/individuals included on the list provided; the 30-day public review comment period will cease November 2007 and such comments will be considered in future site development activities. If known significant cultural resources are present on lands affected by the project, measures to protect and/or avoid such resources shall be made Conditions of Approval of the EIR to ensure impacts do not occur. This comment did not result in changes to the Draft EIR.
- C-4 Comment noted. CR-1 and CR-2 include mitigation for undiscovered cultural resources through preparation of a Grading and Monitoring Plan. Language was added to Mitigation Measures CR-1 and CR-2 to require a Native American monitor during all site disturbance activities at the sites where mitigation is required; however, no new impacts were identified. Refer to Section 3.2.5 of the EIR.

- C-6 ☐ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.
- C-7 ☐ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

 Dave Singleton
 Program Analyst

Attachment: List of Native American Contacts

Comment Letter C – Native American Heritage Commission, September 10, 2007

- C-5 Mitigation Measures CR-1 and CR-2 have been amended to address the discovery of Native American human remains or unmarked cemeteries; however, no new impacts were identified. The District will be required to provide evidence to the Department of Planning and Land Use that a County certified archaeologist and Native American Monitor have been contracted to implement a Grading Monitoring Program to the satisfaction of the Director of Planning and Land Use (DPLU). The consulting archaeologist shall contract with a Native American monitor to be involved with the Grading Monitoring Program. If human bones are discovered, the Principal Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains. Refer to Section 3.2.5 of the EIR.
- C-6 Comment noted. Site development activities would be consistent with the requirements of the codes and CEQA Section cited if human remains are discovered. Refer to Response to Comment C-5 above.
- C-7 Comment noted. Mitigation is provided to avoid impacts to significant resources identified that would potentially be affected by the project. If undiscovered and potentially significant resources are identified during site improvement activities, such resources would be documented and evaluated through preparation of a Grading and Monitoring Program. The District will be required to provide evidence to the Department of Planning and Land Use that a County certified archaeologist and Native American Monitor have been contracted to implement a Grading Monitoring Program to the satisfaction of the Director of Planning and Land Use (DPLU). The Grading and Monitoring Program shall be prepared by the consulting archaeologist, approved by the District and the County of San Diego, then carried out using professional archaeological methods. Refer to Mitigation Measures CR-1 and CR-2 in Section 3.2.5 of the EIR. This comment did not result in changes to the Draft EIR.

Comment Letter C – Native American Heritage Commission,
September 10, 2007

Native American Contacts
San Diego County
September 10, 2007

Pala Band of Mission Indians
Robert H. Smith, Chairperson
12196 Pala Mission Road, PMB 50
Pala, CA 92059
(760) 891-3500
(760) 742-1411 Fax

Luiseno
Cupeno

San Luis Rey Band of Mission Indians
Russell Romo, Chairman
12064 Old Pomerado Road
Poway, CA 92064
(858) 748-1586

Luiseno

Pauma & Yuima
Christobal C. Devers, Chairperson
P.O. Box 369
Pauma Valley, CA 92061
paumareservation@aol.com
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(760) 742-3422 Fax

Luiseno

San Luis Rey Band of Mission Indians
Carmen Mojado, Co-Chair
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Vista, CA 92081
(760) 724-8505

Luiseno

Rincon Band of Mission Indians
Angela Veltrano, Rincon Culture Committee
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council@rincontribe.org
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(760) 749-8901 Fax

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Luiseno

Cupeno

San Luis Rey Band of Mission Indians
Henry Contreras, Most Likely Descendent
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Fallbrook, CA 92028
(760) 728-6722 - Home
(760) 207-3618 - Cell

Luiseno

Cupa Cultural Center (Pala Band)
Shasta Gaughen, Assistant Director
35008 Pala-Temecula Rd. PMB Box 445
Pala, CA 92059
cupa@palatribe.com
(760) 742-1590
(760) 742-4543 - FAX

Luiseno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007011136; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for North Education Center-Facilities Master Plan; Fallbrook Area; San Diego County, California.

Comment Letter C – Native American Heritage Commission,
September 10, 2007

Native American Contacts
San Diego County
September 10, 2007

La Jolla Band of Mission Indians
ATTN: Rob Roy, Environmental Director
22000 Highway 76 Luiseno
Pauma Valley, CA 92061
lajolla-sherry@aol.com and
(760) 742-3790
(760) 742-1704 Fax

Charles Devers, Chair
Cultural Committee; Pauma & Yuima Reservation
P.O. Box 369 Luiseno
Pauma Valley, CA 92061
(760) 742-1289
(760) 742-4543 FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007011136; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for North Education Center-Facilities Master Plan; Fallbrook Area; San Diego County, California.



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

September 19, 2007

Ms. Kelley Hudson-MacIsaac
Palomar School District
1140 West Mission Road
San Marcos, California 92069

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR PALOMAR COMMUNITY
COLLEGE – NORTH EDUCATION CENTER, FACILITIES MASTER PLAN PROJECT
(SCH# 2007011136)

Dear Ms. Hudson-MacIsaac:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a Supplemental EIR for the above-mentioned project. The following project description is stated in your document: The project "proposes development of a new Community College center to serve the Northern San Diego County area. The project site is approximately 85 acres of (presently) undeveloped land, generally located east of Interstate 15, between Pala Road/State Rout 76 and Pala Mesa Heights Drive in the Community of Fallbrook...Facilities planned would include instructional space, administrative services, a library, offices, a student services center, food services, maintenance/operations, and other support services...all of the proposed facilities would be located within an approximately 56.5 acre footprint. Development of the project site would be phased over several decades, with an estimated total building square footage of approximately 380,000 to 533,000 square feet, which is anticipated to occur around the year 2030...The conceptual project design also includes a Native Area of approximately 25 acres in the southern portion of the property."

Based on the review of the submitted document DTSC has the following comments:

D-1

- 1) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No. 7 below for more information.

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Comment Letter D – California Department of Toxic Substances Control, September 19, 2007

D-1 Comment noted. The District concurs with this comment. A *Phase I Environmental Site Assessment and Limited Chemical Residue Survey, Hewlett Packard Property 500-acre Property Northeast of Highway 76 and Interstate 15 Pala Mesa Area of San Diego County, California 92028*, was prepared January 7, 2002 by Geo Soils, Inc. (GSI); refer to Appendix I of the EIR. The analysis within the EIR did not identify hazards or hazardous materials onsite or offsite that were considered to pose potential harm to public health or safety, and no mitigation measures were required. However, if unknown hazards or hazardous materials are identified during site improvement activities, testing and/or remediation would occur as required and consistent with applicable state and federal environmental standards, with oversight from the respective regulatory agencies, to ensure that no potential harm or release of or exposure to hazardous materials would occur. Consideration for Department of Toxic Substances (DTSC) guidance for clean up oversight through an Environmental Oversight Agreement (EOA) would occur as appropriate.

This comment did not result in changes to the Draft EIR.

Ms. Kelley Hudson-MacIsaac
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- D-2 [2) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
- D-3 [3) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- D-4 [4) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- D-5 [5) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- D-6 [6) If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- D-7 [7) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

Comment Letter D – California Department of Toxic Substances Control, September 19, 2007

- D-2 Comment noted. The District concurs with this comment. The Phase I ESA did not recommend additional soil or groundwater testing as the result of environmental conditions identified on or off of the proposed site. Refer also to Response to Comment D-1, above, regarding treatment of unknown environmental conditions. As appropriate, all available closure, certification and remediation approval reports by the appropriate agencies are included in Appendix I, *Phase I Environmental Site Assessment*.

This comment did not result in changes to the Draft EIR.
- D-3 Comment noted. The District concurs with this comment. Refer to Response to Comments D-1 and D-2, above. This comment did not result in changes to the Draft EIR.
- D-4 Comment noted. The District concurs with this comment. Refer to Response to Comments D-1 and D-2, above. This comment did not result in changes to the Draft EIR.
- D-5 Comment noted. The District concurs with this comment. Refer to Response to Comments D-1 and D-2, above. This comment did not result in changes to the Draft EIR.
- D-6 Comment noted. The District concurs with this comment. Refer to Responses to Comments D-1 and D-2, above. Although the site was formerly used to support agricultural activities, no hazards or hazardous substances that are anticipated to result in a significant impact to public health or safety were identified, and no additional groundwater or soil sampling was requested. This comment did not result in changes to the Draft EIR.
- D-7 Comment noted. The District concurs with this comment. Refer to Responses to Comments D-1 and D-2, above. As appropriate, the District will seek guidance from the DTSC for cleanup oversight through an EOA as deemed necessary. This comment did not result in changes to the Draft EIR.

Comment Letter D – California Department of Toxic Substances
Control, September 19, 2007

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If you have any questions regarding this letter, please contact
Ms. Eileen Khachatourians, Project Manager, at (714) 484-5349 or
email at EKhachat@dtsc.ca.gov.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814

CEQA# 1832

ERIC GIBSON
INTERIM DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
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October 12, 2007

Kelly Hudson MacIsaac
Palomar Community College, Facilities Planning
1140 West Mission Road
San Marcos, CA 92069

RE: COMMENTS ON THE PALOMAR COMMUNITY COLLEGE - NORTH
EDUCATION CENTER DRAFT ENVIRONMENTAL IMPACT REPORT

E-1

The County of San Diego has received and reviewed the Draft Environmental Impact Report (DEIR) for the Palomar Community College – North Education Center dated August 2007 and appreciates this opportunity to comment. In response to the document the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County, reasonable alternatives and mitigation measures that the County will need to have explored in the environmental document.

County Department of Planning and Land Use (DPLU), Department of Public Works (DPW), and Department of Parks and Recreation (DPR) staff has completed its review and has the following comments regarding the content of the above documents:

GENERAL COMMENTS

E-2

1. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used as guidance for determining the significance of environmental impacts in the unincorporated portions of the County of San Diego. The Guidelines also provide mitigation options for addressing potentially significant impacts. Project impacts that could have potentially significant adverse effects to the unincorporated County or

Comment Letter E – County of San Diego, October 12, 2007

- E-1 The District acknowledges and appreciates this comment. The author's status as a responsible agency under CEQA Section 15381 has been noted. This comment did not result in changes to the Draft EIR.
- E-2 The District acknowledges and appreciates this comment. The Guidelines for the Determination for Significance as adopted by the County of San Diego and the Appendix G of the CEQA Guidelines were used, as appropriate, as guidance for establishing significance criteria. for the proposed project. This comment did not result in changes to the Draft EIR.

E-2
cont'd

County facilities, should evaluate and mitigate environmental impacts using the guidance described in the County of San Diego Guidelines for Determining Significance, available online at: <http://www.sdcountry.ca.gov/dplu/Resource/3~procguid/3~procguid.html#guide>.

AESTHETICS

E-3

2. The DEIR concludes that aesthetic impacts are significant and unavoidable, however it does not identify the feasibility of incorporating any specific design measures to reduce the visibility of the proposed facilities within the surrounding viewshed. The DEIR should identify specific design measures; such as architectural building design, drought and fire resistant landscaping and screening; and analyze how such measures could reduce potential visual impacts to the surrounding viewshed and transportation corridor.

E-4

3. The aesthetic analysis should discuss consistency with the County's I-15 Corridor Scenic Preservation Guidelines. County's I-15 Corridor Scenic Preservation Guidelines are intended to reduce the aesthetic impacts of development in the I-15 corridor by protecting and enhancing scenic resources while accommodating coordinated planned development which harmonizes with the natural environment. The design guidelines establish standards to regulate the visual quality and the environmental integrity of the entire corridor; and encourage scenic preservation and development practices compatible with the goals and policies of the five community and Subregional Planning areas encompassed by the I-15 Corridor area. The guidelines pertain to site design, parking areas, site lighting, landscaping, natural features and architecture. Although the project is not subject to the County's Design Guidelines, these may provide a useful guide to reduce significant aesthetic impacts.

E-5

The project's proposed parking encompasses approximately one-third of the developed area and is highly visible from the I-15 Scenic Corridor. Parking and Circulation Design Standards from I-15 Guidelines state that "Parking areas or structures shall be designed as integral components of the overall design of specific projects. Parking areas shall be bermed or screened from street views where possible." In addition, no conceptual landscape plan was included to identify proposed visual screening. The expansive nature of proposed parking facilities could result in significant aesthetic impacts to surrounding viewsheds and the DEIR should fully evaluate all feasible mitigation options to reduce these impacts.

AIR QUALITY

E-6

4. The technical study uses a vehicle mix ratio that does not include any buses, yet colleges typically have bus stops to facilitate public transportation. The operational emission estimates should reflect likely scenarios.

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E-3

The District acknowledges and appreciates this comment. The EIR prepared for the proposed project is a programmatic EIR to address the property acquisition and impacts from developing the site. A Conceptual Site Plan has been prepared for the project, based on the facilities that the District anticipates will satisfy future educational needs; refer to Figure 1-4 of the EIR. As the student population grows, and the demand for specific buildings or facilities is identified, measures can be implemented in the design phase to reduce visibility of the facilities within the surrounding viewshed; however, as the project is currently in a conceptual phase, application of specific design details of the individual buildings would not be merited at this time. As individual buildings or facilities are designed in the future, the District can integrate architectural design measures and landscaping and screening features to reduce views from surrounding public vantage points and within the transportation corridor. This comment did not result in changes to the Draft EIR.

E-4

Comment noted. Refer to Response to Comment E-3, above.

The District will consider the County's I-15 Corridor Scenic Preservation Guidelines in the future design of the site, specific to parking areas, site lighting, landscaping, natural features and architectural design. These Guidelines will be considered for their potential to reduce visual impacts on the environmental integrity of the I-15 corridor, and to ensure that the project respects the rural character of the surrounding natural environment. This comment did not result in changes to the Draft EIR.

E-5

The County acknowledges and appreciates this comment. See Responses to Comments E-3 and E-4, above. The I-15 Scenic Corridor Guidelines and other design measures will be considered at the time when specific design and landscaping details are prepared for parking areas and other project elements to reduce the visibility of such features within the viewshed. This comment did not result in changes to the Draft EIR.

E-6

Comment noted. The EIR is a programmatic document. The air quality analysis reflects assumptions made for future conditions with regard to vehicle trips generated by the project. Initial development will include construction of approximately 75,000 to 150,000 s.f. of building space, with the remainder of the site being developed over the next several decades as the student population grows and demand for specific facilities is determined. Due to the limited capacity of the initial

- E-7 5. Fugitive Dust Emissions: the DEIR and the technical study both state that only "80 percent of the working weight of the volume of earth that will be moved is capable of generating PM₁₀. This statistic is not substantiated with evidence such as a description of the soil type and the different composition materials of that soil type. If the percent of earth being moved capable of generating PM₁₀ is actually greater than 80%, the project would be generating a significant impact as the current estimate of 94.9 lbs. per day is just below the screening-level threshold. Assumptions used to calculate emissions should be as accurate as possible and should be justified to adequately disclose potential air quality impacts.

BIOLOGICAL RESOURCES

- E-8 6. The document states that a Habitat Loss Permit will be required. Note that the Habitat Loss Permit process would only grant take under the Endangered Species Act for the California gnatcatcher. It appears that the project may also require take authority for indirect impacts to the least Bell's vireo. A formal consultation with the USFWS would be required to obtain take authority for least Bell's vireo.
- E-9 7. The documents states that many of the conditions are "to the satisfaction of the County" or "a County-approved location." Since the land is not under the jurisdiction of the County, it is unclear why the County would be the approving authority.
- E-10 8. In the Biological Technical Report, biological significance thresholds 7 and 16 refer to County wetlands and the County Resource Protection Ordinance (RPO). The proposed project is not subject to this ordinance. Threshold 8 refers to a minimum 25 foot buffer, which seems too narrow based on the onsite resources. The thresholds are not consistent between the Biological Technical Report and the DEIR.
- E-11 9. The project proposes a 1.5:1 mitigation ratio for coyote bush scrub. The rationale given is that the habitat is not functioning as CSS, but rather is "more an extension of riparian habitat." A mitigation ratio of 2:1 is more appropriate for this habitat, since it is a type of coastal sage scrub vegetation and it is located immediately adjacent to riparian habitat.
- E-12 10. The Biological Technical Report refers to an impact neutral area that may be developed in the future. The EIR should state that any development of the impact neutral area would require additional environmental analysis and review.
- E-13 11. The cumulative impact analysis is not consistent between the Biological Technical Report and the DEIR.

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development, providing mass transit for the center would not be merited at this time. Furthermore, the North County Transit District has stated that they have no plan or funding to operate transit service to the site in the near future; refer to Comment Letter G. As future student population grows, and demand for public transit facilities, such as buses, is identified and justified, the District will consider coordinating such a program; however, the use of buses or establishment of a shuttle program is not proposed at this time. Therefore, the air quality analysis and operational emissions estimates are adequate. This comment did not result in changes to the Draft EIR.

- E-7 The District disagrees that no evidence has been provided. Please refer to Section 4.1.2.3 of the EIR, which illustrates the calculations performed to reach the conclusion stated. This comment did not result in changes to the Draft EIR.

- E-8 Comment noted. The District concurs with this comment. The District has met with the Wildlife Agencies, and the project will be subject to a formal Section 7 consultation to address project impacts on the least Bell's vireo. Based on discussion with County staff in May and June of 2008, intersection improvements at Old Highway 395 and Stewart Canyon Road – Canonita Drive are no longer required. Therefore, the project will no longer result in direct impacts on California gnatcatcher. The District will comply with this requirement. This comment did not result in changes to the Draft EIR.

- E-9 Comment noted. Potential impacts to sensitive habitat and species will occur as the result of offsite improvements along Horse Ranch Creek Road and at intersections where improvements are proposed. As these impacts would occur on lands within the County's jurisdiction, not lands owned by the District, mitigation proposed relative to such impacts will be subject to County authority and approval. This comment did not result in changes to the Draft EIR.

- E-10 The District acknowledges and appreciates this comment. The County's RPO would apply to any such wetlands that occur offsite where project improvements would occur. The reference to a minimum 25-foot buffer in Threshold 8 is a minimum distance that can be applied to a typical project. The actual wetland buffers for the proposed project are 50 feet; refer to Figure 3.1-1. This comment did not result in changes to the Draft EIR.

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E-14

12. The project proposes mitigating with coastal sage scrub for non-native grassland/pasture impacts. The site is not within an adopted NCCP plan that has a written policy/agreement allowing out-of-kind mitigation. The document should further justify why mitigation with coastal sage scrub would provide a similar biological function to the non-native grasslands that will be impacted by the project.

FIRE PROTECTION

E-15

13. The EIR includes a limited discussion of Fire Hazards, proposes no mitigation measures, and concludes that impacts are anticipated to be less than significant. However, these conclusions are not supported by a Fire Protection Plan. Per State regulations, a Fire Protection Plan, prepared by a fire consultant is required. (CCR Title 24 part 9 - CFC Article 86; CCR Title 24 part 2 – CBC Chapter 7A.) The purpose of the Fire Protection Plan (FPP) is to assess the potential impacts resulting from wildland fire hazards and identify the measures necessary to adequately mitigate those impacts. As part of the assessment, the plan considers the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history. The plan addresses water supply, access (including secondary access where applicable), structural ignitability and fire resistive building features, fire protection systems and equipment, impacts to existing emergency services, funding on-going staffing, defensible space, and vegetation management. The FPP identifies and prioritizes areas for hazardous fuel reduction treatments, and recommend the types and methods of treatment that will protect the subject property and essential infrastructures. A FPP should be prepared in order to adequately analyze the project's potential wildland fire hazards and identify appropriate mitigation measures.

E-16

14. The project is located in a wildland hazardous fire area, designated as "State Responsibility Area" under CalFIRE mapping documents. Thus it is subject to CCR Title 14 "SRA", California Fire Code, State and North County Fire Protection District Fire Codes, including "Hazardous Fire Area" regulations (California Fire Code Appendix II-A), and the Exterior Wildfire Exposure portion of the State Building Code (CCR Title 24 part 2).

E-17

15. The EIR and project description should incorporate the requirements for building construction constraints for wildland fire building ignition-resistance per State Building Code (CCR Title 24 part 2 - Chapter 7A).

E-18

16. The proposed development footprint setback of 50 feet from wetland areas should be supported or modified based on the completion of a fire behavior model in a Fire Protection Plan, particularly in view of the local fire agency's inability to require fuel modification in riparian areas.

The District concurs with the comment regarding the inconsistencies between the thresholds listed in the Biological Technical Report and the Draft EIR. As such, the Draft EIR has been revised; refer to Section 3.1.3.

E-11

Comment noted. The District concurs with this comment. Mitigation Measure B-1b has been revised to state that mitigation will occur at a ratio of 2:1, therefore requiring the purchase of 43.26 acres of offsite habitat to reduce impacts to less than significant. Refer to Section 3.1.6 and Table S-1 of the EIR.

E-12

The District concurs with this comment. The EIR has been revised to include the requested statement; refer Section 3.1.4.2.

E-13

The District does not concur with this comment. The Biological Technical Report and Draft EIR were reviewed for inconsistencies. Based on the review, the Biological Technical Study had a typographical error regarding the impact to Diegan coastal sage scrub and was revised; refer to Section 5.4 of the Biological Technical Report. Furthermore, based on the review, the impacts, mitigation measures and conclusions were deemed to be consistent. This comment did not result in changes to the Draft EIR.

E-14

Comment noted. The project proposes to mitigate habitat impacts by acquiring a large block of native habitats within the vicinity of the project site to preserve native habitats within same region. Preservation of native habitats increases the long term viability of the habitats for plant and animal species over non-native species because plants and animals do not have to adapt to new habitats and their natural habitats are preserved. Therefore, the proposed purchase of Diegan coastal sage scrub to mitigate for impacts to non-native grassland would provide a habitat of higher ecological value. This comment did not result in changes to the Draft EIR.

E-15

Comment noted. A Fire Protection Plan (FPP) has been prepared for the project which includes design measures to reduce the potential for wildfire to occur. Refer to Comment Letter I from the North County Fire Protection District (NCFPD). The Plan provides design requirements for setbacks, vegetation management, and building materials among other elements that will be implemented by the District as individual structures and facilities are designed and constructed in the future. Additional language was added to Section 4.1.4.3 of the EIR with regard to the FPP.

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- E-19 17. Non-drought tolerant landscaping in a wildland fire area can be a threat to occupants and to building survival. In addition to drought-tolerance, landscaping must be fire-resistant, such as the plants included in the County Department of Planning and Land Use approved plant list – plants which tend not to transmit wildfire to structures. The EIR should address fire resistive landscaping.
- E-20 18. In consideration of the local fire agency's limited resources compared to the size and scale of proposed facilities, the project should incorporate the requirement that all buildings be protected by fire sprinkler systems, and be monitored for waterflow.
- E-21 19. The local fire agency should be given an opportunity to review site plans to insure adequate access for fire fighting apparatus, hoseline and laddering access, hydrant locations and fireflow, consistent with the California Fire Code, local fire code and NCFPD's operational needs.
- E-22 20. Under the discussion of Pankey Road on page 1-8, reference is made to the elimination of Pala Mesa Drive extension under the proposed General Plan 2020 project. If the project is proposing to eliminate or postpone connection of Pala Mesa Drive from the I-15 bridge (vicinity of NCFPD fire station 4) eastward to Horse Ranch Creek Road, a critical route for emergency services delivery is compromised. Absent this connection, (Pala Mesa Drive/ I-15 bridge to Horse Ranch Creek Road,) travel times for fire and emergency medical responses from the nearest station could be excessive, resulting in potential hazards and loss of life or property in the event of a fire. This connection should be completed prior to occupancy of the first building on campus so that fire and emergency medical responses can occur within an acceptable timeframe. While it may not be the responsibility of the project to construct the connecting road, the connection should be complete prior to site occupancy in order to insure a reasonably timely fire and EMS response for occupants.
- E-23 21. It appears that the proposed elimination of Pankey Road to Pala Mesa Drive is to be replaced with a northern extension of Horse Ranch Creek Road. It is critical that continuity of roads be maintained for timely delivery of emergency services. The continuity of roads and adequacy for fire access could not be confirmed based on the level of analysis included in the DEIR.

PARKS AND RECREATION

- E-24 22. The Palomar Community College will be next to two development projects that will have a public trail system. The addition of the proposed college would result in an increase in the use and impact to the existing and proposed trail systems in the community of Fallbrook. It is recommended that the project incorporate

- E-16 Comment noted. The regulations have been considered and addressed through preparation of the FPP. Section 4.1.4.3 of the EIR has been revised to discuss preparation of the FPP. Refer to Section 4.1.4.3 of the EIR and Comment Letter I from the NCFPD.
- E-17 Comment noted. Such regulations have been considered and addressed through preparation of the FPP. Section 4.1.4.3 of the EIR has been revised to discuss preparation of the FPP. Fire suppression and prevention measures (i.e. interior sprinkler systems) will be implemented with future onsite construction, consistent with the requirements of the NCFPD and the FPP. Refer to Section 4.1.4.3 of the EIR and Comment Letter I from the NCFPD.
- E-18 Comment noted. This condition has been considered and addressed through preparation of the FPP. The project design includes a 50-foot setback from wetland areas within the Native Area. Section 4.1.4.3 of the EIR has been revised to discuss preparation of the FPP. Refer to Section 4.1.4.3 of the EIR and Comment Letter I from the NCFPD.
- E-19 The District concurs with this comment. The Draft EIR is a programmatic EIR. The Conceptual Site Plan has been designed to reflect the facilities the District anticipates will be necessary to meet future educational demands. However, site-specific building and landscaping design measures will be determined at the time when new facilities are deemed appropriate due to student demand or educational needs at the time. As such, an analysis of site-specific landscape design elements for the proposed project site is not merited at this time. However, landscape plans prepared at the time when development of a particular structure or other facility is proposed, which will reflect the landscaping requirements of the FPP, and will require the use of drought-tolerant, fire-resistant planting materials as appropriate, to reduce the potential for damage caused by wildfire. Section 4.1.4.3 of the EIR has been revised to discuss the requirements of the FPP.
- E-20 The District concurs with this comment. The proposed project will require as a condition of approval to incorporate the requirement that buildings shall be protected by fire sprinkler systems and will be monitored for waterflow. This comment did not result in changes to the Draft EIR.
- E-21 The District concurs with this comment. The local fire agency will be given an opportunity to review site plans to insure adequate access for fire fighting apparatus, hoseline and laddering access, hydrant locations

E-24
cont'd

additional trails/pathways within the proposed project site to mitigate for increased use of onsite and surrounding trails. Recommendations for additional trails are detailed below.

E-25

23. The proposed pathway along the western side of Horse Ranch Creek Road (running north/south) is also part of and included in the proposed Campus Park project. In addition, the County recommends adding a north/south 20-foot wide trail easement on the western boundary of the proposed project site. This trail would start from the northern tip of the site at the intersection of Horse Ranch Creek Road and Baltimore Oriole Road and end at Pala Mesa Drive. At Pala Mesa Drive, the County recommends adding a 10-foot wide Decomposed Granite (DG) pathway along Pala Mesa Drive adjacent to the southern boundary of the proposed project site. The DG pathway would intersect with the Horse Ranch Creek Road pathway to the east creating approximately a 2-mile loop trail for both the college and community.

TRAFFIC AND CIRCULATION

E-26

24. The project applicant/consultant are encouraged to coordinate with the applicants for the neighboring Campus Park, Meadowood, and Campus Park West projects. It would benefit all of the involved projects if they can provide a consistent traffic assessment for the study area roadway system. Although project coordination is encouraged, the college project is still required to provide a stand alone environmental document.

E-27

25. The DEIR identifies impacts to SR-76 roadway segments as being significant and unavoidable because the campus is expected to begin enrollment in 2011, prior to the expected completion of the proposed widening of SR-76 and SR-76 improvements that proposed are part of the Rosemary's Mountain project. The DEIR should discuss the feasibility of other mitigation measures to reduce this significant traffic impact. For example, project phasing could limit student enrollments so as to not reach full capacity until such time that the SR-76 improvement projects are complete. Another feasible mitigation option would be to coordinate with Caltrans to develop SR-76 improvement projects and cost estimates that could potentially be implemented by the proposed project. The DEIR cites (MM TR-2 to TR-4) that the highway cost estimate identified in the County's Traffic Impact Fee (TIF) program as one of the reasons why it would not be feasible for the proposed project to fully mitigate their project's significant impacts to SR-76, however the DEIR should not rely on the general cost estimates for highway segments used in the County's TIF report as reasoning why the SR-76 improvements are infeasible.

E-28

26. The DEIR proposes (MM TR-5 to TR-14) a fair-share contribution towards the Caltrans SR-76 Transnet program as an option for mitigating the project's direct impacts. The applicant should coordinate with Caltrans staff to verify that a fair-

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and fireflow, as well as to insure consistency with the California Fire Code, local fire codes, and NCFPD's operational needs. This comment did not result in changes to the Draft EIR.

E-22

Comment noted. Refer also to Response to Comment I-7. The District has coordinated with the NCFPD to identify access issues and fire service response times. The NCFPD has provided a written statement that the requirement to construct Pala Mesa Drive for emergency access purposes will be waived and that the response time is adequate. Refer to Comment Letter I from the NCFPD regarding the extension of Pala Mesa Drive. The District received a supplemental letter dated November 1, 2007 from the NCFPD stating that a connection with Pala Mesa Drive is not required and that response times are adequate.

E-23

Comment noted. As discussed in Section 1.1.3 of the EIR, the County's General Plan Circulation Element proposes a north-south connection between Pankey Road and SR 76; refer to Figure 1-8A of the EIR. The project proposes that Horse Ranch Creek Road provide this north-south connection, as anticipated in the County's General Plan 2020 Circulation Element; refer to Figure 1-8B. Refer to Comment Letter I for discussion of access and fire service response times with regard to the NCFPD.

E-24

The District acknowledges and appreciates this comment. The proposed project will include construction of a portion of the trail along the west side of Horse Ranch Creek Road for future connection to other trails that will be constructed by other future developments in the area. The proposed project will also include construction of athletic fields for public use, thereby providing additional recreational opportunities for students attending the College, as well as residents in the surrounding area. As facilities are constructed onsite in the future to address the student population and educational needs as appropriate, the District will continue to evaluate the potential need for additional recreational amenities, such as onsite trails or pathways for recreational use; however, such amenities are not justified at this time, due to the initial student population and construction (75,000 to 150,000 s.f.) anticipated. This comment did not result in changes to the Draft EIR.

E-25

The District acknowledges and appreciates this comment. See Response to Comment E-24 above. Construction of the path proposed along the west side of Horse Ranch Creek Road is included in the Campus Park project, as the owners of Campus Park would be required to construct the road and path if the North Education Center were not

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built. As proposed with the North Education Center project, the District will construct the path as part of the roadway improvements, consistent with County of San Diego Roadway Design Standards. Construction of Pala Mesa Drive is not required or proposed with the project, and therefore, trailway construction is not proposed along this roadway. Additionally, any future development of Pala Mesa Drive, including right-of-way, would be located offsite on property not owned by the District. Furthermore, a pathway along the southern boundary of the site would result in significant impacts to wetland habitats. This comment did not result in changes to the Draft EIR.

E-26 Comment noted. The District acknowledges and appreciates this comment. The District has been working diligently with the mentioned neighboring projects, and in particular Campus Park, which will border the proposed project to the north, east, and south, to provide an accurate and consistent traffic assessment for the study area. Roadway improvements proposed with other area projects have also been considered in the proposed mitigation measures to reduce the project's contribution to traffic congestion on area roadways. This comment did not result in changes to the Draft EIR.

E-27 Comment noted. Construction of the SR-76 widening from two to four lanes is planned to begin in late 2007/early 2008 as reported by Granite Construction at recent (September 2007) Fallbrook Community Planning Group meetings. Construction of the improvements is scheduled to be completed by 2012. The Palomar College project is scheduled to open in 2011.

As the widening project schedule and construction are outside the control of the proposed project, it is not feasible to assume that the College will have any ability to control the schedule of completion of that activity. If the District were to construct interim improvements to the roadway as part of project mitigation, such improvements would be temporary and eliminated with the full roadway improvements to be constructed by Granite Construction. When the North Education Center opens in 2011, approximately 75,000 to 150,000 square feet would be constructed which will house some administrative staff and some classroom facilities. Development of the site is limited by current funding. Current funding is limited to infrastructure an initial development of 75,000 to 150,000 square feet. To have less than a significant impact along SR 76, this initial building would need to generate less than 100 vehicle trips per day. This is not likely to be the

- E-28 cont'd share contribution can be feasibly implemented and would be an acceptable mechanism for mitigating the project's direct impacts to SR-76.
- E-29 27. Mitigation measures (MM) TR-8, TR-9, and TR-11 identify the proposed signalization of the SR-76 intersections for the project's Horizon Year 2030 direct impact. A signal warrant analysis must be completed at the time the signal installations are being considered for construction.
- E-30 28. In the discussion of the fair-share calculations, the DEIR indicates (Pg.70) that the project would only mitigate the impacts at intersections in closest proximity to the project site. The project is responsible for fully mitigating all of the project's significant traffic impacts regardless of the impacted roadway facility's proximity to the project site.
- E-31 29. Signal warrants will also be required for the project's three access driveways along Horse Ranch Creek Road.
- E-32 30. The DEIR should discuss whether the college project will be a phased development. If the project will be developed in phases, the DEIR should clearly identify what road improvements need to be in place prior to the completion of each phase in order to mitigate the project's impacts. In addition, the DEIR should clarify what road improvements are assumed to be in place by each scenario year (Ex. 2008, 2010). A summary table should be provided identifying the project phases, the scenario years, and the needed road improvements.
- E-33 31. The DEIR should provide conceptual striping plans for all proposed road improvements such as the Horse Ranch Creek Road, Pankey Road, and project driveway improvements.
- E-34 32. The phasing of roadway build out and intersection geometry along Horse Ranch Creek Road and Campus Park roadways should be discussed.
- E-35 33. The DEIR should discuss bicycle accommodations on Horse Ranch Creek Road.
- E-36 34. The DEIR should detail its Traffic Demand Management (TDM) plan to reduce single-occupancy vehicle trips and promote alternative transportation options; including carpool programs, transit options, bicycle racks, lockers and showers for commuters.
- E-37 35. The DEIR should address the potential shared use of the college's parking lots as park and ride facilities to serve area casinos during non-instructional hours.

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case, but the traffic generated by the initial construction is likely to be far less than the traffic generated when the campus reaches full occupancy.

The roadway segments with impacts along SR 76 are forecast to operate deficiently with and without the proposed project under Existing Plus Project, cumulative and Horizon Year (2030) conditions. The LOS F operating conditions are not directly related to the project traffic and are in the process of being mitigated by others. Impacts to SR 76 would remain significant and unmitigable under the Existing Plus Project and Horizon Year 2030 With Phase I and Phase II (Buildout) Conditions. Therefore, it is recommended that a Statement of Overriding Consideration be approved for the affected SR 76 segments, which would be consistent with the EIR that will be prepared for the County's General Plan 2020. Fair share contributions toward improvements along SR 76 will be made by the District to mitigate for project impacts along this roadway as appropriate. This is further explained in the traffic analysis; refer to Appendix B of the EIR.

E-28 The District concurs with this comment. Per additional discussion with the County and Caltrans, the EIR has been revised to state that the District will provide a fair share contribution to the County's TIF fund to mitigate for project impacts identified as Impacts TR-5 to TR-14 (Mitigation Measures TR-5 to TR-14). The Draft EIR has been revised to reflect this approach..

E-29 The District does not concur with this comment. Per additional discussion with the County and Caltrans, the District does not propose the signalization of any intersections as mitigation, with the exception of Horse Ranch Creek Road. As such, no signal warrant analysis will be required. Minor revisions to the mitigation measures for the Horizon Year 2030 scenarios have been made to indicate that the project will contribute fair share payments for the Horizon Year With Phase I Conditions as mitigation for project impacts. Refer to Section 2.2.6 of the EIR.

E-30 The District concurs with this comment. The mitigation measures have been revised to state that the District will contribute fair share payments to the County's TIF fund for project impacts, as appropriate, under the Horizon Year 2030 With Phase I Conditions and the Cumulative Plus Project Conditions scenarios. However, no feasible mitigation was identified for the Existing Plus Project and the Horizon Year 2030 With Phase I and Phase II (Buildout) Conditions scenarios. Impacts under

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these scenarios would remain significant and unmitigable. A Statement of Overriding Conditions will be required. This comment resulted in changes to the mitigation measures in the Draft EIR.

- E-31 The District concurs with this comment. The TIAR and EIR were modified to include text recommending that signal warrants be conducted at time of consideration, prior to installation. Refer to Section 2.2.3.5 of the EIR.
- E-32 The District concurs with this comment. Palomar Community College North Education Center is planned as a phased development. The project would be constructed in two phases. Initial development, Phase I, would consist of approximately 75,000 to 150,000 square feet (s.f.) of development and related parking, and would include initial project opening (approximately 40 percent of project buildout or 3,400 enrolled students). The second phase, Phase II, would include to project buildout, with a maximum student population of 8,500 students. Initial construction will result in approximately 75,000 to 150,000 square feet of administrative and instructional space with associated parking; additional development will occur over the next several decades, as student population grows and as available funding and educational needs require. The EIR has been revised to analyze development of the site for Phase I and Phase II development to identify potential impacts and relative mitigation. All roadway and intersection improvements identified in the EIR as part of the project will be completed with initial construction and will not be phased; however, the District will make fair share payments at the appropriate time when project vehicle trips generated result in a significant impact on the circulation system.
- E-33 Comment noted. The EIR is a programmatic EIR. Proposed improvements to Horse Ranch Creek Road are shown in Figure 1-7 of the EIR, based on County Roadway Design Standards; however, only preliminary engineering plans for roadway improvements have been prepared at this time. Engineering drawings, including striping plans, will be prepared prior to initiating such improvements, and will be subject to the review and approval of the County and Caltrans, as applicable. This comment did not result in changes to the Draft EIR.
- E-34 Comment noted. Refer to Response to Comment E-32, above. The District has and will continue to work closely with the developers of Campus Park with regard to intersection geometry and access points along Horse Ranch Creek Road. As development of the site moves forward, and specific engineering drawings are prepared, the design of

Traffic Impact Analysis Report

- E-38 36. The TIAR (Pg.1) should clarify how a student population of 8,500 students equates to 2,833 full-time equivalent (FTE) students per semester. The TIAR should provide documents in the appendix that clarify how part-time students equate to FTE students.
- E-39 37. The project's trip generation assumptions should account for all (full & part time) students enrolled at the college. The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region does not note a trip reduction for part-time students attending a community/junior college. The Institute of Transportation Engineers (ITE) Trip Generation guidelines also do not differentiate between full-time and part-time students.
- E-40 38. The description of existing roadways (Pg.15) should note the current County General Plan Circulation Element (CE) and proposed General Plan 2020 roadway classifications for all project area roadways. A brief description of the existing condition of the planned Horse Ranch Creek Road alignment should also be included.
- E-41 39. The TIAR should elaborate on the planned extension of Horse Ranch Creek Road and how the alignment correlates with the current CE and the General Plan 2020 CE.
- E-42 40. The TIAR should discuss the General Plan conformance of the project's proposed roadway system. If the proposed roadway system does not conform to the currently adopted Circulation Element Plan, a General Plan Amendment would be required. The determination of General Plan conformance should consider the roadway classification, ultimate right-of-way width, alignment, and connectivity to other CE roads.
- E-43 41. The TIAR should discuss if the project's planned roadway system will require the acquisition of off-site right-of-way. If off-site right-of-way will be required, the TIAR should describe the mechanism that the project will use to acquire the right-of-way.
- E-44 42. It should be noted that the County's traffic impact guidelines reference a 25 or more peak hour trip criteria for determining the scope of the traffic analysis for roadway facilities that operate at LOS E/F. The traffic consultant should verify the TIAR scope is adequate based on the County's peak hour trip criteria.
- E-45 43. The TIAR indicates that the 2030 Horizon Year analysis includes the General Plan 2020 land use updates. The TIAR should clarify if the 2030 land use assumptions account for proposed projects that are not consistent with the current and proposed County land use plan.

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access points into the project site will be designed as required by County Roadway Design Standards and as reviewed and approved by the County Department of Public Works. Language has been added to Sections 1.1.3 and 2.2.5.1 of the EIR to address to address this issue.

- E-35 Comment noted. The roadway will be designed to County of San Diego standards; refer to Figure 1-7 of the EIR. The proposed roadway section could accommodate two 12-foot travel lanes and an eight foot bike lane. This comment did not result in changes to the Draft EIR.
- E-36 Comment noted. Refer to Comment Letter F, prepared by SANDAG, and Comment Letter G, prepared by the North County Transit District (NCTD). This comment did not result in changes to the Draft EIR.
- E-37 Comment noted. The District will consider the option to allow use of onsite parking lots to serve as park-and-ride facilities for area casinos during non-instructional hours. However, no such alternative transit facilities are planned at this time. The feasibility and extent of such facilities will be assessed by the District in the future, based on demand for such facilities, the extent of development on the site at the time, and funding, as well as concern for liability issues. It should be noted that there is an existing Caltrans Park and Ride located nearby at the intersection of Old Highway 395 and SR-76 on the west side of Interstate 15. Refer also to Response to Comment E-36, above. This comment did not result in changes to the Draft EIR.
- E-38 Per additional discussions with the County and Caltrans, the traffic analysis and Draft EIR were revised to calculate trip generation rates that would be similar to that presently generated at the Palomar Community College Escondido Education Center. The discussion of FTES has been removed from the Draft EIR. Refer to Response to Comment A-3.

Air Quality

The November 2007 Final EIR determined that development of site under the previously analyzed project description would not result in significant air quality impacts in regards to project construction, project operation, AQMP plan consistency, or cumulative development. The proposed project would involve site preparation, construction, and project operation activities, similar to those identified in the previously analyzed project description. Under the current analysis, emissions from construction equipment would remain the same. The increase in traffic volumes (from 3,400 ADT to 1,870 ADT at Phase I and 4,675 total ADT

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at Phase II buildout) as the result of the revised trip generation would subsequently increase emissions generated by project vehicle trips.

However, the increase in traffic volumes as calculated would not result in new significant impacts on air quality, as compared to the project using the SANDAG trip generation rate. As can be seen from the table below, even if the previously determined 3,400 ADT were doubled, the project would not exceed the significance thresholds for any of the pollutants considered. Therefore, with consideration for the revised total ADT generated, as determined using 0.55 trips per day, no significant impacts to air quality would occur as a result of the project. As a result, air quality impacts resulting from the proposed project would be similar to those identified in the November 2007 Final EIR for the previously analyzed project description. As such, the potential effects of the increase in project vehicle trips were considered as part of the Final EIR process; however, as impacts would remain the same, the analysis within the EIR was not revised and the effects of the increase in ADT on air quality are instead acknowledged and addressed herein.

VEHICLE TRIP EMISSIONS (UNDER PREVIOUSLY ANALYZED SCENARIO)

		Aggregate Trip Emissions in Pounds / Day					
Development Phase	ADT	CO	NO _x	SO _x	PM ₁₀	PM _{2.5}	ROG
EMFAC 2007 Year 2030 Emission Rates (in grams/mile @ 45 MPH)							
Light Duty Autos (LDA):		0.740	0.108	0.003	0.008	0.008	0.021
Light Duty Trucks (LDT):		0.856	0.102	0.003	0.018	0.018	0.011
Medium Duty Trucks (MDT):		1.042	0.217	0.005	0.020	0.020	0.018
Heavy Duty Trucks (HDT):		1.253	2.818	0.013	0.148	0.148	0.165
Buses (UBUS):		1.771	9.214	0.018	0.099	0.099	0.289
Motorcycles (MCY):		20.198	1.362	0.002	0.016	0.016	2.172
PROPOSED PROJECT ACTION @3,400 NET ADT							
Light Duty Autos (LDA):	2346	133.96	19.55	0.54	1.45	1.4	3.80
Light Duty Trucks (LDT):	660	43.57	5.19	0.15	0.92	0.9	0.56
Medium Duty Trucks (MDT):	218	17.50	3.64	0.08	0.34	0.3	0.30
Heavy Duty Trucks (HDT):	160	15.45	34.75	0.16	1.82	1.8	2.03
Buses (UBUS):	0	0.00	0.00	0.00	0.00	0.0	0.00
Motorcycles (MCY):	17	26.49	1.79	0.00	0.02	0.0	2.85
Total (Σ) =	3,400	237.0	64.9	0.9	4.5	4.5	9.5
Significance Threshold (SDAPCD):		550.0	250.0	250.0	100.0		100.0

Assumes:

Average 35-mile trip distance per vehicle (Proposed Project)

SDAPCD air basin wintertime conditions (50° F)

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Noise

The November 2007 Final EIR determined that development of the previously analyzed project would result in significant noise impacts due to both mobile and stationary sources. Mitigation measures proposed would reduce such impacts to less than significant.

The proposed project would involve site preparation, construction, and project operation activities similar to those identified in the previously analyzed project. From an acoustical standpoint, the primary consideration related to the change in potential noise impacts would result from an increase in traffic noise, relative to the increase in vehicle trips generated by applying a trip generation rate of 0.55. Although the number of estimated vehicle trips has been increased from 3,400 ADT to 1,870 ADT at Phase I and 4,675 total ADT at Phase II buildout with the revised approach to calculating trip generation, no significant increase in noise levels is anticipated as compared to those identified with the previously analyzed project. The proposed project would not result in any new, different, or potentially adverse air quality impacts not previously considered and addressed in the November 2007 Final EIR, and no new mitigation measures would be required. As a result, noise impacts resulting from the proposed project would be similar to those identified in the November 2007 Final EIR for the previously analyzed project description. As such, the potential effects of the increase in project vehicle trips were considered as part of the Final EIR process; however, as impacts would remain the same, the analysis within the EIR was not revised and the potential effects of the increase in ADT on noise are instead acknowledged and addressed herein.

EXISTING PLUS PROJECT RELATED TRAFFIC NOISE INCREASES **(UNDER PREVIOUSLY ANALYZED SCENARIO)**

Roadway Segment	Existing (SPL)	Existing plus Project (SPL)	Project Related Difference (SPL)
<u>Pala Road</u>			
Via Monserate to Gird Road	75.0	75.1	0.1
Gird Road to Sage Road	74.6	74.7	0.1
Sage Road to Old Highway 395	74.7	74.8	0.1
Old Highway 395 to South I-5 Ramp	72.9	73.1	0.2
North I-5 Ramp to Pankey Road	70.9	71.4	0.5
Project Road to Rice Canyon Road	67.0	67.2	0.2
Rice Canyon Road to Couser Canyon Rd	67.2	67.3	0.1

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**EXISTING PLUS PROJECT RELATED TRAFFIC NOISE INCREASES
(UNDER PREVIOUSLY ANALYZED SCENARIO), CONTINUED**

Roadway Segment	Existing (SPL)	Existing plus Project (SPL)	Project Related Difference (SPL)
<u>Old Highway 395</u>			
Dulin Road to West Lilac Road	67.1	65.5	0.2
Reche Road to Stewart Canyon	68.4	68.8	0.4
East Mission Road to Reche Road	66.2	67.3	1.1
<u>Reche Road</u>			
South Live Oak Park Road to Gird Road	69.2	69.1	0.1
Gird Road to Wilt Road	68.5	68.6	0.1
Wilt Road to Tecalote Drive	68.9	69.3	0.4

Notes: Source: RBF, 7/07.

SPL = sound pressure level in dBA at 50-feet from the road edge. CNEL = community noise exposure level.

All values given in dBA CNEL. Contours assumed to be line-of-sight perpendicular (⊥) distance.

**EXISTING PLUS CUMULATIVE PLUS PROJECT RELATED
TRAFFIC NOISE INCREASES (UNDER PREVIOUSLY ANALYZED SCENARIO)**

Roadway Segment	Existing plus Cumulative (SPL)	Existing plus Cumulative plus Project (SPL)	Project Related Difference (SPL)
<u>Pala Road</u>			
Via Monserate to Gird Road	75.5	75.5	0.0
Gird Road to Sage Road	75.1	75.2	0.1
Sage Road to Old Highway 395	75.2	75.3	0.1
Old Highway 395 to South I-5 Ramp	73.7	73.8	0.1
North I-5 Ramp to Pankey Road	72.9	73.3	0.4
Project Road to Rice Canyon Road	68.1	68.2	0.1
Rice Canyon Road to Couser Canyon Rd	68.0	68.1	0.1
<u>Old Highway 395</u>			
Dulin Road to West Lilac Road	68.9	68.9	0.0
Reche Road to Stewart Canyon	69.8	70.1	0.3
East Mission Road to Reche Road	67.4	67.6	0.2
<u>Reche Road</u>			
South Live Oak Park Road to Gird Road	69.3	69.4	0.1
Gird Road to Wilt Road	68.9	69.0	0.1
Wilt Road to Tecalote Drive	69.4	69.5	0.1

Notes: Source: RBF, 7/07.

SPL = sound pressure level in dBA at 50-feet from the road edge. CNEL = community noise exposure level.

All values given in dBA CNEL. Contours assumed to be line-of-sight perpendicular (⊥) distance.

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**TABLE X-3
2030 PLUS PROJECT RELATED TRAFFIC NOISE INCREASES
(UNDER PREVIOUSLY ANALYZED SCENARIO)**

Roadway Segment	Existing plus Cumulative (SPL)	Existing plus Cumulative plus Project (SPL)	Project Related Difference (SPL)
<u>Pala Road</u>			
Via Monserate to Gird Road	77.8	77.8	0.0
Gird Road to Sage Road	75.9	76.0	0.1
Sage Road to Old Highway 395	76.0	76.1	0.1
Old Highway 395 to South I-5 Ramp	74.4	74.6	0.2
North I-5 Ramp to Pankey Road	74.6	74.8	0.2
Project Road to Rice Canyon Road	71.2	71.2	0.0
Rice Canyon Road to Couser Canyon Rd	71.1	71.1	0.0
<u>Old Highway 395</u>			
Dulin Road to West Lilac Road	71.8	71.8	0.0
Reche Road to Stewart Canyon	73.8	73.9	0.1
East Mission Road to Reche Road	74.1	74.2	0.1
<u>Reche Road</u>			
South Live Oak Park Road to Gird Road	70.5	70.6	0.1
Gird Road to Wilt Road	70.2	70.4	0.2
Wilt Road to Tecalote Drive	70.2	70.3	0.1

Notes:

Source: RBF, 7/07.

SPL = sound pressure level in dBA at 50-feet from the road edge. CNEL = community noise exposure level.

All values given in dBA CNEL. Contours assumed to be line-of-sight perpendicular (⊥) distance.

- E-39 The District acknowledges and appreciates this comment. Please see Response to Comment E-38, above.
- E-40 The District concurs with this comment. The TIAR notes the existing General Plan Circulation Element and proposed General Plan 2020 roadway classifications. A description of the Horse Ranch Creek Road alignment is included in Section 2.2.6 of the EIR. This comment resulted in minor changes to the Draft EIR.
- E-41 Comment noted. The TIAR and EIR have been revised to discuss the extension of Horse Ranch Creek Road and how the alignment correlates to the current Circulation Element and the General Plan 2020 Circulation Element. Refer to Sections 2.2.1 and 2.2.6 of the EIR.

- E-46 44. The TIAR should discuss the project's potential constriction traffic impacts.
- E-47 45. The TIAR and DEIR should identify the project's mitigation measures in a consistent manner. There are inconsistencies between Table S-1 in the DEIR and Table ES-1 in the TIAR. For example, the Table ES-1 identifies three possible mitigation measures for the project's impacts to the SR-76/Sage Road intersection that include additional lanes, fair-share contribution, and TIF participation but Table S-1 does not identify the same mitigation measures.
- E-48 46. The project applicant/consultant should verify that the roadway facilities that are cumulatively impacted by the proposed project in which a TIF participation is recommended are eligible TIF roadway facilities. For example, the SR-76/Sage Road intersection is not considered a TIF roadway facility.
- E-49 47. The TIAR should clarify the implementation process for the short-term and long-term mitigation measures. The TAIR should clarify how the short-term and long-term mitigation measures relate to the project's direct and cumulative impacts. The TIAR should also clarify the schedule/phasing of when the mitigation measures need to be implemented in order to mitigate the project's significant impacts in a timely manner.
- E-50 48. Table 19 (Pg.54) should identify the project's Existing plus Project impacts as direct impacts.

ALTERNATIVES

- E-51 49. The EIR does appear to present a reasonable range of alternatives that would feasibly attain most of the basic objectives of the project and substantially lessen significant effects of the project. The DEIR concludes that significant impacts to both aesthetics and traffic and transportation will remain significant and unmitigated with project implementation, therefore the DEIR should include alternatives that lessen the impacts to those resources. The DEIR presents two no project alternative scenarios and a Light Industrial Alternative. The no project alternatives do not meet basic project objectives and the Light Industrial Alternative does not meet the basic project objectives nor does it substantially reduce any of the significant effects of the proposed project. The EIR should present an analysis of alternatives for a community college that would meet basic project objectives but with an alternative design to reduce the aesthetic impacts and a reduced project alternative which would potentially reduce traffic and transportation impacts to a mitigated level.

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- E-42 Comment noted. Refer to Response to Comment E-41, above. Refer also to Sections 1.1.3.1 and 2.2.6 of the EIR for discussion. Additional discussion was added to the EIR to address the project's conformance with the General Plan with regards to the proposed roadway realignment.
- E-43 Comment noted. The EIR has been revised to include discussion of the acquisition of offsite right-of-way and the mechanism required to acquire such lands. Refer to Section 1.1.3.1 of the EIR.
- E-44 The District concurs with this comment. Based on the County's traffic impact guidelines criteria, the traffic analysis includes all roadway facilities that operate at LOS E/F with 25 or more peak hour project trips. Intersections operating at LOS E/F that were not included in the study area for the TIAR are projected to include less than 25 peak hour trips, based on the SANDAG Series 10 traffic model, which was updated to reflect the County's 2020 General Plan. The intersections of Mission Road / Old Highway 395 and Mission Road / I-15 Northbound Ramps currently operate at LOS F under existing conditions. It has been confirmed that less than 25 peak hour trips will travel through these intersections. Therefore, these locations were omitted from the project study area. This comment did not result in changes to the Draft EIR.
- E-45 The District concurs with this comment. The land use assumptions in the traffic model are consistent with the land use assumptions included in the recently updated General Plan 2020 traffic model update conducted by the County. Modifications to the traffic model were not made to reflect any changes, aside from the proposed project to account for other projects that may be inconsistent with the General Plan. However, ADT volumes forecast for 2030 were compared to the existing plus cumulative project volumes to ensure that 2030 volumes were at least equal to if not greater than the short term volumes. This comment did not result in changes to the Draft EIR.
- E-46 The District acknowledges and appreciates this comment. Earthwork for the proposed college site will be balanced onsite, with use of the borrow pit to the northeast within the Campus Park ownership. Therefore, it will generally not be necessary for large trucks hauling materials to travel to or from the site along area roadways, thereby potentially affecting traffic congestion. Construction-related traffic will therefore generally be limited to bringing initial construction related materials to the site, construction workers, and other construction-related services such as inspectors or

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subcontractors. Such vehicle traffic to and from the site will be intermittent and therefore, impacts to the surrounding area will be minimal and temporary. The traffic related to construction is anticipated to less than the forecast traffic volume evaluated in the short term conditions for the project. Therefore, an assessment of construction-related traffic has not been included in the traffic report. This comment did not result in changes to the Draft EIR.

- E-47 The District concurs with this comment. The TIAR and DEIR will be modified to include consistent mitigation measures. Refer to Section 2.2.8 and Table S-1 of the EIR.
- E-48 The District concurs with this comment. As directed by the County and Caltrans, the District will contribute fair share payments to the County's TIF fund for project impacts, as appropriate; refer to the mitigation measures identified in Section 2.2.8 of the Draft EIR. The EIR was revised, as appropriate, to identify which improvements the District will contribute fair share payments to.
- E-49 The District concurs with this comment. The updated traffic impact analysis report includes a table that summarizes each of the project impacts (direct or cumulative). However, as noted above, no short-term impacts relative to construction were identified. All physical improvements proposed as mitigation will be constructed with initial construction and prior to site occupancy; no phasing of improvements is proposed. However, the District will make fair share payments for project impacts, as appropriate, at the time when project vehicle trips trigger a significant impact. A summary table (Table 2.2-24) has been included in the TIAR (see Appendix B) and EIR (Section 2.2) to identify proposed mitigation and whether the impact is direct or cumulative.
- E-50 Comment noted. Table 21 of the TIAR and Table 2.2-24 of the EIR have been revised to indicate that the Existing Plus Project impacts identified are direct.
- E-51 The District does not concur with this comment. The Draft EIR includes a discussion regarding the rejection of a reduced project alternative. The rationale provided in the Draft EIR states that reduced project alternative would not meet the basic project objectives and would simply shift project impacts elsewhere; refer to Section 5.1.1 of the EIR. Furthermore, significant unmitigated impacts to aesthetics and traffic identified in the EIR would occur with or without implementation of the proposed project.

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E-52

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 Kristin Blackson at (858) 692-1087.

Sincerely,


ERIC GIBSON, Interim Director
Department of Planning and Land Use

cc: Dustin Steiner, Policy Advisor, Board of Supervisors, District 5, MS A500
Vince Nicoletti, CAO Staff Officer, DCAO, M.S. A-6
Nael Areigat, Project Manager, Department of Public Works, MS 0336
Francisco "Nick" Ortiz, Department of Public Works, Transportation Division,
MS 0334
Fallbrook Community Planning Group
Paul Dawson, Fire Marshal; Fire Services Section, Department of Planning and
Land Use
Maryanne Vancio, Trails Program Coordinator, Department of Parks and
Recreation, M.S. 029
Jennifer Campos, Interim Land Use/Environmental Planning Manager,
Department of Planning and Land Use, MS 0650
Priscilla Jaszowski, Administrative Secretary, Department of Planning and
Land Use, MS 0650

Reference County Project IJN 3999 07-024

Comment Letter E – County of San Diego, October 12, 2007

Therefore, a reduced project, able to meet the main project objectives, would not reduce significant and unmitigated impacts that would result from the proposed project to a mitigated level. Consideration of a different use on the site would not meet project objectives of providing an educational center for the northern portion of the College District. As such, no additional alternatives were considered. This comment did not result in changes to the Draft EIR.

E-52

The District acknowledges and appreciates this comment. However, this comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. The comment did not result in changes to the Draft EIR.



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October 12, 2007

File Number: 7000300

Ms. Kelley Hudson-MacIsaac
Palomar Community College District
1140 West Mission Road
San Marcos, CA 92069

Dear Ms. Hudson-MacIsaac:

SUBJECT: Palomar North Draft Environmental Impact Report (DEIR)

Thank you for the opportunity to review the draft EIR (DEIR) for the Palomar North project. Please reference our previous letter in response to the Notice of Preparation (dated February 26, 2007) in which we requested a park-and-ride lot be provided as a part of the project.

As previously mentioned, SANDAG's RTP Unconstrained Network shows plans for future High-Occupancy Vehicle (HOV) Lanes and interregional transit service along the Interstate 15 (I-15) corridor between Escondido and Riverside County. Locating park-and-ride facilities and transit stations along the I-15 corridor is necessary to serve existing and future development such as the proposed Palomar Community College North Education Center. It is important to carefully locate these facilities to maximize the ease of access to both the freeway and nearby development.

We continue to respectfully request that a park-and-ride be included in the site plan for the proposed Palomar Community College North Education Center.

In addition, please consider the following mitigation measures as a part of your project:

Please coordinate with the North County Transit District to determine the feasibility of transit at this location. Absent the provision of public transit, please consider a shuttle to the Escondido Transit Center and North County Fair for connectivity to/from regional transit services, including the proposed SPRINTER Rail Service that will start in December 2007 (terminating at the Escondido Transit Center) and the I-15 Bus Rapid Transit, as well as the existing Express Route 20 that originates at the Westfield North County/North County Fair Mall.

Comment Letter F – SANDAG, October 12, 2007

F-1

The District acknowledges and appreciates this comment. The Draft EIR is a programmatic EIR and the proposed project is therefore conceptual in nature. The Conceptual Site Plan has been prepared with consideration for the facilities that the District anticipates will be necessary to meet future educational needs of students and staff. As such, the construction of buildings and implementation of instructional programs will be determined based on future demands. Initial development on the site will consist of approximately 75,000 to 150,000 square feet (s.f.) of building space and related parking. Development of the remainder of the project site will be phased over several decades, with an estimated total building square footage of approximately 380,000 s.f. at buildout, which is anticipated to occur around the year 2030. Due to the limited capacity of the initial development and associated student enrollment, as well as uncertainty as to the degree of future demand for additional facilities, provision of a park-and-ride lot or designation of specific funding for alternative transportation facilities or programs would not be merited or feasible for the District at this time. As a result, no such facilities or programs are proposed with the project; however, as the student population and the population in the Fallbrook area grow over upcoming years, a sufficient rider base may be achieved to justify alternative transportation facilities in the project area, and may be considered by the District at such a time. The District recognizes the benefits of such a facility with consideration for existing and future traffic circulation to and from the Fallbrook area. This comment did not result in changes to the Draft EIR.

F-2

The District acknowledges and appreciates this comment. The North County Transit District has stated in their comment letter, included as Letter G, that they currently do not operate fixed route bus service near the proposed site, nor do they currently have plans or funding to operate transit service to the site in the foreseeable future. Furthermore, for the reasons stated above in Response F-1 regarding provision of a park-and-ride lot, providing shuttle service from the Escondido Transit Center and/or the North County Fair is not merited, nor feasible for the District at this time due to funding, and is therefore not proposed as part of the project. However, the District will consider providing shuttle service to/from public transit facilities in the future as the student population continues to grow and additional funding may allow for such service to be established. It should be noted that one of the Palomar Community College District's objectives for developing an education center in Fallbrook is to provide facilities closer to students living in North San

Comment Letter F – SANDAG, October 12, 2007

Diego County. Facilities in this location will help reduce driving times and the number of miles traveled of students and faculty living in North San Diego County. The District does not actively recruit students in Riverside County, due to an agreement with the San Jacinto Community College District. Therefore, the District does not plan to coordinate transit facilities or routes for the Riverside Transit Agency at this time.

F-2
cont'd

You should also coordinate with the Riverside Transit Agency for possible coordination with transit to/from Riverside County.

Please contact me to discuss the additional mitigation measures discussed above.

Sincerely,



TRAVIS CLEVELAND
Assistant Regional Planner

TCL/dsn

cc: Stefan Marks, North County Transit District (NCTD)
Mark Stanley, Riverside Transit Agency

Comment Letter E – County of San Diego, October 12, 2007

October 12, 2007

Ms. Kelley Hudson-MacIsaac
Palomar Community College District
1140 West Mission Road
San Marcos, CA 92069

RE: Draft EIR for the Palomar Community College-North Education Center Facilities Master Plan

Dear Ms. Hudson-MacIsaac:

- G-1 Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Palomar Community College District North Education Center District Master Plan, which proposes development of a new community college campus on 85 acres of presently undeveloped land, generally located east of Interstate 15, between Pala Road/State Route 76 and Pala Mesa Heights Drive, in the Fallbrook area.
- The North County Transit District (NCTD) previously submitted comments regarding this DEIR in letters dated February 22, 2007 and July 30, 2007. These comments have not been addressed in the DEIR. NCTD asks that they are incorporated into the final EIR.
- G-2 The North County Transit District (NCTD) does not currently operate any fixed route bus service near this proposed development site and has no current plans or funding to operate transit service to it in the foreseeable future. The closest existing NCTD bus service to this site is in either downtown Fallbrook or northern Escondido.
- G-3 NCTD requests that the EIR comprehensively address management of the transportation impacts resulting from development of this scale in such a remote location. Currently, the Initial Study prepared by RBF Consulting states that the project will produce a less than significant impact with mitigation, in terms of an increase in traffic, or in exceeding a level of service standard for designated roads or highways. Furthermore, the Initial Study states that the project will have no impact on adopted policies, plans, or programs supporting alternative transportation. NCTD asserts that the project's impacts on traffic and alternative transportation may be understated in the Initial Study and that further analysis is required. Requests for further analysis are explained in greater detail below.
- G-4 In particular, the following requests regarding alternative modes of transportation are of crucial importance for visitors to the campus (students and employees) with lower income levels. Palomar Community College's statement of values emphasizes celebration of diversity; it should be noted that optimal access to the campus via alternative modes of transportation is particularly important for students and employees of color, many of whom have lower income levels, and therefore do not own or have access to automobiles. Such students and employees therefore rely on transit, bicycling, or walking as their means of transportation to campus.
- G-5 Additionally, the initial study must acknowledge that this project will produce impacts on the environment, as associated increases in enrollment will result in additional auto trips that will be generated from this expansion. These additional auto trips will add to congestion on Mission Road and other surrounding arterials and freeways, contributing to an increase in greenhouse gas emissions and impacting air quality. The initial study must describe how such environmental impacts will be mitigated.
- G-6 NCTD requests that the EIR address the following issues: travel demand, pedestrian circulation, and encouraging alternative modes of transportation. These issues are identified below:
- G-7

- G-1 The District acknowledges and appreciates this comment. Previously submitted comments (dated February 22 and July 30, 2007) regarding the Notice of Preparation, as provided by NCTD, have been reviewed and considered by the District. Many of the comments appear to be included again in the October 12, 2007 letter, and are addressed herein.
- G-2 The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- G-3 Comment noted. The Initial Study was prepared prior to the EIR to assess potential environmental impacts relative to the proposed project. These issue areas were then further evaluated in the EIR for significance.
- The findings of the traffic analysis prepared for the project provides the basis for the discussion in the EIR; refer to Section 2.2 and Appendix B of the EIR. The traffic analysis identifies significant impacts and provides mitigation measures to reduce such impacts; however, impacts were identified that cannot be reduced to less than significant.
- G-4 The EIR prepared is a programmatic EIR, and therefore, provides for future development of the site on a programmatic level, rather than providing specific design details. The District is willing to work with NCTD in the future to consider integrating alternative means of transportation into the school's program in the future; however, at this time, only a Conceptual Site Plan for development of the site has been prepared, which does not offer interior street design or features such as bus stops or bike lanes. As noted, the NCTD does not currently operate fixed route bus service near the proposed site, and has no current plans or funding to operate transit service in the foreseeable future. The District is willing to consider alternative transportation programs for the transport of students and staff to and from the North Education Center, as appropriate, and as funding is made available.

In addition, the North Education Center will be developed over the next several decades as student demand for educational programs increases. As such, future demand for and accessibility to alternative means of transportation can only be analyzed on a programmatic level at this time. Initial development would consist of approximately 75,000 to 150,000 square feet (s.f.) of development and related parking. The remaining development would occur over several decades, with an

Comment Letter G – North County Transit District, October 12, 2007

estimated total building square footage of approximately 380,000 s.f., at full buildout around the year 2030.

Due to the limited capacity of the initial development, providing mass transit or alternative transportation would not be merited in the near future. Based on growth conditions in the proposed project area, future transportation conditions may warrant the establishment of alternative transportation facilities or programs in the area. However, the majority of demand for alternative transportation or mass transit would not be created by the North Education Center, and the District would not create and fund such programs simply to serve the proposed project. Instead, the establishment of such facilities and programs would depend on the growth of an adequate ridership base for justification. As such, the analysis contained in the Initial Study is adequate at this time, as the proposed project would not impact adopted policies regarding alternative transportation.

- G-5 The District acknowledges and appreciates this comment. However, the issue raised regarding people of color or of lower income levels having increased dependence on public transportation is not a specific environmental issue pursuant to CEQA; however, this condition will be considered by the District in the future at the time when the implementation of and/or funding for alternative transportation programs is deemed appropriate. Furthermore, refer to Response to Comment G-4, regarding discussion of the present lack of an adequate demand or ridership base to support such means of alternative transportation at this time. This comment did not result in changes to the Draft EIR.
- G-6 The District does not concur with this comment. The EIR, which was prepared to further analyze those issues identified in the Initial Study, acknowledges that the proposed project will have significant environmental impacts and proposes appropriate mitigation to reduce such impacts. Potential traffic impacts, including congestion to roadways, as a result of additional vehicular trips that will be generated from the proposed project have been analyzed and mitigation has been proposed to reduce project-related impacts; refer to Section 2.2 of the Draft EIR. Furthermore, potential impacts to air quality, including those potentially resulting from greenhouse gas emissions, are identified in the EIR and mitigation is proposed to reduce such impacts to less than significant; refer to Section 4.1. As such, this comment did not result in changes to the Draft EIR.

G-7
cont'd

1. Travel demand:

Specifically, the traffic impact analysis of the EIR should address transportation impacts resulting not just from the projected 8,500 students, but also from faculty and employees, and trips (presumably auto vehicle) that will be generated by vendors and other visitors conducting business on campus. Projected trip generation should be quantified according to these three sources of trips, so that mitigation strategies may be designed to appropriately address each source. Accordingly, the projected mode shares (automobile, transit, carpool, vanpool, non-motorized) should be categorized according to the above sources (students, faculty, employees, etc.) as well.

G-8

In addition, the EIR should acknowledge travel demand that this project will generate from not only the Northern San Diego County area, but from Southern Riverside County as well. This demand should be projected to the extent possible within the EIR's traffic impact analysis, as a significant number of students, faculty, employees, and others conducting business on campus will likely originate from Southern Riverside County. Trip origins from locations within San Diego County should be quantified as well, so that mitigation strategies can be planned appropriately.

G-9

Finally, the EIR should clearly identify potential mitigation measures such as Interstate 15 interchange improvements and the construction of new direct access ramps to and from Interstate 15 for use by buses, carpools, and vanpools. Such measures could significantly reduce project impacts on the region's transportation system, particularly with respect to the trips that will be generated from both Northern San Diego and Southern Riverside Counties.

2. Pedestrian circulation:

G-10

The Initial Study states that "the proposed project would support alternative means of transportation by providing a campus environment oriented toward pedestrian travel..." To this end, the EIR should include an analysis of pedestrian circulation through the plan area. The street network and structures within the plan area should be designed to encourage pedestrian trips to, from, and within the development. Amenities such as landscaping, enhanced crosswalks, and pedestrian-supportive lighting should be included. Specific guidelines for creating a pedestrian-friendly environment can be found in *Planning and Designing for Pedestrians*, at www.sandag.org/urbandesign. All pedestrian paths included in this analysis should be ADA-compliant, so as to facilitate safe access for seniors and people with disabilities.

3. Reducing automobile trips by encouraging alternative modes of transportation:

G-11

The EIR should include an analysis of measures designed to encourage alternative modes of transportation to and from the campus. These measures include:

- a. Funding transit services for a demonstration period (5 years) to encourage transit use by students, faculty, and employees –
 - Fund transit service connecting the campus with other regional transit centers such as Escondido, or with destinations in Southern Riverside County;
 - Fund an express shuttle connecting the North Education Center with the main Palomar Community College campus in San Marcos;
 - Plan for ADA-compliant bus stops accessibly located throughout the campus, complete with passenger amenities such as covered shelters, benches, trash cans, and solar lighting (if the area is not well-lit).

Comment Letter G – North County Transit District, October 12, 2007

G-7

Refer to Response to Comment A-3. Potential traffic impacts as a result of additional vehicular trips that will be generated from the proposed project have been analyzed to include such vehicle trips, and mitigation has been proposed in the EIR to reduce such impacts; refer to Section 2.2 of the Draft EIR. Additional discussion regarding the trip-generation rate has been included in Section 2.2.3.1 for clarification.

As the Draft EIR is a programmatic EIR and the ultimate buildout of the North Education Center is not anticipated until the year 2030, the traffic analysis did not forecast alternative transportation modes, such as carpooling. As such, the estimated project-generated traffic is a conservative number and would only be reduced if alternative transportation, such as carpooling or ridesharing programs, were funded and effectively implemented. Refer also to Responses to Comments G-4 and G-5, above.

G-8

The District does not concur with this comment. The Palomar Community College District does not actively recruit students from outside of its District, including the San Jacinto Community College District to the north, which serves Southern Riverside County. Therefore, to assess future trips generated by travelers to and from the College from Riverside County would be speculative. The traffic analysis includes consideration for vehicles traveling to and from the site from the northern portion of San Diego County that is served by the District. Refer also to Response to Comment G-4 above regarding buildout of the project site and associated provision of educational programs over the next several decades. This comment did not result in changes to the Draft EIR.

G-9

The District does not concur with this comment. Potential traffic impacts, including the project's contribution to congestion on area roadways, have been analyzed and mitigation has been proposed to reduce potential impacts; refer to Section 2.2 of the Draft EIR. Furthermore, refer to Responses to Comments G-4, G-7, and G-8, above.

G-10

The District acknowledges and appreciates this comment. The Draft EIR is a programmatic EIR and the proposed site plan is, at this time, conceptual. The Conceptual Site Plan been designed with the anticipation of those facilities the District anticipates will be needed to meet future demands; however, construction details, such as for roadways, sidewalks, and pathways, will be designed based on future facilities demand and relation to the other facilities and infrastructure which exists on the site at the time development is proposed. As such,

G-12

b. Initiation of a Transportation Demand Management (TDM) program to encourage transit use by students, faculty, and employees –

- Establish a universal transit pass program funded by a portion of student fees;
- Offer pre-paid or greatly reduced transit passes to faculty and staff;
- Provide financial incentives for faculty and staff that commute via alternate modes such as transit, carpooling, vanpooling, bicycling, or walking;
- Establish a full-time transportation demand management coordinator to oversee the above programs and provide resources to commuters seeking to learn about available commute options and incentives;
- Clearly identify how many parking spaces are designated for students versus faculty and staff – implementation of a TDM program could reduce the number of parking spaces required.

G-13

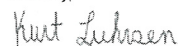
c. Providing facilities to encourage bicycle travel, to, from, and within campus -

- Include ample bicycle parking (lockers and U-loops) for students, faculty, and employees throughout the campus;
- Include bike lanes on the planned street network surrounding and through campus;
- Provide shower facilities for bicycle commuters.

G-14

NCTD will be pleased to work with Palomar Community College District to successfully address the issues listed above. If you have any questions regarding our comments, please feel free to contact me at (760) 966-6546 or by e-mail at kluhrsen@nctd.org.

Sincerely,



Kurt Luhrsen
Principal Planner

Cc: Coleen Clementson, SANDAG
Dave Schumacher, SANDAG
Chris Schmidt, Caltrans District 11
Mark Stanley, Riverside Transit Authority

Comment Letter G – North County Transit District, October 12, 2007

an analysis of pedestrian circulation either within the proposed project site, or with linkages to outside facilities, cannot be determined at this time. However, the District will apply standard design guidelines that will be utilized in the design of the pedestrian areas, including amenities such as landscaping, enhanced crosswalks, pedestrian-supportive lighting, and ADA-compliant ramps and other infrastructure, to ensure the adequacy of the site with consideration for pedestrian travel. Furthermore, SANDAG's guidelines as found in *Planning and Designing for Pedestrians* will be considered by the District in future design of the site, as requested. This comment did not result in changes to the Draft EIR.

G-11

The District acknowledges and appreciates this comment. Initial development will include construction of approximately 75,000 to 150,000 s.f. of structure, with future development determined by increasing demands for additional facilities; however, due to the limited capacity of the initial development and the uncertainty of future demand for educational services at the North Education Center, the provision of mass transit, funding for alternative transportation (such as those mentioned in this comment), or bus stops with the proposed project would not be merited or feasible for the District at this time. Refer also to Response to Comment G-4, above. This comment did not result in changes to the Draft EIR.

G-12

The District acknowledges and appreciates this comment. Such facilities to support alternative means of transit will be considered at the time when specific designs are prepared for development onsite. The District is willing to consider and encourage such means of transportation as justified by future demand. Furthermore, refer to Responses to Comments G-4 and G-11. This comment did not result in changes to the Draft EIR.

G-13

The District acknowledges and appreciates this comment. Such facilities to support bicycle travel will be considered at the time when specific designs are prepared for development onsite. The District is willing to consider and encourage such means of transportation as justified by future demand. Furthermore, refer to Responses to Comments G-4 and G-11. This comment did not result in changes to the Draft EIR.

G-14

The District acknowledges and appreciates this comment. NCTD's request to work with Palomar College to successfully address the comments has been noted. This comment did not result in changes to the Draft EIR.

FALLBROOK COMMUNITY PLANNING GROUP
205 Calle Linda, Fallbrook CA 92028
Jim Russell, Chair

September 18, 2007

Ms. Kelley Hudson-MacIsaac
Manager, Facilities Planning
Palomar Community College District
1140 West Mission Road, San Marcos CA 92069

H-1 The Fallbrook Community Planning Group was asked you to review the Draft Environmental Impact Report for the Palomar Community College District North Education Center proposed to be built in Fallbrook. This project was on the agenda of the Planning Group meeting of September 17, 2007, and for each of the five Group sub-committees which met the preceding week. Alex Jewell of RBF Consulting represented Palomar College at each of those six meetings.

H-2 The majority of the study was done by the sub-committees. At the Planning Group meeting, each of the sub-committees submitted their recommendations. The entire Group discussed these committee reports, and decided to place a compendium of the five reports in the Group meeting minutes. There is inherently some overlap in these reports, but that emphasizes our interest in seeing that you are fully informed of our thoughts regarding your proposal. In spite of these seemingly negative concerns, we still are fully in favor of your proposal to locate a satellite campus in Fallbrook.

H-3 Draft Environmental Impact Report (EIR) for the Palomar Community College District – North Education Center. The project proposes development of a new Community College education center to serve the Northern San Diego County area on 85 acres located east of I-15 and north of SR76. The proposed Education Center would be constructed to serve a projected student population of approximately 8,500 students when completed. It is estimated that development of the site would be phased over approximately twenty years, with ultimate build out occurring around the year 2030. Contact person Kelley Hudson MacIsaac 760-744-1150 x2772, kmacisaac@palomar.edu. The EIR can be reviewed at the Palomar Community College, Facilities Planning, 1140 West Mission Road, San Marcos, CA or at the Fallbrook Public Library. Comments to be sent to Palomar Community College, Facilities Planning, 1140 West Mission Road, San Marcos, CA attention Kelley Hudson MacIsaac. Deadline for comments is 12 October 2007. **Land Use, Circulation, Parks & Recreation, Public Facilities & Design Review Committees.** Community input. Voting item. (8/29)

Circulation Committee Report

H-4 Alex Jewell presented an overview of the project: 56 acres of campus and 30 acres of native area. (The native area will not be an open space easement; it will simply be left alone. If future development is contemplated in the native area, a new EIR will be required.) The campus s projected to hold 8,500 students at build out, anticipated in 2030. Anticipated EFT (equivalent full-time) students is 2833 which will generate 3400 ADT (Average Daily Trips). Palomar

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- H-1 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- H-2 The District acknowledges and appreciates this comment; however, the issues raised are not at variance with the content of the Draft EIR. The author's support has been noted. This comment did not result in changes to the Draft EIR.
- H-3 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- H-4 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.

**Comment Letter H – Fallbrook Community Planning Group –
Jim Russell, Chair, September 18, 2007**

- H-4 cont'd College assessed 10 intersections as its fair share of traffic impacts, but not all of them are planned for improvement. Instead the College will fully improve three intersections –Horse Ranch Creek and 76, Pankey Road and 76, and Stewart Canyon/Pankey/395/Canonita at a total cost of \$1.5 million, three times the estimated fair share value of the College's required improvements. They will also build two lanes on the west side of Horse Ranch Creek Road.
- H-5 Committee members expressed concerns about the need to complete the extension of Pala Mesa Drive to the east in a timely manner and suggested that Campus Park should be required to build this road before the college campus opens. Fire Department response time is also at issue.
- H-6 Committee members commented that the projected enrollment seems insufficient, (the original estimate was 12,000 students) and expressed concerns about the numbers of students coming from Riverside. At the February 13 meeting of the Circulation Committee Bonnie Ann Dowd, Vice President of Finance and Administrative Services of Palomar College assured the committee that San Jacinto Community College District was opening their own community college "Center" in Temecula so that it was not likely that Riverside County students will contribute significantly to the Fallbrook enrollment. However, Palomar College President Robert Deegan commented to Jack Wood that Palomar could not prevent Riverside students from attending the Fallbrook "Center," suggesting that the Riverside students might indeed be more numerous than previously suggested and contribute to increased congestion at I-15 and 76. Committee members requested clarification of this issue.
- H-7 Committee members also expressed concerns that improvements to Highway 76 were already being paid for by other projects in the area and therefore the College should address circulation issues to the north. It was also suggested that the College's fair share contribution be increased to anticipate future increases in enrollment.
- H-8 Eileen Delaney moved to recommend that:
- H-9 1) The extension of Pala Mesa Road to the east be completed prior to or concurrent with the completion of the Palomar College "Center" campus and be paid for by Campus Park.
- H-10 2) The student enrollment projection is insufficient and needs to more accurately reflect the original 12,000 estimated student enrollment.
- H-11 3) The College's fair share should be increased for traffic improvement and mitigation, and the College should look seriously at considering such improvements as a diamond interchange on I-15 at Stewart Canyon. In regard to their planned intersection improvements on SR 76, their money would better spent on improvements to the west side of I-15. If their construction is so much earlier than other projects, and the SR76 projects must be built by the College, they should have an arrangement for payback for the Horse Ranch Creek Road and Pankey Road intersections. The College should look at other improvements to the west side of Interstate 15 or areas other than Pankey Road and Highway 76.
- H-12 4) The Traffic Study should be reexamined to more accurately reflect enrollment trips, access, and the project trip distribution.
- H-13 The motion was approved unanimously.

Design Review Committee Report

- H-14 Alex Jewell of RBF Consulting presented an overview of the Palomar College project. Chair Delaney outlined a number of areas that the Design Review Committee should discuss, including:
- H-15 1) The estimated student population is inadequate which will impact the parking, and she urged the College to recalculate the number of students to the original 12,000 estimate.
- 2) Lighting. There is currently no lighting plan, and Delaney urged the College to consider ballard lighting (for pathway lighting primarily) and to incorporate the dark sky guidelines in their lighting plan.

- H-5 Comment noted. As identified in the EIR, the number of vehicle trips generated by the College would not justify the cost of constructing the extension of Pala Mesa Drive to connect with Horse Ranch Creek Road. The extension is not necessary to facilitate adequate circulation to and from the College site. In addition, buildout of the proposed College site is not anticipated until the year 2030. As such, Horse Ranch Creek Road, as well as the additional offsite roadway improvements proposed, would be adequate to support traffic generated by the College over time. It is anticipated that the requirement to build Pala Mesa Drive extension would be satisfied as a condition of approval for one of several planned projects in the surrounding area in the near future; however, if the roadway is not constructed and the student population served by the College grows to generate the need for construction of the roadway, additional traffic analysis may be undertaken at that time to determine whether or not the road extension is required. This comment did not result in changes to the Draft EIR. Refer also to Response to Comment Letter I.

The proposed project would not directly result in the expansion of area fire protection services. The NCFPD has indicated that it can adequately provide service to the project, and that response times can be met. The proposed project would not change existing fire service response times and would not require new or physically altered governmental facilities. Refer also to Responses to Comment Letter I.

- H-6 Comment noted. The District acknowledges and appreciates this comment. The original estimated student population of 12,000 at full buildout was estimated utilizing a standard calculation typically used for generating student population for a higher education campus, based on the property acreage. This number was subsequently revised to 8,500 based upon further review of empirical demographics data by research and development staff. Further consideration for attendance at the District's other facilities, as well as consideration for the programs and services that are anticipated to be offered at the North Education Center, supported revision of the number.

The Palomar Community College District does not actively recruit students from outside of its District, including the San Jacinto Community College District to the north, which serves Southern Riverside County. Therefore, to assess future trips generated by travelers to and from the College from Riverside County would be speculative. The traffic analysis includes consideration for vehicles

Comment Letter H – Fallbrook Community Planning Group –
Jim Russell, Chair, September 18, 2007

traveling to and from the site from the northern portion of San Diego County that is served by the District.

- H-7 Improvements are underway along SR 76 as the condition of the Palomar Aggregate Quarry project. The District has worked closely with the County and Caltrans to identify appropriate mitigation measures for each of the roadway segments and intersections potentially impacted by the project, as feasible. The District will contribute fair share payments, as appropriate, to the County's TIF fund. Fair share payments will be determined by the District at the time in the future when appropriate, to reduce project impacts.

The estimate prepared for fair share improvements generated by the proposed project considers the anticipated North Education Center's population of 8,500 at full buildout. The proposed improvements would effectively mitigate for traffic impacts (as feasible) generated by this student population, which is anticipated to be achieved over the next several decades, and not in the near future. Refer to Appendix B of the EIR for additional discussion. Therefore, the District does not concur that fair share contributions should be increased to anticipate future increases in enrollment. Discussion of fair share requirements was revised within the Draft EIR.

- H-8 Comment noted. The extension of Pala Mesa Drive is not required with the proposed project, as traffic generated by the College would not justify such construction, and adequate access can be provided by the construction of Horse Ranch Creek Road. It is anticipated that Pala Mesa Drive would be constructed in the future as a condition of other large-scale projects in the surrounding area; however, the College would not be responsible for funding or constructing the extension of this roadway. Refer also to Responses to Letter G. No change was made to the Draft EIR as the result of this comment.

- H-9 Comment noted. Refer to Response to Comment H-6, above. No change was made to the Draft EIR as the result of this comment.

- H-10 Comment noted. The District acknowledges and appreciates this comment. Refer to Response to Comment H-7, above.

As determined by the traffic analysis, traffic generated by the College, even at full buildout, would not justify the construction of a diamond interchange at the Stewart Canyon Road/I-15 intersection. A portion of traffic generated by the College would utilize this intersection, resulting in significant impacts under the Horizon Year with Phase I Conditions

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and the Cumulative Plus Project scenarios. The EIR was revised to state that the District will make fair share payments to the County's TIF fund to mitigate project impacts at this intersection, thereby reducing project impacts to less than significant.

- H-11 The District acknowledges and appreciates this comment. The District proposes contribution to the County's TIF fund for improvements to SR 76 west of I-15 to mitigate for the project's contribution to cumulative impacts along this roadway; refer to Tables 2.2-25 through 2.2-28 of the EIR.
- H-12 The District acknowledges and appreciates this comment. Improvements to SR 76 as part of the Palomar Aggregates Quarry project are currently underway along SR 76 east of I-15 to widen the roadway. The construction of Horse Ranch Creek Road is required for access to and from the project site. As part of the project, the District will construct the westerly half of Horse Ranch Creek Road, which will adequately support traffic generated by the proposed project in the near term. Construction of the easterly half of Horse Ranch Creek Road is anticipated with the future Campus Park project. No change was made to the Draft EIR as the result of this comment.
- H-13 The District acknowledges and appreciates this comment. Refer also to Responses to Comments H-5 and H-6, above, as well as Responses to Letter G. In addition, the trip generation rate used to calculate project trips was revised, per the direction of the County and Caltrans. The EIR was revised to reflect a new trip generation rate of 0.55 daily trips per enrolled student, based on typical traffic patterns at the College's existing Education Center in Escondido. Refer to Section 2.2.3.1 of the EIR for additional discussion.

The traffic analysis was prepared in coordination with the District to accurately estimate the anticipated student population and attendance patterns. The traffic analysis considers the trip distribution anticipated to occur in the future with development of the site and the traffic model used makes the necessary assumptions as to where vehicles trips would occur with the proposed project to determine how vehicles would travel to and from the College during operational hours. In addition, the cumulative traffic analysis was prepared with consideration for future buildout of the planned Pappas, Campus Park, and Meadowood projects, which are located east of I-15 in the general vicinity of the proposed project.

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- H-16 3) Building Aesthetics. The buildings should conform to Fallbrook Design Review Guidelines with a 35' maximum height. She stressed that the Fallbrook Planning group hopes to be active participants in the design elements of the College.
- H-17 4) Parking lots. Delaney also commented that the Design Review Committee would like to be active in the landscape plan for the parking lots.

H-18 Committee members expressed several concerns: the parking for the recreation area is too small; there is a need for more parking in general and additional parking near the sports park; a landscape berm should be created to hide the view of the College from the freeway; the sports facilities should be shared with the public; there should be no sports lights at night (there is no current plan to install lighting at the sports park or for sponsoring night activities there); the College should be aware of the air quality concerns because of the two proposed quarries nearby and should address the issues related to it.

H-19 Jackie Heyneman moved to recommend that:

- H-19 1. Building heights should be a maximum of 35 ft to comply with the local zoning ordinance and the Fallbrook Community Plan.
- H-20 2. The Fallbrook Design Review Board Committee/Planning Group should be active participants in the planning and design review of the site, including on site landscaping.
- H-21 3. Exterior lighting should combine bollard style lighting and other types that are as non-obtrusive as possible.
- H-22 4. Parking lots and parking lot landscaping should incorporate the design aspects found in the County of San Diego Off-Street Parking Design Manual.
- H-23 5. The estimated student population at build out is deficient, and that the original number of 12,000 students should be used. This increase will affect the number of proposed parking spaces and that number should be re-calculated to reflect this increase in student population.
- H-24 6. Shared use with the public should be allowed for the Athletic fields, and the parking spaces adjacent to these fields should be open to the public without the requirement of parking permits.
- H-25 7. A landscape berm along the 1-15 freeway should be constructed for visual screening.
- H-26 8. The open space areas should be fenced. The fencing material in the areas with public visibility, in particular along Horse Ranch Creek Rd., should be other than chain link. This motion was passed unanimously.

Land Use Committee Report

H-27 Alex Jewell of RBF Consulting represented Palomar College. Harry Christiansen thanked Jewell for agreeing to meet with the PG committees this week. Jewell gave an overall review of the proposed 85 acre college project, from initial work until buildout in 20 plus years. Horse Creek Ranch Road will border the campus to the east. It will have two traffic lanes but graded on a 106 foot right-of-way. The plan now is for only one or two-story buildings, with a maximum height of 35 feet, compatible with the current Fallbrook General Plan. The water supply will be from the mains installed by Hewlett-Packard. The college now holds 100 EDU of sewage capacity from Rainbow Municipal Water District because of the facilities installed by Hewlett Packard. Jewell thinks the real need of the college is for 80 of those EDUs. They plan to use reclaimed water for irrigation, etc. when available.

H-28 Their building plan is based on 8500 part-time students, equating to 2833 full time "students". The Conceptual Site Master Plan shows 467,000 sq. ft. of buildings. (55 nsq.ft. per actual student. or 165 sq. ft. per equated full time student). This, and the

Access to the site will be provided by Horse Ranch Creek Road, which will be constructed by the District as a two-lane road, adequate to serve the initial development of a 75,000 to 150,000 s.f. structure. Offsite intersection improvements would reduce direct project impacts on the surrounding roadway system to less than significant.

H-14 Comment noted. The District acknowledges and appreciates this comment. Refer to Response to Comment H-6, above. No change was made to the EIR as the result of this comment.

H-15 Comment noted. The District acknowledges and appreciates this comment. As stated in Section 2.1 of the EIR, the proposed project would include onsite lighting to ensure the security and safety of the students and faculty. Outdoor lighting would consist of low-impact, shielded lighting around buildings and walkways. Parking areas would also have lighting for security and safety. Where feasible, lighting bollards would be used to minimize light spillover and visibility from offsite areas. No lighting is proposed for the athletic fields. Any lighting required adjacent to the Native Area would be shielded and directed away from the area to reduce potential conflicts with wildlife or adjacent land uses. With implementation of these design measures, the proposed project would not create a new source of substantial light or glare that would potentially adversely affect day or nighttime views in the area. Design of offsite lighting would consider the County's dark sky policy and the rural character of the proposed site within northern San Diego County.

Offsite, lighting installed along Horse Ranch Creek Road, or where intersection improvements would occur, would be consistent with County of San Diego lighting standards and the County's dark sky policy to minimize potential lighting impacts.

No change was made to the Draft EIR as the result of this comment.

H-16 The Conceptual Site Plan prepared for the project does not include specific architectural designs. In designing future educational facilities, the District would consider the rural characteristics of the Fallbrook community, as well as Northern San Diego County. As appropriate, the District will take into consideration in future building design, the Fallbrook Design Review Guidelines for building heights. Refer also to Section 2.1.3 of the EIR for discussion.

H-17 Comment noted. The District acknowledges and appreciates this comment and will take it into consideration as appropriate in the design

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process as site-specific landscaping plans are prepared in the future. However, this comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.

- H-18
- a) Comment noted. Parking for the planned recreational facilities will be provided at a standard ratio to satisfy onsite parking requirements. Although not anticipated, if on occasion, there are events where parking provided within the vicinity of the recreation areas is not sufficient, additional parking would be available at the northern end of the Educational Center. This comment did not result in changes to the Draft EIR.
 - b) Comment noted. A landscape plan has not yet been prepared for the proposed project. Landscaping would occur over time, as the facilities and supporting amenities are constructed onsite. Views to the site will be considered on a site-specific basis in the future, as conditions will vary based on the location of structures within the building area, as well as on the structures existing onsite at the time construction of a specific structure is proposed. Construction of a landscaped berm is not proposed at this time, but may be considered in the future as the proposed facilities are constructed and as deemed appropriate. This comment did not result in changes to the Draft EIR.
 - c) The District has made a commitment to allow for use of the planned sports fields by others when constructed as defined in the District's established policies governing the use of its facilities. This comment did not result in changes to the Draft EIR.
 - d) Comment noted. As stated in Section 2.1.3 of the EIR, no lighting is planned for the proposed sports fields; limited outdoor lighting will be installed for the purposes of safety and to facilitate the movement of visitors and athletes. Events scheduled for the recreational facilities would occur during the daylight hours. This comment did not result in changes to the Draft EIR.
 - e) Comment noted. The air quality analysis considered a planned quarry (Rosemary's Mountain/Palomar Aggregates Quarry) and a borrow pit, both to the northeast of the project site) as part of the cumulative analysis; refer to Table 1-2, *Cumulative Projects*, of the EIR. However, future operation of these facilities is not expected to adversely affect the proposed project or attendees. Daily operation

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of the quarry and borrow pit would require implementation of standard air quality control measures. These projects would also be subject to the environmental review process by the County of San Diego, and if potential impacts to air quality are identified, these projects would be individually responsible for providing mitigation measures to reduce impacts to less than significant.

This comment did not result in changes to the Draft EIR.

- H-19 Comment noted. Refer to Response to Comment H-16, above. This comment did not result in changes to the Draft EIR.
- H-20 Comment noted. As appropriate, the District will take this comment into consideration, when the design process for specific components anticipated as part of the project occurs in the future. This comment did not result in changes to the Draft EIR.
- H-21 Comment noted. Refer to Response to Comment H-15, above. This comment did not result in changes to the Draft EIR.
- H-22 Comment noted. Landscaping would be consistent with District standards for landscaping, and would consider guidelines provided in the County of San Diego Off-Street Parking Design Manual; however, the District would not be subject to the County's guidelines for landscaping. This comment did not result in changes to the Draft EIR.
- H-23 Comment noted. Refer to Response to Comment H-6, above. This comment did not result in changes to the Draft EIR.
- H-24 Comment noted. Refer to Response to Comment H-18(a), above. Onsite parking would be provided for the sports fields at a standard ratio to ensure that adequate parking is available. As the District has agreed to allow for shared use of the sports fields by the public, parking arrangements will be made accordingly to allow visitors to park onsite; however, the details of such an arrangement (with regards to parking permits) would be worked out at the appropriate time when the athletic fields are constructed. This comment did not result in changes to the Draft EIR.
- H-25 Comment noted. Refer to Response to Comment H-18(b), above. This comment did not result in changes to the Draft EIR.
- H-26 Comment noted. Language was added to Sections 1.1.2.1 and of the Draft EIR to state that signage would be provided to identify the limits of the onsite Native Area to restrict access into this area of the property.

- H-28
cont'd projections of student home locations, drew a lot of discussion. The earlier presentations by the college had suggested 12,000 part time students, which seemed plausible considering population growth projections for the general area. The anticipation of only 2 % of students coming from areas to the north seemed not to be realistic, and the other home locations were questioned.
- H-29 The wetlands area to the south of their property is planned for a 60 ft. setback from Horse Creek Ranch Road. Electrical and phone facilities will be located underground, possibly excepting an existing high voltage line. This is not stated in the DEIR. The number of parking lot spaces and permits vs. the on-site population was discussed. Any off-site facilities installed by the college is subject to normal County standards and permits. The college plans mitigation for eight separate Needs. There is no mention of the extension of Pala Mesa Drive from the existing bridge eastward and Palomar does not plan to participate in its construction although it will be an important access to the college.
- H-30 Harry Christiansen moved that our opinion is that the DEIR is deficient in the following general areas:
- H-31 • Long term enrollment projection is too small.
 - H-32 • Projection of student home locations is unrealistic. This will have a major effect on traffic circulation
 - H-33 • Water supply assumes that RMWD will be able to supply.
 - H-34 • Sewage disposal makes a similar assumption. However, Campus Park does not have nearly enough EDUs for their proposal, and other potential players in this area are not yet supplied.
 - H-35 • Roads need to be considered on an area basis. For example, the 2 lane Horse Creek Ranch Road seems a major bottleneck.
 - H-36 • On site parking should be reviewed. Any overflow parking will occur along the two-lane road boundaries.
 - H-37 • Utilities need to be spelled out as "Underground location".
 - H-38 • The need for building Pala Mesa Drive extension needs to be spelled out, even if the college is not responsible for its construction.
 - H-39 • Riparian Open Space description needs to be spelled out.
- This motion was approved unanimously by the Land Use Committee..

Parks & Recreation Committee Report

- H-39 Alex Jewell of RBF consulting for Palomar College presented. Major emphasized the focus of pathways, trails and sports facilities. The college has 85 acres, 56 to be developed, 30 acres "natural area". The wetlands are not considered open space easement. A new road from Hwy. 76 to Pankey Road North consisting of 2 lanes will be built. East side will have pathway and trail. Sports facilities will have baseball field, tennis courts(?), and possible football field. They will improve their part of the trail. Sport fields will be open to the public but will not be built in the first phase. Buildings will be approximately 100,000 sq. ft.
- H-40 Major expressed concern about the timing of the building of the sports park within the College in relation to the development of Passerelle's project. Passerelle has stated to our committee that the sports facilities will be used by their development, and should be considered as part of the recreational facilities for Passerelle. The College agrees with that but the sports facilities will not be part of the first phase of construction.
- H-41 Delaney asked about grass or landscaping before the fields are completed. Jewell stated

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Signage identifying the Native Area will be placed approximately every 100 feet along the northern boundary identifying the area as such. Any fencing installed along Horse Ranch Creek Road will be constructed with materials consistent with County design requirements.

- H-27 The District acknowledges and appreciates this comment. However, this comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.

One note of clarification is provided herein. Water service would be provided through an extension of an existing 16-inch water line from Pankey Road in the north, along proposed Horse Ranch Creek Road, then west on SR 76 to Pankey Road, and connection to an existing 16-inch water line just south of SR 76. Through an agreement with the Passerelle ownership to the east of the project site, the District has obtained 100 EDUs from the Rainbow Municipal Water District for future sewer service.

- H-28 Comment noted. Refer to Response to Comment H-6, above. This comment did not result in changes to the Draft EIR.
- H-29 Comment noted. Language has been added to Section 1.1.3.1 of the EIR to state that electrical and phone lines extended to the site as part of the proposed project will be undergrounded, with possible exception of the existing overhead high voltage line. Undergrounding of the high voltage line will be evaluated as specific engineering design details are prepared for site development.
- H-30 Comment noted. Refer to Response to Comment H-6, above. This comment did not result in changes to the Draft EIR.
- H-31 Comment noted. Refer to Responses to Comments H-6, above. The Palomar Community College District has a mutual standing agreement with other community college districts in the area to not actively recruit students from outside of their districts. It is speculative to predict the number of students that may come from the north to attend the college. This comment did not result in changes to the Draft EIR.
- H-32 Comment noted. The District has coordinated with the RMWD regarding future water supply for the proposed project. The RMWD has provided a written statement that it will be able to adequately provide water to support the uses proposed with the project. If future development is desired or required in the future which exceeds that proposed in the

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EIR, the District would be required to obtain additional agreements from the RMWD for water supply to support such uses. This comment did not result in changes to the Draft EIR.

- H-33 Comment noted. The District has coordinated with project engineers and the RMWD to determine the EDU's required to support future sewer service for the project. Standard calculations were used to determine that sewer service for the project to full buildout can be supported with 100 EDU's. The District has a written commitment from the RMWD for supply of sewerage service to support 100 EDU's as needed as development of the site occurs over future decades. As the RMWD has committed this resource to the proposed project, the supply of EDU's for sewer service for other projects in the area will not affect the provision of such services for the proposed project. This comment did not result in changes to the Draft EIR.
- H-34 Comment noted. The traffic analysis was prepared to determine the potential impacts of the proposed project on the existing circulation system, as well as cumulative impacts with consideration for other future projects planned in the surrounding area. Horse Ranch Creek Road will be designed to County Roadway Design Standards, and will adequately serve traffic generated by the project site. Project improvements will include signalization of the intersection of SR 76/Horse Ranch Creek Road to reduce potential traffic congestion contributed to the circulation system by the project. This comment did not result in changes to the Draft EIR.
- H-35 Parking will be provided at a standard ratio to ensure that adequate parking is available onsite. Parking areas will be constructed simultaneously with each facility onsite as the property is developed over the next several decades. Parking is not proposed along the (western) portion of Horse Ranch Creek Road that will be constructed with the proposed project; refer to Figure 1-7 of the EIR. Refer also to Response to Comment H-18(a), above. This comment did not result in changes to the Draft EIR.
- H-36 Comment noted. Refer to Response to Comment H-29, above. This comment did not result in changes to the Draft EIR.
- H-37 Comment noted. Refer to Response to Comment H-5 and H-8, as well as Responses to Comment Letter G. This comment did not result in changes to the Draft EIR.

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- H-41 cont'd they will be seeded to prevent erosion but no landscaping. Comella asked about the length of the pathway along the new road. College will only develop the part that borders their property.
- H-42
- H-43 The College is only expecting a smaller number of students than was originally projected.
- H-44 Discussion: The committee wanted to know if a trail could be put around the entire college property. Major requested discussion with Palomar and the County to research trails. Miller questioned coordination of trails and roads with other developers... Freese questioned active use of fields and how to determine when they are built. Jewell stated it is decided by the Palomar College District and the board of Trustees. It depends on the number of students and can be subject to future planning..
- H-45
- H-46 It was recommended that athletic fields be in place when a certain number of dwelling units are completed so the community can use the facility. Hayden stated that she remembered that it was an agreement with Passerelle when the college was proposed that the college would have recreational facilities as soon as possible.
- Motion made by Delaney:
- H-47 1. Consider trail around perimeter of project is recommended,
- H-48 2. Consider implementing athletic fields as soon as for the benefit of the community and before the Phase 2 development.
- The motion was passed unanimously. Meeting adjourned at 3:10 pm.

Public Facilities Committee Report

- H-49 Alex Jewell, RBF Consulting, Environmental Project Manager discussed a draft of the Environmental impact report (EIR). John Crouch distributed copies of "The Public Facilities Elements" defining elements within the Public Facilities Committee scope of interest. A copy is included with these minutes. John also presented each Member with an EIR Summary prepared by the Palomar Community College for reference material and discussion.
- Members present exchanged ideas and comments during the presentation on number of concerns stated below;
- H-50 1. Satellite or Cell phone transmission/reception communication facilities are not included in the College plans.
- H-51 2. All utilities will be placed underground. One overhead power line crossing the Sport field will be placed underground when the field is developed.
- H-52 3. Potable water and wastewater treatment will be provided by Rainbow MWD. Palomar has 100 EDUs for wastewater and expects to use 80 holding 20 in reserve. Wastewater requirements are calculated using 60 gallons per student per day.
- H-53 4. Palomar College will install "purple colored recycled water pipes for irrigation purposes.
- H-54 5. NCFD response time must be meet Fire Department requirements.
- Following a number of comments by committee members, Eileen Delaney made the following 3 part motion;
- Our comments, responses and recommendations are as follows:

- H-38 Comment noted. The proposed onsite Native Area is not proposed as "Riparian Open Space." This area is not proposed for development as part of the project; however, development on this land may or may not occur in the future, depending on the student population and the land area needed to satisfy future demand for educational facilities. The Native Area is described in Section 1.1.2.1 of the EIR. This comment did not result in changes to the Draft EIR.
- H-39 The District acknowledges and appreciates this comment. However, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- One point of clarification is that initial development would consist of approximately 75,000 to 150,000 square feet (s.f.) of development and related parking. The remaining development of the site would occur over several decades, with an estimated total building square footage of approximately 380,000 s.f. at full buildout around the year 2030.
- H-40 The District acknowledges and appreciates this comment. The athletic fields will be provided at the time when appropriate and when the student population grows to demand such amenities. As public money will be used to construct these facilities, construction would be undertaken in a timely manner when deemed appropriate by the District, not as the result of future development of the adjacent Passerelle property. Use of the planned sports fields by others will be allowed subject to the District's established policies governing the use of its facilities. Refer also to Response to Comment H-18(c). This comment did not result in changes to the Draft EIR.
- H-41 Comment noted. The whole of the proposed development area would be graded at once to allow future development to occur without additional grading. Areas where development is not planned in the immediate future will be covered with hydroseed for visual enhancement, as well as to reduce the potential for increased runoff or erosion to occur. This comment did not result in changes to the Draft EIR.
- H-42 As stated in Section 1.1.3.1 of the EIR, the proposed project would result in construction of Horse Ranch Creek Road to the east of the site from Pankey Road to SR 76. The roadway would be constructed to County roadway design standards, as it would be located on County land. As such, the pathway proposed for construction along the west

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side of the road would be constructed to County standards. The roadway will provide a linkage from Stewart Canyon Road to SR 76 to the south to provide the north-south access required for adequate vehicular circulation generated by the College; however, per County standards, the District would only be required to construct the pathway along the portion of the road adjacent to the proposed site. Other landowners to the south, as well as owners of the Campus Park project to the east, would be required to fund and construct such improvements along their own frontages as part of development of their properties. This comment did not result in changes to the Draft EIR.

- H-43 The District acknowledges and appreciates this comment. Refer to Response to Comment H-6, above. This comment did not result in changes to the Draft EIR.
- H-44 The District acknowledges and appreciates this comment. The District will consider the potential for construction of a trail around the perimeter of the property. A portion of a trail will be constructed along the project frontage along Horse Ranch Creek Road (see Response to Comment H-42), which will provide future linkage with other area trails, as development of surrounding land occurs. This comment did not result in changes to the Draft EIR.
- H-45 The District acknowledges and appreciates this comment. Refer to Response to Comment H-40, above. This comment did not result in changes to the Draft EIR.
- H-46 The District acknowledges and appreciates this comment. Refer to Responses to Comments H-18(c) and H-40, above. This comment did not result in changes to the Draft EIR.
- H-47 Comment noted. Refer to Response to Comment H-44, above. This comment did not result in changes to the Draft EIR.
- H-48 The District acknowledges and appreciates this comment. Refer to Responses to Comments H-18(c) and H-40, above. This comment did not result in changes to the Draft EIR.
- H-49 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. This comment did not result in changes to the Draft EIR.
- H-50 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. No satellite or cell communication facilities are included are proposed as part of the

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- H-55 [1. At the completion of Building phase 1 and the initial opening of the campus, Fire and Emergency Response time should be within the required time frame specified by North County Fire Protection District.
- H-56 [2. All existing overhead utilities on the site should be undergrounded at the time that the athletic fields are developed and constructed.
- H-57 [3. We believe that the anticipated student population at build out is deficient and should be adjusted up to the original number of 12,000. Campus EDU's should reflect this increase.
- Motion passed unanimously.

Submitted to the Palomar District College.

(Jim Bowen, Secretary)
for
Jim Russell, Chair
Fallbrook Community Planning Group

Cc: Bill Horn, Supervisor, Fifth District
Eric Gibson, Director, Department of Planning & Land Use, San Diego County

project in the EIR. This comment did not result in changes to the Draft EIR.

- H-51 Comment noted. Refer to Response to Comment H-29, above. This comment did not result in changes to the Draft EIR.
- H-52 Comment noted; however, the comment does not raise a specific environmental issue within the Draft EIR pursuant to CEQA. Refer to Responses to Comments H-32 and H-33, above. This comment did not result in changes to the Draft EIR.
- H-53 Comment noted. Installation of reclaimed water pipes for irrigation purposes would be consistent with County Public Works standards, at the time when such improvements are determined appropriate. This comment did not result in changes to the Draft EIR.
- H-54 Comment noted. Refer to Response to Comment I-7. Language was added to Section 4.1.4 to state that the required response time will be met.
- H-55 Comment noted. Refer to Response to Comment H-29, above. This comment did not result in changes to the Draft EIR.
- H-56 Comment noted. Refer to Response to Comment Letter I. This comment did not result in changes to the Draft EIR.
- H-57 Refer to Responses to Comments H-6, H-32 and H-33, above. This comment did not result in changes to the Draft EIR.

NORTH COUNTY FIRE PROTECTION DISTRICT

315 East Ivy Street · Fallbrook, California 92028-2138 · (760) 723-2005 · Fax (760) 723-2004 · www.ncfire.org

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October 1, 2007

County of San Diego
Dept. of Planning & Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123-1666

Re: Draft EIR for Palomar College Satellite Campus

Please review the following comments regarding comments regarding this project.

- I-1 This project is in a wildland hazardous fire area. The project is located in "State Responsibility Area" (SRA) and is subject to CCR Title 14 which requires a Fire Protection Plan to be prepared by a fire consultant. (CCR Title 24 part 9 – CFC Article 86; CCR Title 24 part 2- CBC Chapter 7A.)
- I-2 Access: The amount of people projected to attend Palomar College will significantly impact our agency. On page 37 under Public Services the report states "the project is just over one mile from the project site, and service would be available for the subject property." This statement is not totally correct because it assumes that the road connecting the "Bridge to Nowhere" (Pala Mesa Drive) is built. If the connection is not built than this agency can not properly serve the College. This is based on the standard requirement of a 5 minute response time. This comment also pertains to page 27 under e). Less than significant impact. Again this assessment assumes the connection "bridge to nowhere, (Pala Mesa Drive) is built." This agency does not feel that an adequate response time will be met without the connection to the bridge to nowhere and this access should be built prior to any combustibles coming on the site.
- I-3 This agency agrees with the local planning group in that the access roads the College is proposing as mitigation are already placed on the other proposed projects for this area. The College should be providing additional mitigation that is not already required on the project.
- I-4 On page 1-19 under 1.8.1.3 Fire Protection: The statement that the fire department maintains a full time fire station and administrative offices is incorrect. The station that is nearby houses four paid personnel and one reserve firefighter. The administrative offices are located at 315 East Ivy Street, located in the downtown area of Fallbrook.
- I-5 On page 1-22 under 1.8.5 Roadway improvements: This agency disagrees with the statement that the construction of "Horse Ranch Creek Road, would provide adequate emergency access to the site. Our research feels that the site could not be served within the 5 minute time criteria. The fact that the project also has a circulation element road requirement, "Bridge to Nowhere" this agency feels the "Bridge to Nowhere" needs to be built prior to combustible being brought on site.



PROUDLY SERVING THE COMMUNITIES OF FALLBROOK, RAINBOW AND PALOMAR

Comment Letter I – North County Fire Protection District, October 1, 2007

I-1 Comment noted. Per the requirements of the California Code of Regulations (CCR) Title 24, the District has prepared a Fire Protection Plan (FPP) for the proposed development of the site. The Plan recognizes the site's location in a State Responsibility Area (SRA) and identifies design measures to reduce the potential for wildfire to occur. Language has been added to the Draft EIR in Section 4.1.4.3 to state that the project will conform to the requirements of the FPP for future development of the site, as well as for long-term operation and maintenance activities. As preparation of the FPP is mandatory under the CCR, it is not considered to be a mitigation measure. Therefore, no additional significant impacts or mitigation measures were identified in the EIR with regard to this issue.

I-2 Comment noted. Refer also to Response to Comment I-7. Sections 1.8.1.3, 4.1.4, and 4.1.7 of the EIR have been revised as appropriate to state that the project site is located approximately 2.5 miles from the nearest fire station, located at 4375 Pala Mesa Drive (Old Highway 395, to Stewart Canyon, to Pankey/Horse Ranch Creek Road). The majority of the travel route to the site is along Old Highway 395. Old Highway 395 is a major thoroughfare that can accommodate emergency vehicles. Travel time from the existing fire station to the northern boundary of the project site is less than five minutes, and therefore, fire service response times can be met.

Initially, the project will result in approximately 75,000 to 150,000 square feet of development and supporting parking. Construction of additional structures and facilities on the site will occur over the next several decades, as the student population grows and educational needs and programs are identified; refer to Figure 1-4, Conceptual Site Plan, of the EIR. Therefore, in the near-term, the site will support relatively small-scale facilities.

The EIR does not assume (or propose) the extension of Pala Mesa Drive to the east. Construction of this roadway is not a part of the proposed project, and is not discussed in the EIR as such. The District has received a supplemental letter (dated November 1, 2007) from the NCFPD stating that the extension of Pala Mesa Drive is not required with the proposed project for emergency access, and that emergency response times (maximum of five minutes) can be met for the project. Based on the initial student population and size of the facilities planned, as well as the findings of the traffic analysis prepared for the project (refer to Section 2.2 of the EIR), the construction of Pala Mesa Drive by

NORTH COUNTY FIRE PROTECTION DISTRICT

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I-6 The proposed buildings appear to be 2 stories or less at this time. If any taller buildings are proposed this agency does not have the laddering capabilities to properly serve buildings above 2 stories and this issue would need to be mitigated for.

Sid Morel

Fire Marshal



PROUDLY SERVING THE COMMUNITIES OF TALLBROOK, BONSALL AND RAINBOW

Comment Letter I – North County Fire Protection District, October 1, 2007

the District is not required at this time. The extension of Pala Mesa Drive is proposed as part of the adjacent Campus Park development. The project does propose to construct Horse Ranch Creek Road to provide a connection from SR 76 in the south to Pankey Road in the north. This connection will provide an alternative access route to Stewart Canyon Road on the east side of Interstate 15.

In addition, a FPP has been prepared for the site to require additional design measures that will further reduce the potential for damage caused by wildfire to occur. The District will be required to implement the measures included in the FPP, such as building and landscaping materials and setbacks, into future design and construction of the planned facilities. The site will be designed to provide a 100-foot wide clearing of native vegetation around all structures, as well as inward from the project boundaries. In addition, a 50-foot wide buffer will be established from the boundary of the onsite Native Area to distance onsite uses from open areas. Buildings onsite will be required to meet the Fire District's requirements for sprinkling.

Language has been added to the Draft EIR for discussion of the above issues; however, no additional significant impacts or mitigation measures were required with regard to emergency access to the site.

I-3 Comment noted. The EIR does not propose mitigation in the form of other proposed projects in the area extending Pala Mesa Drive to the east. Adequate fire protection services can be provided without the construction of Pala Mesa Drive, and the provision of adequate fire protection services to the project site is not dependent upon extension of the roadway. Although it is assumed that extension of the roadway will be completed as mitigation for other large projects in the surrounding area in the future, adequate fire protection services can be provided without construction of the roadway by the District at this time. Refer also to Response to Comment I-7. No mitigation measures are proposed with regard to fire service protection. This comment did not result in changes to the Draft EIR. Refer also to Section 2.2 of the EIR for discussion of traffic-related impacts.

I-4 Comment noted. Sections 1.8.1.3, 4.1.4, and 4.1.7 of the Draft EIR were revised to reflect the information stated for accuracy.

I-5 Comment noted. Refer also to Response to Comment I-7. Language was added to the Draft EIR in response to these comments. The project does not have a "circulation element road requirement" with regards to

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November 1, 2007

RBF Consulting
9755 Clairemont Mesa Boulevard, Suite 100
San Diego, CA. 92124-1324

RE: Palomar Community College North Education Center EIR

Please review the following comments regarding Fire Protection for this particular project.

The requirement for the Community College to complete the connection of Pala Mesa Drive (The bridge to nowhere) is waived for the initial phase based on the following reasons:

- I-7
- The Community College will be installing Horse Ranch Creek Road from Pankey Road to Highway 76.
 - The response time will be adequate for the project.

- I-8
- The requirement for the connection to be completed may be a condition for future development by the Community College.

Feel free to contact me if you have any questions,

Sid Morel


Fire Marshal



PROUDLY SERVING THE COMMUNITIES OF FALLBROOK, BONSALL AND RAINBOW

Comment Letter I – North County Fire Protection District, October 1, 2007

Pala Mesa Drive. The road alignment is located offsite, and is not a part of the proposed project, nor is construction of the roadway required for purposes of access. Horse Ranch Creek Road will be constructed to the east of the site, providing a north-south connection from Pankey Road to SR 76, as anticipated by the County of San Diego General Plan 2020 Circulation Element; refer to Figure 1-8A and 1-8B of the EIR.

- I-6
- A FPP has been prepared for the project. Development of the proposed North Education Center will conform to the requirements of the FPP and will be consistent with NCFPD regulations for fire protection requirements and design measures. Design of the proposed facilities will be consistent with the height requirements of the NCFPD, unless otherwise provided for within the FPP. No significant impacts relative to fire service protection have been identified with regards to this issue, and no mitigation measures are required.
- I-7
- The District acknowledges and appreciates this comment. The District proposes to construct Horse Ranch Creek Road to provide a north-south connection between Pankey Road and SR 76. The District acknowledges that the response time for the NCFPD to serve the project site will be under five minutes, and will therefore meet NCFPD requirements. Language has been added to Sections 4.1.4 and 4.1.7 of the EIR to address this issue.
- I-8
- The District acknowledges and appreciates this comment. The District understands that construction of Pala Mesa Drive may be a requirement, based on future conditions at the time, and as determined appropriate. Language has been added to Sections 4.1.4 and 4.1.7 of the EIR to address this issue.



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JIMMY AYALA, AICP
Director
Community Development

October 11, 2007

Kelley Hudson MacIsaac
Project Manager
Palomar Community College District
Facilities Planning
1140 West Mission Road
San Marcos, CA 92069

Subject: Comments to the Palomar College EIR

Dear Kelley:

J-1

Pardee Homes has reviewed the Palomar College Environmental Impact Report (EIR) and would like to offer the following comments for your consideration. The addition of a community college campus to northern San Diego County would be beneficial to current residents as well as to the new community of which the campus will be an integral part. It is noted that this project is not subject to County regulations, with the exception of offsite facilities and a Habitat Loss Permit, although the mitigation measures for cultural resources all defer to County requirements and approvals. Our comments are as follows:

J-2

Project Description

It is noted that the description of the project is significantly reduced in terms of the total number of enrolled students that has been discussed in public meetings. The EIR estimates an enrollment of 8,500 students at buildout, while an ultimate enrollment of 20,000 was discussed in public meetings. Please explain the apparent discrepancy.

J-3

Traffic

The Traffic Impact Analysis Report (TIAR) and the EIR make different mitigation recommendations. A listing of the differences, and rationale for the differing recommendations should be explained in the EIR.

J-4

The EIR includes an extensive analysis of the traffic impacts that will result due to project implementation and provides some mitigation for those impacts. In several places (Section 2.2.5.3 is one such section) it is noted that there is no mechanism in place to allow the College to make a monetary fair share contribution that could be used to mitigate impacts. Therefore, the contribution will not be made. It is also noted that fair share contributions will be made in other instances through Transnet. However, the exact amount of the contribution is not stated. This is confusing to the reader and difficult to determine if the project will contribute fairly to much-needed road improvements in this area. It also should be noted that there are many

Comment Letter J – Pardee Homes, October 11, 2007

J-1

The District acknowledges and appreciates this comment. As noted, development of the project site will not be subject to County of San Diego regulations. A Habitat Loss Permit (HLP) will be required for impacts to coastal sage scrub (CSS) as the result of offsite roadway improvements on lands subject to County regulations. In addition, potential impacts to cultural resources will occur offsite near the intersection of SR-76/Horse Ranch Creek Road, which is located within the County. As such, proposed mitigation for potential impacts to cultural resources defers to County requirements and approval. This comment did not result in changes to the Draft EIR.

J-2

Comment noted. Refer to Responses to Comments H-6.

J-3

The TIAR identifies potential traffic-related impacts resulting from the proposed project and gives the corresponding mitigation measures to reduce the project's impacts. The EIR includes this same discussion. The TIAR was revised to utilize a new trip generation rate, and as such, the traffic analysis of project impacts was also necessarily revised. The EIR was revised accordingly to reflect the changes to the TIAR and ensure that mitigation measures proposed were consistent between the two documents.

J-4

Mitigation measures for potential traffic impacts resulting from the proposed project are given in Section 2.2.8 of the EIR. Through preparation of the traffic analysis, potential direct and cumulative impacts to roadways and intersections were identified. To reduce project impacts, mitigation measures are proposed. The traffic analysis has been revised to evaluate potential impacts resulting from the proposed project in two phases, as development of the site will occur over the next several decades, and will not result in the total estimated 4,675 ADT at full buildout at any time in the near future. As stated in the EIR, the District will contribute fair share payments to the County's TIF fund for future improvements at the identified project-impacted intersections, as feasible, to reduce project impacts. Mitigation proposed will also require the District to make physical improvements at one affected intersection, Horse Ranch Creek Road and SR 76 (Pala Road). The mitigation proposed represents feasible and proportional mitigation that will improve traffic conditions, while allowing for future improvements to the levels of service at these intersections. Fair share payments will be determined by the District at the appropriate time in the future when project-related traffic triggers the need for mitigation to occur. Language has been added to Section 2.2.8 of the EIR to reflect

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- J-4
cont'd mechanisms available through which contributions could be made including the establishment of escrow or special purpose accounts that can only be used for a designated purpose. The College is a valuable member of the community and should clarify that they are willing to contribute proportionally to mitigation for their impacts. The inclusion of a table to establish the amounts being paid for which improvements, and to document where mitigation is not being offered, would improve the clarity of the document.
- J-5
- J-6 The project will not make any contribution to the necessary improvement of the I-15/SR 76 ramps, or to several other roads, noting that the cost of the improvements exceeds the impact of the proposed project. It is recommended that the college provide adequate funds to mitigate their impacts and not leave the burden to future projects or to existing residents.
- J-7 The EIR does not mention the need for the construction of Pala Mesa Road from Horse Ranch Creek Road to Old 395. This link is critical for access to the proposed project. It will provide relief for traffic on SR-76 and greatly improve response times for the fire department and other emergency services. The traffic analysis should be revised to include this road and provide a fair share contribution to its construction.
- J-8 The EIR notes that several regionally needed road improvements (e.g. the widening of SR-76 from two to four lanes) will be accomplished by others. It would be helpful if a contingency plan was included to address what would be done if the anticipated construction is not done as predicted.
- J-9 It appears that the road standards used are those that are the preliminary standards proposed as part of GP 2020, which is not yet adopted and which may not be adopted prior to approval and implementation of the proposed project. It would be helpful if the rationale for using road standards that are not adopted rather than those that are currently used was included in the report.
- J-10 **Biology**
Section 3.1.1.3 states that biology surveys for certain sensitive annual plants was not done at the ideal time of year, nor did a requirement for updated surveys seem to be included. This could result in impacts to sensitive biological resources that could be alleviated by including such a requirement, and by identifying contingency mitigation.
- J-11 **Cultural Resources**
Section 3.2.3.2 states that impacts could occur to CA-SDI-16890, the ruins of the Monserate adobe and Pankey Ranch Complex. This site is not located within the project boundaries. The EIR and technical report should be revised to address those resources that are in, or suspected to be within, the project boundaries and the area affected by offsite improvements.
- J-12 With respect to the offsite construction of Horse Ranch Creek Road, it should be noted that no evidence of the Monserate adobe has been found within the alignment to date. Based on surveys and extensive subsurface testing, it is not likely to be present in the road alignment for Horse Ranch Creek Road. The EIR should suggest contingency measures in the event that the Monserate adobe is found in that road alignment.

revisions to the proposed mitigation measures. Tables 2.2-25 to 2.2-28 have also been added to identify mitigation that will be implemented with the proposed project to reduce traffic impacts.

- J-5 The District acknowledges and appreciates this comment. The District has worked with the owners of the adjacent Campus Park project and other landowners in the surrounding area in identifying traffic impacts and appropriate mitigation. The mitigation measures proposed for implementation were determined by the TIAR to be feasible and proportional to the impacts resulting from the proposed project. Tables 2.2-25 through 2.2-28 have been added to the EIR to summarize the mitigation proposed for implementation to reduce project-related impacts. Fair share payments will be determined by the District at the appropriate time in the future when project-related traffic triggers the need for mitigation to occur. Refer also to Responses to Comments J-3 and J-4 above.

- J-6 As discussed in Section 2.2.3, *Environmental Impacts*, of the EIR, the proposed project will result in significant impacts to the Interstate 15/SR-76 ramps which would operate at a deficient level of service with or without the proposed project under the Horizon Year With Phase I Conditions scenario. For this and other impacts identified, the TIAR and EIR have been revised to propose mitigation that is feasible and proportional to the impacts resulting from the project. The District will be required to make a fair share contribution to the County's TIF fund, as feasible, for improvements along SR 76 to adequately reduce project-related impacts. At locations where fair share contributions cannot be made to reduce project impacts, impacts will remain significant and unmitigable, and a Statement of Overriding Conditions will be required. Tables 2.2-25 to 2.2-28 have been added to the EIR to summarize the mitigation proposed for implementation to reduce project-related impacts. Refer also to Responses to Comments J-4 to J-5 above.

- J-7 The extension of Pala Mesa Drive is not proposed with the project. The traffic generated by the project would not justify construction of the roadway, and traffic circulation can be adequately handled with the improvements proposed as mitigation in the EIR. The traffic analysis evaluated the proposed project at buildout (Phases I and II - 4,675 ADT); however, it is not anticipated that this number of trips will be achieved for years. The TIAR determined that the extension of Pala Mesa Drive was not necessary as part of the project. This comment did not result in changes to the Draft EIR.

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Language has been added to the EIR to state that emergency access to the site can be adequately provided and service times met without extension of Pala Mesa Drive, as determined by the North County Fire Protection District (NCFPD).

- J-8 The District acknowledges and appreciates this comment; however, future construction of improvements to SR 76 or other roadways in the area to alleviate traffic congestion along SR 76 is not the responsibility of the District. As noted in the traffic analysis. Impacts to SR 76 would occur with or without construction of the proposed project. The SR 76 is a Caltrans facility and the District is not responsible for the timing or management of construction improvements along the roadway. The mitigation proposed in the EIR to reduce project-related impacts is not dependent upon the mitigation provided by other projects in the surrounding area. Mitigation measures proposed with the project will effectively mitigate for the project's impacts and represent the project's fair share contribution. This comment did not result in changes to the Draft EIR.
- J-9 The District has worked closely with the owners of the adjacent Campus Park project, which is currently being reviewed by the County. The improvements proposed for construction by the District along Horse Ranch Creek Road are consistent with County Roadway Design Standards and with that anticipated by the County for the roadway if it were to be constructed as part of the Campus Park project. The District has met with County staff and discussed the required roadway design improvements. The roadway will be constructed based on current County roadway standards applicable at the time grading and improvement plans are approved by the County. This comment did not result in changes to the Draft EIR.
- J-10 All required surveys were completed as part of the biological resources analysis prepared for the proposed project. The USFWS and CDFG have reviewed the EIR and did not request the completion of additional surveys or updates. A follow-up survey was completed for ambrosia, which was found to be negative (refer to Appendix C of the EIR for the results of this survey). In addition, the site currently and historically has supported grazing activities, thereby reducing the site's potential to support sensitive species. As part of the proposed site improvements, the approximately 56-acre area proposed for development will be graded and covered with hydroseed until the time when development is proposed, thereby further reducing the potential for sensitive species to

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- J-13 Section 3.2.5.1 addresses mitigation measures for Loci A and B of CA-SDI-682. This site is not within the boundaries of the project, and it is not clear why mitigation is being required. The EIR should address cultural resources within the boundaries of the project. If reference is made to CA-SDI-682 due to the need to construct Horse Ranch Creek Road offsite to SR-76, then the EIR should note that Horse Ranch Creek Road has been specifically designed and located to avoid impacts to this significant site, based on extensive surveys and testing.
- J-14 **Aesthetics**
It may be beneficial to consider modifying the location from which the "cumulative" visual simulation (Viewpoint 2a in Figure 2.1-9) is presented. The location chosen may not be representative of the cumulative visual context of the multiple projects in the area. A more distant view (i.e., southbound I-15 taken north of the project site) may better encompass the cumulative visual impacts of the projects (i.e., proposed project, Meadowood and Campus Park).
- J-15 In addition, the use of comparable sizing of the existing condition photograph and the simulation in all of the figures in this section would allow the reader to better discern the visual affect from each of the viewpoints.
- J-16 **Noise**
It would be helpful if the report clarified which standard is being used to calculate exterior noise impacts and the corresponding mitigation requirements. Page 3.3-5 indicates that the County of San Diego standards would be used rather than the State Guidelines. However, the impacts (i.e., Impact N-1) appear to be based on a State 70 CNEL standard rather than the County's 60 CNEL standard for the proposed project. In addition, the references to mitigation measure N-1 included on pages 3.3-8 and 3.3-9 indicate that the State Guidelines, and not the County standards, would be used to both describe noise impacts and achieve noise mitigation.
- J-17
- J-18 The projected future traffic volumes on I-15 of 232,000 ADT used to calculate noise impacts appear to be low. Traffic analyses from other projects in the area identify 272,000 ADT for I-15 in the buildout condition. In addition, it is not clear how the exterior noise levels were calculated. Specifically, the exterior noise levels shown represent the hourly noise levels calculated by TNM. However, the CNEL would be greater than these shown hourly noise levels. Using a distribution of 68 percent of the ADT during the daytime hours, 12 percent during the evening hours, and 20 percent during the nighttime hours would be consistent with the 24-hour measurements taken for the other projects in the area (e.g., Campus Park). This would result in a CNEL that is 4 dB greater than an hourly daytime noise level. It would be helpful if the analyses and calculation of exterior CNEL levels take into account the higher percentages of nighttime traffic and the higher percentage of heavy truck traffic that characterize of this portion of I-15. This approach would be consistent with the noise studies prepared for the other projects in the area.
- J-19
- J-20 Finally, the aesthetics section of the EIR (page 2-4) describes a six-foot wall as being proposed to mitigate potential noise impacts. The noise section of the EIR does not specify this mitigation requirement. It would be helpful if this were clarified.

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occupy the site. For these reasons, the need for updated surveys for sensitive plants or animals is not considered necessary. This comment did not result in changes to the Draft EIR.

- J-11 Comment noted. The cultural site (CA-SDI-16890) is located offsite, as described in Section 3.2.3.2 of the EIR. Proposed improvements on SR 76 have the potential to impact unidentified cultural remains at this site, and therefore, such impacts must be addressed in the EIR and mitigation provided. Mitigation in the form of monitoring is proposed in case of discovery of such resources to reduce potential impacts to less than significant. This comment did not result in changes to the Draft EIR.
- J-12 Section 3.2.5.2 provides mitigation in the form of monitoring for CA-SDI-16890. Although it is not likely that the Monserate adobe will be found within the road alignment, due to project design, mitigation is required in case such resources are discovered. This comment did not result in changes to the Draft EIR.
- J-13 The site (CA-SDI-682) is located offsite; however, project-related ground-disturbing activities near SR 76 may result in potential impacts to unidentified subsurface archaeological deposits at this site. The site is eligible for listing on both the California Register and the National Register of Historic Places (NRHP). The site is also identified as an RPO resource by the County of San Diego, and therefore, mitigation cannot be achieved through data recovery and the site must be protected and avoided.
- Based on additional discussion with representatives of the proposed Meadowood project, Mitigation Measure CR-1 in the EIR was revised to require that only Loci B of CA-SDI-682 be capped. As stated in the Draft EIR, mitigation proposed for project impacts to cultural resources are the same as that required for the Meadowood project to ensure consistency between the projects. Both projects would result in potential impacts to unknown cultural resources from improvements required near Horse Ranch Creek Road / SR 76; however, such improvements would not impact Loci A. Impacts to Loci A would only occur as the result of grading improvements associated with the Meadowood project. As such, Mitigation Measure CR-1 was revised to delete the requirement to cap Loci A. Refer to Section 3.2.5 of the EIR.
- J-14 Comment noted. The visual simulation 2.1-9 was prepared from the selected location to analyze a location where the majority of structures

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associated with the Campus Park and Meadowood projects would be visible. The view is a direct view that would occur for travelers southbound along the freeway and Old Highway 395, and affords views of the slopes in the background where future development (Campus Park and Meadowood) is anticipated. This simulation is based upon the Conceptual Site Plan for the North Education Center, wherein the locations and individual building sizes may change at the time when the need for specific facilities or programs are identified. In addition, the visual simulation reflects the current plans prepared for the Campus Park and Meadowood developments, which are in the process of being reviewed by the County of San Diego and may therefore ultimately change from that which is currently depicted in Figure 2.1-9. The Figure is intended to show, based on the best information available to date, a cumulative view of the area if future development were to occur. Figure 2.1-5 shows an additional view of the site with the project from the north looking south. This comment did not result in changes to the Draft EIR.

- J-15 Existing conditions onsite and in the surrounding area are shown in Figures 2.1-1 to 2.1-4. The purpose of Figures 2.1-5 to 2.1-9 is to illustrate the visual composition of the site at full project buildout, and therefore, emphasis is placed on the developed view, versus the existing view. No changes to the visual simulations were made based on this comment. This comment did not result in changes to the Draft EIR.
- J-16 The District acknowledges and appreciates this comment. The State 70 CNEL criterion was used for the onsite project areas and the 60 CNEL criterion was used for offsite areas.
- J-17 The District agrees with this comment. The mitigation measures relate to freeway traffic noise onsite and, therefore, the State 70 CNEL criterion was used. No changes to the EIR were required as a result of this comment.
- J-18 The District acknowledges and appreciates this comment. The traffic volumes were based off of the County of San Diego's General Plan 2020 based on the County's projected land use model. No changes to the EIR were required as a result of this comment.
- J-19 The District disagrees with this comment. The traffic noise levels were measured using Traffic Noise Model 2.5 which is the only noise modeling program accepted by Caltrans in the State of California.

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Land Use

- J-21 The EIR states (Section 4.1.6.3) that the project will use seek a Habitat Loss Permit from the County due to impacts to coastal sage scrub and the coastal California gnatcatcher, but does not include the required findings in the document. It would seem that these findings would be included and reviewed under CEQA to ensure that adequate public review has occurred, avoiding the potential for additional CEQA review at a later date.

Public Facilities

- J-22 Section 4.1.7.3 states that there would be no change in response times to the area for fire protection, and that service would be available. However, the existing and projected response times are not discussed. These should be addressed in the EIR, along with an evaluation of whether the response times are adequate.

- J-23 The area currently is generally vacant grassland with no structures. This would change with project implementation and could affect the manpower and equipment that is needed to insure an adequate level of fire protection. The effect of the change in the nature of the fire protection needed should be discussed and mitigation identified if necessary.

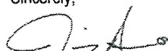
- J-24 Section 4.1.7.4 states that the sewage generated by the project would be treated by the Rainbow Municipal Water District (RMWD), and that impacts are not significant. RMWD has a documented history of not maintaining their infrastructure, resulting in failures and fines. Most recently, there was a spill of raw sewage in an area near the San Luis Rey River, due to lack of maintenance of existing facilities. It is suggested that the project team evaluate the ability of RMWD to properly operate and maintain their existing facilities in order to avoid any future liability.

Project Alternatives

- J-25 Section 5.2.2.2 notes that there would be no traffic impacts under the No Project/No Build alternative. It should be pointed out that an absence of traffic impacts does not mean that congestion would not occur. It does mean that there would be no financial contribution to regional solutions that address traffic congestion.

Thank you for your consideration of these comments. Please let me know if you have any questions.

Sincerely,



Jimmy Ayala, AICP
Director
Community Development

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Because the traffic noise coming onto the site is from Interstate 15, a Caltrans facility, use of this model is appropriate.

- J-20 Comment noted. Reference to the noise wall has been removed from Section 2.1.3.2 of the EIR. Mitigation for potential noise impacts will require that a site-specific noise analysis be prepared at the appropriate time in the future to demonstrate that noise levels onsite are acceptable, or that design measures are required to reduce noise to an acceptable level.

- J-21 Comment noted. As part of compliance with Habitat Loss Permit (HLP) Ordinance, the HLP findings have been prepared and will be submitted to the County of San Diego for review and approval, along with the application for an HLP Permit. The application and findings will be distributed by the County for public review, prior to issuance of the HLP permit, and consistent with CEQA. This comment did not result in changes to the Draft EIR.

- J-22 Comment noted. Language has been added to Section 4.1.7.3 of the EIR for clarification.

- J-23 Comment noted. Refer to Responses to Comment Letter I. A Fire Protection Plan has been prepared for the project to identify fire prevention requirements and design measures to be implemented to reduce the potential for wildfire to occur. The North County Fire Protection District (NCFPD) has reviewed the project and has indicated that it can adequately provide service to the site. A discussion of response times has been added to Section 4.1.7.3 of the EIR. As such, no significant impacts with regards to fire service protection would occur with the project, and no mitigation measures are required.

- J-24 Comment noted; however, this is not an environmental issue that requires consideration under CEQA. The District has purchased 100 EDUs from RMWD for future sewer service. As such, the RMWD has indicated that it is capable of providing sewer service for the project site. The issue of future operation and maintenance of RMWD facilities will be the responsibility of the RMWD, and not the responsibility of the District. This comment did not result in changes to the Draft EIR.

- J-25 Section 5.2.2.2 describes the No Project/No Build Alternative. Under this alternative, the site would continue to be used for grazing purposes and no new development would be proposed. As such, maintenance and operation of grazing activities on the site would not change from present conditions. Therefore, no new vehicle trips would be generated

Comment Letter J – Pardee Homes, October 11, 2007

above that which presently exists, nor contribute to traffic impacts that would require mitigation. Under this alternative, the site would not contribute to additional congestion along area roadways. This comment did not result in changes to the Draft EIR.

ERIC GIBSON
INTERIM DIRECTOR



County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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December 11, 2007

Kelly Hudson MacIsaac
Palomar Community College, Facilities Planning
1140 West Mission Road
San Marcos, CA 92069

COMMENTS ON THE TRANSMITTAL OF RESPONSES TO AGENCY COMMENTS
ON THE DRAFT ENVIRONMENTAL IMPACT REPORT PALOMAR COMMUNITY
COLLEGE - NORTH EDUCATION CENTER

The County of San Diego has received and reviewed the Transmittal of Responses to Agency Comments on the Draft Environmental Impact Report (DEIR) Palomar Community College – North Education Center dated November 28, 2007. The County continues to have concerns about the adequacy of the traffic analysis and associated mitigation presented in the DEIR. Specifically, the Department of Public Works (DPW) has the following comments regarding responses E-26 to E-50:

- K-1
1. The responses state that the TIAR and EIR have been revised to address County comments, however the County staff has not had an opportunity to review the adequacy of the revised TIAR and EIR because a copy of the revised TIAR and EIR was not provided for our review.
- K-2
2. The responses do not provide adequate documentation and/or justification for the project's trip generation assumptions. The project's trip generation assumptions should account for all (full & part time) students enrolled at the college. The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region does not note a trip reduction for part-time students attending a community/junior college. The Institute of Transportation Engineers (ITE) Trip Generation guidelines also do not differentiate between full-time and part-time students. Both County and Caltrans staff have not

Comment Letter K – County of San Diego Department of Planning
and Land Use, December 11, 2007

K-1 The District acknowledges and appreciates this comment. The District has provided the County with an electronic version of the Final EIR. The Final EIR includes responses to comments previously received from the County (letter dated October 12, 2007). The responses address the County's comments, identify whether the comment resulted in a change to the EIR, and if so, where the change can be found within the document.

K-2 RBF met with County DPLU, DPW and Caltrans to negotiate an approach to appropriately calculating project trip generation rates. Per direction from the County and Caltrans, RBF revised the trip generation rate to more closely reflect current trip generation rates that occur at the existing Palomar Education Center in Escondido.

The SANDAG trip generation rate for a Junior College (2 years) is 1.2 daily trips per student. Due to the size, location, and concentration in providing courses based on community needs, the proposed project is not anticipated to function the same as or attract the same type of attendance experienced at a typical junior college. The Palomar Community College District intends to build the education center as community interests and needs grow. Therefore, full buildout of the college may never be realized.

Due to the unique characteristics of the project, a trip generation study was performed at the Palomar Community College Escondido Education Center in February 2008. The purpose of the trip generation study was to establish the correlation between daily trips per student to the number of enrolled students at a campus similar to the proposed project. The trip generation study was conducted at the Palomar Community College Escondido Education Center. The Escondido Educational Center was selected for the study because it is associated with the Palomar Community College District, is located approximately 15 miles south of the proposed project site, and serves a comparable population to the proposed campus. Differences between the Escondido Campus and the proposed Fallbrook campus include availability of services and residential density surrounding the campuses. As Escondido is a more developed and populated area than the Fallbrook community, availability to and proximity of urban services such as employment, retail, and public transportation may be greater. These characteristics may result in a higher number of students visiting the campus multiple times per day than what may be expected at the Fallbrook campus.

K-2
cont'd

accepted the project's trip generation assumptions/methodology. The trip generation assumptions/methodology has a significant effect in determining the project's potential direct and/or cumulative impacts.

K-3

3. To the extent possible, the completion of the college project should coincide with the completion of the SR-76 widening project. The response indicates that the college project will likely be completed before the completion of the SR-76 widening project. Assurance should be provided that there will not be a lengthy amount of time between the completion of the college project and the construction of the SR-76 widening project. Without the SR-76 improvements, the proposed project results in direct impacts to roadway segments and intersections.

K-4

4. As with other proposed developments located in the northeastern portion of the Fallbrook community, the college project is responsible for fully mitigating all of the project's significant traffic impacts regardless of the impacted roadway facility's proximity to the project site. Response E-30 does not concur with the County's comment. The response should further elaborate why the project would not be responsible for mitigating all of its traffic impacts and why overriding findings would not be required for the project's unmitigated impacts.

K-5

5. The college project should contribute to the County's TIF program in order to mitigate cumulative impacts from project traffic added to County roads.

K-6

6. The response E-32 states that the college project is not planned as a phased development and that the EIR identified the buildout impacts and mitigation measures. Subsequently, the project's mitigation measures should not be phased in and all required road improvements should be constructed before the college project comes online.

K-7

7. County staff has not reviewed how the revised TIAR addresses whether or not the proposed Horse Ranch Creek alignment will require a General Plan Amendment (GPA). The applicant will need to demonstrate that the proposed changes to currently adopted Circulation Element Plan (Pankey Road/SC 260.2) will not warrant a GPA. County staff will determine General Plan conformance after the applicant has provided documentation concerning proposed changes to Circulation Element road alignment, design, and connectivity to other Circulation Element roads. The County reserves the authority to request a GPA after the project's EIR has been certified by the Community College District Governing Board.

Comment Letter K – County of San Diego Department of Planning and Land Use, December 11, 2007

Daily traffic volumes were collected over a five-day (Monday through Friday) period in February 2008 to capture the average daily traffic experienced on campus. It should be noted that counts were collected at the beginning of the quarter when attendance is typically higher than towards the end of the quarter. The data collection revealed an ADT of 4,269 daily trips on the Escondido campus, or 55 percent of total enrollment (7,715 enrolled students). Therefore, the trip generation study resulted in a recommended trip generation rate of 0.55 trips per student for the analysis of the Fallbrook Educational Center. The Draft EIR was revised to reflect these changes; refer to Section 2.2 of the EIR for additional discussion.

K-3

At the time the traffic analysis was prepared, SR-76 was scheduled to be widened from two lanes to six lanes by year 2012. The College is scheduled to open Fall 2011. Therefore, the construction of improvements to mitigate the project's direct impacts would likely be removed during the SR-76 construction project. Cumulative impacts resulting from the project will be mitigated through the payment of fees toward the widening project. However, County of San Diego does not accept payment of fees to mitigate direct project impacts. Therefore, there is no feasible mitigation for the project's direct impacts. However, it is not anticipated that there will be a lengthy amount of time between the completion of the college project and construction of the SR 76 widening project, although there is no guarantee that the widening project will be completed on time, due to the unpredictability of funding and continued need. No change was made to the Draft EIR as a result of this comment.

K-4

Mitigation measures have been identified to reduce each of the project's impacts identified in the EIR, as feasible. The District will make fair share contributions at all affected intersections and roadway segments, as feasible, to reduce project impacts to less than significant. However, the County of San Diego does not accept payment of fees to mitigate direct project impacts. Therefore, direct impacts under the Existing Plus Project and the Horizon Year 2030 with Phase I and Phase II (With Buildout of the RTP) scenarios would remain significant and unmitigable. As a result, not all project traffic impacts would be reduced to less than significant with contribution of a fair share portion of funds as mitigation. For these impacts, a Statement of Overriding Conditions would be required.

December 11, 2007

K-7
cont'd

The County of San Diego appreciates the opportunity to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Bobbie Stephenson at (858) 692-3680.

Sincerely,



Interim
Deputy Director

ERIC GIBSON, Interim Director
Department of Planning and Land Use

cc: Dustin Steiner, Policy Advisor, Board of Supervisors, District 5, MS A500
Vince Nicoletti, CAO Staff Officer, DCAO, M.S. A-6
Naël Areigat, Project Manager, Department of Public Works, MS Q336
Alex Jewell, RBF Consulting
Francisco "Nick" Ortiz, Department of Public Works, Transportation Division,
MS 0334
Fallbrook Community Planning Group
Jennifer Campos, Interim Land Use/Environmental Planning Manager,
Department of Planning and Land Use, MS 0650
Priscilla Jaskowski, Administrative Secretary, Department of Planning and
Land Use, MS 0650

Reference County Project IJN 3999 07-024

Comment Letter K – County of San Diego Department of Planning and Land Use, December 11, 2007

In addition, the District will signalize the Pala Road (SR 76)/Horse Ranch Creek Road intersection and provide sufficient turning movements and storage capacity to reduce project impacts at this intersection to less than significant.

The proposed mitigation represents feasible and proportional mitigation that will ultimately improve traffic conditions and provide improvement to the levels of service at the affected roadway segments and intersections. Refer to Tables 2.2-25 through 2.2-28 of the EIR for a summary of project mitigation proposed.

K-5 The Draft EIR was revised to allow the District to contribute fair share payments into the County's TIF fund, as feasible, to mitigate for cumulative impacts; refer to Section 2.2 of the EIR for additional discussion. Refer also to Response to Comment K-4, above.

K-6 The District acknowledges and appreciates this comment. The Draft EIR and traffic analysis were revised to analyze a phased project (Phase I and Phase II – Buildout). Physical improvements proposed at the intersection of SR 76 (Pala Road)/Horse Ranch Creek Road will be constructed with initial development of the site, along with Horse Ranch Creek Road, and will not be phased. However, payment of fair share contributions will occur at the time when traffic generated by the project is sufficient to trigger a significant impact on a particular intersection or roadway segment. Refer to Tables 2.2-25 through 2.2-28 of the EIR for a summary of mitigation measures proposed.

K-7 Comment noted. Language was added to the TIAR and EIR to address the potential need for a General Plan Amendment for the proposed realignment of a portion of Pankey Road (future Horse Ranch Creek Road). The District met with the County several times to discuss this issue, and it was determined that a General Plan Amendment will be required to address project consistency with the General Plan. Refer to Section 2.2.6 of the EIR for additional discussion.

DEPARTMENT OF TRANSPORTATION

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December 11, 2007

11-SD-76
PM 17.9
Pankey Road
Palomar College
DEIR SCH 2007011136

Mr. Mark Evilsizer
President, Governing Board
Palomar Community College District
San Marcos Campus
1140 West Mission Road
San Marcos, CA 92069-1487

Dear Mr. Evilsizer:

L-1

The California Department of Transportation (Caltrans) is providing you with this correspondence regarding the Palomar Community College District's (District) response to our comments on the Palomar Community College North Education Draft Environmental Impact Report (DEIR - SCH 2007011136). Caltrans submitted on October 18, 2007 our comment letter identifying issues we have with the DEIR. Subsequent to our letter, we received the District's response to our agency's comments.

L-2

Caltrans does not agree with the District's findings on how the vehicular traffic generation rate was determined. The District methodology using Full Time Equivalent Students (FTES) to calculate average daily student trips is not a known recognized methodology that has been adopted as a standard practice. The accepted guidelines used to determine Average Daily Trips (ADT) for the San Diego region for community colleges (2 years), is to use the *San Diego Association of Governments Vehicular Traffic Generation Rates for the San Diego Region*, or the recommended practice identified by the Institute of Transportation Engineers (ITE) latest *ITE Trip Generation Handbook*.

Therefore, the result of using the FTES methodology may be an underreporting of total daily traffic that is generated by the proposed campus, and as a result, an inaccurate finding of impacts and necessary mitigation to State transportation facilities.

Furthermore, the FTES methodology currently identified in the DEIR may not be acceptable for Caltrans encroachment permit approval for access to State Route 76 (SR-76).

L-3

We very much appreciate the coordination efforts made by both the District and RBF Consulting to resolve this issue. However, Caltrans cannot support at this time the

"Caltrans improves mobility across California"

Comment Letter L – California Department of Transportation, District 11, December 11, 2007

L-1 The District acknowledges and appreciates this comment.

L-2 RBF met with County DPLU, DPW and Caltrans to negotiate an approach to appropriately calculating project trip generation rates. Per direction from the County and Caltrans, RBF revised the trip generation rate to more closely reflect current trip generation rates that occur at the existing Palomar Education Center in Escondido.

The SANDAG trip generation rate for a Community College (2 years) is 1.2 daily trips per student. Due to the size, location, and concentration in providing courses based on community needs, the proposed project is not anticipated to function the same as or attract the same type of attendance experienced at a typical junior college. The Palomar Community College District intends to build the education center as community interests and needs grow. Therefore, full buildout of the college may never be realized.

Due to the unique characteristics of the project, a trip generation study was performed at the Palomar Community College Escondido Education Center in February 2008. The purpose of the trip generation study was to establish the correlation between daily trips per student to the number of enrolled students at a campus similar to the proposed project. The trip generation study was conducted at the Palomar Community College Escondido Education Center. The Escondido Educational Center was selected for the study because it is associated with the Palomar Community College District, is located approximately 15 miles south of the proposed project site, and serves a comparable population to the proposed campus. Differences between the Escondido Campus and the proposed Fallbrook campus include availability of services and residential density surrounding the campuses. As Escondido is a more developed and populated area than the Fallbrook community, availability to and proximity of urban services such as employment, retail, and public transportation may be greater. These characteristics may result in a higher number of students visiting the campus multiple times per day than what may be expected at the Fallbrook campus.

Daily traffic volumes were collected over a five-day (Monday through Friday) period in February 2008 to capture the average daily traffic experienced on campus. It should be noted that counts were collected at the beginning of the quarter when attendance is typically higher than towards the end of the quarter. The data collection revealed an ADT of 4,269 daily trips on the Escondido campus, or 55 percent of total

Mr. Mark Evilsizer
December 11, 2007
Page 2

L-3
cont'd

certification of the EIR until further justification or changes are made to the traffic analysis regarding the trip generation rate calculations. The District has been very supportive in working with Caltrans to resolve this issue, and our agency would be willing to continue our coordination efforts in order to reach an agreement that is favorable to both agencies.

If you have any questions, please contact me at (619) 688-6960.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

C: Scott Morgan
Nael Areigat
Susan Hoang
Nick Ortiz
Alex Jewel
Kelly Hudson-Macisaac

State Clearinghouse, OP&R
County of San Diego, DPW
County of San Diego, DPW
County of San Diego, DPW
RBF Consulting
Palomar Community College District

**Comment Letter L – California Department of Transportation,
District 11, December 11, 2007**

enrollment (7,715 enrolled students). Therefore, the trip generation study resulted in a recommended trip generation rate of 0.55 trips per student for the analysis of the Fallbrook Educational Center.

The proposed mitigation represents feasible and proportional mitigation that improves traffic conditions and provides immediate improvement to the levels of service at these intersections. Mitigation is provided in the EIR to mitigate for impacts on traffic. Overriding findings will be prepared for impacts that cannot be mitigated to less than significant as appropriate. Revisions were made to the Draft EIR as a result of this comment to reflect the new trip generation rate that was calculated per the direction of the County and Caltrans; refer to Section 2.2. of the EIR.

L-3

The District acknowledges and appreciates this comment. Refer also to Response to Comment A-3. Revisions were made to the Draft EIR as a result of this comment to reflect the new trip generation rate that was calculated per the direction of the County and Caltrans; refer to Section 2.2 of the EIR.

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IC GIBSON
CRIM DIRECTOR



County of San Diego

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May 21, 2008

Kelly Hudson MacIsaac
Palomar Community College, Facilities Planning
1140 West Mission Road
San Marcos, CA 92069

RE: COMMENTS ON THE PALOMAR COMMUNITY COLLEGE - NORTH
EDUCATION CENTER

The County of San Diego has received and reviewed the following documents regarding the proposed Palomar Community College North Education Center: the Traffic Impact Analysis (TIA) Report prepared by RBF Consulting dated April 17, 2008; the revised EIR Section 1.0 Project Description and Environmental Setting; and the revised EIR Section 2.2, Traffic and Circulation. In response to the documents, the County, as a responsible agency under CEQA Section 15381, has completed its review and has the following comments regarding the content of the above documents:

Traffic and Transportation

M-1

1. The Executive Summary in the TIA should provide text and in particular, a table that explicitly shows the mitigation measures that will either be completed or funded (fair share) by the project. The Executive Summary provides five pages of text and five pages of tables that summarize the impacts and "Recommended" Mitigation Measures, but it is not until the last three sentences of the Executive Summary that the TIA mentions that funding mechanisms are not in place and that it is recommended that the project identify improvements (2) most directly related to the project.

M-2

2. The TIA and EIR must demonstrate that each of the project's direct and cumulative impacts will be fully mitigated by the mitigation measures proposed

**Comment Letter M – County of San Diego, Department of Planning
and Land Use, May 21, 2008**

- M-1 The District concurs with this comment. The tables in the Executive Summary have been revised to clearly state the project impact and the proposed mitigation. Please see Tables ES 1 through ES 4. The Traffic Impact Analysis (TIA) was revised as a result of this comment.
- M-2 The District concurs with this comment. The TIA has been revised to clearly identify the project direct and cumulative impacts. The report has been revised to clearly identify the proposed mitigation and to state the significance of the impact after mitigation. Please see revised Tables ES 1 through ES 4 in the TIA Executive Summary for a summary of this report.

The TIA and Final EIR have been revised to clarify the proposed traffic mitigation. Direct impacts to State Route 76 (SR 76) have been identified and determined to be significant and not mitigated. This has not changed since the draft EIR. The District has agreed to participate in the Transportation Impact Fee (TIF) Ordinance program to address cumulative impacts on County roadway segments and intersections.

District staff met with staff from the County of San Diego and Caltrans on June 5, 2008 to discuss the County's May 21, 2008 comment letter. As part of that discussion, the District and County staff agreed that constructing a traffic signal at the intersection of Old Highway 395/Stewart Canyon/Cannonita was not necessary, as the District would be paying fees to the County, per the TIF. The County TIF program is a mitigation fee program designated for the improvement of selected roadways and intersections within the unincorporated area of the County. The intersection of Old Highway 395/Stewart Canyon/Cannonita is included within the County's TIF program. The County updated the TIF Program in January 2008. Under the provisions of State CEQA Guidelines section 15130(a)(3), payment of the fee "to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact" allows an EIR to "determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant." The project will be conditioned to pay a fair-share contribution pursuant to the TIF program. Based on the existence of these programs, there is a reasonable likelihood that payment of these fees will result in construction of needed improvements at an appropriate time. Therefore, the signalization of the Old Highway 395/Stewart Canyon/Cannonita intersection is no longer a part of the project and has been removed from the EIR. The TIA and Final EIR have been updated to reflect this change.

- M-2
cont'd and implemented by the project. The project proposes to construct and install signals at Horse Ranch Creek Road and Old Highway 395/Canonita Drive/ Canyon Road instead of contributing to the fair-share funds for the recommended improvements to ten cumulatively impacted intersections. The project cannot opt to choose alternative mitigation measures for improvements closer to the proposed project site (Ex. MM TR-7, & 10) and disregard the project's significant impacts that occur to roadway facilities not located adjacent to the project site.
- M-3 3. Two of the cumulatively impacted intersections are County intersections: 1) Old Highway 395/Canonita Drive/Stewart Canyon Road and 2) Old Highway 395/Reche Road. The EIR/TIA does not identify a specific mitigation measure towards the Old Highway 395/Reche Road intersection. The EIR/TIA should provide a recommended mitigation measure to address the project's impacts to the Old Highway 395/Reche Road intersection. Without a recommended mitigation measures, the project's impact to the Old Highway 395/Reche Road intersection would need to be identified as significant and unmitigated.
- M-4 4. The proposed project must mitigate its direct impacts in one of the following ways: 1) construct the necessary improvements or 2) wait until the improvements have been constructed before the project comes online. The local regional cumulative impacts can be mitigated by the following additional methods: 1) participate in the TIF program and/or 2) make a fair-share contribution to a construction project after it has been identified/established as an officially scheduled project by the County/Caltrans. The TIA should use the aforementioned approach when proposing mitigation measures for the project's direct and cumulative impacts.
- M-5 5. The EIR/TIA should clearly identify that the proposed project will be required to contribute to the County's Traffic Impact Fee (TIF) program.
- M-6 6. Table ES-3 (TIA Pg.11) identifies several Caltrans and County roadway facilities in which the project will result in significant and unmitigated impacts. One of the project's significant and unmitigated impacts is to segments of Old Highway 395. The TIA recommends a Statement of Overriding Findings for the significant and unmitigated impacts and makes assumptions regarding the GP 2020 EIR. The TIA should not speculate on the conclusions and findings of the yet to be prepared GP 2020 EIR and should not use the unapproved GP 2020 EIR as a basis for accepting Overriding Findings for significant unmitigated impacts to Caltrans and County roadway facilities. The TIA must demonstrate the project's significant impacts have been mitigated to the extent possible.
- M-7 7. The Existing plus Project analysis is based only on the Phase 1 student enrollment projection of 3,400 students and not the maximum enrollment of 8,500 students. The EIR and TIA must clearly demonstrate that all of the project's significant Phase 1 traffic impacts will be fully mitigated.

Comment Letter M – County of San Diego, Department of Planning and Land Use, May 21, 2008

The proposed project still includes the construction of the traffic signal at the intersection of Horse Ranch Creek Road and SR 76. This has not changed since the draft EIR. The project has not chosen alternative mitigation measures for improvements closer to the project site. The comment references 10 cumulative impact intersections, these intersections have been identified as cumulative significant impacts and payment to the County's TIF fees has been identified as mitigation. Mitigation Measures 7 and 10 (now Mitigation Measures 9 and 12 in the Final EIR) have been revised in both the TIA and EIR to state that the appropriate mitigation is payment into the TIF Fees. As stated above payment into an established mitigation fee program reduces potential impacts to less than significant per Section 15130(a)(3). No potentially significant impacts have been disregarded on roadway facilities not located adjacent to the project site. The TIA and Section 2.2 have been revised in response to this comment.

M-3 The District concurs with this comment. The TIA and EIR have been revised to state that the appropriate mitigation for cumulative impacts is payment into the County TIF program. Mitigation Measures MM-14 in Section 2.2.8.3 of the EIR. Please see Response M-2 for a discussion on using TIF fees to reduce potential impacts.

M-4 The District does not agree that the project must mitigate direct impacts using the two methods suggested in the comments. The District, as a lead agency has determined that improvements to SR 76 are not feasible due the substantial cost of widening SR 76 to four lanes, which is what is required to reduce potential impacts to SR 76. Please see the discussion following Mitigation Measures MM-1 through MM-4 in Section 2.2.8.2 of the EIR. The District has identified these impacts as significant and not mitigated and is prepared to adopt Statement of Overriding Considerations in support of the project.

The District agrees that cumulative impacts can be mitigated by participating in the County's TIF program and making a fair share contribution to the Caltrans interchange improvement program at Interstate 15 and SR 76. Caltrans has established a program for their proposed interchange improvement at SR 76 and Interstate 15 which would widen the interchange an approach to six lanes. As shown in Appendix H of Appendix B, Caltrans has based their planned improvements for the interchange on traffic volumes project in the RTP. Based on the existence of these programs, there is a reasonable likelihood that payment of these fees will result in construction of needed improvements at an appropriate time.

**Comment Letter M – County of San Diego, Department of Planning
and Land Use, May 21, 2008**

Therefore, the project would instead provide fair share contribution toward the I-15 / SR 76 interchange improvement project to mitigate for cumulatively significant project impacts. The Caltrans fair share payment system is based on a project's percentage of traffic through an intersection based on the total projected volume of traffic at the intersection. The percentage of project traffic is then applied to the overall cost of the improvements. The percentage of project traffic represents the project's fair share percentage of the overall cost of the improvements. The project is then required to pay the commensurate fee amount towards the future intersection improvement project. Project impacts would be reduced to less than significant with mitigation.

The EIR and TIA have been revised to address this comment.

- M-5 The District agrees that proposed project will make a contribution to the County's TIF program. The TIA and EIR have been revised to address this comment.
- M-6 The District agrees with this comment. The TIA and EIR have been revised to identify the segments of Old Highway 395 as a significant cumulative impact. The discussion regarding the future General Plan Update has been removed. The discussion in the TIA has been revised to state that the project will contribute to the County's TIF program as mitigation. Please see Response M-2 for a discussion of the use of a mitigation fee program to reduce potential cumulative impacts. Please see Table ES-3 in the TIA and Table 2.2-12 in the TIA. The EIR and TIA were revised in response to this comment.
- M-7 The District concurs that the Existing plus Project analysis includes the Phase I traffic. Potential impacts under this scenario are summarized in Table ES -1of the TIA and identified Tables 2.2-9 and 2.2-10 of the EIR. Please see the discussion following Mitigation Measures MM-1 through MM-4 in Section 2.2.8.2 of the EIR. The District has identified these impacts as significant and not mitigated and is prepared to adopt Statement of Overriding Considerations in support of the project. The EIR and TIA were revised in response to this comment.

- M-8 8. The EIR/TIA must clearly identify what road improvements must be in place prior to the opening of the college and prior to the college reaching the 3,400 students threshold (Phase 1).
- M-9 9. The EIR/TIA must clearly describe what road improvements must be in place to allow the proposed Phase 2 project to increase student enrollment beyond 3,400 students and up to 8,500 students. Once the college project commences with the Phase 2 development, all of the significant traffic impacts that would occur at the maximum 8,500 student enrollment must be fully mitigated and the corresponding road improvements must be constructed/completed. The timing of the road improvements that would be required after Phase 1 and between the years 2011 and 2030 (Phase 2 time period) is not specified in the EIR/TIA.
- M-10 10. The EIR/TIA state (EIR Pg.1-4) that the worst-case scenario would occur at buildout of the college campus around the year 2030. Because the timing/schedule for the Phase 2 development is unknown at this time, the EIR/TIA should provide an Existing plus Phases 1 and 2 traffic analysis for a true worst-case traffic assessment.
- M-11 11. The EIR indicates (EIR Pg.1-9) that the District will need to obtain land not owned by the District in order to be able to build Horse Ranch Creek Road. The EIR states that the District will be required to obtain agreements with the appropriate landowners in order to contract the roadway. The EIR should describe the process that would be used to obtain the necessary lands if the land owners and the District can not come to any agreement.
- M-12 12. The project has direct impacts to three SR-76 segments located west of I-15. The TIA and EIR must clearly state whether or not the project proposes fair-share contributions to the approved Caltrans/RTP expansion project to mitigate its impacts. For example, the EIR (Pg.2-51), for Mitigation Measure TR-4, states that to partially mitigate the project's impacts to SR-76 the District would contribute a fair share towards widening and that it is feasible mitigation, but then states the improvements will be constructed prior to the project. Also, the TIA should note if Caltrans has determined that fair-share contributions are an adequate mitigation measure for the project's direct and cumulative impacts to SR-76.
- M-13 13. Based on current Caltrans estimates, SR-76 East construction is not expected to begin until 2011. If the project comes on-line before the Caltrans improvements to SR-76 west of I-15 are made then impacts will remain significant and unmitigated. The proposed project should be conditioned to open only after the expansion of SR-76.
- M-14 14. The project is also relying on the SR-76 widening improvements that will be constructed east of I-15 as part of the Rosemary Mountain project to address
cont'd

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- M-8 The TIA and EIR have been revised to clearly state the proposed mitigation measures. The project is required to construct Horse Ranch Creek Road and construct the traffic signal at Horse Ranch Creek Road and SR 76 prior to the opening of Phase I. No other roadway or intersection improvements are proposed. The remaining mitigation will be satisfied with the payment of fees to the County TIF program and to Caltrans for the Interstate 15/SR 76 interchange improvement. With the proposed project, the roadbed for Horse Ranch Creek Road would be graded to its full intended right-of-way (ROW) width of 106 feet. To the southeast of the project site, where the road would intersect with SR 76, the ROW would be graded to 116 feet in width to accommodate a future left turn lane. The left turn lane would be constructed upon future buildout of Horse Ranch Creek Road by other developers when traffic volumes require the additional lane; refer to Figure 1-7 of the EIR. With the proposed project, the road would be improved within the ROW to its intended half-width consistent with County of San Diego Roadway Design Standards. The road would be paved to 32 feet in width to construct two travel lanes, with curb and gutter along the western edge. Additionally, the applicant will signalize the intersection at Horse Ranch Creek Road and SR 76. Three points of access into the site are anticipated along the Horse Ranch Creek Road frontage, which will be designed to County standards, and with consideration for the Campus Park project relative to intersection geometry; refer to Figure 1-4. Along the improved project frontage with Horse Ranch Creek Road, (generally from the northern project boundary to the southern boundary), an additional 14-foot wide landscaped easement would contain a meandering walkway comprised of an 8-foot wide decomposed granite trail. A 16-foot wide landscaped area would be located adjacent to the west of the 14-foot easement; refer to Figure 1-7. These improvements will be required prior to the opening of the College.
- M-9 The project does not propose the construction of any physical intersection or roadway improvements as mitigation for project impacts. Development of the project site is limited by funding provided by Proposition M. Development of the project site would be phased over several decades, with an estimated total building square footage of approximately 380,000 s.f., which is anticipated to occur around the year 2030. The project site would be built out commensurate with student enrollment levels and programming needs. Payment to the County's TIF program would be made based on the square-footage of building area proposed to be constructed. Payments to the Caltrans

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interchange program would be made based on a fair share calculation based on the amount of additional traffic. Refer also to Response to Comment M-8, above regarding the physical roadway improvements the project would complete as part of Phase I.

- M-10 The District concurs with this comment. The TIA and EIR have been revised to include an analysis of the project plus Phase I and Phase II (Horizon Year 2030 With Buildout – Phase I and Phase II Conditions (With Buildout of the SANDAG Regional Transportation Plan). As indicated in Table 2.2-27 of the EIR and Table 25 of the TIA, no feasible mitigation has been identified to reduce potential impacts under this scenario. Impacts would remain significant and not mitigated. The County of San Diego General Plan update includes Pala Road (SR 76) as a four lane arterial in the General Plan Circulation Element update. Traffic volumes forecast using the SANDAG traffic model shows that forecast daily traffic (without the project) would exceed the allowable threshold for a four-lane arterial. Therefore, six lanes are required to maintain acceptable operating conditions. It is therefore recommended that Statements of Overriding Considerations be made for the roadway segments impacted by the project under this scenario, as the County does not have the right-of-way for future improvements to the roadways, and widening the road to more than four lanes would be inconsistent with the existing Circulation Element classifications for SR 76.
- M-11 The District has been coordinating with the surrounding landowners with plans to develop their lands in the near future (Meadowood, Campus Park and Pappas). As the construction of Horse Ranch Creek Road will provide required north-south access to the College, site, it is also necessary to for these other projects as well, in particular, Campus Park. The District has coordinated closely with the Campus Park developers for the engineering design requirements of the roadway to ensure that the design can effectively serve both properties. The roadway is shown in the Land Use Concept Plan of the Campus Park Specific Plan, and construction of the easterly half of the roadway will be completed by the Campus Park owners. In addition, the alignment of Pankey Road is shown on the General Plan Circulation Element, and is intended by the County to provide a north-south connection between SR 76 and Stewart Canyon Road in the north. As part of the project, the District plans to provide construction of the roadway, with a slight realignment of the roadway to the east. Although a General Plan Amendment will be required, construction of the roadway is consistent with the intent of the Circulation Element to provide the north-south connection.

- M-14 cont'd [the project's cumulative impacts. As with the segment of SR-76 west of I-15, the proposed project should be conditioned to open only after the completion of the SR-76 widening east of I-15.
- M-15 [15. The EIR/TIA should provide recommended mitigation measures for the project's cumulative impacts to the segments of SR-76 located west and east of I-15.
- M-16 [16. Caltrans staff should verify the validity of the roadway capacity assumptions used for the segment of SR-76 east of I-15. The EIR/TIA assumed a 2-lane Town Collector with a LOS E capacity of 19,000. A 2-lane Town Collector would have a continuous center turn lane/median which is why it would have a greater capacity than a standard two-lane road (16,200 ADT). If Caltrans does not agree with the capacity assumptions used for SR-76 east of I-15, the EIR/TIA LOS and project impact assessment will need to be redone.
- M-17 [17. In the EIR (Pg. 2-46 to 2-49), Section 2.2.6.1 Mitigation Measures Summary, there is no clear discussion of mitigation measures for impacts to roadway segments. This section only states that improvements will be made to two intersections in lieu of fair share contributions to all of the impacted intersections, but not whether or not it is also in lieu of fair share contributions to roadway segments. The "summary" should include discussion for roadway impacts/mitigations as well.
- M-18 [18. The EIR (Pg. 2.61 to 2.66), Impact After Mitigation section, frequently lists a Mitigation Measure for an "intersection", but then in the following paragraph summarizing the mitigation measure the EIR refers to the improvement as a "roadway segment", and vice-versa.

County of San Diego General Plan, Circulation Element Consistency

- M-19 [19. As mentioned in previous letters to the school district, a GPA will be required based on the project's proposed road improvements that are inconsistent with the County's current Circulation Element Plan. The EIR should recognize that a GPA will be one of the approvals required to implement the project. The GPA does not need to be complete prior to approval of the project, however the EIR would need to include the appropriate analysis to support approval of the GPA to amend the County's Circulation Element Plan. The GPA approval will need to be complete prior to County issuance of a grading permit for the construction of Horse Ranch Creek Road. Based on the proposed deletion of SC 260.2 and the proposed Horse Ranch Creek Road alignment, the following are factors which are not in conformance with the County's currently adopted Circulation Element, necessitating a General Plan Amendment to be conducted:

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- M-12 The TIA and EIR have been revised to propose that the District make fair share contributions to the County's TIF fund for impacts to these roadway segments. The payment of fair share fees is an appropriate and proportional means to reduce project impacts. Discussion with Caltrans has indicated that fair share contributions for the project's cumulative impacts to SR 76 are adequate. Please see discussion in M-2 and M-4. However, as the County does not accept fair share payments to mitigate for direct impacts, such impacts would remain significant and unmitigable, with no feasible mitigated identified.
- M-13 The District does not concur with this comment. The District has met with the County on several occasions to discuss appropriate mitigation measures to reduce potential project impacts. The District will be required to contribute fair share payments to the County's TIF fund for project impacts along SR 76. As widening of the roadway would not be financially feasible for the District to complete independently, fair share contribution for improvement of the roadway is seen as appropriate and proportional.
- M-14 The District does not agree with this comment. The project does not have any direct impacts to the segment of SR 76 east of Interstate 15 under the Existing Plus Phase I project scenario. The project does have cumulative impacts under the Existing Plus 2030 Horizon Year scenario. As such, the project will contribute to the County's TIF program for cumulative impacts to this roadway segment. It should be noted that as of June 2008 construction of the SR 76 in conjunction with the Rosemary's Mountain project was initiated. Its current construction schedule is two years. At that schedule, the roadway improvements would be completed prior to the planned opening of the campus in 2011. No changes to the TIA or EIR were made in response to this comment.
- M-15 The District agreed with this comment. The District has agreed to contribute to the County's TIF program. The District has confirmed with County staff that the roadway segment on SR 76 impacted by the proposed project are covered by the County's TIF Ordinance as updated in January 2008. Table ES -3 in the TIA has been updated to reflect the District's contribution to the TIF program.
- M-16 The District has worked with Caltrans staff to evaluate the appropriate traffic volumes for SR 76 east of Interstate 15. Caltrans provided the District with a Draft Study Report for 76 East, dated December 10, 2007 and prepared by LLG. The report provides traffic volumes that based

M-20

- Proposed roadway/design plans would shift SC 260.2 (Pankey Road) more than a quarter-mile east to the new road (Horse Ranch Creek Road) alignment.
- The proposed alignment does not match the current General Plan CE alignment for SC 260.2, which has Pankey Road aligned directly with Pankey Road/Dulin Road south of SR-76.
- Dulin Road would no longer directly connect to the SC 260.2 corridor north of SR-76. There would no longer be the planned intersection of Circulation Element roads consisting of SR-76, Pankey Road, and Dulin Road
- The proposed alignment of Horse Ranch Creek Road creates a new CE intersection along SR-76
- Project related mitigation measures propose signalization at the new intersection of Horse Ranch Creek Road and SR-76
- Proposed graded width (106') of Horse Ranch Creek Road has been planned to be greater than the ultimate right-of-way (ROW) width required for the current classification of SC 260.2 (Light Collector = 60')
- The proposed realignment does not address the planned extension of Pala Mesa Drive (SC 150) to SC 260.2/Pankey Road which is part of the current Circulation Element Plan.
- The DEIR states that the roadway design plans coincide with the GP 2020 Update, but the GP 2020 Update has not yet been approved by the County Board of Supervisors. Furthermore, there is no guarantee that the GP 2020 Update roadway network will be adopted as currently recommended by County staff and endorsed by the Board of Supervisors.

M-21

20. The TIA (Pg.20) and EIR (Pg.2-34 and 2-45) should be consistent when discussing the requirement of a General Plan Amendment (GPA) for the alignment of Horse Ranch Creek Road.

M-22

21. The EIR/TIA should clearly identify and assess the proposed changes to the County's Circulation Element Plan and provide a Plan-to-Plan assessment. The proposed GPA should account for the planned extension of Pala Mesa Drive east to Pankey Road/Horse Ranch Creek Road and the segment of Pankey Road (SR-76 to Pala Mesa Dr) that would remain in the Circulation Element Plan roadway network. The GP 2020 documentation regarding the recommended roadway network should be referenced when developing the project's proposed GPA. The GPA assessment should demonstrate that the

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on the Regional Transportation Plan for San Diego County. The traffic analysis in the EIR and TIA were revised to update the analysis based on the Caltrans report. The Caltrans report included higher traffic volumes along SR 76 than what the County had projected in the General Plan Update. Information from the Caltrans report is included in the TIA as Appendix H. The Caltrans report shows that the segment of SR 76 east of Interstate 15 is proposed to be six lanes on the approach. This is two travel lanes in each direction, and a deceleration and acceleration lane as cars approach and leave the interchange. The additional lanes would increase the capacity of the interchange over the existing two-lane configuration. The EIR and TIA have been revised to include this information.

M-17

The EIR and TIA traffic analyses have been revised to clearly state what the proposed mitigation measures are. The traffic analysis has been revised and no longer states that traffic improvements are proposed in lieu of making fair share contributions. The project will contribute to the County's TIF fee and to the Caltrans interchange improvement project as part of the 76 East project. Please see Responses M-2 and M-4 for an explanation of the project's contribution to those mitigation fee programs.

M-18

This District concurs with this comment. Section 2.2.8.3 of the EIR has been revised to correctly identify the segments and roadways.

M-19

The District has met with County staff in June 2008 and discussed the General Plan Amendment Process with staff. The EIR and TIA have been revised to identify that a General Plan Amendment is required and have included the appropriate analysis in the traffic discussion regarding potential impacts as a result construction of Horse Ranch Creek Road. The District will work with County staff to ensure conformance with the County's Circulation Element and General Plan.

M-20

The District does not concur with bullets 2 and 3 of this comment. The project does not propose to remove the segment of Pankey Road from Pala Mesa Drive to SR 76. No changes to this segment are proposed. Please see Figure 1-8C in the EIR, which was added to clarify this comment. Therefore, no impacts would occur on the proposed alignment of Pankey Road and Dulin Road (South of SR 76) would occur. No inaccuracies have been identified in the other bullets. A new figure was added to the EIR (Figure 1-8C) and to the TIA (Exhibit 34) as a result of this comment.

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M-22 cont'd proposed changes to the Circulation Element Plan will not prevent the planned Circulation Element road system for operating at its planned Level of Service at buildout.

M-23 22. The EIR Project Description should address/identify the GPA for Horse Ranch Creek Road.

California Government Code Section 65402, General Plan Consistency Determination

M-24 23. To date, the Department of Planning and Land Use has not received a request for a review of the project's conformity with the County's General Plan as required pursuant to Section 65402(c) of the Government Code. Please submit a letter requesting this review so that the County may report on the project's conformity with the General Plan.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Bobbie Stephenson at (858) 694-3680.

Sincerely,



ERIC GIBSON, Interim Director
Department of Planning and Land Use

cc: Dustin Steiner, Policy Advisor, Board of Supervisors, District 5, MS A500
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Reference County Project IJN 3999 07-024

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M-21 The District concurs with this comment. The TIA and EIR have been revised to be consistent in this discussion.

M-22 The District concurs that the TIA and EIR should assess the proposed changes to the County's Circulation Amendment. The TIA and EIR have been revised to provide a discussion of the changes to the Circulation Element Road and have provided a Plan-to-Plan Analysis. Please see section 2.2.6 of the EIR.

The District does not concur that the extension of Pala Mesa Drive to Horse Ranch Creek Road should be shown as part of the project. That extension is only shown on the County's General Plan Update plans and has not been approved by the County Board of Supervisors. Therefore, the extension of Pala Mesa Drive is not part of the proposed project and is not included as part of the General Plan Amendment.

M-23 The District concurs with this comment. The EIR project description has been revised to include a description of the General Plan Amendment. Please see Section 1.1.3.1 of the EIR.

M-24. The District concurs with this comment. The District will send a letter to the County of San Diego requesting a review of the proposed project's conformity to the County's General Plan pursuant to Section 65402(c) of the government code.