Board of Directors Agenda

Friday, December 10, 2021

>>Please note start time<<
8:30 a.m.

Teleconference Meeting

MEETING ANNOUNCEMENT AMIDST COVID-19 PANDEMIC:

The Board of Directors meeting scheduled for Friday, December 10, 2021, will be conducted virtually in accordance with Governor Newsom's State of Emergency declaration regarding the COVID-19 outbreak, Government Code Section 54953(e), Assembly Bill 361 (Rivas 2021), and the COVID-19 Emergency Temporary Standards issued by the California Department of Industrial Relations. Board members will primarily participate in the meeting virtually, while practicing social distancing, from individual remote locations.

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Public Comments: Persons who wish to address the members on an item to be considered at this meeting, or on non-agendized issues, may email comments to the Clerk at clerkoftheboard@sandag.org (please reference Friday, December 10, 2021, Board meeting in your subject line and identify the item number(s) to which your comments pertain). Comments received by 4 p.m. on Thursday, December 9 will be provided to members prior to the meeting. If you desire to provide live verbal comment during the meeting, please join the Zoom meeting by computer or phone and use the "Raise Hand" function to request to provide public comment. On a computer, the "Raise Hand" feature is on the Zoom toolbar. By phone, enter *9 to "Raise Hand" and *6 to unmute. Requests to provide live public comment must be made at the beginning of the relevant item, and no later than the end of any staff presentation on the item. The Clerk will call on members of the public who have timely requested to provide comment by name for those joining via a computer and by the last three digits of for those joining via telephone. All comments received prior to the close of the meeting will be made part of the meeting record. Please note that any available chat feature on the Zoom meeting platform should be used by panelists and attendees solely for procedural or other "housekeeping" matters as comments provided via the chat feature will not be retained as part of the meeting record. All comments to be provided for the record must be made via email or orally per the instructions above.

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Message from the Clerk
In compliance with Government Code §54952.3, the Clerk hereby announces that the compensation for legislative body members attending the following simultaneous or serial meetings is: Executive Committee (EC) $100, Board of Directors (BOD) $150, and Regional Transportation Commission (RTC) $100. Compensation rates for the EC and BOD are set pursuant to the SANDAG Bylaws, and the compensation rate for the RTC is set pursuant to state law.

Vision Statement
Pursuing a brighter future for all.

Mission Statement
We are the regional agency that connects people, places, and innovative ideas by implementing solutions with our unique and diverse communities.

Our Commitment to Equity
We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups impacted by actions and inactions at all levels of our government and society.

We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. In 2021, SANDAG will develop an equity action plan that will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us.

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.

Board of Directors

Friday, December 10, 2021

Item No. **Action**

1. Public Comments/Communications

Public comments under this agenda item will be limited to five public speakers. Members of the public shall have the opportunity to address the Board on any issue within the jurisdiction of SANDAG that is not on this agenda. Public speakers are limited to three minutes or less per person. If the number of public comments under this agenda item exceeds five, additional public comments will be taken at the end of the agenda. Subjects of previous agenda items may not again be addressed under public comments.

Report

+2. 2021 Regional Plan and Final Environmental Impact Report — Adopt

Coleen Clementson, SANDAG

The Board of Directors is asked to:

1. Adopt Resolution No. 2022-09, certifying that the Final Environmental Impact Report (EIR) for San Diego Forward: The 2021 Regional Plan (Regional Plan) has been completed in compliance with the California Environmental Quality Act (Public Resources Code §21000 et seq.), that the Final EIR was presented to, reviewed, and considered by the Board of Directors prior to approving the Project, and that the Final EIR reflects the independent judgment and analysis of SANDAG; and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program; and
2. Adopt Resolution No. 2022-10, adopting the air quality conformity determination, finding that the Sustainable Communities Strategy (SCS) achieves the regional greenhouse gas reduction targets established by the California Air Resources Board, and adopting San Diego Forward: the 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast.

3. Potential Future Update to 2021 Regional Plan — Discussion/ Possible Action

Coleen Clementson, SANDAG

The Board of Directors is asked to consider whether to direct staff to immediately begin evaluation of a potential update to the 2021 Regional Plan for Board consideration, including evaluating alternatives to the regional road usage charge program in light of the availability of new federal transportation funding.

4. Member Comments

Board members shall have the opportunity to provide information and announcements on any issue within the jurisdiction of SANDAG that is not on this agenda. Subjects of previous agenda items may not again be addressed under member comments.

5. Upcoming Meetings — Information

The next Board meeting is scheduled for Friday, December 17, 2021, at 9 a.m.

6. Adjournment

+ next to an agenda item indicates an attachment

2021 Regional Plan and Final Environmental Impact Report

Overview

In early 2019, the Board of Directors approved an action plan to allow for additional time to prepare a transformative Regional Plan. San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) is the culmination of years of analysis, public engagement, and research to prepare a vision for the future that incorporates the latest technologies, meets all state and federal requirements, addresses traffic congestion and roadway safety, and improves social equity. It details a $163 billion investment in the region over the next 30 years to build a transformative transportation system, incentivize sustainable growth and development, protect natural resources, and deploy innovative mobility services. The Final Environmental Impact Report (EIR) and 2021 Regional Plan are available on SDForward.com.

Key Considerations

The 2021 Regional Plan considers how we will grow, where we will live, and how we will move around the region. It combines the Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS), and Regional Comprehensive Plan. As such, the 2021 Regional Plan must comply with specific state and federal mandates, including an SCS, per Senate Bill 375 (Steinberg, 2008), that achieves greenhouse gas emission reduction targets set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process. Assembly Bill 1730 (Gonzalez, 2019) requires SANDAG to adopt an updated regional transportation plan on or before December 31, 2021.

Final Environmental Impact Report

Attachment 1 is the resolution certifying the EIR prepared for the 2021 Regional Plan and adopting the Findings (Attachment 1A), Statement of Overriding Considerations (Attachment 1B), and Mitigation Monitoring and Reporting Program (Attachment 1C).

Action: **Adopt**

The Board of Directors is asked to:

1. Adopt Resolution No. 2022-09, certifying that the Final Environmental Impact Report (EIR) for San Diego Forward: The 2021 Regional Plan (Regional Plan) has been completed in compliance with the California Environmental Quality Act (Public Resources Code §21000 et seq.), that the Final EIR was presented to, reviewed, and considered by the Board of Directors prior to approving the Project, and that the Final EIR reflects the independent judgment and analysis of SANDAG; and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program; and
2. Adopt Resolution No. 2022-10, adopting the air quality conformity determination, finding that the Sustainable Communities Strategy (SCS) achieves the regional greenhouse gas reduction targets established by the California Air Resources Board, and adopting San Diego Forward: the 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast.

Fiscal Impact:

Funding for development of the 2021 Regional Plan and EIR is included in Overall Work Program Element Nos. 3102000 and 3102006 in the FY 2022 Program Budget.

Schedule/Scope Impact:

Assembly Bill 1730 (Gonzalez, 2019) requires SANDAG to adopt an updated regional transportation plan by December 31, 2021.

The Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-O), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG responses to significant environmental issues raised in the review and consultation process; and other information (Appendix P-1 of the EIR and Attachment 2 to this report). SANDAG received 51 communications, each containing multiple EIR comments, during the public review period. The Final EIR incorporates changes made to the Draft EIR as a result of comments received during the public review period and changes made to the Draft 2021 Regional Plan. Comments and changes made to the Draft EIR did not result in any new significant impacts not addressed in the Draft EIR or a substantial increase the severity of significant impacts identified in the Draft EIR.

Pursuant to Public Resources Code §21081 and California Environmental Quality Act (CEQA) Guidelines §15091, SANDAG has prepared findings for every significant impact identified in the Final EIR and for each alternative evaluated in the Final EIR, as well as alternatives proposed in comments on the Draft EIR that were not evaluated in detail (Attachment 1A).

Even after adoption of all feasible mitigation measures, the 2021 Regional Plan will have significant impacts that cannot be mitigated to less than significant levels. SANDAG has prepared a Statement of Overriding Considerations in compliance with Public Resources Code §21081(b) and CEQA Guidelines §15093, which concludes that specific economic, legal, social, technological, and other benefits of the Regional Plan outweigh the significant and unavoidable impacts identified in the Final EIR (Attachment 1B).

Additionally, SANDAG has prepared a Mitigation Monitoring and Reporting Program in compliance with Public Resources Code §21081.6 and CEQA Guidelines §15097 to ensure compliance with the mitigation measures identified in the Final EIR during program implementation and operation (Attachment 1C).

2021 Regional Plan

Attachment 3 is the resolution adopting the air quality conformity determination, finding that the SCS achieves the SB 375 greenhouse gas reduction targets, and adopting the 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast. On April 9, 2021, the SANDAG Board of Directors also directed staff to consider specific topics in developing the 2021 Regional Plan; Attachment 4 describes how each topic has been considered.

Air Quality Conformity Determination

Attachment 5 is Appendix C of the Regional Plan, which describes the process used to document the conformity of the Revenue Constrained Regional Plan with the State Implementation Plan for air quality and the emissions budgets included in the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. This process, which is required by federal law, involves estimating regional vehicle emissions resulting from the Regional Plan and making a determination that the Regional Plan meets established emissions budgets.

Achieving Senate Bill 375 Greenhouse Gas Emissions Reduction Targets

Chapter 2 of the Regional Plan includes the Sustainable Communities Strategy – A Framework for the Future and Appendix D contains the SCS Documentation and Related Information. Appendix D describes how the 2021 Regional Plan fulfills requirements for the SCS described in SB 375, including the reduction of greenhouse gas emissions with implementation of the SCS. The state-mandated target is a 19% reduction—compared with 2005—in per capita greenhouse gas emissions from cars and light duty trucks by 2035. The 2021 Regional Plan achieves a 20% reduction by 2035. After the Regional Plan is adopted, CARB staff will collaborate with SANDAG staff to complete its technical evaluation, allowing CARB to determine that the Regional Plan, and its SCS, if implemented, achieve CARB's SB 375 greenhouse gas emission reduction targets. The CARB Executive Officer will issue an Air Resource Board executive order accepting or rejecting the determination.

Series 14 Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern

Appendix F of the Regional Plan describes the Series 14 Regional Growth Forecast and SCS Land Use Pattern. The Regional Growth Forecast aligns with the regional forecast from the California Department of Finance and includes the 2050 forecast of population, jobs, and housing units for the entire region. These region-level data are then allocated to the subregional areas using the most recent planning assumptions considering local general plans and other factors. The SCS land use pattern is a subregional allocation that is a vision for land use in the region. In developing the SCS land use pattern, staff considered SB 375, which requires the SCS to include a land use pattern that contributes toward the regional greenhouse gas reduction targets when combined with the transportation network, policies, and programs.

Public Participation and Response to Comments

At the October 29, 2021, Board of Directors meeting, staff provided draft responses to the comments received on the Draft 2021 Regional Plan during the public comment period and presented proposed updates for the final 2021 Regional Plan. The Board of Directors discussed the changes for the proposed final 2021 Regional Plan. Updates to public comments and responses on the Draft Regional Plan that occurred after the close of the public comment period (August 6, 2021) and before the writing of this report are included as Attachment 6 of this report.

Appendix G of the Regional Plan documents the comprehensive public outreach and involvement program to support the development of the 2021 Regional Plan. Efforts to involve the public in the development of the 2021 Regional Plan have been tracked and recorded to chronicle the large number and wide range of activities organized and held by SANDAG beginning in 2016.

Next Steps

Following action by the Board of Directors, staff will submit the 2021 Regional Plan to the U.S. Department of Transportation (U.S. DOT) and the U.S. Environmental Protection Agency and request that the U.S. DOT make its air quality conformity determination. The 2021 Regional Plan and its SCS will also be submitted to CARB to make the final determination that the 2021 Regional Plan and its SCS, if implemented, achieve the SB 375 per capita greenhouse gas emission reduction targets.

Hasan Ikhrata, Chief Executive Officer

Key Staff Contact: Coleen Clementson, (619) 699-1944, coleen.clementson@sandag.org

Attachments:
1. Resolution No. 2022-09
1A. CEQA Findings of Fact
1B. Statement of Overriding Considerations for the 2021 Regional Plan
1C. Mitigation Monitoring and Reporting Program
2. Final EIR Appendix P-1
3. Resolution No. 2022-10
4. Discussion of Topics in SANDAG Board of Directors Resolution No. 2021-17
5. Appendix C: Air Quality Planning and Transportation Conformity
6. Public Comments and Responses on the Draft 2021 Regional Plan Received after August 6, 2021

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***Resolution No.* 2022-09**

A Resolution of the San Diego Association of Governments Board of Directors Certifying the Final Environmental Impact Report Prepared for San Diego Forward: The 2021 Regional Plan (SCH# 2010041061), and Adopting Environmental Findings Pursuant to the California Environmental Quality Act; a Statement of Overriding Considerations; and a Mitigation Monitoring and Reporting Program

WHEREAS, San Diego Forward: the 2021 Regional Plan (the "Project") proposes and encompasses the planning foundation for transportation improvements and regional growth throughout the San Diego region through 2050, and provides a framework for a fast, fair, and clean transportation system and a resilient region through the efficient movement of people and goods; access to affordable, reliable, and safe mobility options; and healthier air and reduced greenhouse gas emissions; and

WHEREAS, pursuant to the California Environmental Quality Act ("CEQA") (Public Res. Code Sections 21000, et seq.) and the CEQA Guidelines (14 Cal. Code Regs. Sections 15000, et seq.), SANDAG is the lead agency for the Project; and

WHEREAS, SANDAG prepared a Program Environmental Impact Report ("EIR") (SCH# 2010041061) and provided full disclosure and analysis of the significant environmental effects of the Project; and

WHEREAS, SANDAG issued a Notice of Preparation ("NOP") of a Draft EIR on November 14, 2016, and circulated the NOP for a period of 60 days pursuant to CEQA Guidelines Sections 15082(a), 15103 and 15375; and

WHEREAS, pursuant to CEQA Guidelines Sections 15206 and 15082, SANDAG publicly noticed and held a public scoping meeting on December 8, 2016, for the purpose of soliciting comments from the public and potential responsible and trustee agencies, including details about the scope and content of the environmental information related to the responsible and trustee agencies' areas of statutory responsibility, as well as significant environmental issues, reasonable alternatives, and mitigation measures; and

WHEREAS, 18 written statements were received by SANDAG in response to the NOP, which assisted SANDAG in narrowing the issues and alternatives for analysis in the Draft EIR; and

WHEREAS, a Draft EIR was completed and released for public review on August 27, 2021; and

WHEREAS SANDAG initiated a 45-day public comment period by filing a Notice of Completion and Notice of Availability with the State Office of Planning and Research; and

WHEREAS, pursuant to Public Resources Code Section 20192, SANDAG also provided a Notice of Availability to all organizations and individuals who had previously requested such notice and published a Notice of Availability for the Draft EIR on or about August 27, 2021, in the Union Tribune and Union Tribune en Español; and

WHEREAS, SANDAG provided copies of the Draft EIR for public review at the offices of SANDAG, the San Diego Central Library, and on its website at www.sdforward.com; and

WHEREAS, during the 45-day comment period, SANDAG consulted with and requested comments from responsible and trustee agencies and the public pursuant to CEQA Guidelines Section 15086; and

WHEREAS, during the public review period for the Draft EIR, SANDAG received 51 communications, each containing comments on the Draft EIR, which are included in the Final EIR; and

WHEREAS, SANDAG evaluated all comments on environmental issues received during the public review period on the Draft EIR, and prepared written responses to these comments as required by CEQA Guidelines Section 15088, which are included in the Final EIR; and

WHEREAS, SANDAG prepared the Final EIR as required by CEQA Guidelines Section 15132, consisting of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-O), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG responses to environmental issues raised in Draft EIR comments; and other information (bound separately as "Appendix P"); and

WHEREAS, pursuant to Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SANDAG provided proposed written responses to all public agencies, that submitted timely comments on the Draft EIR at least ten days prior to certification of the EIR; and

WHEREAS, SANDAG made the Final EIR publicly available on its website (www.sdforward.com) on November 30, 2021; and

WHEREAS, the Final EIR satisfies all the requirements of CEQA and the CEQA Guidelines; and

WHEREAS, the Final EIR sufficiently analyzes both the feasible mitigation measures that could avoid or substantially lessen the Project's significant environmental impacts and a reasonable range of alternatives to avoid or substantially lessen these effects in accordance with CEQA and the CEQA Guidelines; and

WHEREAS, all of the findings and conclusions made by SANDAG pursuant to this Resolution are based upon the oral and written evidence presented to it as a whole, and are not based solely on the information provided in this Resolution; and

WHEREAS, the SANDAG Board of Directors, at a special session assembled on December 10, 2021, reviewed and considered the significant environmental impacts of the Project, including but not limited to information and data in the Final EIR; comments on the Draft EIR received during and after the close of the Draft EIR public review period; all written and oral testimony given at meetings and hearings; and submission of testimony from the public, organizations, and public agencies; and

WHEREAS, no information added to the Draft EIR, no comments made in the public hearings conducted by SANDAG, or any additional information submitted to SANDAG, have produced significant new information requiring Draft EIR recirculation under CEQA Guidelines Section 15088.5; and

WHEREAS, SANDAG has prepared CEQA Findings in compliance with Public Resources Code Sections 21081 and 21081.5 and CEQA Guidelines Section 15091 for every significant impact of the Project identified in the EIR and for each alternative evaluated in the EIR, including an explanation of the rationale for each finding (attached as Attachment 1A); and

WHEREAS, the Project will have significant impacts that cannot be mitigated to less than significant levels, and SANDAG has prepared a Statement of Overriding Considerations in compliance with Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093 (attached as Attachment 1B), which concludes that specific economic, legal, social, technological, and other benefits of the Project outweigh the significant and unavoidable impacts identified in the EIR; and

WHEREAS, SANDAG has prepared a Mitigation Monitoring and Reporting Program in compliance with Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097 (Attachment 1C) to ensure implementation of the mitigation measures identified in the Final EIR during project implementation; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred;

NOW THEREFORE BE IT RESOLVED BY the SANDAG Board of Directors that the foregoing recitals are true and correct and incorporated by this reference; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-O), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG responses to significant environmental issues raised in Draft EIR comments; and other information (bound separately as "Appendix P"); and

BE IT FURTHER RESOLVED that, pursuant to CEQA Guidelines Section 15090, the SANDAG Board of Directors hereby certifies that the Final EIR (SCH# 2010041061) has been completed in compliance with CEQA (Public Resource Code Sections 21000, et seq.), that the Final EIR was presented to and reviewed and considered by the SANDAG Board of Directors prior to approving the Project, and that the Final EIR reflects the independent judgment and analysis of SANDAG; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors makes and adopts the Findings as required by Public Resources Code Sections 21081 and 21081.5 and CEQA Guidelines Section 15091, which are attached as Attachment 1A and incorporated fully by this reference; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors adopts the Statement of Overriding Considerations as required by Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093, which is attached as Attachment 1B and incorporated fully by this reference; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors adopts the Mitigation Monitoring and Reporting Program as required by CEQA Guidelines Section 15097, which is attached as Attachment 1C and incorporated fully by this reference.

PASSED AND ADOPTED this 10th of December 2021.

Attest:

Chair	**Secretary**

Member Agencies: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.

Advisory Members: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico.

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ATTACHMENT 1A
CEQA FINDINGS OF FACT

I. INTRODUCTION TO CEQA FINDINGS

These findings are made pursuant to the California Environmental Quality Act (CEQA, Public Resources Code §21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.) by the Board of Directors of the San Diego Association of Governments (SANDAG) as the lead agency for San Diego Forward: The 2021 Regional Plan (proposed Plan). These findings pertain to Environmental Impact Report (EIR) State Clearinghouse (SCH) #2010041061.

A. PROJECT DESCRIPTION SUMMARY

SANDAG, as the Regional Transportation Commission and federally designated Metropolitan Planning Organization (MPO) for the San Diego region, builds consensus, develops strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life. As a regional Council of Governments, voting members of the agency consist of the County of San Diego and 18 cities in the region.

The proposed Plan is an update to San Diego Forward: The 2015 Regional Plan (2015 Regional Plan), adopted in October 2015, and the 2019 Federal Regional Transportation Plan (2019 Federal RTP), adopted in October 2019.

The proposed Plan sets forth a vision for a fast, fair, and clean transportation system and a resilient region that will be achieved through investing in a reimagined transportation system, incentivizing sustainable growth and development, and implementing innovative demand and system management. The plan looks approximately 30 years ahead, accommodating more than 436,000 people, 280,000 new homes, and 439,000 new jobs.

The Plan's Sustainable Communities Strategy (SCS) envisions concentrated development into either Mobility Hub or Smart Growth Opportunity areas. The Mobility Hubs are communities with a high concentration of people, destinations, and travel choices and are an integral element of the SCS land use pattern. The SCS envisions densification in the Mobility Hub areas due to incentivized transportation infrastructure in collaboration with local jurisdictions.

Under Senate Bill (SB) 375, the Regional Transportation Plan must include an SCS consisting of land use, housing, and transportation strategies that, if implemented, would allow the region to meet its regional targets for greenhouse gas (GHG) emissions reductions from passenger vehicle use established by the California Air Resources Board (CARB). The purpose of an SCS is to align regional transportation, housing, and land use planning to attain the regional GHG reduction targets.

Building on the current transportation system with funding anticipated over the next 30 years, the proposed Plan is anchored in the 5 Big Moves: Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next OS. Each of the 5 Big Moves will tackle an aspect of the total transportation system, but the success of each will rely on the success of the others and they will be inextricably linked. The outcome will be more mobility options for everyone and a shift away from overloading the region's roadways with cars. The proposed Plan's SCS shows how the region would exceed the SB 375 GHG emissions reduction targets for passenger vehicles established by CARB for 2020 and 2035 by using land in a way that makes development more compact, conserving open space and investing in a transportation network that reduces per capita vehicle miles traveled and gives residents alternative transportation options.

B. PROJECT OBJECTIVES (EIR SECTION 2.4)

SANDAG developed the following project objectives for the EIR:

1. Focus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas.
2. Provide transportation investments that support compact land development patterns and reduce sprawl.
3. Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board and the SANDAG Board of Directors.
4. Provide transportation investments and land use patterns that promote social equity.
5. Provide transportation investments and land use patterns that reduce vehicle miles traveled and improve air quality.
6. Provide multi-modal access to employment centers and key destinations for all communities.
7. Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

C. TYPE OF EIR

This EIR for the Plan is a Program EIR, which CEQA Guidelines Section 15168(a) defines as an EIR that may be prepared on a series of actions that can be characterized as one large project and are related (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts that can be mitigated in similar ways.

A Program EIR can provide a comprehensive environmental review for a program of related projects, such as the Plan, that are to be developed over a long period of time. This allows lead agencies to consider program-wide alternatives and cumulative impacts consistently, and avoids unnecessary repetition of analysis in subsequent project-specific reviews (see CEQA Guidelines Section 15168(b)).

The degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This EIR analyzes impacts of the Plan at the same level of detail as the Plan. This EIR provides a foundation for second-tier CEQA documents for subsequent projects, but does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely. When a first-tier Program EIR is prepared, “leaving project-specific details to subsequent EIRs when specific projects are considered” is a proper approach to CEQA tiering (*In re Bay Delta* [2008] 43 Cal. 4th 1143, 1174).

D. PROCEDURAL COMPLIANCE WITH CEQA

SANDAG published a Draft EIR on August 27, 2021, and a Final EIR on November 30, 2021, in compliance with CEQA requirements. SANDAG prepared the Final EIR in accordance with CEQA and the CEQA Guidelines. As allowed for in CEQA Guidelines §15084(d)(2), SANDAG retained a consultant to assist with the preparation of the environmental documents. SANDAG, acting as lead agency, has directed, reviewed, and edited as necessary all material prepared by the consultant,

and such material reflects SANDAG's independent judgment. In general, the preparation of the EIR included the following key steps and public notification efforts:

- A 60-day scoping process began with SANDAG's issuance of the Notice of Preparation (NOP) of an EIR on November 14, 2016. The NOP was filed with the State Clearinghouse on November 14, 2016, which started a 60-day comment period that ended January 13, 2017. SANDAG noticed and held an EIR scoping meeting on December 8, 2016, at the SANDAG Office at 401 B Street, San Diego, CA 92101 to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.
- SANDAG issued the Draft EIR on August 27, 2021. The Notice of Availability for the Draft EIR was published in local newspapers and mailed to an extensive distribution list. The Draft EIR was also posted on SANDAG's website and was available for review at the SANDAG Office. In addition, Draft EIRs were distributed to those who provided comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, public libraries, and other interested parties and stakeholders.
- The Notice of Completion for the Draft EIR was filed with the State Clearinghouse on August 27, 2021. The Draft EIR was available for a 45-day public review period starting August 27, 2021. Following close of the public review period, SANDAG revised the Draft EIR, including the project description, in response to comments received during the public review period, and provided written responses addressing all significant environmental issues raised. Revisions made to the Draft EIR are shown throughout the Final EIR in strikethrough and underline text.
- SANDAG published the Final EIR on November 30, 2021. SANDAG provided written responses to all public agencies that commented on the Draft EIR 10 days prior to certifying the EIR. The SANDAG Board of Directors held a public hearing on December 10, 2021, to consider certification of the Final EIR.

E. INCORPORATION OF FINAL EIR BY REFERENCE

The Final EIR is hereby incorporated by reference into these Findings. The Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A–P), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG's responses to significant environmental issues raised in the review and consultation process; Master Responses to comments; and other information (bound separately as "Appendix P").

II. FINDINGS REGARDING ENVIRONMENTAL IMPACTS

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers,

make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project's underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint. See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

SANDAG has made one or more of these specific written findings regarding each significant impact associated with the Plan. Those findings are presented below, along with a presentation of facts in support of the findings. The Board certifies these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed.

The EIR evaluation included a detailed analysis of impacts on 19 resource topics, and analyzed impacts of the Plan and alternatives to the Plan, including a No Project Alternative. The EIR disclosed the environmental impacts that would result from the adoption and implementation of the Plan. Feasible mitigation measures were identified intended to avoid or substantially lessen significant environmental effects.

III. FINDINGS REGARDING ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

Public Resources Code §21081 and CEQA Guidelines §15091 do not require findings of fact for impacts that are less than significant. Nevertheless, for the sake of completeness, the SANDAG Board of Directors hereby finds that the following environmental impacts of the Plan either have would not occur or are less than significant. These findings are based on the detailed impact analyses provided in Sections 4.1 through 4.19 of the EIR and the cumulative impacts discussed in Chapter 5 of the EIR. Under CEQA, no mitigation measures are required for impacts that are less than significant (CEQA Guidelines §15126.4(a)(3)).

A. AIR QUALITY (EIR SECTION 4.3)

AQ-1 CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE REGIONAL AIR QUALITY STRATEGY AND/OR STATE IMPLEMENTATION PLAN

The SANDAG Board of Directors finds that implementation of the proposed Plan would be consistent with the State Implementation Plan (SIP) growth forecasts, and applicable rules, regulations, and programs adopted as part of the plans by the San Diego Air Pollution Control District (SDAPCD) and California Air Resources Board (CARB). Implementation of the transportation network improvements and programs would also be consistent with the applicable air quality plans because the emissions are less than the conformity budget emissions budget for Reactive Organic Gas (ROG) and nitrogen oxides (NO_X). Also, the transportation network improvements and programs are consistent with the traffic control measures contained within the SIP and the San Diego Regional Air Quality Standards. Therefore, this impact (AQ-1) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to conflicts with or obstruction of applicable air quality plans, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans, would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to conflicts with or obstruction of applicable air quality plans (AQ-1) are not cumulatively considerable in 2025, 2035, and 2050.

AQ-6 EXPOSE SENSITIVE RECEPTORS TO CARBON MONOXIDE HOT-SPOTS

The SANDAG Board of Directors finds that implementation of the proposed Plan would not expose sensitive receptors to substantial concentrations of carbon monoxide (CO) because the 2015 Regional Plan EIR did not find a CO hotspot at congested intersections while assuming higher on-road source CO emissions; the proposed Plan would also not create any CO hotspots. Therefore, this impact (AQ-6) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to exposure of sensitive receptors to substantial concentrations of CO, in combination with similar impacts that would result in the southern California and northern Baja region based on projections in adopted plans, would not be cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to exposure of sensitive receptors to substantial concentrations of CO (AQ-6) are not cumulatively considerable in 2025, 2035, and 2050.

AQ-7 RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE

The SANDAG Board of Directors finds that implementation of the proposed Plan would not result in significant odor impacts because both development projects and transportation network improvements would be required to comply with applicable odor regulations that prevent impacts from being significant, including SDAPCD Rule 51. Odors from these projects would not cause nuisance to a considerable number of persons or to the public, when compared to existing conditions.

Regarding cumulative impacts, the Plan's impacts related to odors, in combination with similar impacts that would result in the southern California and northern Baja region based on projections in adopted plans, would not be cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to odors (AQ-7) are not cumulatively considerable in 2025, 2035, and 2050.

B. BIOLOGICAL RESOURCES (EIR SECTION 4.4)

BIO-4 CONFLICT WITH THE PROVISIONS OF AN ADOPTED HCP, NCCP, OR OTHER CONSERVATION PLAN, OR WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES

The SANDAG Board of Directors finds that implementation of regional growth and land use changes and transportation network improvements and programs associated with the proposed Plan would result in less-than-significant impacts related to encroachment into hardline preserve areas identified by adopted Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs) because the proposed Plan would require biologically equivalent or superior habitat compensation or project redesign when there is encroachment into hardline preserve areas. Project-specific planning, review by local agencies (including jurisdictions), regulatory agencies, and Wildlife Agencies, and CEQA review of land use and transportation projects would minimize or remove any potential conflict with policies and ordinances protecting biological resources. No other conflicts are expected with any approved local, regional, state, or federal regulations, policy, ordinance, or plan. Therefore, this impact (BIO-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to conflicts with adopted policies of HCPs and NCCPs and other local policies and ordinances protecting biological resources, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects, wound not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to conflicts with adopted HCPs

and NCCPs and other local policies and ordinances protecting biological resources (BIO-4) are not cumulatively considerable in 2025, 2035, and 2050.

C. CULTURAL RESOURCES (EIR SECTION 4.5)

CULT-2 DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF DEDICATED CEMETERIES, IN VIOLATION OF EXISTING LAWS AND REGULATIONS PROTECTING HUMAN REMAINS

The SANDAG Board of Directors finds that although ground-disturbing activities associated with the implementation of forecasted regional growth and land use change and planned transportation network improvements have the potential to uncover buried human remains, existing laws and regulations would be followed, ensuring that any human remains encountered are treated appropriately. Therefore, this impact (CULT-2) is less than significant in 2025, 2035, and 2050.

The Plan's impacts related to disturbance of human remains in violation of existing laws and regulations, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to disturbance of human remains in violation of existing laws and regulations (CULT-2) are not cumulatively considerable in 2025, 2035, and 2050.

D. ENERGY (EIR SECTION 4.6)

EN-1 RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY DURING PROJECT CONSTRUCTION OR OPERATIONS

The SANDAG Board of Directors finds that implementation of regional growth and land use change and transportation network improvements and programs would not result in an increase in overall per capita energy consumption, or otherwise use energy in an inefficient, wasteful, or unnecessary manner, because per capita energy use would decrease by approximately 27 percent from 2016 to 2050 (see EIR Table 4.6-1).

Regarding cumulative impacts, the Plan's impacts related to overall per capita energy consumption and use of energy in an inefficient, wasteful, or unnecessary manner, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects, would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to overall per capita energy consumption relative to baseline conditions and use of energy in an inefficient, wasteful, or unnecessary manner (EN-1) are not cumulatively considerable in 2025, 2035, and 2050.

EN-2 CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY

The SANDAG Board of Directors finds that implementation of forecasted regional growth and land use change and planned transportation network improvements and programs would not result in increased reliance on fossil fuels and decreased reliance on renewable energy sources because total energy use would decrease, fossil fuel energy consumption would decrease, and renewable energy consumption would increase. Therefore, this impact (EN-2) is less than significant in 2025, 2035, and 2050.

The Plan's impacts related to reliance on fossil fuels and renewable energy sources, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to reliance of fossil fuels and renewable energy sources (EN-2) are not cumulatively considerable in 2025, 2035, and 2050.

E. GEOLOGY, SOILS, AND MINERAL RESOURCES (EIR SECTION 4.7)

GEO-1 DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING:

- **RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA, OR BASED ON OTHER SUBSTANTIAL EVIDENCE SHOWING AN EARTHQUAKE FAULT IS ACTIVE;**
- **STRONG SEISMIC GROUND SHAKING;**
- **SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION; AND**
- **LANDSLIDES.**

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in land use changes and the construction of transportation network improvements that would expose a greater number of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides. However, adherence to the laws, regulations, and programs, including but not limited to those described in Section 4.7.4 of the Final EIR would ensure people or structures would not be exposed to substantial adverse effects. Therefore, this impact (GEO-1) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to exposure of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to exposure of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides (GEO-1) are not cumulatively considerable in 2025, 2035, and 2050.

GEO-2 LOCATE PROJECTS ON A GEOLOGIC UNIT OR SOIL THAT IS EXPANSIVE OR UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIALLY RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION OR COLLAPSE, CREATING SUBSTANTIAL DIRECT OR INDIRECT RISKS TO LIFE OR PROPERTY.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in regional growth development and transportation network improvements that would be constructed on expansive soils or expose a greater number of structures to risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable. Adherence to the laws and regulations and programs including but not limited to those described in Section 4.7.4 and project-specific investigations consistent with local and State standards and practices would minimize risks to people and property. Therefore, this impact (GEO-2) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related geologic hazards, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to expansive soils or expose a greater number of structures to

risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable (GEO-2) are not cumulatively considerable in 2025, 2035, and 2050.

GEO-3 RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in land use changes and the construction of transportation network improvements, both of which would cause soil erosion or the loss of topsoil. Compliance with regulatory requirements and implementation of required design measures would ensure that regional growth and land use changes as well as transportation network improvements and programs associated with the proposed Plan would not cause substantial soil erosion or the loss of topsoil. Therefore, this impact (GEO-3) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to substantial soil erosion or the loss of topsoil, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to substantial soil erosion or loss of topsoil (GEO-3) are not cumulatively considerable in 2025, 2035, and 2050.

GEO-4 HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTEWATER, POTENTIALLY CAUSING ADVERSE GROUNDWATER IMPACTS.

The SANDAG Board of Directors finds regional growth and land use change associated with the proposed Plan would occur on expansive or unstable soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems; however, adherence to the laws and regulations including but not limited to those described in Section 4.7.4 and described above would minimize the potential for adverse impacts on groundwater. Therefore, this impact (GEO-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to soils that are incapable of adequately supporting septic tanks or alternative wastewater systems and potentially causing adverse groundwater impacts, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan's incremental impacts related to soils that are incapable of adequately supporting septic tanks or alternative wastewater systems and potentially causing adverse groundwater impacts (GEO-4) are not cumulatively considerable in 2025, 2035, and 2050.

F. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)

GHG-1 DIRECTLY OR INDIRECTLY RESULT IN AN INCREASE IN GHG EMISSIONS COMPARED TO EXISTING CONDITIONS (2016)

The SANDAG Board of Directors finds that implementation of the proposed Plan would not directly or indirectly result in an increase in greenhouse gas (GHG) emissions compared to existing conditions because total annual regional emissions would be approximately 13 percent lower in 2025, 26 percent lower in 2035, and 28 percent lower in 2050, relative to 2016. Therefore, this impact (GHG-1) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to increases in GHG emissions compared to existing conditions (2016), in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because the Plan's

GHG emissions would decrease compared to 2016 levels. Therefore, the Plan's incremental impacts related to direct or indirect increases in GHG emissions compared to existing conditions (2012) (GHG-1) are not cumulatively considerable in 2025, 2035, and 2050.

GHG-2 CONFLICT WITH THE SANDAG REGION'S ACHIEVEMENT OF SB 375 GHG EMISSIONS REDUCTIONS TARGETS FOR 2035

The SANDAG Board of Directors finds that implementation of the proposed Plan would not conflict with Senate Bill (SB) 375 emission reduction targets for 2035 because it would result in a 20 percent reduction in per capita CO_2 emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction for the SANDAG region. Therefore, this impact (GHG-2) is less than significant in 2035.

The Plan's impacts related to conflicts with SB 375 GHG emission reduction targets, in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with the SB 375 emissions reduction targets. Therefore, the Plan's incremental impacts related to conflicts with SB 375 GHG emission reduction targets (GHG-2) are not cumulatively considerable in 2035.

GHG-3 CONFLICT WITH OR IMPEDE ACHIEVEMENT OF AN AT LEAST 30% REDUCTION IN PER CAPITA GHG EMISSIONS FROM THE ENTIRE ON-ROAD TRANSPORTATION SECTOR BY 2035 COMPARED TO EXISTING CONDITIONS (2016)

The SANDAG Board of Directors finds that implementation of the proposed Plan would reduce 2035 per-capita GHG emissions from the on-road transportation sector by 39 percent compared to 2016 levels, which is higher than the 30 percent reduction identified in SANDAG Board Resolution No. 2021-17. Therefore, this impact (GHG-3) is less than significant in 2035.

The Plan's impacts related to conflict with SANDAG Board Resolution No. 2021-17 in combination with adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with SANDAG Board Resolution No. 2021-17. Therefore, the Plan's incremental impacts related to per capita GHG emission from the entire on-road transportation sector (GHG-3) are not cumulatively considerable in 2035.

GHG-4 CONFLICT WITH OR IMPEDE THE IMPLEMENTATION OF LOCAL PLANS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS

The SANDAG Board of Directors finds that implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan would not conflict with or impede the implementation of adopted climate action plans (CAPs), GHG reduction plans, and/or sustainability plans. An analysis of whether the proposed Plan would conflict with the policies, measures, and actions of adopted plans is provided in Appendix J of the Final EIR. Therefore, this impact (GHG-2) is less than significant for 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to conflicts with local plans, in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with adopted CAPs, GHG reduction plans, and/or sustainability plans. Therefore, the Plan's incremental impacts related to conflicts with local plans adopted for the purpose of reducing GHG emissions (GHG-4) are not cumulatively considerable in 2025, 2035, and 2050.

G. HAZARDS AND HAZARDOUS MATERIALS (EIR SECTION 4.9)

HAZ-1 CREATE A SIGNIFICANT HAZARD BY GENERATING HAZARDOUS EMISSIONS OR HANDLING HAZARDOUS MATERIALS, OR RESULT IN THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT DURING PRE-CONSTRUCTION, DEMOLITION, AND/OR CONSTRUCTION ACTIVITIES, INCLUDING BEING LOCATED ON A GOVERNMENT CODE SECTION 65952.5 HAZARDOUS MATERIALS SITE

The SANDAG Board of Directors finds that Regional growth, land use development, and transportation network improvements would increase by 2050, thereby increasing the risk of hazards to the public and/or the environment through the routine transport, use, or disposal of hazardous materials during preconstruction, construction, and demolition activities. However, adherence to the existing regulations including but not limited to US Environmental Protection Agency (EPA) regulations, San Diego Regional Water Quality Control Board (RWQCB) regulations, Local Enforcement Agency (LEA) regulations, California Administrative Code provisions governing container design and how materials are secured, County of San Diego Department of Environmental Health (DEH) Hazardous Materials Division (HMD) routine compliance inspections, US Department of Transportation (USDOT) regulations for safe hauling procedures, and compliance with Chemical Accident Prevention Provisions (40 CFR Part 68), would ensure that a significant hazard to the public or the environment would not be created due to upset or accident conditions involving the release of hazardous materials into the environment. Therefore, this impact (HAZ-1) is less than significant in 2020, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to the creation of significant hazards by generating hazardous emissions or handling hazardous materials in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to the creation of significant hazards by generating hazardous emissions or handling hazardous materials (HAZ-1) are not cumulatively considerable in 2025, 2035, and 2050.

HAZ-2 CREATE A SIGNIFICANT HAZARD TO THE PUBLIC, SCHOOLS WITHIN ONE-QUARTER MILE, OR THE ENVIRONMENT THROUGH THE ROUTINE USE, HANDLING, TRANSPORT, OR DISPOSAL OF HAZARDOUS MATERIALS.

The SANDAG Board of Directors finds that regional growth, land use development, and transportation network improvements would increase by 2050, thereby increasing the risk related to the handling and emission to hazardous materials near schools. However, adherence to existing regulations, including but not limited to Emergency Planning and Community Right to Know Act requirements governing storage and handling of toxic chemicals, EPA Unified Program requirements and EPA requirements under the Resource Conservation and Recovery Act of 1976, the Chemical Accident Prevention Provisions (40 CFR Part 68), California Education Code requirements (Section 17210 et seq.), Occupational Safety and Health Administration (OSHA) requirements to protect workers, Hazardous Materials Transportation Act and US Department of Transportation (USDOT) requirements for transportation of hazardous materials by truck and rail, California Highway Patrol requirements, and California State Fire Marshall regulations, would ensure that the risks associated with the handling or emissions of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be minimized. Therefore, this impact (HAZ-2) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to the creation of significant hazards to the public, schools, or the environment through the routine use, handling, transport, or disposal of hazardous materials, in combination with similar impacts that would result in the southern California

and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to the creation of significant hazards to the public, schools, or the environment through the routine use, handling, transport, or disposal of hazardous materials (HAZ-2) are not cumulatively considerable in 2020, 2035, and 2050.

HAZ-3 FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA.

The SANDAG Board of Directors finds that forecasted regional growth and land use change and planned transportation network improvements and programs would be subject to and implement existing laws and regulations protecting people living and working near airports, airstrips, and helipads from air traffic hazards and substantial safety risks, including safety risks that could result from increases in traffic levels or changes in location. These existing laws and regulation include but are not limited to Airport Land Use Compatibility Plans adopted by the Airport Land Use Commission for the region's public use airports (e.g., San Diego International Airport) and Department of Defense requirements to prepare Air Installation Compatible Use Zone (AICUZ) plans for major military air installations. Therefore, this impact (HAZ-3) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to air traffic hazards for people residing or working within an airport land use plan or within 2 miles of public or private airports, airstrips, or helipads, or changes in air traffic patterns that result in substantial safety risks, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to air traffic hazards for people residing or working within an airport land use plan or within 2 miles of public or private airports, airstrips, or helipads, or changes in air traffic patterns that result in substantial safety risks (HAZ-3) are not cumulatively considerable in 2025, 2035, and 2050.

HAZ-4 IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN OR RESULT IN INADEQUATE EMERGENCY ACCESS.

The SANDAG Board of Directors finds that increased development and transportation network improvements may cause obstruction for emergency response vehicles or result in activities that would cause physical interference in the implementation of an emergency response or evacuation plan. However, adherence to regulations including the San Diego County Multi-Jurisdictional Hazard Mitigation Plan and the San Diego County Emergency Plan would ensure development and transportation projects would not impair implementation of or physically interfere with an emergency response or evacuation plan. Therefore, this impact (HAZ-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to impeding implementation of an adopted emergency response plan or emergency evacuation plan or resulting in inadequate emergency access, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to impeding implementation of an adopted emergency response plan or emergency evacuation plan or resulting in inadequate emergency access (HAZ-4) are not cumulatively considerable in 2025, 2035, and 2050.

H. HYDROLOGY AND WATER QUALITY (EIR SECTION 4.10)

HWQ-1 SUBSTANTIALLY DEGRADE SURFACE WATER OR GROUNDWATER QUALITY, INCLUDING IN VIOLATION OF ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR IN CONFLICT WITH A WATER QUALITY CONTROL PLAN OR ITS IMPLEMENTATION

The SANDAG Board of Directors finds that implementation of regional growth and land use changes and transportation network improvements associated with the proposed Plan would not substantially degrade water quality in violation of existing standards and waste discharge requirements (WDRs) or conflict with a water quality control plan or its implementation because compliance with detailed existing and evolving regulatory requirements would substantially lessen or eliminate the discharge of pollutants into receiving waters, including 303(d)-listed waters, during construction and operations. Therefore, this impact (HAZ-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to substantially degrading surface water or groundwater quality, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to substantially degrading surface water or groundwater quality (HWQ-1) are not cumulatively considerable in 2025, 2035, and 2050.

HWQ-2 SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF AN AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE

The SANDAG Board of Directors finds that compliance with regulatory requirements and implementation of similar design measures would ensure that regional growth and land use changes as well as transportation network improvements associated with the proposed Plan would not substantially alter existing drainage patterns such that erosion and siltation would increase. Through the various requirements to incorporate hydromodification and low impact development (LID) measures, the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff. Therefore, this impact (HWQ-2) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to substantially altering the existing drainage pattern of an area, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to substantially altering the existing drainage pattern of an area (HWQ-2) are not cumulatively considerable in 2025, 2035, and 2050.

HWQ-3 SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF AN AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD (I) SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE OR (II) IMPEDE OR REDIRECT FLOOD FLOWS

The SANDAG Board of Directors finds that compliance with regulatory requirements and implementation of similar design measures would ensure that regional growth and land use changes as well as transportation network improvements associated with the proposed Plan would not

substantially alter existing drainage patterns such that erosion and siltation would increase. Through the various requirements to incorporate hydromodification and LID measures, the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff. Therefore, this impact (HWQ-2) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to substantially altering the existing drainage pattern of an area, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to substantially altering the existing drainage pattern of an area (HWQ-4) are not cumulatively considerable in 2025, 2035, and 2050.

HWQ-4 SUBSTANTIALLY INCREASE RISK OF POLLUTION RELEASE DUE TO INUNDATION OF A FLOOD HAZARD, TSUNAMI, OR SEICHE ZONE.

The SANDAG Board of Directors finds that compliance with applicable regulatory requirements and implementation of design measures, safety ordinances, and water quality requirements would ensure that regional growth and land use changes as well as transportation network improvements would minimize the release of pollutants due inundation of a flood hazard, tsunami, or seiche zone. Through the various requirements to incorporate floodplain management, safety ordinances, and treatment best management practices (BMPs), the proposed Plan would not substantially increase the risk of pollutant release due to inundation in a flood hazard, tsunami, or seiche zone. Therefore, this impact (HWQ-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to substantially increasing risk of pollution release due to inundation, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan's incremental impacts related to substantially increasing risk of pollution release due to inundation (HWQ-4) are not cumulatively considerable in 2025, 2035, and 2050.

I. LAND USE (EIR SECTION 4.11)

LU-2 CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY, OR REGULATION (INCLUDING, BUT NOT LIMITED TO, THE GENERAL PLAN, LOCAL COASTAL PROGRAM, OR ZONING ORDINANCE) AND RESULT IN A PHYSICAL CHANGE TO THE ENVIRONMENT NOT ALREADY ADDRESSED IN THE OTHER RESOURCE CHAPTERS OF THIS EIR.

The SANDAG Board of Directors finds that while implementation of regional growth and land use change and transportation network improvements, would conflict with land use plans, policies, and regulations, including general plans, specific plans, and community plans, adopted for the purpose of avoiding or mitigating an environmental effect, impacts are already evaluated in other sections of the Final EIR, so these conflicts would not cause new significant impacts. Therefore, this impact (LU-2) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the Plan's impacts related to conflicting with the land use portion of adopted local general plans or other applicable land use plans, including specific plans and community plans adopted for the purpose of avoiding or mitigating an environmental effect, in combination with similar impacts that would result in the southern California region based on projections in adopted plans would not create significant cumulative impacts because the Plan would create no such conflicts. Therefore, the Plan's incremental impacts related to conflicting with

the land use portion of adopted local general plans or other applicable land use plans (LU-2) are not cumulatively considerable in 2025, 2035, and 2050.

J. NOISE AND VIBRATION (EIR SECTION 4.13)

NOI-3 FOR A PROJECT LOCATED WITHIN THE VICINITY OF A PRIVATE AIRSTRIP OR AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, THE PROJECT WOULD EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS.

The SANDAG Board of Directors finds that improvements associated with regional growth would not expose noise-sensitive land use to levels of noise in excess of applicable standards. As such, this impact (NOI-3) would be less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, implementation of the proposed Plan would not cause exposure of people to excessive noise levels from aircraft operations within the region due to growth and land use change or transportation improvements. Similarly, the 2008 San Diego International Airport, Airport Master Plan EIR identified no cumulative aircraft-induced noise exposure of people to excessive noise levels from aircraft operations would not occur within the region. Because significant cumulative noise impacts associated with exposure of people to excessive noise levels of aircraft operations would not occur within the region, the proposed Plan's less-than-significant noise impacts associated with aircraft noise exposure (NOI-3) are not cumulatively considerable in 2025, 2035, and 2050.

K. TRANSPORTATION (EIR SECTION 4.16)

TRA-1 CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES

The SANDAG Board of Directors finds that the proposed Plan would implement additional bicycle facilities, additional transit service miles, and would increase the number of bicycle, pedestrian, and transit trips, while reducing vehicular mode share. These characteristics of the proposed Plan would not conflict with the 2019 Federal RTP and Riding to 2050. Therefore, this impact (TRA-1) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not create significant cumulative impacts. Other adopted plans and related projects did not identify an impact related to conflict with a program, plan or ordinance in the region. Therefore, the proposed Plan's less-than-significant transportation impacts associated with conflict with a program, plan, or ordinance (TRA-1) are not cumulatively considerable in 2025, 2035, and 2050.

TRA-3 SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES

The SANDAG Board of Directors finds that implementation of the proposed Plan would not change the applicable design standards of the implementing agencies, and the transportation network improvements would be designed consistent with those standards. Further, the proposed Plan includes several planning efforts that would improve transportation safety. Therefore, this impact (TRA-3) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the impacts related to substantially increasing hazards due to a design feature or incompatible use would not create significant cumulative impacts. Other adopted plans and related projects did not identify an impact related to increased hazards. Therefore, the proposed Plan's less-than-significant transportation impacts associated with substantially increasing hazards due to a design feature or incompatible use (TRA-3) are not cumulatively considerable in 2025, 2035, and 2050.

TRA-4 LEAD TO A LACK OF PARKING SUPPLY THAT WOULD CAUSE SIGNIFICANT SECONDARY ENVIRONMENTAL IMPACTS NOT ALREADY ANALYZED IN THE EIR

The SANDAG Board of Directors finds that the proposed Plan parking strategy and policies were analyzed under Impact TRA-2. These vehicle miles traveled (VMT) results were relied upon for impact analysis conducted throughout the EIR. Therefore, the proposed Plan would not lead to a lack of parking supply that would cause significant secondary impacts not already analyzed in the EIR; and this impact (TRA-4) is less than significant in 2025, 2035, and 2050.

Regarding cumulative impacts, the impacts related to implementation of the proposed Plan leading to a lack of parking supply that would cause significant secondary impacts not already analyzed in the EIR would not create significant impacts, and no cumulative impact is identified that was not identified elsewhere in the EIR. Thus, the proposed Plan would not contribute to a cumulative impact associated with the lack of parking. Therefore, the proposed Plan's less-than-significant transportation impacts associated with a lack of parking that would cause significant secondary environmental impacts not already analyzed in the EIR (TRA-4) are not cumulatively considerable in 2025, 2035, and 2050.

IV. FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The SANDAG Board of Directors hereby finds that mitigation measures that have been identified in the EIR will lessen the following significant environmental impacts but not to a less-than-significant level. These findings are based on the discussion of impacts in the detailed issue area analyses in Sections 4.1 to 4.19 of the EIR and the cumulative impacts discussed in Chapter 5 of the EIR as well as relevant responses to comments in the Final EIR.

Impacts within the following resource categories will remain significant and unavoidable with implementation of all feasible mitigation measures:

- Aesthetics and Visual Resources
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Paleontological Resources
- Greenhouse Gas Emissions
- Land Use
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services and Utilities
- Transportation
- Tribal Cultural Resources
- Water Supply
- Wildfire

A. AESTHETICS AND VISUAL RESOURCES (EIR SECTION 4.1)

AES-1 Have a Substantial Adverse Effect on a Scenic Vista (2025, 2035, and 2050)

Significant Impact

By 2025, 2035 and 2050, development associated with regional growth and land use change, as well as planned transportation network improvements, would have substantial adverse effects on scenic vistas.

Mitigation Measures

Implementation of mitigation measures AES-1a and AES-1b would reduce this significant impact, but not to a less-than-significant level.

AES-1a Protect Public Views of Scenic Vistas for Transportation Network Improvements. During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, ensure that projects protect public views of scenic vistas. Construction and operational measures include, but are not limited to, the following:

- Site construction staging areas away from scenic vistas. Where infeasible, reduce the visibility of construction staging areas. Fence and screen these areas with low contrast materials consistent with the surrounding environment.
- Avoid permanent obstruction of scenic vistas from public viewing areas when selecting alignments and the grade of new infrastructure (i.e., above, at, or below grade).
- Use transparent safety barrier designs (e.g., railings) rather than walls.

AES-1b Protect Public Views of Scenic Vistas for Development Projects. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate scale and massing measures, including those listed under mitigation measure AES-1a as well as measures specific to development projects. These measures include, but are not limited to, the following:

- Ensure building siting, height, and mass protect views of scenic vistas.
- Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.
- Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive or interfere with the experience within the scenic vista. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.
- Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:
    - Creative site planning.
    - Integration of natural features into the project.

- Appropriate scale, materials, and design to complement the surrounding natural landscape.
- Minimal disturbance of topography.
- Clustering of development to preserve a balance of open space vistas, natural features, and community character.
- Creation of contiguous open space network.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure AES-1a have been required in, or incorporated into, the Plan to reduce this significant impact on scenic vistas caused by blocking panoramic views or impeding public views of major landscape features or landforms. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-1a and AES-1b would reduce significant impacts on scenic vistas caused by blocking panoramic views or impeding public views of major landscape features or landforms. However, some of the development associated with regional growth and land use change and transportation network improvements would be located in areas where substantial adverse effects on scenic vistas cannot be avoided. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-1) remains significant and unavoidable.

AES-2 Substantially damage scenic resources, including but not limited to, trees, rocks, outcroppings, and historic bridges within a state scenic highway (2025, 2035, 2050)

Significant Impact

By 2025, 2035 and 2050, implementation of regional growth and land use change and transportation network improvements would substantially damage scenic resources within a state scenic highway and other local scenic resources and protected public viewsheds identified in local plans.

Mitigation Measures

Implementation of mitigation measure AES-1a as discussed under Impact AES-1 will also reduce impacts on scenic resources, public viewsheds, and eligible and designated state scenic highways. Implementation of mitigation measures AES-2a, AES-2b, and AES-1a would reduce this significant impact, but not to a less-than-significant level.

AES-2a Reduce Impacts on Scenic Resources Within a State Scenic Highway and Local Scenic Resources for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements within eligible or designated state scenic highways and local scenic resources, SANDAG shall, and other transportation project sponsors can and should, ensure that projects are designed to minimize damage to scenic resources.

The following measures would reduce the significant effects related to damage of scenic resources within a state scenic highway or other scenic resource or a local scenic route that are in the jurisdiction and responsibility of California Department of Transportation (Caltrans) or other public agencies. Where a project has the potential for significant effects, mitigation measures shall ensure compliance with regulations for Caltrans scenic vistas, requirements of the Coastal Act, and policies within county and city general plans. Such measures may include the following:

- Use a palette of colors, textures, and building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
- Use alternating façades to "break up" large façades and provide visual interest.
- Design new corridor landscaping to respect existing natural and human-made features and to complement the dominant landscaping of the surrounding areas.
- Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- Retain or replace trees bordering highways, so that clear-cutting is not evident.
- Provide new corridor landscaping that provides appropriate transition to existing natural and human-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.
- Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

AES-2b Reduce Impacts on Scenic Resources Within a State Scenic Highway and Local Scenic Resources for Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce impacts on scenic resources within eligible and designated state scenic highways, coastal areas, and local scenic resources. Measures include, but are not limited to, the following:

- Avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources and public viewsheds, where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans. For projects within or adjacent to designated or eligible state scenic highway corridors, and local scenic resources and public viewsheds identified in local approved plans, prior to project approval, complete visual resources studies. If a significant impact on scenic resources is identified, the study would require site-specific mitigation measures, which may include those identified below.
- Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, and site grading.
- Ensure vegetation used as screening and landscaping blends in and complements the natural landscape.

- Retain or replace trees within scenic resources so that clear-cutting is not evident.
- Ensure grading blends with the adjacent landforms and topography.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-2a, AES-2b, and AES-1a have been required in, or incorporated into, the Plan to reduce this significant impact on scenic resources, including resources within a state scenic highway and local scenic routes and protected public viewsheds. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-2a, AES-2b, and AES-1a would reduce significant impacts on scenic resources, including resources within a state scenic highway and local scenic routes and protected public viewsheds. However, some of the growth and land use change, and transportation network improvements are located in areas where damage, movement, or removal of trees, rocks, outcroppings, and other scenic resources cannot be avoided, such as improvements on state-designated SR 52 and SR 125, and eligible scenic highways I-5, SR 76, SR 52, I-8, and SR 94. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-2) remains significant and unavoidable.

AES-3 Substantially degrade the existing visual character or quality of public views of the site and its surroundings, including adding a visual element of urban character to an existing rural or open space area, conflicting with regulations governing scenic quality (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, regional growth and land use change and transportation network improvements would substantially degrade visual character, including adding visual elements of urban character to existing rural or open space areas.

Mitigation Measures

In addition to the measure below, mitigation measures AES-1a, AES-2a, and AES-2b would also help to reduce impacts on visual character. Implementation of mitigation measures AES-3a, AES-3b, AES-1a, AES-2a, and AES-2b would reduce this significant impact, but not to a less-than-significant level.

AES-3a Reduce Impacts on Visual Character for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures include, but are not limited to, the following:

- Use contour grading to match surrounding terrain and existing natural, and human-made features of the area.
- Revegetate graded slopes and exposed earth surfaces prior to completion of construction.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.
- Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.

AES-3b Reduce Impacts on Visual Character for Development Projects. During planning, design, and project-level CEQA review of development projects the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures include, but are not limited to, the following:

- Use contour grading to match surrounding terrain and existing natural, and man-made features of the area.
- Revegetate graded slopes and exposed earth surfaces prior to completion of construction.
- Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.
- Apply development standards and design guidelines to maintain compatibility with surrounding development, including site coverage, building height and massing, building materials and color, landscaping, and site grading.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-3a, AES-3b, AES-2a, AES-2b, and AES-1a have been required in, or incorporated into, the Plan to reduce this significant impact of substantial degradation of visual character. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-3a, AES-3b, AES-2a, AES-2b, and AES-1a would reduce this significant impact of substantial degradation of visual character. However, while these mitigation measures reduce changes in visual character, it would be infeasible to prevent all instances of substantial degradation of visual character caused by regional growth and land use change as well as transportation network improvements. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures

or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-3) remains significant and unavoidable.

AES-4 Substantially degrade the existing visual character or quality of public views of the site and its surroundings by creating a new source of light and glare that would adversely affect day or nighttime views (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, regional growth and land use change and transportation network improvements would create new light sources from new development and vehicle headlights at night that would adversely affect dark skies in some locations.

Mitigation Measures

Implementation of mitigation measures AES-4a and AES-4b would reduce this significant impact, but not to a less-than-significant level.

AES-4a Minimize Effects of Light and Glare for Transportation Network Improvements. During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas.

Where SANDAG and other transportation project sponsors have identified that a project has the potential for significant effects, they can and should adopt mitigation measures to ensure consistency with the goals and policies within county and city general plans, as applicable. Construction and operational measures include, but are not limited to, the following:

- Minimize and control glare from transportation projects through the adoption of project design features that reduce glare, such as those listed below:
    - Planting trees along transportation corridors to reduce glare from the sun.
    - Landscaping off-street parking areas, loading areas, and service areas.
    - Limiting the use of reflective materials, such as metal.
    - Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry.
    - Screening parking areas by using vegetation or trees.
    - Using low-reflective glass.
- Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with transportation network improvements. These standards include the following:
    - Minimizing incidental spillover of light onto adjacent private properties and undeveloped open space.
    - Directing luminaries away from habitat and open space areas adjacent to the project site.
    - Installing luminaries that provide good color rendering and natural light qualities.

- Minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.

AES-4b Minimize Effects of Light and Glare for Development Projects. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas. Where a project has the potential for significant effects, mitigation measures shall ensure consistency with the goals and policies within county and city general plans, as applicable. Such measures may include, but are not limited to, the following:

- Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
- Restrict the operation of outdoor lighting for construction from the hours of 7:00 p.m. to 7:00 a.m.
- Use high pressure sodium vapor and/or cut-off fixtures including LED lights, instead of typical mercury-vapor fixtures for outdoor lighting.
- Use unidirectional lighting to avoid light trespass onto adjacent properties.
- Provide structural and/or vegetative screening from light-sensitive uses.
- Shield and direct all new street and pedestrian lighting away from light-sensitive offsite uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-4a and AES-4b have been required in, or incorporated into, the Plan to reduce this significant impact of substantial degradation of visual character. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-4a and AES-4b would reduce significant impacts associated with the introduction of new light and glare sources. However, while these mitigation measures reduce light and impacts, it would be infeasible to prevent all instances of new light and glare sources caused by regional growth and land use change as well as transportation network improvements, particularly from additional light sources from vehicle headlights at night. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-4) remains significant and unavoidable.

Cumulative Aesthetics and Visual Resources Impacts (EIR Section 5.2.1)

Significant Impacts

Because cumulative aesthetic and visual resource impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the proposed Plan's incremental aesthetic and visual resource impacts are significant in 2025, 2035, and 2050, the proposed Plan's incremental aesthetic and visual resource impacts (AES-1, AES-2, AES-3, and AES-4) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, and AES-4b would reduce the proposed Plan's significant aesthetic and visual resources impacts related to scenic vistas, scenic resources within state scenic highways, degradation of visual character, and light and glare, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, and AES-4b have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative aesthetic and visual resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, and AES-4b would reduce the proposed Plan's significant cumulative aesthetic and visual resources impacts. However, while these mitigation measures reduce the proposed Plan's significant aesthetic and visual resources impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant aesthetic and visual resources impacts to less-than-significant levels, these impacts (AES-1, AES-2, AES-3, and AES-4) remain cumulatively considerable post-mitigation.

B. AGRICULTURE AND FOREST RESOURCES (EIR SECTION 4.2)

AG-1 Convert agricultural lands to non-agricultural use (2025, 2035, 2050)

Significant Impact

Implementation of forecasted regional growth and land use change would convert the following amounts of existing agricultural land to nonagricultural uses: about 6,401 acres from 2016 to 2025 (including about 709 acres of FMMP-designated lands), about 7,125 acres from 2026 to 2035 (including about 760 acres of FMMP-designated lands), and about 7,586 acres from 2036 to 2050 (including about 760 acres of FMMP-designated lands (EIR Tables 4.2-3, 4.2-5, 4.2-7). Implementation of planned transportation network improvements would convert the following amounts of existing agricultural land to nonagricultural uses: about 57 acres from 2016 to 2025 (this

impact does not affect FMMP-designated lands), about 138 acres from 2026 to 2035 (including about 7 acres of FMMP-designated lands), and about 601 acres from 2036 to 2050 (including about 9 acres of FMMP-designated lands) (EIR Tables 4.2-4, 4.2-6, and 4.2-8). In addition, forecasted regional growth and land use change near existing agricultural lands would indirectly decrease the viability of agricultural production on those lands in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures AG-1a and AG-1b would reduce this significant impact, though not to a less-than-significant level.

AG-1a Preserve Existing Agricultural Lands. During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, preserve existing agricultural lands by avoiding agricultural land conversion when feasible; if not feasible, measures to reduce conversion of agricultural lands to nonagricultural use include, but are not limited to, the following:

- Acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the conversion occurs. Where conversion occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible.
- If a project requires cancellation of a Williamson Act contract, acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the cancellation occurs. Where the cancellation occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible.
- Where agricultural conservation easements are acquired or dedicated, consider the suitability of a specific proposed easement on its ability to avoid or reduce fragmentation of agricultural land to enhance overall production value and operation viability.
- Where project-specific mitigation described above is not feasible, use other commensurate solutions, such as payment of an agricultural resource impact fee made pursuant to an approved in-lieu fee program.

AG-1b Reduce Transportation Network Improvement and Development Conflicts with Agricultural Operations. During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, reduce conflicts with agricultural operations through the implementation of project design features and mitigation measures to protect surrounding agriculture, including, but not limited to, the following:

- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, topographic features, and open space, and to reduce conflict between transportation network improvements and/or developments and farming.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- Align corridors, incorporate buffer zones and setbacks, and design berms and fencing to avoid agricultural lands and to reduce conflicts between transportation projects and agricultural lands.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a and AG-1b have been required in, or incorporated into, the Plan to reduce this significant impact of converting existing agricultural lands to nonagricultural use. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a and AG-1b would reduce significant impacts related to the direct and indirect conversion of existing agricultural lands to nonagricultural use. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AG-1) remains significant and unavoidable.

AG-2 Conflict with existing zoning for agricultural use or a Williamson Act contract (2025, 2035, 2050)

Significant Impact

Forecasted regional growth and land use change would conflict with the following lands: about 1,162 acres of land zoned for agricultural use and about 732 acres of Williamson Act contract lands from 2016 to 2025, about 1,333 acres of land zoned for agricultural use and about 852 acres of Williamson Act contract lands from 2016 to 2035, and about 1,333 acres of land zoned for agricultural use and about 852 acres of Williamson Act contract lands from 2016 to 2050. Planned transportation network improvements would conflict with the following lands: about 5 acres of land zoned for agricultural use and no Williamson Act contract lands from 2016 to 2025, about 9 acres of land zoned for agricultural use and no Williamson Act contract lands from 2016 to 2035, and about 27 acres of land zoned for agricultural use and 1 acre of Williamson Act contract lands from 2016 to 2050.

Mitigation Measures

Implementation of mitigation measures AG-1a and AG-1b would reduce this significant impact, though not to a less-than-significant level.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a and AG-1b have been required in, or incorporated into, the Plan to reduce this significant impact of conflicts with existing zoning for agricultural use and Williamson Act contract lands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a and AG-1b would reduce significant impacts related to conflicts with existing zoning for agricultural use and Williamson Act contract lands. However, it

cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AG-2) remains significant and unavoidable.

FR-1 Convert or result in the loss of "Forest Land" as defined in the California Forest Legacy Act of 2007 (Public Resources Code Section 12220(g)) (2025, 2035, 2050)

Significant Impact

Forecasted regional growth and land use change would result in the loss of the following amounts of forest lands: about 1,162 acres from 2016 to 2025, about 1,333 acres from 2016 to 2035, and about 1,333 acres from 2016 to 2050. Planned transportation network improvements would result in the loss of the following amounts of forest lands: about 8 acres of forest lands from 2016 to 2025, about 20 acres of forest lands from 2016 to 2035, and about 33 acres from 2016 to 2050.

Mitigation Measure

Implementation of mitigation measure FR-1, as well as BIO-1a, BIO-1b, and BIO-1e, as discussed in Section 4.4 of the EIR, would reduce this significant impact, though not to a less-than-significant level.

FR-1: Reduce Impacts on Forest Lands During project planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, preserve forest lands by avoiding conversion of such lands when feasible and, if not feasible, by implementing measures to reduce impacts on forest lands, including, but not be limited to, the following:

- **Implement Compensatory Mitigation of Forest Lands**. Provide compensatory mitigation using mitigation ratios as specified through consultation with resource agencies and in approved natural community conservation plans (NCCPs) and habitat conservation plans (HCPs). Compensatory mitigation outside the Coastal Zone would be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and is required to be located within the Coastal Zone close to the impact. To the extent allowed by the above plans and ordinances, project-specific mitigation would be provided through onsite restoration of temporary impacts, onsite or offsite preservation of existing habitats, or offsite restoration.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure FR-1a have been required in, or incorporated into, the Plan to reduce this significant impact of loss of forest lands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure FR-1a, BIO-1a, BIO-1b, and BIO-1e would reduce significant impacts related to loss of forest lands. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (FR-1) remains significant and unavoidable.

Cumulative Agriculture and Forest Resources Impacts (EIR Section 5.2.2)

Significant Impacts

Because cumulative impacts on agriculture and forest resources throughout California by 2025, 2035, and 2050 would be significant, and because the Plan's incremental impacts on agriculture and forest resources are significant in 2025, 2035, and 2050, the Plan's incremental impacts on agriculture and forest resources (AG-1, AG-2 and FR-1) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures AG-1a, AG-1b, and FR-1 above, along with BIO-1a, BIO-1b, and BIO-1e, would reduce the Plan's significant agriculture and forest resources impacts related to conversion of existing agricultural land to nonagricultural use, conflicts with existing zoning for agricultural use and Williamson Act contracts, and loss of forest lands, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a, AG-1b, and FR-1, as well as BIO-1a, BIO-1b, and BIO-1e, have been required in, or incorporated into, the Plan to reduce the significant cumulative agriculture and forest resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a, AG-1b, and FR-1, as well as BIO-1a, BIO-1b, and BIO-1e, would reduce the Plan's significant cumulative agriculture and forest resources impacts. However, while these mitigation measures reduce the Plan's significant agriculture and forest resources impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant agriculture and forest resources impacts to less-than-significant levels, these impacts (AG-1, AG-2, and FR-1) remain cumulatively considerable post-mitigation.

C. AIR QUALITY (EIR SECTION 4.3)

AQ-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation (2025, 2035, 2050)

Significant Impact

Implementation of the proposed Plan would result in a cumulatively considerable net increase in particulate matter (PM) less than 10 microns in diameter (PM10(and sulfur dioxide (SO_X) emissions in 2050.

Mitigation Measures

2050

Implementation of mitigation measures AQ-2a, AQ-2b, GHG-5a, GHG-5b, GHG-5d, GHG-5f, and TRA-2 would reduce this significant impact, though not to a less-than-significant level.

Implement mitigation measures **GHG-5a (Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans), GHG-5b (Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure), GHG-5d (Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide),** and **GHG-5f (Implement Measures to Reduce GHG Emissions from Development Projects),** as discussed under Impact GHG-5 in Section 4.8. In addition, implement mitigation measure **TRA-2 (Achieve Further VMT Reductions for Transportation and Development Projects)**, as discussed under Impact TRA-2 in Section 4.16.

AQ-2a Secure Incentive Funding. SANDAG, in partnership with SDAPCD and the Port of San Diego, and member cities, will seek to secure incentive funding to reduce mobile SO_X and PM emissions from mobile exhaust, and entrained PM sources such as tire wear, brake wear, and re-entrained road dust. Such incentive funding or programs are:

- Voucher Incentive Program (VIP)
- Vehicle Registration Fund Program (VRF)
- Lower Emission School Bus Replacement and Retrofit Program (LESB)
- American Recovery and Reinvestment Act funding for the National Clean Diesel Funding Assistance Program (ARRA)

AQ-2b Zero Emission Trains. SANDAG shall only purchase zero emission trains on any new rail lines or train equipment after 2035. Zero emission trains can include fully electric, battery-electric, hydrogen fuel cell, or any technology that results in no tailpipe emissions. New rail lines construction after 2035 shall be powered completely by zero emission trains.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, GHG-5a, GHG-5b, GHG-5d, GHG-5f, and TRA-2 have been required in, or incorporated into, the Plan to reduce PM10 and SO_X. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GHG-5a, GHG-5b, GHG-5d, and GHG-5f would reduce PM10 and PM2.5 emissions from tire wear, break wear, and vehicle exhaust. In addition, mitigation measure TRA-2 would reduce criteria pollutants through project-level VMT reduction measures. Implementation of mitigation measure AQ-2a would reduce PM10 and SO_X emissions from onroad sources by securing funding to implement ways to reduce all emissions, including PM10 and SO_X emissions from mobile sources. Implementation of mitigation measure AQ-2b would reduce exhaust PM10 and SO_X emissions from commuter trains by replacing diesel fuel combustion with zero-emission energy sources. Mitigation measure AQ-2b would reduce SO_X emissions so that they would be less than cumulatively considerable, and therefore less than significant.

However, for mitigation measure AQ-2a and other PM-reducing mitigation measures, it cannot be guaranteed that PM10 emissions would be reduced to where they would be less than cumulatively considerable. Therefore, impacts related to cumulatively considerable net increases in air pollutant emissions would remain significant and unavoidable.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-2) remains significant and unavoidable.

AQ-3 Result in a construction-related emissions above mass emission thresholds (2025, 2035, 2050)

Significant Impact

The proposed Plan could result in a substantial increase in construction-related emissions exceeding County thresholds as the various land use changes and transportation network improvements are constructed, and this impact would be significant.

Mitigation Measures

Implementation of mitigation measures GHG-5e, GHG-5f, AQ-3a, AQ-3b, and AQ-3c would reduce this significant impact, but not to a less-than-significant level.

Implement mitigation measures **GHG-5e (Implement Measures to Reduce GHG Emissions from Transportation Projects)** and **GHG-5f (Implement Measures to Reduce GHG Emissions from Development Projects),** as discussed under Impact GHG-5 in Section 4.8.

AQ-3a Implement Construction Best Management Practices for Fugitive Dust. During planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential for localized particulate (PM10 and PM2.5) impacts that result in exceedances of the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) using applicable procedures and guidelines for such analyses (for example, SDAPCD and EPA air dispersion modeling guidance). If impacts are significant, during project-level construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce impacts, including but not limited to, the following:

- Use fugitive dust control measures to reduce generation from exposed surfaces during construction, as specified in SDAPCD Rule 55 (SDAPCD 2009). SDAPCD Rule 55 includes

various requirements, including preventing visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, removing all track-out/carry-out dust at the conclusion of each work day Compliance with these regulatory requirements is a performance standard for mitigation of construction activity particulate emissions. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out to 90 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007, WRAP 2006).

- Use additional fugitive dust control measures such as watering or application of dust suppressants to reduce the generation of fugitive dust at active construction sites. Reductions in fugitive dust emissions range from 10 to 74 percent for watering of unpaved surfaces to 84 percent for use of dust suppressants (WRAP 2006).
- Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off site. Reductions in fugitive dust emissions are estimated at 91 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007).
- Remove visible mud or dirt track-out onto adjacent public roads. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out (WRAP 2006).
- Limit vehicle speeds on unpaved surfaces during construction to 15 mph. Reductions in fugitive dust emissions from unpaved surfaces are estimated at 57 percent (WRAP 2006).
- Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph. Reductions in fugitive dust emissions are estimated at 98 percent (WRAP 2006).
- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas. Reductions in fugitive dust emissions from wind erosion are estimated at 90 percent (WRAP 2006).
- Wash all trucks and equipment, including their tires, prior to leaving the construction site. No quantitative estimate of the effectiveness of this measure is available.
- Implement other site-specific fugitive dust control measures as warranted for individual construction projects for the transportation network and/or land use projects.

AQ-3b Reduce Diesel Emissions During Construction From Off-Road Equipment. For impacts on air quality from construction exhaust s, during planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce criteria pollutant and toxic air contaminants (TAC) impacts from off-road equipment, including, but not limited to, the following:

- Ensure off-road equipment greater than 25 horsepower (hp) that will be operating for more than 20 hours during construction meets the following requirements:
    - Ensure engines are zero emissions or equipped with an CARB Level 3 Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.
    - If project-specific analysis demonstrates that the above measure would not adequately reduce impacts (as determined by the project-level lead agency), provide engines that meet or exceed either EPA Tier 4 off-road standards.
- Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.

- Maintain and properly tune construction equipment in accordance with the manufacturers' specifications.
- Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.
- Use late model engines.
- Use low emission diesel products.
- Use alternative fuels in construction equipment.
- Use engine retrofit technology to control emissions from off-road equipment.

AQ-3c Reduce Diesel Emissions During Construction From On-Road Vehicles. For impacts on air quality from construction exhaust as a result of transportation network improvements and programs or development projects, during project-level CEQA review and construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce criteria pollutant and TAC impacts from on-road vehicles, including but not limited to:

- Monitor idling time of diesel-powered trucks, and limit to no more than 2 minutes.
- Provide clear signage for construction workers at all access points.
- Maintain and properly tune vehicles in accordance with the manufacturers' specifications.
- Ensure that construction activity deliveries are scheduled during off-peak hours (e.g., 10 a.m. to 3 p.m.) and are coordinated to consolidate truck trips. When the movement of construction materials and/or equipment impacts traffic flow, provide temporary traffic control (e.g., flag person) to improve traffic flow.
- Use late model engines (2010 or new model years).
- Use low emission diesel products in on-road vehicles.
- Use zero emission or near-zero emission technologies or alternative fuels in on-road vehicles.
- Use engine retrofit technology on on-road vehicles.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-5e, GHG-5f, AQ-3a, AQ-3b, and AQ-3c, have been required in, or incorporated into, the Plan to reduce this significant impact of cumulatively considerable increases in particulate emissions. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Mitigation measure AQ-3a would reduce the impacts associated with fugitive dust (fugitive PM10 and PM2.5 emissions) during construction, as well as the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3b would reduce the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3c would reduce diesel emissions during construction from on-road vehicles. Additionally, mitigation measures GHG-5e and GHG-5f would reduce construction emissions through use of energy and fuel-efficient vehicle and equipment. Although mitigation would reduce impacts, there is no

guarantee that all projects' impacts would be reduced to below a level of significance; thus, impacts would be significant and unavoidable. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-3) remains significant and unavoidable.

AQ-4 Expose sensitive receptors to substantial PM10 and PM2.5 concentrations (2025, 2035, 2050)

Significant Impact

Implementation of the proposed Plan by 2025 could substantially contribute to violations or create new violations of annual PM10 CAAQS in the Escondido domains, and the 24-hour PM10 CAAQS in the Chula Vista domain. Implementation of the proposed Plan by 2035 could substantially contribute to violations or create new violations of annual PM10 CAAQS in the El Cajon and Escondido domains, and the 24-hour PM10 CAAQS in the Chula Vista domain. Implementation of the proposed Plan by 2050 could substantially contribute to violations or create new violations of annual PM10 CAAQS in the Kearny, El Cajon, and Escondido domains, and the 24-hour PM10 CAAQS in the Chula Vista domain.

Mitigation Measures

Implementation of mitigation measures AQ-2a, GHG-5a, GHG-5b, GHG-5d, GHG-5f, TRA-2, and AQ-4 would reduce this significant impact, but not to a less-than-significant level.

Implement mitigation measure AQ-2a, as discussed under Impact AQ-2. Mitigation measure AQ-2a would reduce road dust from freeway travel, which is the primary cause of the PM10 exceedances discussed herein.

The following mitigation measures presented in Section 4.8 will further reduce PM10 and PM2.5 emissions:

- **GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans**
- **GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure**
- **GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide**
- **GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects**

The following mitigation measure, presented in Section 4.16, will further reduce PM10 and PM2.5 emissions by reducing VMT:

- **TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects**

In addition, the following measure is proposed:

AQ-4 Reduce Exposure to Localized Particulate Emissions. During planning, design, and project-level CEQA review of transportation network improvements and programs, and during planning, design, and project-level CEQA review of development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential particulate matter concentration impacts of the project using

applicable procedures and guidelines for such analyses. If exceedances of PM10 or PM2.5 standards are predicted, SANDAG shall, and other transportation project sponsors can and should, apply measures to reduce PM emissions, including but not limited to the following:

- Design sites to locate sensitive receptors more than 500 feet of a freeway, 500 feet of urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
- Design sites to locate sensitive receptors more than 1,000 feet of a major diesel rail service or railyards.

Where adequate buffer cannot be implemented, implement the following:

- Install air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to indoor reduce pollution exposure for residents and other sensitive populations in buildings that are close to transportation network improvement projects. Use air filtration devices rated MERV-13 or higher. As part of implementing this measure, require an ongoing maintenance plan for the building's Heating, Ventilation and Air Conditioning (HVAC) air filtration system. Air filtration devices rated MERV-13 are estimated to reduce indoor levels of particulates by 75 to 90 percent (CARB 2017b).
- Plant trees and/or vegetation suited to trapping roadway air pollution and/or sound walls between sensitive receptors and the pollution source. This measure would trap pollution emitted from pollution sources such as freeways, reducing the amount of pollution to which residents and other sensitive populations would be exposed. The vegetation buffer should be thick, with full coverage from the ground to the top of the canopy (CARB 2017c, EPA 2016). Vegetation can be combined with sound walls to further reduce pollution exposure, particularly for locations immediately behind the barrier.
- Design streets that have more open space and varied building heights.
- Move bus stops and other gathering location farther from intersections.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, GHG-5a, GHG-5b, GHG-5d, GHG-5f, TRA-2, and AQ-4 have been required in, or incorporated into, the Plan to reduce this significant impact of exposing sensitive receptors to substantial PM10 and PM2.5 concentrations. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure AQ-2a would help secure incentive funding to reduce PM emissions from mobile sources. Implementation of mitigation measures GHG-5a, GHG-5b, GHG-5d, GHG-5f, and TRA-2 would reduce PM10 and PM2.5 emissions from tire wear, brake wear, vehicle exhaust, and through project-level VMT reduction measures. Mitigation measure AQ-4 would reduce the exposure of sensitive receptors to localized PM emissions with the implementation of design measures. Although mitigation would reduce impacts, there is no guarantee that all projects would be reduced to below a level of significance. Impacts would remain significant for the Escondido and Chula Vista areas for 2025, 2035, and 2050 and the El Cajon area for 2035 and 2050. Thus, impacts would be significant and unavoidable.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible

mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-4) remains significant and unavoidable.

AQ-5 Expose sensitive receptors to substantial TAC concentrations (2025, 2035, 2050)

Significant Impact

Implementation of the proposed Plan would not expose existing sensitive receptors, but would expose new receptors, to substantial concentrations of TAC emissions.

Mitigation Measures

Implementation of mitigation measures AQ-2a, AQ-4, GHG-5a, GHG-5b, GHG-5d, GHG-5f, TRA-2, AQ-5a, and AQ-5b would reduce this significant impact, but not to a less-than-significant level.

Implement mitigation measure AQ-2a, as discussed under Impact AQ-2. Mitigation measure AQ-2a would reduce road dust from freeway travel, which is the primary cause of the PM10 exceedances discussed herein.

Implement mitigation measure AQ-4, as discussed under Impact AQ-4. Mitigation measure AQ-4 would reduce pollution exposure at land uses near emission sources. These design measures would also reduce TACs by reducing exposure to all roadway and rail pollution.

The following mitigation measures, as discussed in Section 4.8, will further reduce TAC emissions:

- **GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans**
- **GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure**
- **GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide**
- **GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects**

The following mitigation measure, presented in Section 4.16, will further reduce TAC emissions by reducing VMT:

- **TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects.**

In addition, the following measures are proposed:

AQ-5a Reduce Exposure to Localized Toxic Air Contaminant Emissions. During planning, design, and project-level CEQA review of transportation network improvements and programs, SANDAG shall, and other transportation project sponsors can and should, evaluate the potential TAC impacts of the project using applicable procedures and guidelines for such analyses (for example, California Air Pollution Control Officers' Association, OEHHA, and/or EPA air toxics health risk assessment guidance).

In addition, during planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should apply the above measures, and additional measures to reduce TAC emissions or exposure to TAC emissions, including but not limited to:

- Reduce the potential for TACs to be introduced into buildings by all of the following:
    - Maintaining a positive air pressure within buildings that include sensitive receptors.
    - Achieving a performance standard of at least one air exchange per hour of fresh outside filtered air.
    - Achieving a performance standard of at least 4 air exchanges per hour of recirculation.
    - Achieving a performance standard of at least 0.25 air exchanges per hour of unfiltered air if the building is not positively pressurized.
- Within developments, separate sensitive receptors from truck activity areas, such as loading docks and delivery areas. This measure would reduce exposure of residents and other sensitive receptors by locating sources of TACs associated with loading docks and delivery areas away from sensitive receptors.
- Replace or retrofit existing diesel generators that are not equipped to meet CARB's Tier 4 emission standards.
- Reduce emissions from diesel trucks using the project site through the following measures:
    - Install electrical hook-ups for electric or hybrid trucks at loading docks.
    - Require trucks to use Transportation Refrigeration Units (TRUs) that meet Tier 4 emission standards.
    - Require truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels.
    - Prohibit trucks from idling for more than 2 minutes as feasible.

This measure would reduce emissions of TACs from trucks and TRUs by reducing operations and requiring them to use electrical hookups.

- Do not locate sensitive receptors in the same buildings as a perchloroethylene dry cleaning facility. This measure would reduce potential exposure of sensitive receptors to perchloroethylene from dry cleaning facilities.
- Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year). This measure would reduce potential exposure of sensitive receptors to emissions from gas stations.
- Ensure that private (individual and common) exterior open space, including playgrounds, patios, and decks, is shielded from stationary sources of air pollution by buildings or otherwise buffered to further reduce air pollution exposure for project occupants. This measure would reduce the potential for exposure of residents and other sensitive populations to stationary sources of TAC emissions.

AQ-5b. Reduce Exposure to Localized Toxic Air Contaminant Emissions during Railway Design. In order to help reduce localized toxic air contaminant (TAC) concentrations at sensitive receptors near the future proposed railway(s), SANDAG shall require the design of railway tunnels or other approaches to move emissions underground, where feasible, during individual project-level design. Furthermore, individual project-level design of railway tunnels or other underground features shall require that portals, adits, windows, and other venting features are located as far away as feasibly possible from nearby sensitive receptor(s).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-4, GHG-5a, GHG-5b, GHG-5d, GHG-5f, TRA-2, AQ-5a, and AQ-5b have been required in, or incorporated into, the Plan to reduce this significant impact of exposing sensitive receptors to substantial TAC concentrations. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure AQ-2a would help secure incentive funding to reduce PM emissions from mobile sources. Implementation of mitigation measure AQ-5a would reduce TAC emissions and TAC emission exposure on existing and new receptors through design and siting requirements. Implementation of mitigation measure AQ-5b would reduce diesel emission exposure on existing and new receptors through undergrounding and design. Implementation of mitigation measures GHG-5a, GHG-5b, GHG-5d, GHG-5f, and TRA-2 would reduce PM10 and PM2.5 emissions from tire wear, brake wear, vehicle exhaust, and through project-level VMT reduction measures which would reduce TAC emissions and associated concentrations. Although mitigation would reduce impacts, there is no guarantee that all projects would be reduced to below a level of significance for every project. Thus, impacts would be significant and unavoidable.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-5) remains significant and unavoidable.

Cumulative Air Quality Impacts (EIR Section 5.2.3)

Significant Impacts

Because cumulative air quality impacts throughout the southern California and northern Baja California region would be significant in 2025, 2035, and 2050, and because the Plan's incremental air quality impacts are significant in 2025, 2035, and 2050, the Plan's incremental air quality impacts (AQ-2, AQ-3, AQ-4 and AQ-5) are cumulatively considerable in 2025, 2035, 2050.

Mitigation Measures

Implementation of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-5a, GHG-5b, GHG-5d, GHG-5e, GHG-5f, and TRA-2 would reduce significant air quality impacts related to violating any air quality standard or contributing substantially to an existing or projected air quality violation, construction-related emissions above mass emission thresholds, exposing sensitive receptors to substantial PM10 and PM2.5 concentrations, or TAC concentrations, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-5a, GHG-5b, GHG-5d, GHG-5e, GHG-5f, and TRA-2 have been required in, or incorporated into, the Plan to reduce the Plan's significant air quality impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation

measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-5a, GHG-5b, GHG-5d, GHG-5e, GHG-5f, and TRA-2 would reduce the Plan's significant cumulative air quality impacts. However, while these mitigation measures reduce the Plan's significant air quality impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant air quality impacts to less-than-significant levels, these impacts (AQ-2, AQ-3, AQ-4, and AQ-5) remain cumulatively considerable post-mitigation.

D. BIOLOGICAL RESOURCES (EIR SECTION 4.4)

BIO-1 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS; or have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means (2025, 2035, 2050)

Significant Impact

Forecasted regional growth and land use change and planned transportation network improvements would result in substantial adverse effects on sensitive natural communities and regulated aquatic resources for year 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would reduce this significant impact, but not to a less-than-significant level.

BIO-1a Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources. During project planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid impacts on sensitive natural communities and regulated aquatic resources when feasible. Avoidance measures include, but are not limited to, the following:

- Conduct early coordination with the Wildlife Agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands.
- During the site identification and project design process, to the extent feasible, prioritize the least environmentally constrained site, and select a design that avoids and minimizes impacts on biological resources and NCCP lands, and maintains habitat integrity.
- Confine development footprints to the minimum amount of undeveloped area necessary for construction and safe, reliable operation. Limit access routes and staging areas to existing roadways, and developed or disturbed areas. Direct drainages away from sensitive habitats,

such as canyons. Clearly delineate all construction areas, staging areas, and access routes in the final engineering plans.

- Limit grading and earth-moving activities to the permitted impact footprint. Install environmentally sensitive area fencing or flagging along the limits of disturbance prior to the start of construction to avoid incidental loss of sensitive habitat types.
- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special status species and natural communities detected during project surveys to the CNDDB.

BIO-1b Provide Compensatory Mitigation. Where impacts are unavoidable, during project planning, design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation, as specified by and consistent with adopted MSCP or MHCP guidelines and agreements, applicable federal and State regulatory requirements for mitigating impacts on regulated aquatic resources, applicable local regulations protecting sensitive natural communities, or through consultation with resource agencies. SANDAG shall, and other implementing agencies can and should, establish appropriate mitigation ratios where ratios have not already been established through ordinances and guidelines, specifically for impacts on sensitive coastal, riparian, and shrubland communities. SANDAG shall, and other implementing agencies can and should, design compensatory mitigation to result in the conservation, establishment, or creation of self-sustaining sensitive natural and native communities, replacing the lost habitat and/or habitat value as required to offset those lost from project implementation. Otherwise, mitigation measures would include the requirement for and financing of long-term conservation and management requirements of the mitigation projects.

Sensitive Vegetation Communities

For impacts outside the Coastal Zone, provide compensatory mitigation in the form of project- and habitat-specific onsite or offsite mitigation. Offsite mitigation would occur through several options, including (1) the purchase of credits at an existing authorized mitigation bank within or adjacent to the ecoregion or watershed within which the impacts occurred; (2) in lieu fee program; or (3) project-specific (permittee responsible) mitigation, such as habitat enhancement, establishment (creation), or re-establishment (restoration). Mitigation should occur as close to the impact and in the same local watershed as feasible, unless compelling ecological benefits, as supported by the state and federal wildlife agencies, would result from mitigation located in another area.

Compensatory mitigation for impacts inside the North Coast Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP 2014) should be consistent with Chapter 6B Resources Enhancement and Mitigation Program. Compensatory mitigation for impacts inside the Coastal Zone and outside the PWP/TREP should be provided within the Coastal Zone as close as feasible to the impact. Consistent with the resource agencies approval and applicable adopted plans, ordinances, and policies, provide compensatory mitigation for sensitive upland vegetation communities through the following:

- Onsite restoration and post-restoration monitoring for temporary impacts using appropriate native species and natural habitat configurations similar to or better than those impacted.
- On- or offsite preservation of existing habitats through acquisition and/or restoration using Environmental Mitigation Program (EMP) and other (e.g., project-specific) mitigation funds for permanent impacts. Protect mitigation lands in perpetuity (e.g., through a conservation easement or similar legal conservation assurance to be approved by the regulatory agencies), fund long-term management (e.g., through the establishment of an endowment

for habitat management and for easement management), and adequately manage such lands to maintain the originally intended biological quality and function in perpetuity.

- Offsite mitigation requirements met through EMP and/or other (e.g., project specific) mitigation funds. When mitigation is provided outside of an adopted NCCP/HCP plan area the following conditions should apply:
    - Give priority to mitigation lands connected to existing conserved open space.
    - Consider contributing to the establishment of large blocks of habitat or lands that are otherwise critical for covered species and/or providing for biological core areas and habitat linkages consistent with current regional conservation planning goals.
    - Mitigate impacts on critical habitat within the same Critical Habitat Unit where the impacts occurred.
- Purchase of habitat credits at an approved mitigation bank, or through payment into an in-lieu mitigation fee program applicable to the impacts and as approved by the Wildlife Agencies.

Regulated Aquatic Resources

Construction within regulated aquatic resources would be subject to prior authorization by U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and California Coastal Commission (CCC) (as applicable in the coastal zone). Consistent with the resource agencies' permitting and applicable adopted plans, ordinances, and policies, provide project-specific mitigation for impacts on regulated aquatic resources, including waters and wetlands, and associated state-regulated riparian habitat, through one of the following, in order of priority:

- Purchase of credits at an existing authorized mitigation bank or in lieu fee program, except within the coastal zone. Provide compensatory mitigation for impacts inside the coastal zone at sites within the coastal zone close to the impact. Mitigation of impacts on aquatic resources within the coastal zone may require offsets outside the coastal zone and would be negotiated with the CCC on a case-by-case basis.
- Project-specific (permittee responsible) mitigation. Apply an appropriate mitigation ratio for regulated aquatic resources in consultation with the regulatory agencies (i.e., following the USACE Standard Operating Procedure and any other applicable standards) to ensure no net loss of wetlands functions and services, account for temporal losses, and set in coordination with USACE, RWQCB and CDFW. Impacts on vernal pools within the City of San Diego would require mitigation consistent with the Vernal Pool Habitat Conservation Plan (VPHCP) (City of San Diego 2017); impacts on vernal pools outside the City of San Diego would require permitting through the RWQCB.

BIO-1c Prepare a Habitat Restoration Plan. During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation with and as approved by the resource agencies, and consistent with adopted Multiple Species Conservation Program (MSCP) or Multiple Habitat Conservation Program (MHCP) guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a Habitat Mitigation and Monitoring Plan (HMMP) consistent with the requirements of and approved by USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands. This mitigation measure applies

provided that mitigation does not occur through credit purchase at a mitigation bank. The restoration plan should include the following:

- Details regarding the location of the site, site conditions and functions, site preparation (e.g., grading, bio-engineering methods), recontouring, planting specifications (including native seed mixes and plant palettes), irrigation design (if determined necessary), and measures to control exotic vegetation.
- Details on avoidance of impacts on any extant sensitive biological resources that may occur as the result of habitat restoration, including direct loss and indirect effects related to changes in hydrology and associated potential effects on species composition.
- Identification of locally appropriate plant species for the plan, sourcing (e.g., seed collection, contract-growing of container plants), and outline of performance standards (success criteria). Success should be measured by comparing a similar, natural (undisturbed) reference site containing the same vegetation communities and located within the same watershed as the restoration site, and should use statistical metrics in consideration of the temporal difference between an established reference site and an immature restoration site.
- Performance standards sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of applicable agency and adopted plans, ordinances, and policies. After final performance standards have been met and any relevant permitting agencies have approved the mitigation project as complete, the mitigation areas must be conserved and managed in perpetuity (see BIO-1d).
- Maintenance and monitoring procedures (including post-restoration monitoring and reporting). Any habitat restoration and mitigation site should be monitored for a minimum of 5 years or as required by regulatory agencies, but continue maintenance and monitoring until performance standards are met.
- Identification of remedial measures if the mitigation efforts fall short of the performance standards. Remedial measures typically include, but are not limited to, replanting, reseeding, topographical/surface contour adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.
- Climate science and climate change resiliency and adaptation measures, to be developed as adaptive management strategies for restoration and long-term management planning to reflect the latest available information on climate change impacts and adaptation measures, such as seed storage and adaptation of the seed mixes and planting palettes to adapt to changing climate conditions and sea-level rise.

BIO-1d Prepare Habitat/Long-Term Management Plans. During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation with and approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a Long-Term Management Plan (LTMP) consistent with the requirements of USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands; or a Habitat Management Plan (HMP) or Resources Management Plan (RMP) for upland mitigation areas. The management plans can and should be consistent with the SDMMP Management Strategic Plan (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures, describe management in perpetuity of the mitigation and conservation areas, illustrate adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives. Management

goals should include adaptive management measures for climate adaptation and resiliency. Furthermore, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, prepare a management cost analysis to identify long-term management costs pursuant to measures outlined in the LTMP, HMP, or RMP. Long-term management should be funded using endowments or other financial assurances to generate sufficient annual interest to manage mitigation areas in perpetuity. In addition to the funding requirements, the management plans should also identify the habitat manager and propose a site protection instrument, such as an agency-approved Conservation Easement (CE), restrictive covenant or other title restriction that identifies the mitigation site to be conserved in perpetuity. In some cases, compensatory mitigation would occur through adding lands through public lands that are already preserved (e.g., National Wildlife Refuge).

BIO-1e Implement Best Management Practices to Avoid Indirect Impacts. During planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, include location-specific measures to avoid and minimize construction-generated dust, erosion, runoff, and sedimentation, and exotic plant invasion, within or into sensitive natural habitats and jurisdictional waters. Location-specific measures include, but are not limited to, the following:

- Place construction materials, staging, storage, dispensing, fueling, and maintenance activities in upland areas outside of sensitive habitat, and take adequate measures to prevent any runoff from entering regulated waters, including wetlands.
- Fuel equipment on existing paved roads. Check contractor equipment for leaks prior to operation and repaired as necessary.
- Monitor construction activities using a qualified biologist when construction is occurring in, or adjacent to, sensitive natural communities and grant the biologist the authority to stop work if it deviates from approved plans and mitigation measures.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory, including the development of an integrated invasive plant control plan describing protocols and enforcement schedules for maintenance, construction, and emergency activities working within and moving between important habitat areas.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial adverse effects on riparian habitat, wetlands, and uplands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would reduce significant impacts related to substantial adverse effects on riparian habitat, wetlands, and uplands. However, there is no assurance that these mitigation measures would be implemented by non-SANDAG project sponsors or would be equally effective for all projects due to the wide variety of circumstances, such as lack of available mitigation sites, shortage of acreage at mitigation banks, mitigation complexity and cost, lack of long-term management and monitoring, and lack of enforcement. Instances may occur in which impacts are not reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-1) remains significant and unavoidable.

BIO-2 Have a substantial adverse effect, either directly or indirectly, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, including their federally designated critical habitat, or species that are considered sensitive in CEQA Guidelines Section 15380 (2025, 2035, 2050)

Significant Impact

By 2025, 2035 and 2050, forecasted regional growth and land use change and planned transportation network improvements would result in substantial adverse change to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS, and the habitat of these special-status species (EIR Tables 4.4-10, 4.4-11, and 4.4-12).

Mitigation Measures

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, and BIO-2c would reduce this significant impact, but not to a less-than-significant level.

Mitigation measures BIO-1a through BIO-1d are also applicable to, and avoid, minimize, and mitigate impacts on, sensitive vegetation communities that provide habitat for special-status species.

BIO-2a Implement Design, Minimization, and Avoidance Measures for Special Status Animal Species. During planning, design, project-level CEQA review, regulatory permitting process, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, incorporate measures to avoid and minimize impacts on special-status animal species.

Construction

Construction measures include, but are not limited to, the following:

- Avoid construction during the nesting or breeding season of special-status animal species.
- If the nesting or breeding season cannot be avoided, conduct focused surveys (by certified biologists approved by the Wildlife Agencies) and implement noise attenuation measures (e.g., temporary noise barriers) if construction noise levels are found by the focused survey to disturb special-status animal species, specifically during the breeding season.
- Backfill all wildlife pitfalls (trenches, bores, and other excavations) at the end of each work day. If backfilling is not feasible, slope all trenches, bores, and other excavations at a 3:1 ratio at the ends to provide wildlife escape ramps, or cover completely to prevent wildlife access.
- Delineate permitted work areas, including staging areas, equipment access, and placement of soils, with fencing or stakes prior to construction to prevent access to areas occupied by special-status species.

- Require monitoring of construction activities by qualified or certified biologists when construction occurs in, or adjacent to (i.e., within buffer areas approved by the regulatory agencies), areas suitable for or occupied by special-status species, with authority to stop work if it deviates from approved plans and mitigation measures. Avoidance buffers may vary by species and should be approved by the Wildlife Agencies.
- Avoid nighttime construction or minimize lighting. When activities must occur at night, direct lighting (e.g., staging areas, equipment storage sites, roadway) downward and away from sensitive vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.
- Remove spoils, trash, or any debris to an offsite, approved disposal facility. Contain trash and food items in closed containers and remove daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Prohibit workers from bringing pets and firearms to the site.
- Clear vegetation outside of the typical breeding season of special-status animal species as determined by the Wildlife Agencies or qualified biologist. If activities must occur during special-status species breeding season timeframes, conduct a preconstruction survey by a qualified biologist to determine whether the species of concern, including special-status birds protected under the Migratory Bird Treaty Act (MBTA), are present within the proposed work area or appropriate buffer (buffer distance may vary depending on the type of activity and the species and other site conditions). If the species of concern are found on site, implement measures, surveys, and construction monitoring to avoid impacts as determined by the regulatory agencies and/or the qualified biologist.

Operation and Maintenance

Operation and maintenance measures include, but are not limited to, the following:

- If permanent lighting is necessary, use motion sensitive lighting rather than steady burning, and direct downward and away from natural vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.
- In the event that vegetation clearing or other vegetation maintenance is required, schedule vegetation clearing outside special-status animal species breeding seasons.
- Implement operational noise reduction measures described in Section 4.13 (see mitigation measure NOI-1a).

BIO-2b Provide Compensatory Mitigation for Special Status Plant Species. Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status plant species as specified through consultation with resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations.

Federally and/or State-Listed Plant Species

- If an individual project would result in take of a federally and/or state-listed plant species, consult with the Wildlife Agencies and/or require the applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, NCCP, Section 7, Section 10 HCP) prior to construction as required by State and federal law. Federally listed plant species may not fall under this requirement if no federal project nexus is provided. If the area is

covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines.

- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.
- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat, including, but not limited to, seed collection, salvage of root masses, translocation of transplantation of populations or plant parts, and planting seeds and/or root masses in an area with suitable conditions as approved by the Wildlife Agencies or authorized jurisdiction. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.
- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.
- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, replanting and reseeding of appropriate habitat elements, and propagation and seed bulking programs.
- Conserve any restoration and translocation sites in perpetuity, fund a long-term management endowment, identify a long-term habitat manager, and provide long-term adaptive habitat management measures through a Habitat Management Plan.

Non-Federally and/or Non-State-Listed Special-Status Plant Species

- For plant species covered by adopted NCCPs or other ordinances such as the San Diego County RPO, obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances. This may include species-specific mitigation for covered narrow endemic plant species pursuant to MSCP or MHCP requirements.
- Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, translocation/transplantation, restoration, or creation of self-sustaining suitable habitat as described above for federally and state-listed species. Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.

BIO-2c Provide Compensatory Mitigation for Special Status Animal Species. Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status animal species as specified through consultation with resource agencies, and in adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations.

Federally and/or State Listed Animal Species

- If an individual project would result in take of a federally and/or state-listed animal species, consult with the Wildlife Agencies and/or require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by State and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the Wildlife Agencies.
- Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available.
- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.
- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat based on available scientific information and as recommended by the respective species experts. If appropriate and approved by the regulatory agencies, mitigation may include translocation (active or passive) of the species. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.
- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.
- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, habitat restoration, and predator control programs.

Non-Federally and/or Non-State-Listed Special-Status Animal Species

- Obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances (such as the County RPO).
- Follow guidelines that identify mitigation requirements, such as local biology guidelines and mitigation ordinances, or Memoranda of Understanding (MOU) between the respective jurisdiction and Wildlife Agencies.
- Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat. Create species-specific breeding opportunities and protect mitigation areas from edge effects (e.g., roadkill). Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, and BIO-2c have been required in, or incorporated into, the Plan to reduce this significant impact of direct and indirect substantial adverse effects on wildlife and plants identified as candidate, sensitive, or special-status species. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, and BIO-2c would reduce significant impacts related to direct and indirect substantial adverse effects on wildlife and plants identified as candidate, sensitive, or special-status species. However, there is no assurance that these mitigation measures would be implemented or would be equally effective for all projects due to the wide variety of circumstances, complexity of some sites, and impacts on them. Instances may occur in which impacts are not reduced to less-than-significant levels.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-2) remains significant and unavoidable.

BIO-3 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (2025, 2035, 2050)

Significant Impact

By 2025, 2035 and 2050, forecasted regional growth and land use change and planned transportation network improvements would interfere substantially with fish and wildlife movement, wildlife corridors, and nursery sites.

Mitigation Measure

Implementation of mitigation measure BIO-3 would reduce this significant impact, but not to a less-than-significant level.

BIO-3 Facilitate Wildlife Movement. During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement project designs that provide for continued movement of wildlife by limiting edge effects and assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are impacted, as determined by best available information, modeled wildlife corridors, linkages identified in adopted HCP/NCCPs, studies conducted by San Diego Management and Monitoring Program in collaboration with the U.S. Geological Survey Biological Resource Division or project-specific wildlife movement studies. Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking and consider balancing conservation and recreation (Mitrovich et al. 2020). Include adaptive management and monitoring measures in the CEQA review, mitigation measures and project design. Design measures include, but are not limited to, the following:

- Allow corridor buffer zones and wide movement corridors to remain or incorporate periodic larger habitat patches along a corridor's length.
- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands.
- Where feasible, prohibit night-time trail use, implement seasonal trail closures, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.
- As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.
- Use only native species for landscaping within at least 200 feet of identified wildlife corridors.
- Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
- Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e., rubberized asphalt), and traffic calming measures.
- Minimize the number of road crossings through identified wildlife corridors.
- Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure will be designed following the latest scientific information, and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, installing wildlife bridges or undercrossing, and managing in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors.
- If the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings and/or other crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g. habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats.
- Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.

- Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways.

The inclusion of the above design features should result in an equal or net-benefit to wildlife movement compared to existing conditions. In addition, pursuant to the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands, and areas identified as core linkages, wildlife corridors, or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure BIO-3 have been incorporated into the Plan to reduce this significant impact of decreasing the permeability of existing wildlife corridors. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure BIO-3 would reduce significant impacts related to decreasing the permeability of existing wildlife corridors. However, there is no assurance that these mitigation measures would be implemented for all projects or would be equally effective due to the wide variety of circumstances, complexity of some sites, and impacts on them. Instances may occur in which impacts are not reduced to less-than-significant levels.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-3) remains significant and unavoidable.

Cumulative Biological Resources Impacts (EIR Section 5.2.4)

Significant Impacts

Because cumulative biological resources impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental biological resources impacts are significant in 2025, 2035, and 2050, the Plan's incremental biological resources impacts (BIO-1, BIO-2, and BIO-3) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, BIO-2c, and BIO-3 would reduce the Plan's significant biological resources impacts related to riparian habitats, wetlands, and uplands, direct and indirect substantial adverse effects on wildlife and plants identified as candidate, sensitive, or special-status species, and decreases in wildlife corridor permeability, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, BIO-2c, and BIO-3 have been required in, or incorporated into, the Plan to reduce the Plan's significant biological resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, BIO-2c, and BIO-3 would reduce the Plan's significant biological resources impacts. However, while these mitigation measures reduce the Plan's significant biological resources impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant biological resources impacts to less-than-significant levels, these impacts (BIO-1, BIO-2, and BIO-3) remain cumulatively considerable post-mitigation.

E. CULTURAL RESOURCES (EIR SECTION 4.5)

CULT-1 Cause a substantial adverse change in the significance of a historical resource or unique archaeological resource (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, forecasted regional growth and land use change and planned transportation network improvements and programs would cause a substantial adverse change in the significance of historical resources and unique archaeological resource.

Mitigation Measures

Implementation of mitigation measures CULT-1a and CULT-1b would reduce this significant impact, but not to a less-than-significant level.

CULT–1a Develop Project-level Measures for Development Projects and Transportation Network Improvements. During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a CEQA-defined historical resource or significantly affect a unique archaeological resource, the County of San Diego, cities, and other local jurisdictions can and should, or SANDAG shall, and other transportation project sponsors can and should, develop project-level protocols and mitigation measures, consistent with CEQA Guidelines Section 15126.4(b) and in consultation with the State Historic Preservation Officer (SHPO) as needed, to avoid substantial adverse changes to CEQA-defined historical resources and unique archaeological resources. The local lead agency can and should, SANDAG shall, and other transportation project sponsors can and should allow for adequate resources to identify (through survey, consultation, or other means) cultural resources in order to develop minimization and avoidance methods where possible, and will/can and should consult with appropriate Native American representatives to provide necessary input as to resources that are of concern. These may include natural areas that contain resources of importance to tribes if they are historical resources or unique archaeological resources. Project-level mitigation measures include, but are not limited to, the following:

Archaeological Resources

- Where feasible, avoid impacts on archaeological resources by preservation in place by:
  - Avoiding archaeological sites
  - Deeding archaeological sites into permanent conservation easements
  - Capping or covering archaeological sites with a layer of soil before building on the sites
- If preservation in place is not feasible, reduce impacts on archaeological sites by completing a data recovery program conducted in compliance with CEQA Guidelines Section 15126.4(b). (A data recovery program for archaeological sites consists of excavation of a percentage of the site—determined in consultation with the lead agency—to provide information necessary to answer significant research questions.)

Historic Architectural Resources

- Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction to reduce impacts on historic structures, and have a qualified architectural historian or historic architect review mitigation plans to review consistency with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.
- If avoidance of a built historic resource is not feasible, apply additional mitigation options including, but not limited to, specific design plans for historic districts, or plans for alteration or adaptive reuse of a historical resource that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings.
- If demolition of a historic structure must occur, apply mitigation options such as recordation including a building description, historical narrative, and photographic documentation of the building and appropriate as-built drawings similar to the Historic American Building Survey documentation outlined by the National Park Service (National Park Service 2015).

CULT–1b Implement Monitoring and Data Recovery Programs for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should, or during construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement monitoring and data recovery measures to reduce impacts on both known and undiscovered CEQA-defined historical resources and unique archaeological resources, including but not limited to the following:

- Require areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor if needed.
- Should an archaeological deposit and/or feature be encountered during construction activities that is determined to be a historical resource or unique archaeological resource by a qualified archaeologist, stop ground-disturbing activities and prepare and/or implement an Archaeological Data Recovery Program (ADRP) in consultation with SHPO and/or, when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management.
- Integrate curation of archaeological and/or historical artifacts and associated records in a regional center focused on the care, management, and use of archaeological collections if the artifact must be excavated. This does not include Native American human remains and

associated burial items, the disposition of which should be determined in consultation with the Most Likely Descendants (MLDs) (see Impact CULT-2).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures CULT-1a and CULT-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of causing a substantial adverse change in the significance of a historical resource or unique archaeological resource. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures CULT-1a and CULT-1b would reduce significant impacts related to causing a substantial adverse change in the significance of a historical resource or unique archaeological resource through proper resource handling, surveys, regulatory compliance, and mitigation monitoring. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (CULT-1) remains significant and unavoidable.

Cumulative Cultural Impacts (EIR Section 5.2.5)

Significant Impacts

Because cumulative cultural impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the proposed Plan's incremental cultural impact is significant in 2025, 2035, and 2050, the proposed Plan's incremental cultural resources impact (CULT-1) is cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures CULT-1a and CULT-1b would reduce significant cultural resources impacts related to causing a substantial adverse change in the significance of a historical resource or unique archaeological resource and directly or indirectly destroying a unique site or unique geologic feature, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures CULT-1a and CULT-1b have been required in, or incorporated into, the Plan to reduce the Plan's significant cultural resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures CULT-1a and CULT-1b would reduce the Plan's significant cumulative cultural resources impacts. However, while these mitigation measures reduce the Plan's significant cultural resources impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific

economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant cultural resources impacts to less-than-significant levels, the impact (CULT-1) would remain cumulatively considerable post-mitigation.

F. GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES (EIR SECTION 4.7)

PALEO-1 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, forecasted regional growth and land use change and planned transportation network improvements and programs would directly or indirectly destroy unique paleontological resources or sites and unique geologic features.

Mitigation Measures

Implementation of mitigation measures PALEO-1a and PALEO-1b would reduce this significant impact, but not to a less-than-significant level.

PALEO-1a Identify Potential for Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, assess the potential for disturbing unique paleontological resources (e.g., fossils and fossiliferous deposits consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils) or affecting unique geological features (i.e., a geologic feature that is the best example of its kind locally or regionally, illustrates a geologic principle, provides a key piece of geologic information, is the "type locality" of a fossil or formation, or has high aesthetic appeal) in the project area. For project sites with a high probability of these resources being present, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist to conduct a field survey and recommend subsequent steps to be taken during project construction to reduce or avoid impacts on these resources—as described in mitigation measure PALEO-1b—in a report documenting the field survey, and with as-needed support from a registered geologist for unique geologic features not related to fossil localities or fossiliferous deposits.

PALEO-1b Avoid or Reduce Impacts on Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements. If it is determined during planning, design, and project-level CEQA review that transportation network improvements or development projects would be located within an area that likely contains unique paleontological resources or unique geologic features (based on results of the work done in mitigation measure PALEO-1a), SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid or reduce impacts on these resources when feasible. If impacts cannot be avoided, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist prior to construction to:

- Prepare a paleontological monitoring and mitigation plan, which will outline where monitoring should occur and procedures for discoveries, consistent with applicable regulations and guidelines. Such regulatory standards include the Antiquities Act of 1906, Paleontological Resources Preservation Act (PRPA), and Public Resources Code requirements; regional and local policies of San Diego County and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Escondido, La Mesa, Lemon Grove, National City, Oceanside, San Diego, San Marcos, Santee, Solana Beach, and Vista; and guidelines of other transportation project sponsors such as the California Department of Transportation's Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance, Chapter 8: Paleontology (Caltrans 2014).
- Establish procedures for monitoring and the possible preconstruction salvage of exposed unique resources if fossil-bearing rocks or unique geologic features have the potential to be affected.
- Provide preconstruction coordination with contractors.
- Be on site to observe during grading operations and oversee original cutting in previously undisturbed areas of sensitive geologic formations, temporarily halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, recover scientifically valuable specimens or ensure avoidance of the unique paleontological resource or unique geologic feature, and oversee fossil salvage operations and reporting.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures PALEO-1a and PALEO-1b have been required in, or incorporated into, the Plan to reduce this significant impact of directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures PALEO-1a and PALEO-1b would reduce significant impacts related to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (PALEO-1) remains significant and unavoidable.

Cumulative Geology, Soils and Paleontological Resources Impacts (EIR Section 5.2.7)

Significant Impact

Because cumulative impacts on paleontological resources and unique geologic features throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the proposed Plan's incremental paleontological resources impacts are significant in 2025, 2035, and 2050, the Plan's incremental paleontological resources impacts (C-PALEO-1) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measure

Implementation of mitigation measure PALEO-1a and PALEO-1b would reduce the significant impact on paleontological resources and unique paleontological resource or site or unique geologic feature, but not to a less-than-significant level.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure PALEO-1a and PALEO-1b have been required in, or incorporated into, the Plan to reduce the significant cumulative paleontological resources impact. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure PALEO-1a and PALEO-1b would reduce the Plan's significant paleontological resources and unique geologic feature impact. However, while these mitigation measures reduce the Plan's significant paleontological resources and unique geologic feature impact, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to a cumulatively significant mineral resources impact to a less-than-significant level, this impact (PALEO-1) remains cumulatively considerable post-mitigation.

G. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)

GHG-5 Be inconsistent with the State's ability to achieve the 2030 Reduction Target of SB 32 and Long-Term Reduction Goals of Executive Order S-3-05 and B-55-18 (2030, 2045, and 2050)

Significant Impact

Because total GHG emissions in the San Diego region of 20.3 million metric tons (MMT) carbon dioxide equivalent (CO_2e) in 2030 would exceed the regional 2030 GHG reference point of 15.6 MMT CO_2e (which is based on SB 32 targets for 2030), and total emissions in the San Diego region would exceed the 2045 and 2050 reference points of net zero and 5.2 MMT CO_2e, respectively (which is based on the goals of EO B-55-18 and S-3-05), the proposed Plan's 2035, 2045 and 2050 GHG emissions would be inconsistent with the state's ability to achieve the goals of SB 32, EO B-55-18, and S-3-05.

Mitigation Measures

Overview. Many features currently included in the proposed Plan (e.g., the SCS, increased transit, and active transportation investments) have the effect of reducing GHG emissions that might otherwise occur. Mitigation measures presented in this section are additional feasible GHG reduction measures not included in the proposed Plan that SANDAG or other agencies could implement. Presented below are three types of feasible GHG reduction mitigation measures presented later in this section:

- Plan- and policy-level mitigation measures SANDAG has committed to implement.
- Mitigation measures for transportation network improvements and programs, which SANDAG has committed to implement for its projects and which other transportation project sponsors can and should implement for their projects.
- Mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions can and should implement.

While SANDAG has the authority to implement the mitigation measures it has committed to, it has no legal or jurisdictional authority to require other transportation project sponsors or local jurisdictions to implement mitigation measures for specific projects for which they have responsibility and jurisdiction. As explained in the introduction to Chapter 4, mitigation can include measures that are within the responsibility and jurisdiction of another public agency. SANDAG in its CEQA findings may find that those measures assigned to other agencies can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2)). Additional Plan-level measures to reduce GHG emissions are included as components of the project alternatives in Chapter 6, rather than as individual mitigation measures in this section. These include still more compact land use patterns and policies to reduce transit fares, increase parking prices, and establish road user fees.

Implementation of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f would reduce this significant impact, but not to a less-than-significant level.

Mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, and WS-1b would also reduce emissions of GHGs by decreasing overall pollutant emissions from equipment, vehicles, and water consumption:

- **AQ-3b Reduce Diesel Emissions During Construction from Off-Road Equipment.**
- **AQ-3c Reduce Diesel Emissions During Construction from On-Road Vehicles.**
- **AQ-4 Reduce Exposure to Localized Particulate Emissions.**
- **TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects**
- **WS-1a Implement Water Conservation Measures for Transportation Network Improvements**
- **WS-1b Implement Water Conservation Measures for Development Projects**

GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans. No later than December 2023, SANDAG shall implement a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement the stated strategies or measures in local jurisdiction CAPs or GHG reduction plans. Examples of such projects to reduce GHG emissions include existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems, activities at the local level that reduce VMT, Smart Cities measures that result in the reduction of GHG, programs and infrastructure to divert organic waste from landfills, and tree planting.

The new and/or revised grant program(s) shall: (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan's contribution to climate change.

To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG's satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding. Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction's adopted CAP or GHG reduction plan.

Prior to December 2023, as part of next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program SANDAG shall: (1) continue to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and (2) make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions. Any new or updated CAP or GHG reduction plan receiving funding through this program shall also meet the following minimum criteria:

- The CAP or GHG reduction plan shall be adopted by the jurisdiction's elected decision-making body.
- The CAP or GHG reduction plan shall establish a locally appropriate 2030 GHG reduction target for communitywide GHG emissions derived from the State's legislative target for 2030 (as established by SB 32 or as amended by future legislation), and should establish long-term targets
- The CAP or GHG reduction plan shall quantify, using substantial evidence, how local GHG reduction strategies, programs, and measures would meet or exceed the local GHG reduction target.
- The CAP or GHG reduction plan shall establish a mechanism to monitor the plan's progress toward achieving the target, including reporting data to SANDAG consistent with, and inclusion in, the Climate Action Data Portal or similar database, and a requirement to amend the plan if it is not achieving adopted goals.

Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively). SANDAG shall also pursue federal and State partnerships to leverage additional dollars for these programs. SANDAG shall document and report to the SANDAG Board of Directors the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis.

GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure. SANDAG shall establish one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure.

Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenants, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement

funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure.

SANDAG shall include approximately $100 million by 2025 of the Electric Vehicle Program (Table 2-13 in Chapter 2 and Near-Term Action 9[b] in Appendix K), and approximately $5 million of Transportation Demand Management funding for an electric bike incentive program (Table 2-13 in Chapter 2).

The funding for electric bikes will become available beginning in FY 2022 with the launch of a $500,000 pilot incentive program and will be expanded through FY 2025. This pilot program will reduce GHG emissions by providing funding for, at minimum, 200 electric bikes and associated services.

The funding for zero-emission buses and infrastructure will become available in FY 2023 to enable investments in zero emission transit buses, zero emission school buses, and supporting infrastructure through partnerships with the transit agencies (the Metropolitan Transit System [MTS] and North County Transit District [NCTD]) and San Diego County Air Pollution Control District (APCD). This program will reduce GHG emissions by providing funding for, at minimum, 100 zero-emission buses, as well as associated fueling/charging infrastructure and services.

Beginning in FY 2022 SANDAG will begin two planning strategies to inform transition to zero-emission goods movement: the California Energy Commission-funded Medium Duty/Heavy Duty EV Blueprint grant for San Diego Region in partnership with Port of San Diego, and the Caltrans-funded San Diego and Imperial Counties Sustainable Freight Implementation Strategy. SANDAG will also rely on the Portside Community Emissions Reduction Plan (CERP) and Maritime Clean Air Strategy (MCAS) to inform investment decisions. Investments in goods movement vehicle and infrastructure will begin in FY 2024.

SANDAG shall also establish one or more programs to allocate approximately $30 million in funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles). Eligible entities could include, but are not limited to, school districts, water districts, local jurisdictions, transportation network companies (TNCs), private businesses, and non-profit organizations. New funding will be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target.

Beginning in FY 2023, SANDAG will formalize a partnership with CALeVIP San Diego County Incentive Project administrator to make available incentives for fleet charging infrastructure. Beginning in FY 2024, SANDAG will establish a vehicle incentive program that allocates funding incentives for public and private fleet vehicles. This program will reduce GHG emissions by providing funding for a minimum of 5,000 light-duty vehicles and/or chargers.

To further support this mitigation measure, SANDAG shall also participate in federal and State processes to support transportation electrification as well as pursue federal, State, and local partnerships to leverage additional dollars for these programs.

GHG-5c. Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere. Beginning immediately upon adoption of the proposed Plan and prior to December 2025 (adoption of the next Regional Plan), SANDAG shall establish a Nature-Based Climate Solutions Program that will restore or enhance natural infrastructure that uses or mimics natural processes to benefit people and wildlife. Through this program SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions. Examples include, but are not limited to, restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of

fallow agricultural native coastal sage scrub and chaparral, and removal of fill within salt and freshwater and restoration with wetland habitat.

Prior to implementation of any projects proposed for funding under this program, SANDAG shall prepare, or require the preparation of, studies demonstrating that such proposed projects would increase rates of carbon sequestration over baseline conditions. SANDAG shall document the proposed carbon sequestration for each project receiving funding under this program and provide a report to the SANDAG Board on an annual basis.

SANDAG shall use the Nature-Based Climate Solutions Program (approximately $40 million) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Action 9(e) in Appendix K) to fund projects under this program. Additional funding could come from the TransNet Environmental Mitigation Program Fund for mitigation projects that require restoration and/or land management grants for the restoration of land to native habitat. SANDAG shall also pursue federal and State partnerships to leverage additional dollars for this program.

GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. Subsequent to adoption of the proposed Plan and prior to January 2023, SANDAG shall adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and the associated GHG emissions. Investment in reliable technology and high-speed connectivity are critical to close the digital divide and the foundation of a Smart Cities efforts to become more efficient, use less resources and reduce GHG. The Action Plan will identify specific actions, responsible parties, and a timeline for implementing the strategies identified in the Action Plan. Prior to December 2024, SANDAG commits to researching and evaluating methodologies for quantifying, where possible, the corresponding GHG reductions. Prior to December 2025 (adoption of the next Regional Plan), SANDAG will identify and commit approximately $32 million to undertake projects in the Action Plan that have quantified GHG reductions associated with improved access to remote services enabled by broadband (e.g., telehealth, remote work, distance learning, and other remote services). SANDAG shall implement the Next OS (approximately $32 million) identified in the proposed Plan (Table B-1, Page B-5 in Appendix K) to fund projects that advance Smart Cities efforts and close the digital divide. SANDAG shall also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs. SANDAG shall document SANDAG's funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis.

Project-Level Mitigation

GHG-5e. Implement Measures to Reduce GHG Emissions from Transportation Projects. During the planning, design, project-level CEQA review, construction, operation, and maintenance of transportation network improvements, SANDAG shall, and transportation project sponsors can and should, implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to applicable transportation project measures from the California Air Pollution Control Officers Association's (CAPCOA) Quantifying Greenhouse Gas mitigation measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment's Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). GHG reduction measures include, but are not limited to, the following.

- Implement sustainable construction measures through construction bid specifications, including the following:

    - Use energy and fuel-efficient vehicles and equipment and/or use alternative fuel vehicles and equipment, where applicable.
    - Use lighting systems that are energy efficient, including light-emitting diode (LED) technology.
    - Use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements.
    - Recycle 50–75 percent of construction and demolition waste.
- Install efficient lighting (including LEDs) for traffic, street, and other outdoor lighting.
- Incorporate infrastructure electrification into project design (e.g., EV charging; charging for electric bikes) above minimum code requirements.
- Plan, design and construct all new, upgraded, and regularly maintained infrastructure with electricity demand shall demonstrate how such infrastructure will achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
- Incorporate and increase electric vehicle charging equipment and preferred EV parking spots into projects that include commuter parking areas.
- Include design measures (e.g., curb management strategies) to accommodate flexible fleets.
- Install solar photovoltaic canopies over parking areas.
- Design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Design measures to reduce water consumption, such as drought-resistant landscaping, smart irrigation systems, and other measures, including those listed in mitigation measures WS-1a and WS-1b in Section 4.18, *Water Supply*.
- Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards or equivalent standards.
- Funding for those measures that SANDAG selects would be included in individual project budgets.

GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects. During the planning, design, project-level CEQA review, construction, and operation of development projects, the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to, applicable land use measures in CAPCOA's Quantifying Greenhouse Gas mitigation measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment's Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). These measures include, but are not limited to, the following.

- Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
    - Building or funding a major transit stop within or near development, in coordination with transit agencies.
    - Developing car-sharing and bike-sharing programs.
    - Providing pedestrian network improvements and a comprehensive bicycle network.

- Providing traffic calming measures.
- Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
- Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.
- Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.
- Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy.
- Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
- Implementing measures to increase transit use through service frequency and affordability as identified through community engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.
- Building low stress bicycle networks including bike trails and connections, lanes, paring, and end of trip facilities.
- Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.
- Implementing employer trip reduction measures to reduce employee trips and VMT such as vanpool and carpool programs, providing end-of-trip facilities, telecommuting, teleconferencing, and alternative work schedule programs.
- Incorporating ride hailing and autonomous vehicle innovations.
- Including design measures (e.g., curb management strategies) to accommodate flexible fleets.
- Implementing a school bus program in areas currently not served by school buses.

- Measures that reduce VMT through parking strategies based on the SANDAG Regional Parking Management Toolbox, including the following:
  - Parking pricing strategies consistent with the Toolbox.
  - Reduced minimum parking requirements.
  - Residential parking permit programs.
  - Designation of a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, with adequate passenger loading and unloading for those vehicles.
  - Adequate bicycle parking.
  - Other strategies in the SANDAG Regional Parking Management Toolbox.
- Measures that reduce VMT through Transportation Systems Management (TSM), including measures included in Appendix DD of the proposed Plan.
- Land use siting and design measures that reduce GHG emissions, including the following:
  - Developing on infill and brownfields sites.

- Building high density and mixed-use developments near transit.
- Developing within areas with high jobs gravity to increase destination accessibility.
- Orienting development towards transit or an active transport corridor.
- Retaining onsite mature trees and vegetation, and planting new trees.
- Measures to plan, design, and build all new, renovated, and upgraded development and infrastructure with electricity demand to achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.

- Measures that increase vehicle efficiency or reduce the carbon content of fuels, including constructing EV charging, alternative fueling stations, or neighborhood electric vehicle networks or charging for electric bicycles consistent with SANDAG's regional readiness planning for alternative fuels.
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Measures to reduce water consumption, including those listed in mitigation measure WS-1a and WS-1b in Section 4.18.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f have been required in, or incorporated into, the proposed Plan to reduce this significant impact of inconsistency with the State's ability to achieve the GHG reduction goals of SB 32, EO B-55-18, and EO S-3-05. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f would reduce this significant impact related to inconsistency with the State's ability to achieve the GHG reduction goals of SB 32, EO B-55-18, and EO S-3-05. The EIR's discussion of mitigation measures for Impact GHG-5 (in Section 4.8) evaluates the effectiveness of plan-level mitigation measures to be implemented by SANDAG. The effectiveness of the actions included in the mitigation measures in reducing GHG emissions has been demonstrated by CAPCOA and the Center for Resource Efficient Communities and the Center for the Built Environment (CAPCOA 2010, Center for Resource Efficient Communities and the Center for the Built Environment 2021). Implementation of this measure by the County of San Diego and cities will also reduce total GHG emissions under the proposed Plan. However, SANDAG does not have the authority to require other agencies to implement this measure. It is the responsibility of the implementing agency to determine and adopt project-specific mitigation measures.

Implementation of mitigation measures GHG-5a through GHG-5f, as well as mitigation measures AQ-3b, AQ 3c, AQ-4, TRA-2, WS-1a, and WS-1b, would substantially lessen the amount of proposed Plan GHG emissions in 2030, 2054, and 2050. However, even full implementation of all identified mitigation measures would not be sufficient to reduce the proposed Plan's GHG emissions to below the regional 2030, 2045, and 2050 reference points based on SB 32, EO B-55-18, and EO S-3-05. Because the proposed Plan's 2030, 2045, and 2050 GHG emissions would remain

inconsistent with the State's ability to achieve 2030, 2045, and 2050 GHG reduction goals, this impact (Impact GHG-5) remains significant and unavoidable

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (GHG-5) remains significant and unavoidable.

Cumulative Greenhouse Gas Emissions Impacts (EIR Section 5.2.8)

Significant Impacts

Because cumulative global greenhouse gas emissions by 2030, 2045 and 2050 would be significant, and because the Plan's incremental greenhouse gas emissions impacts are significant in 2030, 2045, and 2050, the Plan's incremental greenhouse gas emissions impacts (GHG-5) are cumulatively considerable in 2030, 2045, and 2050.

Mitigation Measures

Implementation of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f would reduce the Plan's significant greenhouse gas emissions impact related to inconsistency with the State's ability to achieve the GHG reduction goals of SB 32, EO B-55-18 and S-3-05, but not to a less-than-significant level.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant greenhouse gas emissions impact. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, GHG-5f would reduce the Plan's significant greenhouse gas emissions impact. However, for the reasons stated above, these measures do not reduce this significant impact to a less-than-significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant greenhouse gas emissions impacts to a less-than-significant level, this impact (GHG-5) remains cumulatively considerable post-mitigation.

H. LAND USE (EIR SECTION 4.11)

LU-1 Physically divide an established community (2025, 2035 and 2050)

Significant Impact

By 2025, 2035 and 2050, planned transportation network improvements, but not regional growth and land use change, would physically divide established communities.

Mitigation Measure

Implementation of mitigation measures LU-1 would reduce this significant impact, but not to a less-than-significant level.

LU-1 Provide Access and Connections for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, including new rail extensions, Mobility Hubs, and roadway widening improvements, SANDAG shall, and other transportation project sponsors can and should, design new transportation network improvements within established communities to avoid the creation of barriers that physically divide such communities. Where avoidance is not feasible, measures to reduce the creation of barriers that physically divide such communities should be considered, including but not limited to, the following:

- Selecting alignments within or adjacent to existing public rights-of-way.
- Designing sections above- or below-grade to avoid or reduce physical division of communities, where feasible.
- Providing direct crossings, overcrossings, or undercrossings at regular intervals for various modes of travel (e.g., pedestrians/bicyclists, vehicles).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure LU-1 have been required in, or incorporated into, the Plan to reduce this significant impact of physically dividing established communities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure LU-1 would reduce significant impacts related to physically dividing established communities associated with transportation network improvements through implementation of feasible alignments, design options, and other design features that avoid or substantially reduce impacts on community division. However, there is no guarantee that the impact would be reduced to less-than-significant levels for all projects.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (LU-1) remains significant and unavoidable.

Cumulative Land Use Impacts (EIR Section 5.2.11)

Significant Impacts

Because cumulative land use impacts throughout the southern California region by 2025, 2035 and 2050 would be significant, and because the proposed Plan's incremental land use impacts are significant in 2025, 2035 and 2050, the proposed Plan's incremental land use impacts (LU-1) are cumulatively considerable in 2025, 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures LU-1 would reduce significant land use impacts related to physically dividing established communities, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure LU-1 has been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant land use impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures LU-1 would reduce the Plan's significant land use impacts. However, while these mitigation measures reduce the Plan's significant land use impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant land use impacts to less-than-significant levels, these impacts (LU-1) remain cumulatively considerable post-mitigation.

I. MINERAL RESOURCES (EIR SECTION 4.12)

MR-1 Result in the loss of availability of known aggregate and mineral resources supply sites that would be of value to the region and the residents of the state, or result in the loss of availability of a locally-important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan (2025, 2035, 2050)

Significant Impact

By 2025, 2035 and 2050, forecasted regional growth and land use change and planned transportation network improvements would result in the loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally-important mineral resource recovery sites, including 800 acres of MRZ-2 lands by 2025, 826 acres of MRZ-2 lands by 2035, and 853 acres of MRZ-2 lands by 2050.

Mitigation Measure

Implementation of mitigation measures MR-1a and MR-1b would reduce this significant impact, but not to a less-than-significant level.

MR-1a Conserve Aggregate and Mineral Resources During Planning and Design of Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should avoid or reduce impacts on known aggregate and mineral resources and locally important mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize direct and indirect impacts on these lands. Aggregate and mineral resource areas, especially MRZ-2 areas, should be maintained in open space or other general plan land use and zoning designations that allow for extraction of mineral resources.

MR-1b Conserve Aggregate and Mineral Resources During Planning and Design of Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, avoid loss of known aggregate and mineral resources and locally important mineral resource recovery sites, where feasible. Where avoidance is infeasible, SANDAG shall, and other transportation project sponsors can and should, minimize direct and indirect impacts on the availability of known resources and recovery sites through measures that include, but are not limited to, the following:

- Designing transportation network improvements in a manner (such as buffer zones or the use of screening) that do not preclude adjacent or nearby extraction of aggregate and mineral resources following completion of the improvement and during long-term operations.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures MR-1a and MR-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally-important mineral resource recovery sites. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures MR-1a and MR-1b would reduce significant impacts related to loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally-important mineral resource recovery sites. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (MR-1) remains significant and unavoidable.

Cumulative Mineral Resources Impacts (EIR Section 5.2.12)

Significant Impacts

Because cumulative mineral resource impacts throughout the southern California region by 2025, 2035 and 2050 would be significant, and because the proposed Plan's incremental mineral resource impacts are significant in 2025, 2035 and 2050, the proposed Plan's incremental mineral resource impacts (MR-1) are cumulatively considerable in 2025, 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure MR-1a and MR-1b would reduce significant mineral impacts related to loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally-important mineral resource recovery sites, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure MR-1a and MR-1b has been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant mineral resource impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures MR-1a and MR-1b would reduce the Plan's significant mineral resource impacts. However, while these mitigation measures reduce the Plan's significant mineral resource impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant mineral resource impacts to less-than-significant levels, these impacts (MR-1) remain cumulatively considerable post-mitigation.

L. NOISE AND VIBRATION (EIR SECTION 4.13)

NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plans or noise ordinances, or applicable standards of other agencies; or generate a substantial absolute increase in ambient noise (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, forecasted regional growth and land use change and planned transportation network improvements could increase noise levels throughout the region, resulting in new or increased noise impacts that exceed applicable standards or represent substantial increases in ambient noise levels.

Mitigation Measures

Implementation of mitigation measures NOI-1a, NOI-1b, and NOI-1c would reduce this significant impact, but not to a less-than-significant level.

NOI-1a Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement construction noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable

noise standards or prevent substantial temporary increases in noise levels in the planning, design, project-level CEQA review, and construction of development projects or transportation network improvements. These measures should include, but are not limited to, the following.

- Maintain construction equipment and vehicles per manufacturers' specifications and fit equipment with noise suppression devices (e.g., improved mufflers, equipment redesign, intake silencers, wraps, ducts, engine enclosures).
- Minimize construction equipment idling when equipment is not in use.
- Provide buffer zones or other techniques between stationary equipment (such as generators, compressors, rock crushers, and cement mixers) and the noise receptor.
- For impact tools (e.g., jack hammers, pavement breakers, rock drills), use hydraulically or electrically powered tools; where use of pneumatic tools is unavoidable, use an exhaust muffler on the compressed air exhaust. Use external jackets on the tools themselves. Use quieter procedures such as drills rather than impact equipment.
- For rock-crushing or screening operations, place material stockpiles as a noise barrier blocking line-of-sight between the operations and receptors.

In addition, for pile driving or other activities generating greater than 90 dBA during construction of development projects or transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement noise reduction measures, including but not limited to, the following.

- Erect temporary noise barriers around the noise generating activities, particularly adjacent to residential buildings.
- Implement "quiet" pile driving technology (such as pre-drilling of piles, the use of more than one pile driver to shorten the total pile driving duration) or vibratory pile-driving, where feasible, in consideration of geotechnical and structural requirements and conditions.
- Monitor the effectiveness of noise attenuation measures by performing compliance noise monitoring at noise-sensitive receptors during construction.

NOI-1b Implement Operational Noise Reduction Measures for Transportation Network Improvements. During the planning, design, and project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement operational noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable noise standards or prevent substantial permanent increases in noise levels. These measures should include, but are not limited to, the following.

- Utilize techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, building insulation, and traffic calming measures.

In addition, for railway projects, SANDAG shall, and other transportation project sponsors can and should, implement measures to substantially lessen noise levels to achieve Federal Transit Administration (FTA) /Federal Railroad Administration (FRA) railway noise exposure thresholds during planning, design, and project-level CEQA review. These measures should include, but are not limited to, the following.

- Use wheel treatments such as damped wheels and resilient wheels.
- Use vehicle treatments such as vehicle skirts and under car acoustically absorptive material.

- Establish sufficient buffer zones between railroad and receptors.
- Use sound reduction barriers such as landscaped berms and dense plantings.
- Install sound insulation treatments for impacted structures.
- Implement FRA "quiet zone" requirements in cooperation with local jurisdictions (i.e., reducing or eliminating the requirement for train locomotives to blast their horns) for Plan improvements at new and existing at-grade rail crossings.
- Conduct project-level noise analysis for new and expanded rail corridors and features such as new rail tracks and double-tracking to ensure that measures are implemented to substantially lessen noise levels that exceed applicable standards.

NOI-1c Implement Operational Noise Reduction Measures for Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should implement noise reduction measures to meet local noise standards, including but not limited to, the following.

- Use land use measures such as zoning, site design, and buffers to ensure that future development is noise compatible with adjacent transportation facilities and land uses.
- Site noise-sensitive land uses away from noise-generating facilities. Once sited, orient outdoor use areas of land uses (e.g., backyards) away from adjacent noise sources to shield area with buildings, or construct noise barriers to reduce exterior noise levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-1a, NOI-1b, and NOI-1c have been required in, or incorporated into, the Plan to reduce this significant impact of generating noise levels in excess of applicable standards.

The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-1a, NOI-1b, and NOI-1c would reduce significant impacts related to generating noise levels in excess of applicable standards. However, it cannot be guaranteed that all future project-level impacts would be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (NOI-1) remains significant and unavoidable.

NOI-2 Generation of excessive groundborne vibration or groundborne noise levels (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, forecasted regional growth and land use change and planned transportation network improvements could generate substantial increases in groundborne vibration or groundborne noise levels from construction relating to both regional growth and transportation

network improvements, and relating to operation of transportation network improvements, resulting in a significant impact. Non-construction impacts relating to regional growth are less than significant.

Mitigation Measures

Implementation of mitigation measures NOI-2a and NOI-2b would reduce this significant impact, but not to a less-than-significant level.

NOI-2a Implement Construction Groundborne Vibration and Noise Reduction Measures. SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures during design, project-level CEQA review, and construction of transportation network improvements or development projects, to reduce groundborne vibration and noise levels generated by onsite construction equipment, including, but not limited to, the following.

- Predrill pile holes within 300 feet of any sensitive receptor.
- Where feasible, use soil mix wall for excavation.
- Incorporate a comprehensive construction vibration specification into all construction bid documents.
- Require contractor to assess potential for damage to buildings within 100 feet of a tunnel boring.
- Require contractor to perform a physical survey to document existing condition of a building that might incur damage.
- If pile driving and/or other vibration-generating construction activities are to occur within 60 feet of a historic structure whose integrity would be impaired by exceeding the vibration threshold for historic structures, implement measures to reduce vibration impacts, including but not limited to, the following.
    - Retain a structural engineer or other appropriate professional to determine threshold levels of vibration and cracking that would damage any historic structure, and design construction methods to not exceed the thresholds.
    - Require groundborne vibration monitoring of nearby historic structures. Implement a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for vibration damage to historic structures.
    - Require contractor to assess potential damage to buildings within 200 feet of areas where excavation requires the use of driven piles either by impact or vibratory methods.

NOI-2b Implement Groundborne Vibration and Noise-Reducing Measures for Rail Operations. SANDAG shall, and other transportation project sponsors can and should, implement vibration-reducing measures to meet FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, providing special track support systems such as floating slabs, resiliently supported ties, high-resilience fasteners, and ballast mats.

In addition, rail operators can and should implement groundborne vibration and noise-reducing measures to meet applicable FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, the following.

- Conduct rail grinding on a regular basis to keep tracks smooth.
- Conduct wheel truing to re-contour wheels to provide a smooth-running surface and removing wheel flats.
- To reduce groundborne noise, achieve vibration isolation of the track from underlying surface using the following.
    - Highly resilient direct fixation fasteners
    - Rail suspended fastener system
    - Isolated slab track system
    - Floating slab track system

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-2a and NOI-2b have been required in, or incorporated into, the Plan to reduce this significant impact of substantial increases in groundborne vibration or groundborne noise levels from construction relating to both regional growth and transportation network improvements, and relating to operation of transportation network improvements. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-2a and NOI-2b would reduce significant impacts related to substantial increases in groundborne vibration or groundborne noise levels from construction relating to both regional growth and transportation network improvements, and relating to operation of transportation network improvements. However, it cannot be guaranteed that all future project-level impacts would be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (NOI-2) remains significant and unavoidable.

Cumulative Noise and Vibration Impacts (EIR Section 5.2.13)

Significant Impacts

Because cumulative noise and vibration impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental noise and vibration impacts are significant in 2025, 2035, and 2050, the Plan's incremental noise and vibration impacts (NOI-1 and NOI-2) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures NOI-1a, NOI-1b, NOI2a, and NOI-2b would reduce significant noise and vibration impacts related to increasing noise levels in excess of applicable standards, and exposing persons to or generating excessive groundborne vibration and noise exceeding applicable quantitative thresholds, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-1a, NOI-1b, NOI-2a, and NOI-2b have been required in, or incorporated into, the Plan to reduce the significant cumulative noise and vibration impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-1a, NOI-1b, NOI2a, and NOI-2b would reduce the Plan's significant cumulative noise and vibration impacts. However, while these mitigation measures reduce the Plan's significant noise and vibration impacts, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant noise and vibration impacts to less-than-significant levels, these impacts (NOI-1 and NOI-2) remain cumulatively considerable post-mitigation.

L. POPULATION AND HOUSING (EIR SECTION 4.14)

POP-1 Induce substantial increases in population, either directly (for example, by proposing new homes or businesses), or indirectly (for example, through extension of roads or other infrastructure) (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, regional growth and land use change and planned transportation network improvements and programs would induce unplanned growth in some areas of the San Diego region.

Mitigation Measures

There are no feasible mitigation measures for this significant impact.

Findings and Rationale

The SANDAG Board of Directors finds that the proposed Plan would induce unplanned growth in some areas of the San Diego region. SANDAG has no control over the amount or exact location of growth the region would experience during the implementation of the proposed Plan. The regional growth and land use change forecasted in the proposed Plan would be implemented by local jurisdictions through local plans and individual development projects, and most transportation network improvements would be implemented by transportation project sponsors other than SANDAG. The proposed Plan has been developed to accommodate forecasted regional growth and failing to do so would be inconsistent with the federal and State requirements for RTPs. In addition, precluding growth would conflict with the requirements to provide sufficient housing for the region's population contained in SB 375. As discussed in Section 4.14.2, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives are available to reduce the impact to a less-than-significant level, this impact (POP-1) remains significant and unavoidable.

POP-2 Displace substantial numbers of people or housing units, which would necessitate the construction of replacement housing elsewhere (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, forecasted regional growth and land use change, as well as planned transportation network improvements, would have the potential displace a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere.

Mitigation Measures

Implementation of mitigation measure POP-2a and POP-2b would reduce this significant impact, but not to a less-than-significant level.

POP-2a Design Development Projects to Reduce Displacement. During planning, design, and project-level CEQA review of land development projects, the County of San Diego, cities, and other local jurisdictions can and should develop design strategies to avoid or reduce substantial displacement of people or housing units, including affordable housing units, where consistent with overall goals to promote housing growth, including the provision of affordable housing. For development projects that would displace people or housing units, alternative designs to retain existing housing on site, alternative project site locations, and provision of replacement housing as a mitigation measure can and should be evaluated. While displacement should be considered during project evaluations, avoidance or reduction of displacement should not be employed where it would undermine achievement of housing goals, including the development of transit-oriented development and the provision of affordable housing.

POP-2b Design Transportation Network Improvement Projects to Reduce Displacement. SANDAG shall, and other transportation project sponsors can and should, identify feasible project alignments during planning, design, and project-level CEQA review that avoid or reduce permanent property acquisitions that would result in the substantial displacement of people or housing units. Where avoidance is not feasible, measures to reduce substantial displacement should be considered including, but not limited to, the following:

- Selecting alignments within existing public ROWs.
- Designing sections above- or below-grade to avoid property acquisition that would cause displacement of people or housing units, including affordable housing.
- Selecting alignments within properties that result in the least amount of displacement. For example, acquiring vacant or undeveloped portions of property rather than portions occupied by housing units.
- Work with local jurisdictions to identify opportunities to develop housing as part of transportation projects.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure POP-2a and POP-2b have been required in, or incorporated into, the Plan to reduce this significant impact of displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure POP-2a and POP-2b would reduce significant impacts related to displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. However, there is no guarantee that significant displacement impacts would be reduced to less-than-significant levels for all projects.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (POP-2) remains significant and unavoidable.

Cumulative Population and Housing Impacts (EIR Section 5.2.13)

Significant Impacts

Because cumulative population and housing impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental population and housing impacts are significant in 2025, 2035, and 2050, the Plan's incremental population and housing impacts (POP-1 and POP-2) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

As discussed above under POP-1, there are no feasible mitigation measures available for the significant impact of inducing substantial unplanned population growth. Implementation of mitigation measures POP-2a and POP-2b would reduce significant population and housing impacts related to displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures POP-2a and POP-2b have been required in, or incorporated into, the Plan to reduce the significant cumulative population and housing impacts related to displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures POP-2a and POP-2b would reduce the proposed Plan's significant population and housing impacts. However, while this mitigation measure reduces the proposed Plan's significant population and housing impacts, it cannot be guaranteed that all future

project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant population and housing impacts to less-than-significant levels, these impacts (POP-1 and POP-2) remain cumulatively considerable post-mitigation.

M. PUBLIC SERVICES AND UTILITIES (EIR SECTION 4.15)

PS-1 Result in the substantial adverse physical impacts associated with the provision of or need for new or physically altered (i.e. expanded) public facilities, in order to maintain adequate fire and police protection, emergency services, schools, libraries, and recreation facilities (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, implementation of regional growth and land use change, but not planned transportation network improvements, would result in substantial adverse physical impacts associated with the substantial physical deterioration of existing facilities and the construction of new or expanded public facilities.

Mitigation Measure

Implementation of mitigation measure PS-1a would reduce this significant impact, but to not a less-than-significant level.

PS-1 Implement mitigation measures for New/Expanded Public Service Facilities. During planning, design, and project-level CEQA review of development of public facilities projects, the County of San Diego, cities, and other public service providers can and should implement mitigation measures to avoid or reduce significant environmental impacts associated with the construction of new or expanded public facilities. Mitigation measures should be implemented by public service providers directly responsible for the construction or expansion activities. Significant environmental impacts requiring mitigation may include, but are not limited to, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, transportation, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects and transportation network improvements.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure PS-1a have been required in, or incorporated into, the Plan to reduce this significant impact of substantial adverse impacts associated with the substantial physical deterioration of existing facilities and the construction of new or expanded public facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure PS-1a would reduce significant impacts related to substantial adverse impacts associated with the substantial physical deterioration of existing facilities and the

construction of new or expanded public facilities. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (PS-1) remains significant and unavoidable.

REC-1 Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (2025, 2035, 2050)

Significant Impact

By 2025, 2035, and 2050, implementation of regional growth and land use changes would result in increased demand for recreation facilities leading to accelerated deterioration while regional growth and transportation network improvements combined would contribute to the expansion of active recreation facilities and the physical removal of 988 acres of open space park and recreation lands by the year 2025, a total of 1,512 acres by 2035, and a total of 1,585 acres by 2050, which would result in substantial physical deterioration of existing park and recreation facilities and adverse physical impacts related to future facility expansions.

Mitigation Measure

Implementation of mitigation measure REC-1 would reduce this significant impact, but to not a less-than-significant level.

REC-1 Implement Mitigation Measures for Parks and Other Recreational Facilities. During planning, design, and project-level CEQA review of development projects and transportation network improvements and programs, the County of San Diego, cities, and other public service providers can and should, SANDAG shall, and other transportation project sponsors can and should implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. Mitigation measures could include expanding or improving existing recreation facilities to accommodate additional use, or building new recreation facilities.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure REC-1 has been required in, or incorporated into, the Plan to reduce this significant impact related to the adverse physical impacts of facility expansion and deterioration of existing parkland and recreational facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure REC-1 would reduce significant impacts related to substantial adverse physical impacts of facility expansion and deterioration of existing parkland and recreational facilities. However, it cannot be assured that adequate financial resources would be available to acquire the amount of parkland needed to meet forecasted population growth and offset losses that would occur a result of transportation improvements. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project

alternatives infeasible. Because no mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (REC-1) remains significant and unavoidable.

U-1 Result in the expansion or construction of wastewater collection and treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities to adequately meet projected capacity needs, the construction of which could cause significant environmental impacts (2025, 2035, 2050)

Significant Impact

By 2025 implementation of regional growth and land use change, as well as transportation network improvements and programs, would result in substantial adverse physical impacts associated wit the construction and operation of new or expanded utility infrastructure for wastewater, storm drain, electrical, natural gas and telecommunications systems. By 2035 implementation of regional growth and land use change would result in substantial adverse physical impacts associated with the construction and operation of new, relocated or expanded utility infrastructure for wastewater, storm drain, electrical, natural gas and telecommunications systems. Transportation network improvements and programs implemented by 2035 would cause significant impacts related to stormwater drainage facilities but not wastewater, electricity, natural gas, or telecommunications infrastructure. By 2050 implementation of regional growth and land use change, but not planned transportation network improvements, would result in substantial adverse physical impacts associated with the construction and operation of new or expanded utility infrastructure for wastewater, storm drain, and telecommunications systems. Transportation network improvements and programs implemented by the year 2050 would cause significant impacts related to stormwater drainage facilities, but not wastewater, electricity, natural gas, or telecommunications infrastructure.

Mitigation Measures

Implementation of mitigation measures U-1a and U-1b would reduce this significant impact, but to not a less-than-significant level.

U-1a Implement Mitigation Measures for New/Expanded Wastewater, Stormwater, Electrical, Natural Gas, and Telecommunications Facilities Associated with Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other wastewater, stormwater, and telecommunications management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded facilities. Mitigation measures should be implemented by utilities management agencies directly responsible for the approval and construction of new or expanded facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.

U-1b Implement Mitigation Measures for New/Expanded Stormwater Facilities Associated with Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, be required to implement stormwater BMPs during planning, design, project-level CEQA review, and project construction. Measures include, but are not limited to, implementation and construction of sand filters, bio strips, bioswales, detention basins, storage vaults, and infiltration basins, which would reduce pollutant runoff into the storm drain system.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures U-1a and U-1b have been required in, or incorporated into, the Plan to reduce this significant impact of substantial adverse physical impacts associated with the construction and operation of utility systems and facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures U-1a and U-1b would reduce significant impacts related to substantial adverse physical impacts associated with the construction and operation of utility systems and facilities. However, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (U-1) remains significant and unavoidable.

U-2 Generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure; negatively impact the provision of solid waste services; impair the attainment of solid waste reduction goals; or fail to comply with federal, state and local management and reduction statutes and regulations related to solid waste (2035, 2050)

Significant Impact

By 2035 and 2050, implementation of regional growth and land use change as well as transportation network improvements and programs by 2035 would result generate solid waste and construction and demolition (C&D) debris that may not be accommodated by the regional landfills. Impacts would be less than significant through 2025.

Mitigation Measure

Implementation of mitigation measures U-2a, U-2b, and U-2c would reduce this significant impact, but to not a less-than-significant level.

U-2a Implement mitigation measures for New/Expanded Solid Waste Facilities. During planning, design, and project-level CEQA review of solid waste facility projects, the County of San Diego, cities, and other solid waste management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded solid waste facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.

U-2b Reduce Construction Waste. During planning, design, and project-level CEQA review, and prior to the construction or demolition of transportation network improvement projects and development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures to reduce construction waste to comply with waste reduction goals identified by the state and local agencies, including but not limited to the following:

- Ensure that source reduction techniques and recycling measures are incorporated into project construction/demolition.
- Reuse and/or recycle construction and demolition waste.

This mitigation measure would extend the life of existing landfills and delay the need to construct new or expanded landfills.

U-2c Reduce Operational Waste. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should integrate green building waste management measures such as those identified in the U.S. Green Building Council's LEED, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures include, but are not limited to, the following:

- Prepare and apply a waste management plan that promotes solid waste diversion.
- Implement source reduction through (1) using materials that are more durable and easier to repair and maintain, (2) designing to generate less scrap material through dimensional planning, (3) increasing recycled content, (4) using reclaimed materials, and (5) using structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- Reuse existing structures and shells in renovation projects.
- Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable building components.
- Develop an indoor recycling program and space.

These mitigation measures would extend the life of existing landfills and delay the need to construct new or expanded landfills.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures U-2a, U-2b, and U-2c have been required in, or incorporated into, the Plan to reduce this significant impact of related to the generation of solid waste and C&D debris that may not be accommodated by the regional landfills. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures U-2a, U-2b, and U-2c would reduce significant impacts related to the generation of solid waste and C&D debris that may not be accommodated by the regional landfills. However, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (U-2) remains significant and unavoidable.

Cumulative Public Services and Utilities Impacts (EIR Section 5.2.14)

Significant Impacts

Because cumulative public services and utilities impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental public services and utilities impacts are significant in 2025, 2035, and 2050, the Plan's incremental public services and utilities impacts (PS-1, REC-1, U-1, and U-2) are cumulatively considerable in 2025, 2035, and 2050 (2025 impacts related to solid waste disposal are less than cumulatively considerable).

Mitigation Measures

Implementation of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c would reduce significant public services and utilities impacts associated with the construction of new and expanded public facilities, parkland and recreational facilities, utility systems, and solid waste facilities, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c have been required in, or incorporated into, the Plan to reduce the Plan's significant public services and utilities impacts associated with the construction of new and expanded public facilities, parkland and recreational facilities, utility systems, and solid waste facilities.

The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c would reduce the Plan's significant public services and utilities impacts. However, while these mitigation measures reduce the Plan's significant public services and utilities impacts, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant public services and utilities impacts to less-than-significant levels, these impacts (PS-1, REC-1, U-1, and U-2) remain cumulatively considerable post-mitigation.

N. TRANSPORTATION (EIR SECTION 4.16)

TRA-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3 by not achieving the substantial VMT reductions needed to help achieve statewide GHG reduction goals (2025, 2035, 2050)

Significant Impact

Implementation of the proposed Plan under Year 2025 and 2035 would result in a smaller decrease in VMT per capita than the reduction goals of 14.3 percent. In 2050, implementation of the proposed

Plan, when combined with the off model strategy reductions, would result in a total reduction of 17.6 percent, greater than the 14.3 percent reduction goal. However, the proposed Plan would result in an increase of 5.4 percent of total VMT, and therefore the impact is considered significant in 2050.

In addition, implementation of the proposed Plan would result in an increase of 932,702 daily VMT by 2025, 1,798,264 daily VMT by 2035, and 4,519,230 daily VMT by 2050, compared to the Baseline Year 2016 conditions, which would be a substantial increase.

Mitigation Measures

Implementation of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 would reduce this significant impact, but to not a less-than-significant level.

TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects. During the project design and project-level CEQA review phases of transportation network improvements or land use development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement project-level VMT reduction measures in addition to those included in the Regional Plan. VMT reducing measures include, but are not limited to, the following:

- **Require TDM Strategies –** SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible Transportation Demand Management (TDM) strategies to help offset their impacts. This mitigation measure will further reduce the proposed Plan's VMT because the potential VMT reductions associated with four TDM programs, which include pooled rides (private), vanpool, carshare, and the implementation of a regional TDM ordinance, were not incorporated into the Activity Based Model (ABM2+). Strategies such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Plan can and should also be used, include walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, and bike sharing programs.
- **Reduce Parking Minimums –** The County of San Diego, cities, and other local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 12.5 percent (CAPCOA 2010).
- **Implement Additional Active Transportation Facilities Not Included in the Proposed Plan –** To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Plan includes funding for Complete Streets investments in Mobility Hub areas including implementation of bicycle and pedestrian facilities that provide local connections throughout Mobility Hub areas; however, the associated VMT reductions from this funding could not be modeled, so this mitigation measure would achieve further VMT reductions. Direct access to bicycle facilities can reduce project-related VMT by 0.65 percent, while incorporating new pedestrian facilities can reduce project VMT by up to 2 percent (CAPCOA 2010).

- **Road Diet and Traffic Calming –** The County of San Diego, cities, and other local jurisdictions can and should implement road diets or other traffic calming measures within their local roadway network, where feasible, to further reduce VMT-related impacts that may be associated with land development projects or local transportation projects. Road diet and traffic calming measures would also be eligible for Complete Streets funding in Mobility Hub areas. The reduction of existing travel lanes in favor of multi-modal facilities or additional public space can help to calm and deter vehicular trips within an area or along a roadway segment. Traffic calming measures can reduce VMT by 0.5 percent (CAPCOA 2010). It should be noted that the proposed Plan includes funding, through grants, for local jurisdictions to implement road diets.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 have been required in, or incorporated into, the proposed Plan to reduce this significant impact of an increase in total annual VMT. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 would reduce significant impacts related to an increase in total annual VMT. By Year 2050 the proposed Plan would reduce the region's VMT per capita by 14.1 percent over Baseline Year 2016 conditions. As outlined in Tables S-17 through S-22 in Appendix S of the proposed Plan, there are some TDM strategies included in the proposed Plan that could not be incorporated into ABM2+ and were therefore not assumed in the transportation impact analysis. As noted within the appendix, these reductions could further reduce the total VMT generated within the region by an additional 2.2 percent by Year 2050. These reductions were calculated based on their influence of the total VMT generated within the region. As such, it is reasonable to assume that these strategies would have a similar effect on region's VMT per capita, as the majority of trips within the region are home based. Therefore, the region could achieve reductions of up to of 17.6 percent (15.4 + 2.2 percent) in VMT per capita, over 2016 conditions, by 2050,[1] if these strategies are fully implemented. However, as noted in the mitigation section above, TDM strategies generally are required and implemented at the project level, by local agencies, to be most effective. The VMT reductions associated with these project-level TDM measures can vary greatly based on the project type, location, and size; therefore, an overall regionwide reduction cannot be estimated at the program level.

However, these mitigation measures would not reduce this impact to a less-than-significant level as demonstrated by the alternatives analysis in EIR Chapter 6. The feasibility of an alternative that would reduce total VMT is discussed in Chapter 6. As described throughout Chapter 6, even Alternative 3, which has the most compact land use pattern and further reduces VMT as compared to the proposed Plan, is unable to reduce total VMT to below 2016 levels. As explained in Section C of these findings, Alternative 3 is infeasible to implement. Alternative 3 is legally infeasible because its SCS land use pattern is inconsistent with local government land use plans and policies in both urban and outlying areas.

SANDAG cannot require local agencies implementing development projects, or other transportation project sponsors, to adopt the above mitigation measures, and it is ultimately the responsibility of the CEQA lead agency to determine and adopt mitigation. In addition, the State has indicated that

[1] This exceeds the CARB target reduction of 14.3 percent by 2050.

additional State policy actions and funding would be required to close the VMT gap between what the Metropolitan Planning Organizations (MPOs) could achieve through implementation of their SCSs and reductions needed to meet State goals.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (TRA-2) remains significant and unavoidable.

Cumulative Transportation Impacts (EIR Section 5.2.16)

Significant Impacts

Because cumulative transportation impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental transportation impacts are significant in 2025, 2035, and 2050, the Plan's incremental transportation impacts (TRA-2) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 would reduce significant impacts related to an increase in total annual VMT. However, these mitigation measures would not reduce this impact (TRA-2) to a less-than-significant level.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 have been required in, or incorporated into, the Plan to reduce the Plan's significant transportation impacts related to increases in total annual VMT. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GHG-5a, GHG-5d, GHG-5f, and TRA-2 would reduce the Plan's significant cumulative transportation impacts. However, for the reasons stated above, these mitigation measures would not reduce this impact (TRA-2) to a less-than-significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant transportation impacts to less-than-significant levels, this impact (TRA-2) remains cumulatively considerable post-mitigation.

O. TRIBAL CULTURAL RESOURCES (EIR SECTION 4.17)

TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in public resources code section 21047 that is either (1) listed or eligible for listing in the California Register of Historic Resources, in in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) determined by the lead agency,

in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1 (2025, 2035, 2050)

Significant Impact

By years 2025, 2035, and 2050, implementation of the proposed Plan would result in regional growth and land use change and transportation network improvements and programs that could cause a substantial adverse change in the significance of a tribal cultural resources (TCRs).

Mitigation Measures

Implementation of mitigation measures TCR-1a and TCR-1b would reduce this significant impact, but to not a less-than-significant level.

TCR-1a Implement Tribal Cultural Resources mitigation measures for Development Projects and Transportation Network Improvements. During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a TCR, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors, can and should develop project-level protocols and mitigation measures with consulting tribes, consistent with Public Resources Code (PRC) Section 21080.3.2(a) to avoid or reduce impacts on TCRs during construction and operation of development projects and transportation network improvements. The County of San Diego, cities, and other local jurisdictions can and should. SANDAG shall, and other transportation projects sponsors can and should identify these resources through records searches, survey, consultation, or other means, in order to develop minimization and avoidance methods where possible, and consult with Native American tribes participating in AB 52 consultation to develop mitigation measures for TCRs that may experience substantial adverse changes.

To assist AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should comply with the following best practices for complying with AB 52:

- Get needed information in order to preserve the options of avoidance of cultural resources or preservation in place early in the planning process.
- Build working relationships with tribes that are traditionally and culturally affiliated to the project area or to the agency's geographic area of jurisdiction. In consultation, agencies should deal with officially designated representatives of the tribe who have written designation to speak on behalf of the tribe.
- Avoid inadvertent discoveries of Native American burials and work with tribes in advance to determine treatment and disposition if burials are inadvertently discovered.
- Unless the tribe agrees in writing, the project applicant or the project applicant's legal advisors, using a reasonable degree of care, should maintain the confidentiality of the information exchanged for the purposes of preventing looting, vandalism or damage to a tribal cultural resource and should not disclose the information to a third party.

In the absence of any specific mitigation measures developed during AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should develop standard mitigation measures as set forth in PRC Section 21084.3 (b).

The following are standard mitigation measures for TCRs.

1. Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
2. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    a. Protecting the cultural character and integrity of the resource
    b. Protecting the traditional use of the resource
    c. Protecting the confidentiality of the resource
3. Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
4. Protecting the resource as agreed upon during the tribal consultation process.

TCR-1b Implement Monitoring and Mitigation Programs for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should implement monitoring and mitigation measures to reduce impacts on both known and undiscovered TCRs, during construction and operation activities, as applicable, including but not limited to the following:

- Require TCR areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor.
- Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist is not present, shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in consultation with Native American tribes.
- The qualified archaeologist shall be responsible for ensuring that all artifacts and records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate regional center focused on the care, management, and use of archaeological collections. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants.
- Upon completion of all ground-disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency which describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures TCR-1a and TCR-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of related to significant impacts on TCRs through construction and ground-disturbing activities, and increased access to TCRs. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures TCR-1a and TCR-1b would reduce significant impacts related to significant impacts on TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (TCR-1) remains significant and unavoidable.

Cumulative Tribal Cultural Resources Impacts (EIR Section 5.2.17)

Significant Impacts

Because cumulative tribal cultural resources impacts throughout the southern California and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental tribal cultural resources impacts are significant in 2025, 2035, and 2050, the Plan's incremental tribal cultural resources impact (TCR-1) is cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures TCR-1a and TCR-1b would reduce significant impacts on tribal cultural resources TCRs through construction and ground-disturbing activities, and increased access to TCRs.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures TCR-1a and TCR-1b have been required in, or incorporated into, the Plan to reduce the Plan's significant impacts on tribal cultural resources TCRs through construction and ground-disturbing activities, and increased access to TCRs.

The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures TCR-1a and TCR-1b would reduce the Plan's significant impacts tribal cultural resources TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, while these mitigation measures reduce the Plan's significant impacts on tribal cultural resources, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that

specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant impacts to less-than-significant levels, this impact (TRA-1) remain cumulatively considerable post-mitigation.

P. WATER SUPPLY (EIR SECTION 4.18)

WS-1 Not have sufficient water supplies available to serve the projected regional demand during normal, dry and multiple dry years (2025, 2035, 2050)

Significant Impact

The impacts of regional growth and land use change and transportation network improvements and programs on water supplies between 2016 and 2035 are less than significant. Implementation of regional growth and land use change as a result of the proposed Plan would result in a significant impact on water supplies available to serve the projected demand in the Year 2050. The Urban Water Management Plans (UWMPs) prepared by San Diego County Water Authority (SDCWA) and Metropolitan Water District (MWD) indicate that there would be sufficient water supplies to provide for regional growth and land development through the year 2045. Subsequent to this time, however, documentation regarding sufficient supplies is unavailable, creating uncertainty about regional water supplies in 2050. This uncertainty means that there may be insufficient regional water supplies to meet regional water demand in 2050, a significant impact (WS-1).

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, and WS-1c would reduce this significant impact, but to not a less-than-significant level.

WS-1a Implement Water Conservation Measures for Transportation Network Improvements. SANDAG shall, and other transportation project sponsors can and should, implement feasible water conservation measures during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements, including, but not limited to, the following:

- Comply with all prevailing State, regional, and local government plans, laws, and policies regarding water conservation and efficiency.
- Install drip or other water-conserving or weather-based irrigation systems for landscaping.
- Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent State, regional, and local government plans, laws, and policies.
- Incorporate the use of reclaimed water (also known as recycled water) during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements to reduce the use of potable water.

WS-1b Implement Water Conservation Measures for Development Projects. The County of San Diego, cities, and other local jurisdictions can and should implement feasible water conservation measures during planning, design, and project-level CEQA review of development projects, including, but not limited to, the following:

- Install drip or other water-conserving or weather-based irrigation systems for landscaping.

- Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent State, regional, and local government plans, laws, and policies.
- Install low-flow plumbing fixtures.
- Install water-efficient appliances.
- Incorporate the use of reclaimed water. Measures to incorporate reclaimed water may include, but are not limited to, onsite water recycling; the use of recycled water to fill lakes, ponds, and ornamental fountains; the use of recycled water for irrigation, to mix concrete, and to control dust at construction sites; the use of recycled water for certain industrial processes and for flushing toilets and urinals in nonresidential buildings; and the use of recycled water for street sweeping purposes.

WS-1c Ensure Adequate Water Supply for Development Projects. During planning, design, and project-level CEQA review for development projects, the County of San Diego, cities, and other local jurisdictions can and should ensure that adequate water supply will be available to meet or satisfy projected water demands, consistent with applicable UWMPs, Master Plans, and General Plan projections of water supply and demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, an SB 221 Water Supply Verification, or other water supply analysis.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, and WS-1c have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to potentially inadequate water supplies available between the years 2036 and 2050. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, and WS-1c would reduce significant impacts related to potentially inadequate water supplies available between the years 2036 and 2050. However, there is no guarantee that the mitigation measures would reduce the significant water supply impacts to a less-than-significant level because adequate water supplies have not been identified, and there is uncertainty about insufficient regional water supplies to meet regional water demand, notwithstanding implementation of the listed mitigation measures. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-1) remains significant and unavoidable.

WS-2 Substantially decrease groundwater supplies, or interfere substantially with groundwater recharge such that the proposed plan would impede sustainable management of groundwater basins or obstruct implementation of a sustainable groundwater management plan (2025, 2035, 2050)

Significant Impact

Regional growth and land development would result in population increases on land overlying the San Diego River Valley Basin which requires the preparation of a Groundwater Sustainability Plan

(GSP), and Escondido Creek and Poway Valley groundwater basins, which were identified by the County as having insufficient storage by the Year 2025. Regional growth and land development between 2026 and 2035 would occur on land overlaying the Poway Valley and the Escondido Creek groundwater basins, both of which were identified by the County as having insufficient aquifer storage. Regional growth and land development between 2036 and 2050 would occur on land overlying the Escondido Creek and Poway Valley aquifers, both of which have been identified by the County as having inadequate storage, and on land overlying the San Pasqual and San Diego River groundwater basins, which have been designated as medium priority by Department of Water Resources (DWR). This growth would exacerbate the existing overdraft or insufficient storage in these basins.

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, and WS-2a would reduce this significant impact, but to not a less-than-significant level.

WS-2 Implement Groundwater Measures to Ensure Sustainable Yield For Development Projects. The County of San Diego, cities, and other local jurisdictions can and should ensure sustainable yield of groundwater basins during planning, design, and project-level CEQA review of development projects, by taking measures including, but not limited to, the following:

- Participate in a groundwater trading program to enable permanent transfer and potentially long-term and short-term lease of baseline pumping allocations to allow groundwater users or new development to purchase needed groundwater allocation from others.
- Use drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and offsite mitigation.
- Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, and WS-2a have been required in, or incorporated into, the Plan to reduce this significant impact of regional growth and land use changes that would result in population increases that would impede groundwater basin sustainability and would obstruct implementation of the required GMPs. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, and WS-2a would reduce significant impacts related to regional growth and land use changes that would result in population increases that would impede groundwater basin sustainability and would obstruct implementation of the required GMPs. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-2) remains significant and unavoidable.

WS-3 Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects (2025, 2035, 2050)

Significant Impact

For years 2025, 2035, and 2050 regional growth and land use change and transportation network improvements under the proposed Plan would result in construction of new or expanded water facilities. The impacts of constructing some of these facilities would be significant.

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce this significant impact, but to not a less-than-significant level.

WS-3 Implement Measures for New or Expanded Water Facilities. During planning, design, and project-level CEQA review of development projects and water projects, MWD, SDCWA, the County of San Diego, cities, and other local jurisdictions can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded water facilities. Mitigation measures should be implemented by water management agencies directly responsible for the construction of new or expanded water facilities. Significant environmental impacts requiring mitigation may include but are not limited to air quality, noise, traffic, biological resources, cultural resources, paleontological resources, tribal cultural resources, energy, greenhouse gas emissions, hydrology and water quality, and water supply.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to construction of new or expanded water facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce significant impacts related to construction of new or expanded water facilities. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation

measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-3) remains significant and unavoidable.

Cumulative Water Supply Impacts (EIR 5.2.18)

Significant Impacts

Because cumulative water supply impacts throughout the state of California, Lower Colorado River Basin, and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental water supply impacts are significant in 2025, 2035, and 2050, the Plan's incremental water supply impacts (WS-1, WS-2 and WS-3) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce the Plan's significant water supply impacts related to the availability of adequate water supplies and construction of new or expanded water treatment and conveyance facilities, but not to less-than-significant levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 have been required in, or incorporated into, the Plan to reduce the Plan's significant water supply impacts related to the availability of adequate water supplies, interference with sustainable groundwater basin management, and construction of new or expanded water facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce the Plan's significant water supply impacts. However, while these mitigation measures reduce the Plan's significant water supply impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant water supply impacts to less-than-significant levels, these impacts (WS-1, WS-2 and WS-3) remain cumulatively considerable post-mitigation.

P. WILDFIRE (EIR SECTION 4.19)

WF-1 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled

spread of a wildfire; or expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (2025, 2035, 2050)

Significant Impact

Regional growth, land use change, and transportation network improvements associated with the proposed Plan forecast between 2016 and 2025, 2026 and 2035, and 2036 and 2050 would expose additional people and structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildland. Wildfires would also potentially expose the region's population to harmful pollutant concentrations in the form of wildfire smoke.

Mitigation Measures

Implementation of mitigation measures WF-1 would reduce this significant impact, but to not a less-than-significant level.

WF-1 Reduce Wildfire Risk for Development and Transportation Projects. During planning, design, and project-level CEQA review of transportation network improvements or development projects located in State Responsibility Areas (SRAs) or in Local Responsibility Areas (LRAs) classified as Very High Fire Hazard Severity Zones (VHFHSZs), SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions such as fire protection agencies can and should, ensure that project sponsors implement measures to reduce impacts from wildfires. Such measures include, but are not limited to, the following:

- Establishing site-specific safety measures, such as fire protection plans, to protect local resources from wildfire. Fire protection plans should be based on appropriate wildfire modeling, and include information related to reducing ignition risks during construction and operation of facilities.
- Adhering to the most updated building code requirements (usually updated every 3 years), including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.
- Improving access by designing and improving roads, transit facilities, gates, and access plans to accommodate emergency response and evacuation if necessary.
- Ensuring sufficient emergency water supply for existing and new projects by working with water management agencies and plans.
- Enforcing defensible space regulations to keep overgrown and unmanaged vegetation and other flammable material away from structures.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-1 has been required in, or incorporated into, the proposed Plan to reduce this significant impact related to the exposure of additional people and structures to risk of loss, injury, or death involving wildland fires and the exposure of people to pollutant concentrations in the form of wildfire smoke. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-1 would reduce significant impacts related to exposure of additional people and structures to risk of loss, injury, or death involving wildland fires and the exposure of people to pollutant concentrations in the form of wildfire smoke. However, these mitigation measures do not reduce this impact (WF-1) to a less-than-significant level in all locations for all future wildfires, and therefore resulting exposure to uncontrolled wildfires and the pollution in the form of particulate matter from wildfire smoke. This exposure would occur throughout the time period 2016-2050 given the relatively large area within the San Diego region considered at high risk for wildland fires and the level of uncertainty regarding the location, frequency, and severity of future wildfires. When wildfires occur, prevailing weather conditions usually are such that major portions of the regional population are exposed to dangerous pollution concentrations from wildfire smoke. For these reasons, it cannot be concluded that wildland fire risks and the risks associated with wildfire smoke pollution would be reduced to less than significant in all locations for all future development projects. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WF-1) remains significant and unavoidable.

WF-2 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment (2025, 2035, 2050)

Significant Impact

Land development between 2016 and 2025, 2026 and 2035, and 2036 and 2050 would expand into VHFSZs within the LRA, and the SRA. In instances where new land development would require construction or extension of aboveground electrical transmission lines, a substantial risk of sparking a wildfire exists.

Mitigation Measures

Implementation of mitigation measures WF-2 would reduce this significant impact, but to not a less-than-significant level.

WF-2 Reduce Wildfire Risk Related to Wildfire-Associated Infrastructure Required to Support Development or Transportation Projects. During planning, design, and project-level CEQA review of transportation network improvements or development projects located in SRAs or in LRAs classified as VHFHSZs, the County of San Diego, cities, other local jurisdictions, and public service and utility providers can and should ensure that project sponsors implement measures to reduce impacts from wildfire-associated infrastructure. Such measures include, but are not limited to, the following:

- Establishing site-specific safety measures, such as fire protection plans, for new infrastructure and facilities required to provide public services and utilities for new development in order to protect local resources from wildfire.
- Adhering to wildfire safety and mitigation plans established by local utilities companies, including design and construction standards, inspection schedules, and emergency preparedness.

- Adhering to the most updated building code requirements (usually updated every 3 years) for structures related to public services and infrastructure, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.
- Ensuring sufficient emergency water supply (local water providers) for existing and new projects.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-2 has been required in, or incorporated into, the proposed Plan to reduce this significant impact related to a substantial risk of sparking a wildfire exists due to utility expansion. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-2 would reduce significant impacts related to a substantial risk of sparking a wildfire exists due to expansion of utilities. However, these mitigation measures do not reduce this impact (WF-2) to a less-than-significant because land development within VHFSZs within the LRA and some areas in the SRA would likely require the construction of aboveground electrical transmission lines. Mitigation measure WF-2 would not reduce the serious fire risks posed by these transmission lines and the fire risk impacts would not be reduced to less-than-significant levels. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WF-2) remains significant and unavoidable.

WF-3 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (2025, 2035, 2050)

Significant Impact

Regional growth and land use changes, and transportation projects, that could occur between 2016 and 2025, 2026 and 2035, and 2036 and 2050 would occur in SRAs and VHFSZs within LRAs. The people, buildings. and structures, including transportation facilities, situated in the areas classified as VHFSZs are, subsequent to recurring wildfires, subject to elevated levels of risk from flash floods, debris flows, and landslides.

Mitigation Measures

Implementation of mitigation measures WF-3 would reduce this significant impact, but to not a less-than-significant level.

WF-3 Reduce Post-Fire Risks Related to Flooding, Landslides, Slope Instability, or Drainage Changes for Development and Transportation Projects. During planning, design, and project-level CEQA review of development projects or transportation network improvement projects in SRAs or in LRAs classified as VHFHSZs, SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, ensure that project applicants work with local communities to implement measures to reduce post-fire impacts. Such measures include, but are not limited to, the following:

- Treating wildfire burned areas to control stormwater runoff prior to winter rains.
- Restoring wildfire areas by planting native vegetation cover or encouraging the regrowth of native species using best practices as soon as possible to aid in control of stormwater runoff.
- Reducing potential for future flood hazard by sufficient removal of dead, woody vegetation along watercourses following a catastrophic fire to reduce the risk of future catastrophic fires.
- Including fire hazard reduction measures that balance forest health with fuel-reducing activities while considering the potential effect on flood management.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-3 has been required in, or incorporated into, the proposed Plan to reduce this significant impact related to the potential to increase the risk of flash floods, debris flows, and landslides in the years following wildfires. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-3 would reduce significant impacts related to the potential to increase the risk of flash floods, debris flows, and landslides in the years following wildfires. However, this mitigation measure does not reduce this impact (WF-3) to a less-than-significant level between 2016 and 2050. It is forecast that thousands of acres of land classified as SRA and/or VHFSZ would be converted from vacant land by land development or as a result of the development or transportation facilities. The converted land has been identified, because of slope, vegetation, and other factors to be subject to high levels of risk from wildfires. Wildfire risks will increase due to continuing climate change and the resulting droughts. Climate change will also result in more severe rainfall events. These factors together would greatly increase the risks of flash floods, debris flows, and landslides in the years following wildfires and would likely occur on a scale and in a timeframe that would preclude prevention by implementing mitigation measure WF-3. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WF-3) remains significant and unavoidable.

Cumulative Wildfire Impacts (EIR 5.2.19)

Significant Impacts

Because cumulative wildfire impacts throughout the state of California, Lower Colorado River Basin, and northern Baja California region by 2025, 2035 and 2050 would be significant, and because the Plan's incremental wildfire impacts are significant in 2025, 2035, and 2050, the Plan's incremental wildfire impacts (WF-1, WF-2 and WF-3) are cumulatively considerable in 2025, 2035, and 2050.

Mitigation Measures

Implementation of mitigation measures WF-1, WF-2, and WF-3 would reduce the Plan's significant wildfire impacts related to exposure of people or structures to a risk of loss, injury, or death involving wildland fires, risk of sparking a wildfire due to expansion of utilities, or exposure of people or structures to risk of flash floods, debris flows, and landslides in the years following wildfires.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WF-1, WF-2 and WF-3 have been required in, or incorporated into, the Plan to reduce the Plan's significant wildfire impacts related to exposure of people or structures to a risk of loss, injury, or death involving wildland fires, risk of sparking a wildfire due to expansion of utilities, or exposure of people or structures to risk of flash floods, debris flows, and landslides in the years following wildfires. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-1, WF-2 and WF-3 would reduce the Plan's significant wildfire impacts. However, while these mitigation measures reduce the Plan's significant wildfire impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant water supply impacts to less-than-significant levels, these impacts (WF-1, WF-2 and WF-3) remain cumulatively considerable post-mitigation.

V. FINDING REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES (EIR SECTION 7.3)

CEQA requires that an EIR must address any significant irreversible environmental changes that would be caused if the proposed project were implemented (CEQA Guidelines §15126.2(c)). An impact would come under this category if (1) the project would involve a large commitment of nonrenewable resources; (2) the primary and secondary impacts of the project would generally commit future generations to similar uses; (3) the project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and (4) the proposed consumption of resources is not justified.

Implementation of the Plan would result in permanent changes to the existing environments, which have been described throughout this EIR. While the Plan focuses population and employment growth in Mobility Hubs and existing urban areas while also providing transportation investments that support compact land development patterns and reduce sprawl, there will still be some conversion of undeveloped land to urbanized uses. These conversions are considered a permanent irreversible change and would occur directly through construction of development on undeveloped land. Land use changes and transportation network improvements would result in significant irreversible impacts on aesthetics and visual resources, including changes to existing community character and views. Future development projects associated with the Plan would result in a direct irreversible loss of sensitive vegetation communities that supports rare, threatened, or endangered species, and impacts on these resources would be significant and irreversible. The development of currently undeveloped land and other land use changes would result in significant irreversible impacts on agricultural resources and forest lands, and the availability of known mineral resources. The Plan would substantially induce irreversible population growth and increased density, which would displace existing housing units, and result in additional people that would be susceptible to noise impacts. As development occurs at urban edges, additional people and structures would be at risk from wildland fires.

The Plan's regional growth and land use changes would result in the irreversible consumption of nonrenewable resources. This use will have an incremental and irreversible effect on such resources. The irreversible commitment of limited resources is inherent in any development project or, in the case of the Plan, aggregated development projects. Resources anticipated to be irreversibly committed over the timespan of the Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Development associated with the Plan represents a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating, and cooling of residences and buildings, as well as construction and operation of transit systems.

VI. FINDING REGARDING GROWTH-INDUCING IMPACTS (EIR SECTION 7.1)

The SANDAG Board of Directors has reviewed and considered the information on growth-inducing impacts, including the information provided in comments on the Draft EIR and the responses to those comments in the Final EIR. The CEQA guidelines (§15126.2(d)) require a discussion of growth-inducing impacts of a project. A project may be considered growth inducing when it:

- Fosters economic growth, population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment;
- Removes obstacles to population growth or additional housing;
- Burdens existing community service facilities beyond current/projected capacities; or
- Encourages or facilitates other activities that could significantly affect the environment.

Growth inducement would be caused by the provision or extension of utilities and public services. For example, the development of water, wastewater, fire, or other services in previously underserved areas; the extension of transportation routes into undeveloped areas; and the establishment of major new employment opportunities would all induce growth. The Plan is considered growth-inducing for the following reasons.

From 2016 to 2050, the regional population is forecasted to increase by over 436,000 people (13 percent), adding over 280,000 housing units and over 439,000 jobs. The Plan's objectives include focusing population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas, and providing transportation investments that support compact land development patterns.

The Plan focuses this population, housing unit, and employment growth in either Mobility Hubs or Smart Growth Opportunity Areas near existing and planned transportation infrastructure and in areas with existing utilities and municipal or public services. This growth pattern would preserve sensitive habitat, open space, and farmland. Approximately 1.3 million acres of land would be protected and preserved, more than half of the region's land area. In 2016, less than half of the region's population lived in Mobility Hub areas, but by 2050, 53 percent will. Similarly, 71 percent of jobs and 54 percent of housing units will be located in Mobility Hub areas by 2050.

The Plan would result in construction of additional housing. However, the areas the Plan targets for construction of these additional housing units are largely within previously developed areas. Most of these areas have established roadways and utilities, as well as water and sewer services. The placement of additional housing units in established areas would require upgrading and resizing of existing infrastructure, including water facilities. The upgrading of these facilities would further remove obstacles to the construction of additional housing within and adjacent to these areas. Chapter 2, *Project Description*, and Section 4.14, *Population and Housing,* of the EIR, further describe forecasted population, housing unit, and job growth within the region.

The planned transportation network improvements of the Plan are intended to expand upon the current transportation network by providing transportation investments that support compact land development patterns and decrease sprawl while reducing greenhouse gas (GHG) emissions and other environmental impacts. These transportation network improvements would remove obstacles to growth in some areas of the region, which would support additional housing, population, and economic growth. Section 4.14 discusses forecasted regional population and employment growth associated with the Plan.

VII. FINDINGS REGARDING ALTERNATIVES EVALUATED IN EIR

The SANDAG Board of Directors (Board) has reviewed and considered the information on alternatives provided in the EIR, including the information provided in comments on the Draft EIR, the responses to those comments in the Final EIR, and all comments received up to the date of adoption of these findings.

A. LEGAL REQUIREMENTS FOR ALTERNATIVES

Public Resources Code §21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives…which would substantially lessen the significant environmental effects of such projects." "Feasible" means "capable of being accomplished in a reasonable period of time taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines §15364).

The concept of feasibility also encompasses whether a particular alternative promotes the Plan's underlying goals and objectives, and whether an alternative is impractical or undesirable from a policy standpoint. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

The issue of alternatives feasibility arises twice in the CEQA process, once when the EIR is prepared, and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is "potentially" feasible. Potentially feasible alternatives are suggestions by the EIR preparers that may or may not be adopted by lead agency decision-makers. The fact that an alternative is more costly, or that budgets and funding priorities would need to be revised to implement an alternative, does not automatically mean that an alternative is financially infeasible for purposes of EIR evaluation

When CEQA findings are made after EIR certification, the lead agency decision-making body independently evaluates whether the alternatives are actually feasible, including whether an alternative is impractical or undesirable from a policy standpoint. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.) In making this determination, the decision-making body considers information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).) Where the feasibility of alternatives evaluated in the EIR is dependent upon changes in existing laws, regulations, or funding patterns, the decision-making body must consider the likelihood that such changes will occur within the time frame for implementation of the proposed project.

An EIR must only evaluate reasonable alternatives to a project that could feasibly attain most of the project objectives and evaluate the comparative merits of the alternatives (CEQA Guidelines §15126.6(a)). In all cases, the consideration of alternatives is to be judged against a rule of reason. The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative is infeasible.

B. PROJECT OBJECTIVES

Project alternatives, as described in Chapter 6 of the EIR, were intended to achieve the following basic objectives of the Plan:

1. Focus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas.
2. Provide transportation investments that support compact land development patterns and reduce sprawl.
3. Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board and the SANDAG Board of Directors.
4. Provide transportation investments and land use patterns that promote social equity.
5. Provide transportation investments and land use patterns that reduce vehicle miles traveled and improve air quality.
6. Provide multi-modal access to employment centers and key destinations for all communities.
7. Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

C. ALTERNATIVES ANALYZED IN THE EIR

The EIR considered in detail the following alternatives to the Plan:

1. No Project Alternative
2. 2019 Transportation Network with New Value Pricing and User Fee Policies
3. All Growth Focused in Mobility Hubs and More Progressive Value Pricing and User Fee Policies

These three alternatives are summarized in the text and Table 1 below, and are described in detail in Chapter 6 of the EIR. EIR Table 6-1 provides a comparison of the components of each of the alternatives considered in detail.

Alternative 1: No Project

Description

CEQA requires a No Project Alternative to be analyzed in the EIR. The No Project Alternative assumes that the Plan would not be adopted or implemented.

The No Project Alternative assumes the Series 14 Regional Growth Forecast with the 2019 Federal Regional Transportation Plan (2019 Federal RTP) land use pattern, plus the Regional Housing Needs Assessment 6th Housing Element Cycle 2021-2029 (6th Cycle RHNA) housing allocations for adopted by the SANDAG Board of Directors (SANDAG Board) in July 2020. The Series 14 Regional Growth Forecast was generated to support the 2019 Federal RTP, which was adopted by the SANDAG Board on October 25, 2019. The 2019 Federal RTP land use pattern and 6th Cycle RHNA would likely be implemented even if the proposed Plan were not adopted because they are based on the adopted general plans of the 18 cities and County government except where additional planning assumptions were necessary to accommodate the 6th Cycle RHNA, which must be implemented under State law. Following the January 2020 release of the California Department of Finance (DOF) population projections, SANDAG developed an updated version of the Series 14

Regional Growth Forecast to reflect the new population projections as the latest planning assumptions. Table O-2 (Appendix O of this EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives.

Although the total population, number of housing units, and number of jobs by 2050 would likely be the same as the proposed Plan under this alternative, the pattern of development within the region would be less compact because all transit improvements included in the proposed Plan would not be available to support the focused transit-oriented development pattern envisioned in the proposed Plan. SANDAG transportation and growth modeling has shown that the likelihood of housing stock and households developing and moving to an area is directly correlated to the accessibility of transportation and employment. In the absence of the future transportation network improvements and programs identified in the proposed Plan, it is likely that the future land use pattern would see less concentration of population, housing, and jobs in major transportation corridors and more growth occurring in less developed areas of the region than would occur under the proposed Plan.

The No Project Alternative includes "No Build" transportation projects likely to be implemented if the proposed Plan were not adopted. These consist of transportation projects with environmental clearance, that have full funding, are under construction, or are otherwise reasonably foreseeable based on current plans, as listed in Table O-1 (Appendix O of this EIR). Future project development and implementation under the No Project Alternative would be limited as SANDAG would fall out of compliance with the State and federal funding requirement of an adopted RTP and SCS on January 1, 2022 (State) and October 25, 2023 (federal).

Table 1
Summary of Action Alternatives Considered in the EIR

Components		**Alternative 1: No Project**	**Alternative 2: 2019 Transportation Network with New Value Pricing and User Fee Policies**	**Alternative 3: All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies**
Land Use Pattern		2019 Federal RTP Land Use Pattern	2019 Federal RTP land use pattern	Similar to Proposed Plan except land use pattern with new growth focused in proposed mobility hubs
Transportation Network		"No Build" Projects	2019 Federal RTP transportation network	Proposed Plan transportation network
New Value Pricing and User Fes Policies	Toll Pricing	Existing Policy	Same as proposed Plan (By 2035, update toll pricing to $0.30 per mile on I-15 and other Managed Lane facilities)	Same as proposed Plan (By 2035, update toll pricing to $0.30 per mile on I-15 and other Managed Lane facilities)
	Road User Charge	None	None	By 2026, increase road user charge rate to 4.95 cents/mile, compared to 3.3 cents/mile by 2030 in the proposed Final Plan
	Parking Costs	Existing Policy	2019 Federal RTP	Increases in parking costs by 50% compared to the proposed Plan

Components		Alternative 1: No Project	Alternative 2: 2019 Transportation Network with New Value Pricing and User Fee Policies	Alternative 3: All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies
	Transit Costs	Existing Policy	2019 Federal RTP (No planned transit fare discounts.)	Free transit by 2035
	Microtransit Costs	N/A	N/A	Free Microtransit by 2035, compared to $1.25 one way/ $3 day in the proposed Plan
	Micro-Transponder ownership	N/A	Same as proposed Plan (Microtransponder[2] ownership of 100 percent by 2035)	Same as proposed Plan (Microtransponder ownership of 100 percent by 2035)
	Telework Assumptions	N/A	Same as proposed Plan	Same as proposed Plan
	Micromobility	N/A	Same as proposed Plan (Increases in micro-mobility through assumed personal owned e-bike growth)	Same as proposed Plan (Increases in micro-mobility through assumed personal owned e-bike growth)
Funding		Committed funding	2019 Federal RTP ($130 billion)	Same as Proposed Plan ($163 billion)

[1] These consist of transportation projects with environmental clearance, that have full funding, are under construction, or are otherwise reasonably foreseeable based on current plans.

[2] A microtransponder is an electronic toll collection device that allows users to pay tolls automatically from inside their vehicle.

Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 1 infeasible and rejects this alternative for the reasons explained below.

First, the No Project Alternative does not reduce any of the Plan's significant impacts to less-than-significant levels.

Second, Alternative 1 fails to meet any of the basic project objectives. Alternative 1 would not focus population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas (objective 1) and would not provide transportation investments that support compact land development patterns (objective 2). This alternative would not meet these basic objectives because, in the absence of the Plan's transportation improvements, there would be less compact development in existing neighborhoods and major transportation corridors and more growth in less developed areas of the region. The absence of the Plan's transportation improvements and its less compact development and more growth in less developed areas of the region would likely cause the region to not meet the GHG emissions targets established for the San

Diego region by CARB and the SANDAG Board of Directors. This alternative would not meet the objectives to provide transportation investments that promote social equality (objective 4) or to reduce vehicle miles traveled and improve air quality (objective 5) because more people would drive alone, the annual accident rate for bicycles and pedestrians would be higher, and fewer people and jobs would be located near transit stops and bike facilities.

This alternative would fail to provide multi-modal access to jobs and key destinations for all communities (objective 6) because compared to the Plan it would result in higher daily vehicle delay per capita; peak-period travel time to work would be slower for drive alone, transit, and carpool modes; travel times to and from neighboring counties and military bases would be slower; fewer people would be within 30 minutes of jobs and higher education using transit; fewer people would be within 15 minutes of retail, health care, active parks, and active beaches using transit; and fewer people would be within 15 minutes of an active beach driving alone.

Alternative 1 would not enhance the efficiency of the transportation network through the deployment of new technologies (objective 7). New technologies to make travel more reliable and convenient would not be employed, nor would the efficiency of the transportation system be managed to improve traffic flow to the same degree offered by the Plan because the region would lose access to funding sources needed to pay for deployment of new technologies if the Plan were not adopted.

Third, Alternative 1 is legally infeasible. It does not meet the requirements of federal transportation planning law. Pursuant to 23 USC §134(i), SANDAG is required to "prepare and update" its RTP every 4 years if it is in an area designated as nonattainment under the federal Clean Air Act. Alternative 1 would also not meet the requirements of 23 USC §134(h)(1) which requires that the RTP contain projects and strategies that will:

(A) support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;

(B) increase the safety of the transportation system for motorized and nonmotorized users;

(C) increase the security of the transportation system for motorized and nonmotorized users;

(D) increase the accessibility and mobility of people and for freight;

(E) protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;

(F) enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;

(G) promote efficient system management and operation; and

(H) emphasize the preservation of the existing transportation system.

Alternative 2: 2019 Transportation Network with New Value Pricing and User Fee Policies

Description

Alternative 2 consists of the 2019 Federal RTP transportation network and land use pattern, combined with the new value pricing and user fees policies in the proposed Plan that are compatible with the 2019 Federal RTP network. This alternative could feasibly accomplish most of the basic objectives of the project and substantially lessen one or more of the significant effects by minimizing changes to the existing land use plans in the region. As shown in Table 6-3 in EIR Chapter 6, *Alternatives Analysis,* significant impacts that would be reduced (but not necessarily all to a less-than-significant level) under Alternative 2 are:

- AQ-5 (2025, 2035, and 2050)
- POP-1 (2025, 2035, 2050)
- POP-2 (2025, 2035, 2050)

Alternative 2 consists of the land uses in the 2019 Federal RTP, and reflects the adopted general plans of the 18 cities and County except where additional planning assumptions were necessary to accommodate the 6th Cycle RHNA adopted in July 2020, plus the DOF January 2020 release of the State's population projections. Table O-2 (Appendix O of the EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives. Land uses for Alternative 2 would be the same as for the No Project Alternative because this land use pattern is based on the adopted 2019 Federal RTP, the adopted general plans of the 18 cities and County, and the State-mandated 6th Cycle RHNA, which would be implemented even if the proposed Plan were not adopted.

Alternative 2 includes the 2019 Federal RTP transportation network (included in Appendix O of the Draft EIR) with the addition of policies and programs of the proposed Plan, including toll pricing, microtransponder ownership, telework assumptions, and micromobility.

This alternative does not include the development of the Mobility Hubs or Complete Corridors envisioned in the proposed Plan. This alternative also does not include additional high frequency transit beyond what is shown in the 2019 Federal RTP because the supporting land uses are not included in the 2019 Federal RTP land use pattern. Funding for Alternative 2 would be consistent with the funding proposed in the 2019 Federal RTP.

Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 2 infeasible and rejects this alternative for the reasons explained below.

First, Alternative 2 does not reduce any of the Plan's significant impacts to less-than-significant levels. Alternative 2 would result in lower TACs compared to the proposed Plan because it would not focus growth in Mobility Hubs or include diesel commuter rail lines; however, because Alternative 2 would result in higher per capita and overall VMT, it could result in an increase in TACs from roadways, and would still result in a significant impact related to TACs. Alternative 2 would also reduce impacts POP-1 and POP-2 because fewer transportation improvement projects and a less compact land use pattern would result in less induced unplanned growth and less displacement of people and housing units than the proposed Plan; however, the impacts would still remain significant.

Second, Alternative 2 would not achieve two important project objectives, making this alternative undesirable from a policy standpoint: focusing population and employment growth in mobility hubs and existing urban areas (objective 1) and meeting GHG emission targets established for the region by CARB and SANDAG (objective 3). Inability to meet CARB GHG targets means the Regional Plan's SCS would not comply with SB 375 requirements. Also, Alternative 2 achieves some project objectives to a lesser extent than the Plan, also making this alternative undesirable from a policy standpoint. Providing transportation investments and land use patterns that promote social equality (objective 4) and reducing vehicle miles traveled and improving air quality (objective 5) would be met to a lesser extent because compared to the Plan the increase in total annual VMT would be slightly higher in 2025 and 2035, and on-road emissions would be higher in 2025, 2035, and 2050 compared to the Plan.

Alternative 3: All Growth Focused in Mobility Hubs and More Progressive Value Pricing and User Fee Policies

Description

Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the mobility hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan. This alternative could feasibly accomplish most of the basic objectives of the project and could substantially lessen one or more of the significant effects: in particular, VMT and GHG emissions reductions due to more compact development and increased mode shift. As shown in Table 6-3 in Chapter 6, significant impacts that would be reduced (but not necessarily to a less-than-significant level) under Alternative 3 are:

- AES-1 (2025, 2035, 2050)
- AES-2 (2025, 2035, 2050)
- AES-3 (2025, 2035, 2050)
- AES-4 (2025, 2035, 2050)
- AG-1 (2025, 2035, 2050)
- AG-2 (2025, 2035, 2050)
- AG-3 (2025, 2035, 2050)
- AQ-2 (2050)
- AQ-4 (2025, 2035, 2050)
- BIO-1 (2025, 2035, 2050)
- BIO-2 (2025, 2035, 2050)
- BIO-3 (2025, 2035, 2050)
- CULT-1 (2025, 2035, 2050)
- PALEO-1 (2025, 2035, 2050)
- GHG-5 (2025, 2035, 2050)
- MR-1 (2025, 2035, 2050)
- NOI-1 (2025, 2035, 2050)
- NOI-2 (2025, 2035, 2050)
- PS-1 (2035, 2050)
- REC-1 (2035, 2050)
- U-1 (2035, 2050)
- U-2 (2035, 2050)
- TRA-2 (2025, 2035, 2050)
- TCR-1 (2025, 2035, 2050)
- WS-1 (2050)
- WS-2 (2025, 2035, 2050)
- WS-3 (2025, 2035, 2050)
- WF-1 (2035, 2050)
- WF-2 (2035, 2050)
- WF-3 (2035, 2050)

Land use in Alternative 3 is similar to the proposed Plan, but would focus all growth in proposed mobility hubs throughout the County to further reduce VMT and GHG emissions. The regional mobility hub areas are the same as the proposed Plan.

Alternative 3 would include more progressive value pricing and user fee policies than those offered in the proposed Plan, as shown in Table 1. It also includes the same transportation network as the proposed Plan, and funding for Alternative 3 would be the same as for the proposed Plan. Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 3 infeasible and rejects this alternative for the reasons explained below:

First, Alternative 3 does not reduce any of the Plan's significant impacts to less-than-significant levels. Alternative 3 would result in a small decrease of PM10 and PM2.5 emissions compared to the proposed Plan. However, PM10 concentration impacts would be similar to the proposed Plan and would result in a similar significant impact. In addition, Alternative 3 would result in lower GHG

emissions than the proposed Plan but would not meet the reduction target reference points for 2030 and 2045, and would result in similar impacts as the proposed Plan.

Second, Alternative 3 achieves objective 4 to a lesser extent than the Plan, making this alternative undesirable from a policy standpoint. Objective 4, providing transportation investments and land use patterns that protect social equity, would be met to a lesser extent because, compared to the proposed Plan, Alternative 3 would result in more compact land use patterns and transportation projects in developed areas, which would result in greater displacement of people and housing units, including those located in disadvantaged communities.

Third, Alternative 3 is undesirable from a policy standpoint and legally infeasible because its land use pattern is inconsistent with the region's 6th Cycle Regional Housing Needs Assessment Plan. Since early 2018, SANDAG has been coordinating with California's Department of Housing and Community Development (HCD) and local jurisdictions on the Cycle 6 RHNA process. HCD's RHNA Determination for the San Diego region is based on the 2017 population forecast from the DOF and requires SANDAG and its member agencies to plan for a total of 171,685 housing units through the 2021–2029 planning period. The RHNA methodology allocates housing units to jurisdictions based on access to transit and total number of jobs.

SB 375 links the RHNA process to the region's GHG emissions reduction goals by requiring that the SCS shall "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to 65584. . ." The SCS includes a future land use pattern that focuses forecasted housing and job growth in areas that facilitate mixing of uses and alignment with transportation investments that must demonstrate achievement of GHG emissions reduction goals at target year 2035.

The 6th Cycle RHNA Plan was adopted by the SANDAG Board of Directors in July 2020 and accepted by HCD. The Housing Element Law (Government Code Sections 65580, et seq.) requires that local jurisdictions plan for the housing units allocated in the 6th Cycle RHNA Plan. Both federal transportation planning law and SB 375 require the SCS to be based on the latest planning assumptions, considering local general plans and other factors (Government Code § 65080(b)(2)(B)). Alternative 3 does not comply with the 6th Cycle RHNA allocation. Alternative 3 is therefore undesirable from a policy standpoint as well as legally infeasible.

D. ALTERNATIVES CONSIDERED IN THE EIR BUT REJECTED (SECTION 6.5)

This section discusses several alternatives that were considered by SANDAG decision makers or raised by the public during the planning process for the proposed Plan, or that were raised in public comments on the NOP for the EIR, but were rejected from detailed consideration in this EIR. Reasons for rejecting these alternatives include the following:

- Major elements of the alternative are already included in the proposed Plan or one of the alternatives evaluated in detail in the EIR.
- The alternative is infeasible due to economic, legal, or other considerations.
- The alternative fails to reduce any of the proposed Plan's significant environmental impacts.
- The alternative fails to meet most of the basic project objectives.
- The alternative is for individual project components rather than the proposed Plan as a whole.

D.1 Accelerated Plan Implementation

As discussed in EIR Section 4.16, implementation of the proposed Plan would result in significant VMT and GHG impacts. The proposed Plan includes land use growth and transportation improvements that, when implemented, would reduce VMT. However, to further reduce VMT and GHG impacts for years 2025 and 2035, greater transit ridership would need to be achieved earlier than projected. To accomplish this implementation of the proposed Plan would need to be accelerated.

Reasons for Rejection

Implementation of the proposed Plan is constructed as a system of integrated land use growth and transportation improvements. Several of the transportation improvements are directly related to increases in land use growth. VMT and GHG reductions under the proposed Plan result from the increasing land uses and resident populations in compact transit-oriented development within mobility hubs. Both the land use changes and transportation improvements are essential for the system to work. Under SB 375, an SCS cannot supersede the land use authority of the cities and counties within the region. Therefore, SANDAG does not have the authority to accelerate land use concentration in the region and so several of the transportation improvements, e.g., Mobility Hubs, cannot be accelerated until the corresponding land use growth occurs.

In addition, funding is not available to accelerate the construction of the proposed Plan. The funding strategy for the proposed Plan considers all reasonably anticipated revenues to be received out to 2050. These funds will come with constraints. A majority of the anticipated funds will be tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance), and SANDAG does not have the authority to interchange them. These constraints include requirements from Congress or the State Legislature, and the investment strategy for the proposed Plan is aligned with those rules. SANDAG is also constrained by when funds will become available over the 30-year life of the proposed Plan. More than half of anticipated revenues are not expected to become available until the 2036–2050 timeframe.

For these reasons, this alternative has been rejected from further consideration.

D.2 2019 Federal RTP Plus Updated Department of Finance Population and Telework

This alternative consists of the land uses in the 2019 Federal RTP, and reflects the adopted general plans of the 18 cities and County, except where additional planning assumptions were necessary to accommodate the 6th Cycle RHNA adopted in July 2020, and the DOF January 2020 release of the State's population projections. Table O-2 (Appendix O of the EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives. Land uses for Alternative 2 would be the same as for the No Project Alternative, because this land use pattern is based on the adopted 2019 Federal RTP and the adopted general plans of the 18 cities and County and the State-mandated 6th Cycle RHNA, which would be implemented even if the proposed Plan were not adopted.

In addition, this alternative would only include the following telework policies, but not all of the other policies and programs included for Alternative 2, as discussed above:

- Increases in primary and occasional telework jobs by 2025, 2035, and 2050 based on latest planning assumptions. In 2025, a projected 9.7 percent of employment would be primarily telework, and another 9.8 percent would be occasional telework. In 2035, it is projected that 10.9 percent of jobs would be primary telework, and another 11.8 percent would include

occasional telework. In 2050, it is projected that 12.7 percent of employment would be primary telework jobs, and another 14.8 percent would include occasional telework.

Reasons for Rejection

This alternative is essentially the proposed Alternative 2 without new value pricing and user fees. Adding new value pricing and user fees results in lower VMT and reduced GHG, and as such this alternative would result in more VMT and more GHG than Alternative 2. As discussed in Table 6-3 of the EIR, Alternative 2 would result in a 12.6 percent per capita GHG reduction by 2035, which would not meet the SB 375 2035 GHG reduction target established by CARB for the proposed Plan. There is no evidence that this alternative would avoid or substantially reduce any of the proposed Plan's significant impacts. For these reasons, this alternative has been rejected from further consideration.

D.3 Transit-Constrained Transit Alternative

In a January 13, 2015, NOP comment letter, Circulate San Diego requested that the Regional Plan contain at least one transit-friendly reasonable alternative that will mitigate environmental impacts. They requested that the alternative should be referred to as a "TransNet-Constrained Transit Alternative" and include the following elements:

- Advancing as much public transit and active transportation as possible.
- Including investments from the unconstrained transit network (e.g., investments for which available funding was not identified in the proposed Plan).
- Delaying and eliminating general purpose highway and managed lane investments.
- Converting existing general purpose lanes to managed lanes.
- Providing more compact land use patterns.
- Substantially lowering transit fares.
- Substantially increasing the price of parking.
- Substantially increasing the cost of driving.

Reasons for Rejection

This comment was received prior to SANDAG developing the 5 Big Moves Vision, which served to guide the development of the proposed Plan. The proposed Plan substantially addresses many of the suggestions included in this proposed alternative (e.g., converting existing general purpose lanes to managed lanes, providing more compact land use patterns, substantially lowering transit fares, increasing the price of parking). In addition, Alternative 3 further expands on many of these components, including even more accelerated transit investments, more compact land use patterns, and high transit subsidies, parking pricing, and driving costs. The proposed Plan does not include investments drawn from the unconstrained transit network because the proposed Plan re-envisioned the entire transportation network, and because reasonably foreseeable funding sources for unconstrained projects have not been identified. The proposed Plan does not add funding to add general purpose freeway lanes, but instead focuses on adding Managed Lanes where feasible and appropriate by converting existing general purpose lanes or roadway shoulders. The proposed Plan cannot exclude all roadway and freeway funding and expansion as that would preclude the addition of Managed Lanes, which increase the efficiency of roadway travel for vehicles and transit. Further,

there is no evidence that excluding funding for Managed Lanes would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

Because most of the major elements of the alternative are already included in the proposed Plan and/or Alternative 3, and are analyzed in the EIR, and because there is no evidence that this alternative would avoid or further and substantially reduce any of the proposed Plan's significant impacts, this alterative is rejected from further consideration.

D.4 Coastal Protection Alternative

In a December 19, 2016, NOP comment letter received from the California Coastal Commission, an alternative was identified to consider the effects of sea level rise and minimize the need for shoreline armoring with the relocation of the rail corridor along the Del Mar bluffs. The letter also requests that the expected life of the rail corridor along the Del Mar bluffs and other existing infrastructure be analyzed given sea level rise and other environmental impacts.

Reasons for Rejection

The request to analyze alternatives for the Del Mar Bluffs rail corridor is an individual project included in the proposed Plan rather than an alternative for the proposed Plan as a whole; such a project can be considered but there is no requirement to discuss alternatives to each particular component of a project (See *California Oak Foundation v. Regents of University of California* (2010) 188 Cal. App. 4th 227, 276–277). Because it is limited, this alternative would not avoid or substantially reduce any of the proposed Plan's significant impacts. The proposed Plan includes a proposal to move the rail corridor off the bluffs into a proposed tunnel by 2035 (TL06 Commuter Rail 398 in Appendix B of the EIR). Sea-level rise is a potential effect of climate change, which is discussed in impact analysis sections of the EIR and Appendix C of the EIR. For these reasons, this alternative has been rejected from further consideration.

D.5 Climate, Housing, Transit Alternative

On May 26, 2021, SANDAG received a comment letter on the proposed Plan from Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF) requesting that the SANDAG Board of Directors "include a Climate, Housing, Transit Alternative in the 2021 RTP update – an alternative focused on meeting both the housing needs and greenhouse gas ("GHG") reduction goals for a qualified land use area that have been set collectively by the State of California, the City of San Diego, and SANDAG" that meets the following goals:

- 40 percent reduction in GHG below 1990 levels by 2030.
- 80 percent reduction in GHG below 1990 levels by 2050.
- 25 percent reduction in per capita GHG from passenger cars and trucks relative to 2005 by 2035.
- 14.3 percent reduction in total daily VMT per capita, and 16.8 percent reduction in total light-duty VMT per capita, relative to 2015-2018 average by 2050.
- 50 percent transit, walk and bike mode share for commuters within ½ mile of a major transit stop in City of San Diego by 2035.
- 150 percent increase in transit mode share.
- Adequately plan to meet the housing needs of everyone in the community.

- SB 743 VMT reduction goals.

The SOFAR and CNFF comment letter requested than SANDAG consider the following specific components for the proposed Plan:

- Comprehensive transit investments in each of these four levels:
  - Highest speed commuter/intercity rail in the LOSSAN corridor, including a double-track rail tunnel through Miramar Hill and rail line straightening.
  - Higher-speed high-frequency transit, including separate rights of way, fewer stops grade separations, and new high-speed lines.
  - An intermodal terminal (Grand Central) connecting Airport, central core, LOSSAN corridor, SPRINTER corridor, and trolley system.
  - Local transit (bus or streetcar) and shared mobility.
- Walkable compact land use.
- Excluding roadway/freeway funding and expansion.

In addition, on October 7, 2021, SANDAG received a letter from SOFAR in response to the Draft EIR. requesting further consideration of this alternative. See Section VIII of these findings for further discussion of why this alternative was not included for detailed consideration in the EIR.

Reasons for Rejection in Draft EIR

The proposed Plan includes comprehensive transit investments in each of the four levels identified in the Climate, Housing, Transit Alternative: high-speed commuter rail; tunneling and double-tracking where feasible; rail line straightening, higher-speed and higher-frequency transit with separate rights-of-way, fewer stops, grade separation, and new high-speed lines; a Central Mobility Hub that connects to the airport as well as to transit elements offering further interconnectivity throughout the San Diego region; and expanded local transit and shared mobility.

The proposed Plan also includes an intensified, compact land use, as well as expanded active transportation infrastructure improvements. The proposed Plan does not add funding to add general purpose freeway lanes, but instead focuses on adding Managed Lanes where feasible and appropriate by converting existing general-purpose lanes or roadway shoulders. The proposed Plan cannot exclude all roadway and freeway funding and expansion as that would preclude the addition of Managed Lanes, which increase the efficiency of roadway travel for vehicles and transit. Further, there is no evidence that excluding funding for Managed Lanes would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR. The proposed Plan meets some, but not all, of the Climate, Housing, Transit Alternative goals. The proposed Plan would exceed the GHG emission reduction targets for 2020 and 2035 established by CARB, as shown in Table 2-8. While CARB does not set targets beyond 2035, SANDAG has provided data in Section 4.8 of the EIR utilizing the same methodology to show continued GHG reductions beyond 2035. See Appendix O, Table O-3 of the EIR. Similarly, as discussed in Section 4.16 of the EIR, the proposed Plan achieves a 15.4 percent reduction (approximately 17.6 percent with off model strategies included) in total daily VMT per capita by 2050 as compared to the proposed Plan baseline of 2016. Alternative 3 achieves still greater reductions. See Appendix O, Table O-3 of the EIR.

Both the proposed Plan and Alternative 3 achieve a greater than 150 percent increase in walk to transit and drive to transit mode share by 2050, along with similar increases in walk and bike mode

share. Mode share within 0.5 mile of a major transit stop is not specifically measured for the proposed Plan or Alternative 3.

As for meeting housing needs, the proposed Plan's SCS land use pattern identifies areas within the region sufficient to house the 6th Cycle RHNA Plan allocations. The adopted 6th cycle RHNA Plan for the San Diego region covers the 8-year period from 2021 through 2029. The RHNA allocates housing need in four income categories for each of the cities and San Diego County to use in their housing elements.

The remaining goals of the Climate, Housing, Transit Alternative are considered infeasible to achieve. As described above and in the analyses of this EIR, the proposed Plan includes several major changes in transportation investments and other policy changes specifically for the purpose of reducing total GHG and VMT. Even if SANDAG could achieve zero GHG emissions from the transportation sector (the area that SANDAG has the most control over), it still would not be possible to meet the targets of carbon neutrality by 2045 and 80 percent reduction of 1990 levels by 2050 due to emissions from non-transportation sectors. Table 4.8-8 in Section 4.8 of the EIR shows total GHG emissions in the San Diego region from 2016 to 2050. Even assuming zero GHG emissions from the on-road transportation sector, the region would still have GHG emissions of 10.31 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) by 2050, a 5.11 $MMTCO_2e$ shortfall as compared to the State target of 5.2 $MMTCO_2e$.

Similarly, Alternative 3, which has the most compact land use pattern and includes the most progressive measures to reduce VMT and GHG, is unable to meet the VMT goals of the Climate, Housing, Transit Alternative. Under Alternative 3, GHG and VMT would be reduced by 23.1 percent per capita and 15.6 per capita, respectively, by 2050.

Because the specific feasible components and feasible goals advanced in the Climate, Housing, Transit Alternative proposed by SOFAR and CNFF are already included in the proposed Plan and/or Alternative 3 and analyzed in this EIR; the remaining components and goals are infeasible; and because the SOFAR alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them., as discussed above, this alternative has been rejected from further consideration.

D.6 10 Big Moves to Transportation Justice

A May 27, 2021, comment letter on the proposed Plan from the San Diego Transportation Equity Working Group (SDTEWG), a community-based coalition of the Center on Policy Initiatives, City Heights Community Development Corporation, Environmental Health Coalition, Mid-City CAN, and SanDiego350, requested that SANDAG include an alternative incorporating "the 10 Big Moves to Transportation Justice*."*

Two of the goals identified in the 10 Big Moves to Transportation Justice Alternative—(1) an environmental-justice centered RTP and (6) youth opportunity passes—do not involve physical changes with physical environmental impacts. Under CEQA, an EIR must analyze the impact of a project's physical changes on the physical environment. CEQA does not require EIRs to include an environmental justice analysis or address socioeconomic impacts unrelated to physical environmental impacts. While these two stated goals are not addressed below, they will be addressed by SANDAG staff and considered by the Board of Directors as the proposed Plan is finalized. It should be noted that the Board adopted a pilot youth opportunity pass at its October 22, 2021, meeting. The pilot will run from Spring 2022 to Spring 2023 and provide free transit passes for people 18 and under and will increase transit service on weeknights and weekends, particularly in underserved areas.

The remaining eight goals, which include physical changes with potential physical environmental impacts, are:

(2) **Improve the Bus System Now:** Develop a bus system that is fast, frequent, reliable, and accessible by increasing frequency on popular lines, especially overcrowded ones. This should be done immediately as a way to introduce the public to a new transit era with short-term and long-term solutions. It should be done by providing MTS with the necessary financial support for implementation. EJ communities cannot afford to wait 10-20 years for solutions.

(3) **Blue Line Express:** Fund the planning, environmental, engineering, and capital for the additional Blue Line track that allows express, 24-hour service, and additional frequency enhancements. Rail-grade separations should only move forward with the addition of a third track that eliminates conflict between the Blue Line and freight.

(4) **24-Hour Service by 2025:** Provide 24-hour service on popular transit routes to connect late night and early morning workers to their jobs by 2025.

(5) **Purple Line Serves Central City Heights:** Fund the planning, environmental, engineering, and capital for the Purple Line as a rail line that connects EJ communities in central City Heights and South Bay to Sorrento Valley.

(7) **Electrify Bus Fleet by 2030:** Fund the implementation of California's Innovative Clean Transit rule to accelerate the electrification of the bus fleet ten years before mandated by the California Air Resources Board.

(8) **Identify Anti-Displacement strategies:** Fund anti-displacement efforts to protect vulnerable communities living near transit corridors by developing an anti-displacement strategy that includes affordable/low-income housing and preservation of naturally occurring existing affordable housing, community ownership, and tenant protections.

(9) **Bathroom network:** Develop a bathroom access plan and provide MTS with funding for a clean and accessible bathroom network open at all major transit stations.

(10) **Emergency Ready Transit System:** Fund the planning and implementation of a transit emergency response strategy to provide safety particularly to EJ communities during community-wide emergencies.

Reasons for Rejection

The proposed Plan and Alternative 3 of the EIR are consistent with goals (2), Improve the Bus System Now, and (7), Electrify Bus Fleet by 2030. The proposed Plan includes significant investments in Rapid buses as well as more efficient associated roadway infrastructure for operating those buses by 2050. The proposed Plan also supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the proposed Plan include SANDAG's proposed commitment through 2050 of $657 million for zero-emission buses and infrastructure, which is to support the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. $325 million of SANDAG's investment is proposed between 2021 and 2035. Immediate implementation of all bus system improvements identified in the proposed Plan and accelerated bus fleet electrification by 2035 are economically infeasible due to funding constraints.

Goal (3), Blue Line Express, is not included in the proposed Plan; however, SANDAG will pursue a pilot study of the feasibility of adding a third express track on the Blue Line. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

Goal (4), 24 Hour Service by 2025is not included in the proposed Plan; however, frequency for most transit service will be increased to 4 a.m. through 12 a.m. under the proposed Plan, with frequency

of 4 a.m. through 2 a.m. for commuter rail routes 581, 582, and 583; light rail transit routes 399, 510, 520, and 555; and some bus routes. Twenty-four hour service is anticipated for the airport connection served by route 577. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

The proposed Plan aligns with goal (5), Purple Line Serves Central City Heights. By 2035, the proposed Plan Purple Line connects Sorrento Mesa and National City via UTC, Kearny Mesa, and University Heights. By 2050, the proposed Plan Purple Line is extended from National City to CBX via San Ysidro. Additionally, the South Bay to Sorrento Comprehensive Multimodal Corridor Plan is currently studying a station in City Heights along Commuter Rail 582. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

Goal (8), Identify Anti-Displacement Strategies, is not addressed in the proposed Plan or in the alternatives analyzed in the EIR; however, SANDAG is currently developing a Regional Housing Incentive Program through which SANDAG will look for opportunities to coordinate with interested stakeholders on issues like gentrification and displacement. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

For goal (9), SANDAG will complete a Transit Station Bathroom Access Plan as part of implementing the proposed Plan; however, there is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts. Goal (10), Emergency Ready Transit System, is addressed in Appendix Q of the proposed Plan, which describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan's significant impacts identified in the EIR.

For the reasons above, this alternative has been rejected from further consideration.

VIII. FINDINGS REGARDING ALTERNATIVES PROPOSED IN COMMENTS

Some comments on the Draft EIR suggested additional project alternatives. Where the suggestions requested minor modifications in alternatives or components of alternatives analyzed in the Draft EIR, or requested alternatives that were too vague or speculative to be addressed, these requests were declined as unnecessary. The SANDAG Board of Directors adopts and incorporates by reference the specific reasons for declining such alternatives contained in the responses to comments in the Final EIR as one ground for rejecting these alternatives.

Additionally, alternatives suggested in comments could reduce impacts, but implementation of these alternatives would be infeasible. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the following mitigation measures or project alternatives identified in the final EIR, for the reasons explained below.

Further evidence and analysis supporting these findings on alternatives suggested in Draft EIR comments is included in Final EIR Master Response 1 (alternatives) and individual responses to comments.

The EIR evaluated a reasonable range of alternatives to the Plan. As discussed in Chapter 6 of the EIR, nine potential alternatives were initially considered for further detailed analysis. Of these, three alternatives to the proposed Plan were evaluated in detail. The range of three alternatives evaluated in detail in Chapter 6 of the EIR is in large part based on public and stakeholder requests to reduce GHG emissions, air quality impacts, and VMT.

Alternatives suggested by commenters include, but are not limited to:

- A feasible alternative that would substantially reduce vehicle trips and vehicle miles traveled (VMT).
- Save Our Forests and Ranchlands' (SOFAR's) and Cleveland National Forest Foundation's (CNFF's) Climate, Housing, Transit Alternative.
- An alternative that substantially lessens significant impacts on biological resources.
- An alternative with VMT reduction features such as subsidized transit fares and microtransit.
- Southwest Wetlands Interpretive Association's (SWIA's) alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.
- An alternative that reduces greenhouse gas (GHG) emissions consistent with State goals or achieves net zero emissions.

When considering whether the range of alternatives evaluated in the EIR is adequate, several principles apply. The "discussion of alternatives need not be exhaustive," and the requirement to discuss alternatives is "subject to a construction of reasonableness." (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3d 274, 286.) "An EIR need not consider every conceivable alternative to a project." (CEQA Guidelines §15126.6(a).)

Under CEQA, absolute perfection is not the standard governing a lead agency's proposed range of project alternatives. Rather, in preparing an EIR, a lead agency need only make an objective, good faith effort to provide information permitting a reasonable choice of alternatives that would feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening the project's significant adverse environmental impacts. (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App. 4th 227, 275-276.)

Alternative that Substantially Reduces VMT Below Existing Levels

Commenters suggest the Draft EIR should have evaluated a project alternative that substantially reduces VMT below existing levels. Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the mobility hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower total VMT than the proposed Plan, though still above existing levels.

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above. An alternative including further VMT-reduction measures to reduce total VMT below existing levels is not currently feasible for several reasons, including:

- *Further* substantial changes needed in State and federal policy and legislation. These would include still *further* changes in State road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.
- Lack of funding for *further and accelerated* major transit service improvements (recognizing that, as discussed in additional detail in subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the

lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already raises the fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.
- Lack of authority for SANDAG and local governments to implement such *further* measures. For example, SANDAG has no authority to increase State road pricing, or require local governments to implement land use or parking policies.
- SANDAG's inability to control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, "CEQA is not intended as a population control measure" (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 220).

SOFAR's and CNFF's Climate, Housing, Transit Alternative

This alternative was proposed in scoping, but considered and rejected from detailed consideration in the Draft EIR; in response to a later October 7, 2021, Draft EIR comment letter reiterating it should have been included, further explanations for rejection are included in the Final EIR's responses to SOFAR's and CNFF's Draft EIR comment letters.

The letter requests that SANDAG analyze the effect that Managed Lanes have on transit ridership (i.e., how many transit trips would occur with Managed Lanes versus without Managed Lanes). The letter also suggests that the modeling for the proposed Plan should advance implementation of all transit projects in the first 10 years of the Plan in order to truly understand the effect that a comprehensive transit network would have in achieving the region's environmental and housing goals. In particular the letter suggests that the Plan accelerate the implementation of the LOSSAN double track rail project and the Miramar tunnel rail line and straightening project.

As explained in the Draft EIR (pages 6-14 and 6-15), some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3. These include comprehensive transit investments in: high-speed commuter rail; tunneling and double-tracking where feasible; rail line straightening, higher-speed and higher-frequency transit with separate rights-of-way, fewer stops, grade separation, and new high-speed lines; a Central Mobility Hub that connects to the airport as well as to transit elements offering further interconnectivity throughout the San Diego region; and expanded local transit and shared mobility. The proposed Plan and Alternative 3 also include an intensified, compact land use, as well as expanded active transportation infrastructure improvements.

As discussed in Appendix P, *Response to Comments*, of the EIR, SANDAG conducted a modeling analysis to compare the proposed Plan network with Managed Lanes investments to a network consistent with SOFAR's request in the Draft EIR comment letter. The model run assumed no new Managed Lanes, only transit lanes, and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. Converting Managed Lanes to transit lanes and accelerating the two rail projects as suggested for the SOFAR alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them (see responses to comments 35-7 and 35-16).

Findings and Rationale

This alternative includes the following major components that were not included in the proposed Plan or EIR alternatives, for the reasons discussed below:

- A "transit first" plan that substantially reduces VMT and provides substantive benefits in transit/bike/walk mode share and advancing all transit projects to the first 10 years of the Plan.
- Prioritize transit/active transit over managed lanes.
- Accelerate implementation of the Los Angeles–San Diego–San Luis Obispo Rail Corridor (LOSSAN) double-track rail project and Miramar tunnel and rail line straightening project.

With regards to accelerating transit to the first 10 years of the Plan, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP) are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by the California Department of Transportation (Caltrans).

With regards to prioritizing transit over managed lanes and accelerated implementation of rail projects, SANDAG conducted a modeling analysis to compare the proposed Plan network with Managed Lanes investments to the Climate, Housing, Transit Alternative. The model run assumed no new Managed Lanes (only transit lanes), and accelerated the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR's and CNFF's Draft EIR comment letter, converting Managed Lanes to transit lanes and accelerating the Miramar Tunnel rail line results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

In summary, the Climate, Housing, Transit alternative was not selected for detailed consideration in the EIR because:

- Some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3.
- It is infeasible to accelerate transit to the first 10 years of the Plan and redirect all roadway funding to transit.

- The Climate, Housing, Transit alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.
- It is infeasible to achieve the GHG and VMT reduction goals proposed in the Climate, Housing Transit alternative; see Draft EIR pages 6-15 through 6-16 and the discussion below regarding the infeasibility of an alternative that reduces GHG emissions consistent with State goals.

Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Alternative that Substantially Lessens Significant Impacts on Biological Resources

A commenter suggested an alternative that would avoid or substantially lessen impacts on biological resources.

Findings and Rationale

As discussed in Section 4.4, *Biological Resources*, of the EIR the impacts on biological resources were analyzed at a programmatic level based on best available information. Impacts were analyzed based on the programmatic footprint developed for the 2021 Regional Plan, and mitigation measures were identified accordingly that achieve substantial reductions to impacts. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level.

The Plan places emphasis on maximizing the use of existing facilities and focusing growth within urban areas to preserve habitat and open space. In addition, Alternative 3 has a smaller footprint and would further reduce impacts on biological resources. In summary, the proposed Plan and Alternative 3 both substantially reduce biological resources with the implementation of mitigation measures and the proposed footprints, and a new alternative that also reduces such impacts is not required for an adequate range of alternatives. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Alternative with Subsidized Transit Fares and Microtransit

Another commenter requested that alternatives that include features such as subsidized transit fares and microtransit be considered. SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT.

Findings and Rationale

The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, including subsidized transit fares and microtransit. As discussed in Chapter 6, Alternative 3 (All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies) includes free transit and microtransit by 2035. Because Alternative 3 would not reduce any of the Plan's significant impacts to less-than-significant levels, just modifying the transportation network to include subsidized transit fares and microtransit would not be enough to substantially reduce VMT and GHG emissions as compared to the proposed Plan.

In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by fiscal year (FY) 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, Metropolitan Transit System (MTS), and North County Transit District (NCTD) are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Southwest Wetlands Interpretive Association's Alternative

SWIA suggest an alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible this suggested alternative. Reasons for not including each of the four components in an EIR alternative are discussed below. In addition, there is no evidence that collectively, they would substantially reduce any of the proposed Plan's significant impacts.

Prioritizing transit over managed lanes

Comments suggest that the proposed Plan should prioritize transit over managed lanes. The Managed Lanes network of the proposed Plan uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and High-Occupancy Vehicles (HOVs) to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the Regional Plan.

As discussed above under SOFAR's and CNFF's Climate, Housing, Transit Alternative, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative, which focuses on prioritizing transit. The model run assumed no new managed lanes (only transit lanes), and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR's and CNFF's Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the two suggested rail projects results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

Furthermore, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network, as described further under the SOFAR and CNFF Climate, Housing, Transit Alternative above.

Monitoring system for transportation system's buildout and performance

Comments suggest that SANDAG implement clear and definitive mechanisms to monitor future population growth, jobs, and housing development in accordance with the proposed Plan to ensure that transportation system investments are in line with development and growth trends.

As identified in Appendix B of the Regional Plan, SANDAG will continue to monitor the implementation of the Regional Plan on a 4-year cycle and make the data accessible to the public. Monitoring would occur 2 years after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for the SCS on a 2-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019). A performance monitoring report using the indicators from Appendix E of the Regional Plan is developed halfway between each 4-year regional plan cycle. The report is shared with the SANDAG Board of Directors to provide a high-level status update on critical areas across the region. This information helps inform the Board of Directors in their development of regional goals for the subsequent regional plan. The indicators use available observed data that also informs how each indicator is calculated. In summary, some specific feasible components of this alternative are already included in the proposed Plan.

Regional Habitat Conservation Fund

Comments suggest that an alternative that includes a regional habitat conservation fund be included in the EIR. Appendix AA of the Regional Plan describes the status of the Habitat Conservation Plans (HCPs) within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP has been granted "take" authorization for impacts on endangered and threatened species. By way of the take authorizations, the local jurisdictions have made commitments to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

SANDAG will continue its existing grant programs, partner with member agencies on State funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan. To meet the region's habitat conservation goals, the 2021 Regional Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, Greenhouse Gas Emissions, of the EIR), and $300–$500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

As such, because HCP funding is already included in the proposed Final Plan, no additional alternative with this component is necessary.

Ensuring enforcement

Comments suggest that an alternative should ensure enforcement of the jurisdictions' compliance with the Plan. Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement and monitor the objectives outlined in the 2021 Regional Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Final 2021 Regional Plan.

The 2021 Regional Plan envisions forecasted growth to be concentrated in Mobility Hubs throughout the region, which will be implemented in close coordination with local jurisdictions to align with the unique needs of each community. Many Mobility Hubs are employment centers or other popular

destinations, and SANDAG would work with local jurisdictions to update plans and policies to allow for more housing in these locations where feasible. Local jurisdictions maintain land use authority and are responsible for decisions regarding density, zoning, and housing policies.

In addition, for second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

In summary, a number of enforcement provisions are already included in the proposed Plan, and an additional alternative with this component is not required.

Alternative that Reduces GHG Emissions to Net Zero or Consistent with State Goals

Multiple commenters assert that the range of alternatives is not reasonable because the alternatives would still be inconsistent with statewide GHG reduction and climate goals.

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible this suggested alternative. For the reasons discussed below.

The Draft EIR Impact GHG-5 analysis explains why it is infeasible for the proposed Plan to be consistent with the State's ability to meet the 2030 reduction target of SB 32 and the long-term reduction goals of Executive Orders B-55-18 (2045) and S-3-05 (2050). Similar feasibility constraints apply to other potential proposed Plan alternatives. In addition, as identified in Section 4.8 of the EIR, the proposed Plan would reduce GHG emissions for all three horizon years. As discussed in the Draft EIR, p. 4.8-40, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. California's 2017 Climate Change Scoping establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and put post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California's natural and working lands, and sustainable solid waste management are among many actions the State must take. The State has not adopted a plan analogous to the 2017 Scoping Plan since that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

The proposed Plan would assist in meeting the statewide 2030 GHG target in putting statewide emissions on a downward trajectory toward statewide post-2030 goals by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375. However, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal. Available research and reports, discussed in detail in Section 4.8 of the EIR, indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies; large-scale deployment of new and existing technologies; and the roles of

local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions.

Furthermore, as discussed in Chapter 2, *Project Description*, of the EIR SANDAG updates the Regional Plan every 4 years, and future iterations of the Plan and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045. The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. As such, a proposed Plan alternative that further reduces GHG emissions consistent with State GHG reduction goals was not included for detailed consideration in the EIR because it is beyond SANDAG's or local agencies' current ability to implement.

IX. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS TO THE FINAL EIR

Finding: Appendix P of the EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines §15088(b). The EIR also incorporates information obtained and produced after the Draft EIR was completed, including additions, clarifications, and modifications. The Board has reviewed and considered the Final EIR and all of this information.

The Board finds that responses to comments made on the Draft EIR and revisions to the Final EIR merely clarify, amplify, or make insignificant modifications to the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines §15088.5.

Rationale: CEQA Guidelines §15088.5 provides:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification…. "Information" can include changes in the project or environmental setting as well as additional data or other information…."Significant new information" requiring recirculation includes, for example…

> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. …

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure or alternative considerably different from others previously analyzed that SANDAG declines to adopt and that would clearly lessen the significant environmental impacts of the Plan.

Changes to Draft Regional Plan

None of the changes to the Draft 2021 Regional Plan made in the proposed Final 2021 Regional Plan and reflected in the Final EIR project description constitutes "significant new information" that would trigger EIR recirculation. Rather, they are relatively minor changes that "clarify" or "amplify" the Draft EIR's project description. None of the changes represent or suggest a new project alternative or mitigation measure, so the below analysis focuses on the potential for new or worse significant impacts.

- **Funding Strategy:** The updated funding strategy reflects implementation of a State and regional Road Usage Charge by 2030, and also proposes bonding against future local revenues to fund near-term projects. These fiscal changes to the Draft EIR project description would not create a new or worse significant environmental impact.
- **Land Use and Mobility Hubs:** Explanations were added about the regional Mobility Hub areas and assumptions of the Sustainable Communities Strategy (SCS) land use pattern. These explanations represent clarifications to the Draft EIR project description, and would not create a new or worse significant environmental impact.
- **Habitat Conservation:** The region's dedication to habitat and open space preservation is emphasized. This amplification of the Draft EIR project description would not create a new or worse significant environmental impact.
- **Vision Zero:** The region's commitment to safety and Vision Zero is highlighted with clarity on investments that support vulnerable road users. Again, this amplification of the Draft EIR project description would not create a new or worse significant environmental impact.
- **Projects and Phasing:** Appendix A, *Transportation Projects, Programs, and Phasing*, is updated to describe and map the improvements to each major corridor area and the process used to phase projects. Updates to the project list include the removal of redundant freeway connector projects, inclusion of studies underway for transit projects and services, addition of active transportation projects, and clarity regarding use of existing footprint for improvements on State Route 52 and other complete corridor projects. These updates do have the potential to create new environmental impacts, but are relatively minor changes that would not create a new or worse significant environmental impact.

  Appendix A was also revised to include documentation of strategies to reduce pollution exposure in disadvantaged communities required by Assembly Bill 805 which was previously included in Appendix H, and to add a detailed list of future transit route frequencies and spans of service. This clarification and amplification of the Draft EIR project description would not create a new or worse significant environmental impact.
- **Transit Leap:** Transit Leap strategy was updated to include bathrooms at new rail stations, several minor near-term actions, and evaluation of the transition to free public transit. These minor changes to the Draft EIR project description would not create a new or worse significant environmental impact.
- **Flexible Fleet Pilots:** Additional detail on Flexible Fleets was added to emphasize the importance of pilot projects and partnerships. This amplification of the Draft EIR project description would not create a new or worse significant environmental impact.
- **Cumulative Effect of All Changes to the Regional Plan:** Collectively, the above changes to the 2021 Regional Plan represent minor changes, clarifications, and/or amplifications. Collectively, they do not amount to a major revision to the Draft EIR project description that

would make the Draft EIR "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

Changes to Draft EIR

The discussion below summarizes certain environmental impacts that increased from the Draft EIR to the Final EIR, and explains why these changes do not result in a new significant impact, or a substantial increase in the severity of a significant impact identified in the Draft EIR:

- **Impact acreage updates related to Projects and Phasing:** As discussed above, updates to projects and phasing in the proposed Plan resulted in minor updates to impact acreages included in the Final EIR. Instances where this resulted in minor impact acreage increases include Section 4.2, *Agricultural and Forestry Resources*, Section 4.4, *Biological Resources*, and Section 4.15, *Public Services and Utilities*. In all instances, acreage increases were very minor relative to the impact previously included in the Draft EIR and would not create a new or worse significant environmental impact.
- **Vehicle Miles Traveled:** As discussed in detail in Section 4.16, *Transportation*, VMT numbers were revised to reflect the minor modifications to the transportation network improvements included in the proposed Plan as well as minor corrections made to the ABM2+. As a result, total VMT increased from 0.6 percent to 1.1 percent between 2016 and 2025 but decreased between 2016 and 2035 and 2050. As such, these changes would not create a new or worse significant environmental impact related to VMT, nor would it affect other conclusions in the Final EIR.

X. FINDING ADOPTING A MITIGATION MONITORING PROGRAM

The SANDAG Board of Directors finds that a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Plan and has been adopted concurrently with these Findings (Public Resources Code, §21081.6(a)(1)). SANDAG will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

XI. FINDING REGARDING LOCATION AND CUSTODIAN OF RECORD

The documents and other materials that constitute the record of proceedings on which SANDAG's Findings of Fact are based are located at 401 B Street, Suite 800, San Diego, California 92101. The custodian of these documents is Kirsten Uchitel, Associate Planner. This information is provided in compliance with Public Resources Code §21081.6(a)(2) and 14 Cal. Code Regs. §15091(e).

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by SANDAG and in conjunction with the Project.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the 45-day public comment period on the Draft EIR.
- All comments and correspondence submitted to SANDAG with respect to the Project.
- The MMRP for the Project.

- All Findings and resolutions adopted by SANDAG decision makers in connection with the Project, and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by ICF, consultants to SANDAG.
- All documents and information submitted to SANDAG by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the Project, up through the date the SANDAG Board of Directors approved the Project.
- Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by SANDAG, in connection with the Project.
- Any documentary or other evidence submitted to SANDAG at such information sessions, public meetings, and public hearings.
- Matters of common knowledge to SANDAG, including, but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code §21167.6(e).

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ATTACHMENT 1B

STATEMENT OF OVERRIDING CONSIDERATIONS FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN

The San Diego Association of Governments (SANDAG) Board of Directors (Board) adopts and makes this statement of overriding considerations concerning San Diego Forward: The 2021 Regional Plan's (the Plan's) unavoidable significant impacts to explain why the Plan's benefits override and outweigh its unavoidable impacts.

The Final Environmental Impact Report (EIR) has identified and discussed significant effects that would occur as a result of the Plan. As set forth in the California Environmental Quality Act (CEQA) Findings for the EIR, SANDAG has made a reasonable and good faith effort to avoid or substantially reduce the significant impacts resulting from the Plan and has made specific findings on each of the proposed Plan's significant impacts and on mitigation measures and alternatives. Even with implementation of all feasible mitigation, however, the Plan will result in significant and unavoidable impacts, both direct and cumulative, to: Aesthetics and Visual Resources; Agricultural and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology, Soils, and Paleontological Resources; Greenhouse Gas Emissions; Land Use; Mineral Resources; Noise and Vibration; Population and Housing; Public Services and Utilities; Transportation; Tribal Cultural Resources; Water Supply; and Wildfire.

In accordance with Section 15093 of the CEQA Guidelines, and having reduced the significant environmental effects of the 2021 Regional Plan to the extent feasible, having considered the entire administrative record on the 2021 Regional Plan, and having weighed the benefits of the Plan against its unavoidable adverse impacts after mitigation, the Board hereby finds that the following legal, economic, social, and environmental benefits of the 2021 Regional Plan outweigh its unavoidable adverse impacts and render them acceptable based upon the following considerations. Each benefit set forth below constitutes an overriding consideration warranting approval of the Plan, independent of the other benefits, despite each and every unavoidable impact.

2021 Regional Plan Benefits

SANDAG developed seven project objectives for the EIR to achieve the underlying project purpose of the Regional Plan to address the many regional transportation challenges by integrating land use planning and transportation improvements and using technology to offer more options for travel and increase safety. The outcome would be even greater mobility and transportation connectivity, and a shift away from overloading roadways with single-occupant cars, even as the regional population continues to expand. The Plan achieves the vision in the following ways:

Greenhouse Gas Emissions and Vehicle Miles Traveled Benefits

- The Plan will achieve the Senate Bill 375 (Steinberg, 2008) (SB 375) regional greenhouse gas reduction target, reducing 2035 per capita emissions by 20 percent compared to the SB 375 2005 baseline (Final EIR Section 4.8, *Greenhouse Gas Emissions*).

- The Plan will lower vehicle miles traveled per capita. Daily vehicle miles traveled per capita will decrease by about 15 percent under the Plan, from 18.94 miles per person per day in 2016 to 16.03 miles per person per day in 2050 (Final EIR Section 4.16, *Transportation*).

- The Plan will result in sustained and continued reductions in total GHG emissions from passenger vehicle and light duty trucks. In 2016, there were 10.5 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) emitted from passenger vehicles and light duty trucks; in 2025, the Plan will reduce emissions to 8.0 $MMTCO_2e$; in 2035 to 6.5 $MMTCO_2e$; and in 2050 to 6.4 $MMTCO_2e$. (Final EIR Section 4.8, *Greenhouse Gas Emissions*.)

- The Plan will result in sustained and continued reductions in total GHG emissions from all sources. In 2016, total annual emissions were 25.8 $MMTCO_2e$; in 2025, the Plan will reduce total annual emissions to 22.4 $MMTCO_2e$; in 2035 to 19.1 $MMTCO_2e$; and in 2050 to 18 $MMTCO_2e$ (Final EIR Section 4.8, *Greenhouse Gas Emissions*).

Land Use and Housing Benefits

- The Sustainable Community Strategy (SCS) land use pattern uses Mobility Hubs to concentrate future development by incentivizing land uses and transportation infrastructure that maximize the connectivity of the transportation system set out in the 2021 Regional Plan. In 2016, approximately 44 percent of the region's population lived in Mobility Hub areas, but under the SCS land use pattern that number is projected to grow to 53 percent by 2050. With the Plan, the percentage of the region's population with access to Tier 1 employment centers (employment centers with concentration of more than 75,000 employees) within 30 minutes using transit will grow from 21 percent in 2016 to 36 percent in 2050, and those with access to these employment centers within 45 minutes using transit will grow from 37 percent to 58 percent by 2050. (2021 Regional Plan, Chapter 2.)

- The SCS land use pattern addresses the mobility needs of all segments of the population. Thirty-minute transit access to Tier 1 employment centers increases from 22 percent to 36 percent for minorities and increases from 25 percent to 42 percent for residents with low incomes by 2050. By 2050, the percentage of minorities and residents with low incomes who can access higher education within 30 minutes by transit increases by 10 percent or more regionwide. Similar improvements are also found in 15-minute access to retail via transit (2021 Regional Plan, Chapter 2). The Plan will increase the percentage of the low income and minority populations within 30 minutes of jobs and higher education via transit. For the low income population, the percentage of the population within 30 minutes of an employment center and higher education via transit will increase from 86.9 percent in 2016 to 89.8 percent in 2050 and 50.4 percent to 62.7 percent in 2050, respectively. The percentage of minority population within 30 minutes of an employment center and higher education on transit will increase from 84.9 percent in 2016 to 87.4 percent in 2050 and 48.2 percent to 57.7 percent in 2050, respectively (2021 Regional Plan, Appendix H, Tables H.4 and H.7).

- Forecasted growth will become more sustainable over time under the Plan's SCS. More than 93 percent of housing growth by 2050 will be multifamily development, as shown in the Series 14 Regional Growth Forecast. This trend towards multifamily development will help the region accommodate the projected housing needs for residents of all income levels in a more environmentally sustainable manner. (2021 Regional Plan, Appendix F.)

- The Regional Plan land use pattern protects and preserves about 1.3 million acres of land as open space, more than half (about 55 percent) of the San Diego region's land area. These open space lands include habitat conservation areas, parks, steep slopes, farmland, floodplains, and wetlands. (Final EIR, Section 4.15, *Public Services and Utilities.*)

- The Plan has supporting policies to provide the necessary regional funding for the completion of the habitat conservation plans such as the Multiple Species Conservation Plan (MSCP) and Multiple Habitat Conservation Plan; $3 billion has been identified, which will provide funding for acquisition, management, and monitoring. The Plan will provide the necessary funding to provide a more sustainable land use pattern for habitat conservation and recovery of endangered species. (2021 Regional Plan, Appendix B, pages B-11–B-15.)

Transit, Bicycle/Pedestrian, and Carpool Benefits

- The Plan's new transit services combined with the compact land use pattern of the SCS will increase the number of people within a half-mile of a high-quality public transit stop (commuter rail, light rail, or next gen Rapid) from 9.1 percent in 2016 to 35.0 percent in 2050. Similarly, the percentage of jobs within a half-mile of a high-quality public transit stop will increase from 21.3 percent in 2016 to 47.8 percent by 2050. (2021 Regional Plan, Appendix T, Table T6.2.)

- Similarly, the Plan will increase the percentage of low income, minority, and senior populations within a half-mile of a high-quality public transit stop. For the low-income populations, 41.1 percent will be within a half-mile of a high-quality public transit service stop by 2050, up from 11.8 percent in 2016. For the minority population, 36.1 percent will be within a half-mile by 2050, up from 10.4 percent in 2016. For seniors, 34.7 percent will be within a half-mile by 2050, up from 8.0 percent in 2016. (2021 Regional Plan, Appendix H, Table H.3.)

- The Plan will result in a higher mode share for walk, bike, transit, and carpools. By 2050, the walk, bike, transit, and carpool mode share for all trips will be 59.2 percent, up from about 53.6 percent in 2016. Transit mode share will increase from about 1.6 percent in 2016 to about 5.2 percent in 2050. Walk and bike mode share will increase from about 7.8 percent in 2016 to 13.6 percent in 2050. Drive-alone mode share will decrease from 44.7 percent in 2012 to 38.6 percent in 2050. (2021 Regional Plan, Appendix T, Table T6.2.)

- The Plan will increase the miles of transit service, including commuter rail, light rail transit, rapid, and bus services, from 94,410 miles in 2016 to 263,005 miles in 2050, an increase of 278 percent. Mileage of high-occupancy vehicle (HOV) and Managed Lanes will also increase from 116 miles in 2016 to 821 miles in 2050, an increase of over 700 percent. Mileage of bicycle facilities will increase from 3,112 miles in 2016 to 3,631.7 miles in 2050, an increase of 16.7 percent. (Final EIR Section 4.16, *Transportation.*)

- Compared to 380,540 daily transit boardings per day in 2016, the Plan will more than triple the amount of daily regional transit boardings to 1,235,770 by 2035, with a further increase to 1,440,963 daily boardings by 2050 (2021 Regional Plan, Appendix T, Table T6.2).

Safety and Physical Activity Benefits

- The Plan would upgrade several miles of unprotected bike facilities, specifically 18.1 lane miles of Class III Bike Routes and 66.6 lane miles of Class II Bike lanes, to protected bicycle facilities such as Class I – Multi-Use Pathways and Class IV Cycle Tracks. Upgrading from unprotected to protected facilities would increase cyclist safety. (Final EIR Section 4.16, *Transportation.*)

- Engagement in transportation-related physical activity will increase under the Plan. Average daily bicycle trips and pedestrian trips will increase by 256 percent and 80 percent, respectively, between 2016 and 2050. (Final EIR Section 4.16, *Transportation.*).

- Time engaged in transportation-related physical activity will increase on a per capita basis from 7.39 minutes per day in 2016 to 13.22 minutes per day. In addition, only 11.4 percent of the population engaged in 20 minutes or more of transportation-related physical activity in 2016; under the Plan, this percentage is expected to increase to 20.7 percent. (2021 Regional Plan, Appendix T, Table T6.2.)

SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN

STATE CLEARINGHOUSE NO. 2010041061

MITIGATION MONITORING AND REPORTING PROGRAM

PREPARED FOR:

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November 2021

PURPOSE AND INTENDED USE OF THE MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation Monitoring and Reporting Program (MMRP) prior to approving a project that includes mitigation measures. This MMRP has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

The purpose of this MMRP is to ensure the mitigation measures adopted in the findings of fact for San Diego Forward: The 2021 Regional Plan (Regional Plan) are implemented, in accordance with CEQA requirements. The Regional Plan Environmental Impact Report (EIR) findings adopt feasible mitigation measures to reduce the significant environmental impacts of the Regional Plan. This MMRP clarifies the process for the San Diego Association of Governments (SANDAG) and Implementation Agencies to ensure these mitigation measures are implemented, and designates responsibility for implementing, monitoring, and reporting mitigation.

Several of the adopted EIR mitigation measures are plan-level measures that will be implemented by SANDAG. Many of the adopted mitigation measures are programmatic mitigation measures that shall be implemented by SANDAG and can and should be implemented by other agencies during future project-specific design and environmental review

For second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded. The MMRP for the Program EIR may be used as a tool for incorporating mitigation measures into future second-tier projects, as provided for in CEQA Guidelines Section 15168(c)(3).

In addition, Senate Bill (SB) 375 provides specific CEQA streamlining for residential/mixed-use projects and transportation priority projects (TPPs) if they incorporate mitigation measures from an SB 375 compliant Regional Transportation Plan (RTP) EIR. To take advantage of these CEQA streamlining opportunities, implementing agencies may use this MMRP as a tool for incorporating mitigation measures in their future residential/mixed use projects and TPPs.

MITIGATION MEASURES ADOPTED WITH THE REGIONAL PLAN

Mitigation measures adopted in the Regional Plan EIR findings are included in Attachment A, which identifies:

- The content of the mitigation measure
- The timing of implementation:
    - Planning and Project Design
    - Grading/Construction
    - Post Construction

  - Ongoing
- The responsible party:
  - SANDAG
  - Other Transportation Project Sponsors – Transportation or other governmental agencies, including the California Department of Transportation (Caltrans), transit districts, cities, and the County of San Diego, responsible for implementing local or regional transportation network improvements
  - Land Use – Land use agencies, including cities and the County of San Diego, and special districts such as water service providers, responsible for discretionary actions involved in land use and associated infrastructure projects and planning

ENFORCEMENT

CEQA requires mitigation measures to be "fully enforceable" through the use of permit conditions, agreements, or other measures within each Lead Agency's authority (Public Resources Code 21081.6(b)). Many of the adopted measures are programmatic mitigation measures that shall be implemented by SANDAG and can and should be implemented by other agencies during future project-specific design and environmental review. The Lead Agency for each future project is responsible for assuring the project-specific mitigation measures it adopts are enforceable.

IMPLEMENTATION AND REPORTING

SANDAG shall designate a staff person to serve as coordinator for overall implementation and administration of this Mitigation Monitoring and Reporting Program and for its application to future projects in which SANDAG is the Lead Agency. This person (Coordinator) will also ensure that when SANDAG is the direct source of funding for transportation network improvement projects, SANDAG will require as a grant condition the implementation of those Regional Plan mitigation measures that are applicable to, and feasible for, the project type being funded.

MITIGATION MONITORING STATUS REPORTING

For those mitigation measures that SANDAG is responsible for implementing or partially implementing, reports on the progress of implementation of these measures will be prepared by staff on an annual basis. The report shall be prepared by the Coordinator and contain the following:

- A list of mitigation measures incorporated into second-tier environmental documents;
- Recommendations for modifications to the Mitigation and Monitoring Program to improve effectiveness; and
- Required modifications to the Mitigation Monitoring and Reporting Program to comply with legislation and policies adopted in the previous year (e.g., newly listed threatened species).

Implementing Agencies for second-tier projects will be responsible for developing their own processes for mitigation monitoring status reporting.

Attachment A

San Diego Forward: The 2021 Regional Plan Final EIR Mitigation Monitoring and Reporting Program

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Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
Aesthetics and Visual Resources							
AES-1a Protect Public Views of Scenic Vistas for Transportation Network Improvements. During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, ensure that projects protect public views of scenic vistas. Construction and operational measures include, but are not limited to, the following: • Site construction staging areas away from scenic vistas. Where infeasible, reduce the visibility of construction staging areas. Fence and screen these areas with low contrast materials consistent with the surrounding environment. • Avoid permanent obstruction of scenic vistas from public viewing areas when selecting alignments and the grade of new infrastructure (i.e., above, at, or below grade). • Use transparent safety barrier designs (e.g., railings) rather than walls.	X	X			X	X	
AES-1b Protect Public Views of Scenic Vistas for Development Projects. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate scale and massing measures, including those listed under mitigation measure AES-1a as well as measures specific to development projects. These measures include, but are not limited to, the following: • Ensure building siting, height, and mass protect views of scenic vistas. • Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain. • Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the scenic vista. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.	X	X					X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: ○ Creative site planning. ○ Integration of natural features into the project. ○ Appropriate scale, materials, and design to complement the surrounding natural landscape. ○ Minimal disturbance of topography. ○ Clustering of development to preserve a balance of open space vistas, natural features, and community character. ○ Creation of contiguous open space network.							
AES-2a Reduce Impacts on Scenic Resources within a State Scenic Highway and Local Scenic Resources for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements within eligible or designated state scenic highways and local scenic resources, SANDAG shall, and other transportation project sponsors can and should, ensure that projects are designed to minimize damage to scenic resources. The following measures would reduce the significant effects related to damage of scenic resources within a state scenic highway or other scenic resource or a local scenic route that are in the jurisdiction and responsibility of Caltrans or other public agencies. Where a project has the potential for significant effects, mitigation measures shall ensure compliance with regulations for Caltrans scenic vistas, requirements of the Coastal Act, and policies within county and city general plans. Such measures may include the following: • Use a palette of colors, textures, and building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Use alternating façades to "break up" large façades and provide visual interest. • Design new corridor landscaping to respect existing natural and human-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • Provide new corridor landscaping that provides appropriate transition to existing natural and human-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory. • Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.							
AES-2b Reduce Impacts on Scenic Resources within a State Scenic Highway and Local Scenic Resources for Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce impacts on scenic resources within eligible and designated state scenic highways, coastal areas, and local scenic resources. Measures include, but are not limited to, the following: • Avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources and public viewsheds, where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans. For projects within or adjacent to designated or eligible state scenic highway corridors, and local scenic resources and	X	X			X		X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
public viewsheds identified in local approved plans, prior to project approval, complete visual resources studies. If a significant impact on scenic resources is identified, the study would require site-specific mitigation measures, which may include those identified below. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, and site grading. • Ensure vegetation used as screening and landscaping blends in and complements the natural landscape. • Retain or replace trees within scenic resources so that clear-cutting is not evident. • Ensure grading blends with the adjacent landforms and topography. • Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.							
AES-3a Reduce Impacts on Visual Character for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures include, but are not limited to, the following: • Use contour grading to match surrounding terrain and existing natural, and human-made features of the area. • Revegetate graded slopes and exposed earth surfaces prior to completion of construction. • Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory. • Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements	X	X			X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.							
AES-3b Reduce Impacts on Visual Character for Development Projects. During planning, design, and project-level CEQA review of development projects the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures include, but are not limited to, the following: • Use contour grading to match surrounding terrain and existing natural, and man-made features of the area. • Revegetate graded slopes and exposed earth surfaces prior to completion of construction. • Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades. • Apply development standards and design guidelines to maintain compatibility with surrounding development, including site coverage, building height and massing, building materials and color, landscaping, and site grading.	X	X					X
AES-4a Minimize Effects of Light and Glare for Transportation Network Improvements. During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas.	X	X	X		X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
Where SANDAG and other transportation project sponsors have identified that a project has the potential for significant effects, they can and should adopt mitigation measures to ensure consistency with the goals and policies within county and city general plans, as applicable. Construction and operational measures include, but are not limited to, the following: • Minimize and control glare from transportation projects through the adoption of project design features that reduce glare, such as those listed below: ○ Planting trees along transportation corridors to reduce glare from the sun. ○ Landscaping off-street parking areas, loading areas, and service areas. ○ Limiting the use of reflective materials, such as metal. ○ Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry. ○ Screening parking areas by using vegetation or trees. ○ Using low-reflective glass. • Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with transportation network improvements. These standards include the following: ○ Minimizing incidental spillover of light onto adjacent private properties and undeveloped open space. ○ Directing luminaries away from habitat and open space areas adjacent to the project site. ○ Installing luminaries that provide good color rendering and natural light qualities. ○ Minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.							
AES-4b Minimize Effects of Light and Glare for Development Projects. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should	X	X	X				X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas. Where a project has the potential for significant effects, mitigation measures shall ensure consistency with the goals and policies within county and city general plans, as applicable. Such measures may include, but are not limited to, the following: • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction from the hours of 7:00 p.m. to 7:00 a.m. • Use high pressure sodium vapor and/or cut-off fixtures including LED lights, instead of typical mercury-vapor fixtures for outdoor lighting. • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive offsite uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.							
Agricultural and Forestry Resources							
AG-1a Preserve Existing Agricultural Lands. During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, preserve existing agricultural lands by avoiding agricultural land conversion when feasible; if not feasible, measures to reduce conversion of agricultural lands to nonagricultural use include, but are not limited to, the following: • Acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
city or community in which the conversion occurs. Where conversion occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible. • If a project requires cancellation of a Williamson Act contract, acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the cancellation occurs. Where the cancellation occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible. • Where agricultural conservation easements are acquired or dedicated, consider the suitability of a specific proposed easement on its ability to avoid or reduce fragmentation of agricultural land to enhance overall production value and operation viability • Where project-specific mitigation described above is not feasible, use other commensurate solutions, such as payment of an agricultural resource impact fee made pursuant to an approved in-lieu fee program.							
AG-1b Reduce Transportation Network Improvement and Development Conflicts with Agricultural Operations. During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, reduce conflicts with agricultural operations through the implementation of project design features and mitigation measures to protect surrounding agriculture, including, but not limited to, the following: • Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, topographic features, and open space, and to reduce conflict between transportation network improvements and/or developments and farming. • Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Align corridors, incorporate buffer zones and setbacks, and design berms and fencing to avoid agricultural lands and to reduce conflicts between transportation projects and agricultural lands.							
FR-1 Reduce Impacts on Forest Lands. During project planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, preserve forest lands by avoiding conversion of such lands when feasible and, if not feasible, by implementing measures to reduce impacts on forest lands, including, but not be limited to, the following: • **Implement Compensatory Mitigation of Forest Lands**. Provide compensatory mitigation using mitigation ratios as specified through consultation with resource agencies and in approved natural community conservation plans (NCCPs) and habitat conservation plans (HCPs). Compensatory mitigation outside the Coastal Zone would be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and is required to be located within the Coastal Zone close to the impact. To the extent allowed by the above plans and ordinances, project-specific mitigation would be provided through onsite restoration of temporary impacts, onsite or offsite preservation of existing habitats, or offsite restoration.	X				X	X	X
Air Quality							
AQ-2a. Secure Incentive Funding. SANDAG, in partnership with SDAPCD and the Port of San Diego, and member cities, will seek to secure incentive funding to reduce mobile SO_X and PM emissions from mobile exhaust, and entrained PM sources such as tire wear, brake wear, and re-entrained road dust. Such incentive funding or programs are: • Voucher Incentive Program (VIP) • Vehicle Registration Fund Program (VRF)				X	X		X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Lower Emission School Bus Replacement and Retrofit Program (LESB) • American Recovery and Reinvestment Act funding for the National Clean Diesel Funding Assistance Program (ARRA)							
AQ-2b. Zero Emission Trains. SANDAG shall only purchase zero emission trains on any new rail lines or train equipment after 2035. Zero emission trains can include fully electric, battery-electric, hydrogen fuel cell, or any technology that results in no tailpipe emissions. New rail lines construction after 2035 shall be powered completely by zero emission trains			X		X		
AQ-3a Implement Construction Best Management Practices for Fugitive Dust. During planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential for localized particulate (PM10 and PM2.5) impacts that result in exceedances of the CAAQS or NAAQS using applicable procedures and guidelines for such analyses (for example, SDAPCD and EPA air dispersion modeling guidance). If impacts are significant, during project-level construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement best management practices (BMPs) to reduce impacts, including but not limited to, the following: • Use fugitive dust control measures to reduce generation from exposed surfaces during construction, as specified in SDAPCD Rule 55 (SDAPCD 2009). SDAPCD Rule 55 includes various requirements, including preventing visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, removing all track-out/carry-out dust at the conclusion of each work day Compliance with these regulatory requirements is a performance standard for mitigation of construction activity particulate emissions. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out to 90 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007, WRAP 2006).	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Use additional fugitive dust control measures such as watering or application of dust suppressants to reduce the generation of fugitive dust at active construction sites. Reductions in fugitive dust emissions range from 10 to 74 percent for watering of unpaved surfaces to 84 percent for use of dust suppressants (WRAP 2006). • Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off site. Reductions in fugitive dust emissions are estimated at 91 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007). • Remove visible mud or dirt track-out onto adjacent public roads. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out (WRAP 2006). • Limit vehicle speeds on unpaved surfaces during construction to 15 mph. Reductions in fugitive dust emissions from unpaved surfaces are estimated at 57 percent (WRAP 2006). • Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph. Reductions in fugitive dust emissions are estimated at 98 percent (WRAP 2006). • Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas. Reductions in fugitive dust emissions from wind erosion are estimated at 90 percent (WRAP 2006). • Wash all trucks and equipment, including their tires, prior to leaving the construction site. No quantitative estimate of the effectiveness of this measure is available. • Implement other site-specific fugitive dust control measures as warranted for individual construction projects for the transportation network and/or land use projects.							
AQ-3b Reduce Diesel Emissions During Construction From Off-Road Equipment. For impacts on air quality from construction exhaust, during planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District

to reduce criteria pollutant and TAC impacts from off-road equipment, including, but not limited to, the following:
• Ensure off-road equipment greater than 25 horsepower (hp) that will be operating for more than 20 hours during construction meets the following requirements:
  ○ Ensure engines are zero emissions or equipped with an CARB Level 3 Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.
  ○ If project-specific analysis demonstrates that the above measure would not adequately reduce impacts (as determined by the project-level lead agency), provide engines that meet or exceed either EPA Tier 4 off-road standards.
• Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.
• Maintain and properly tune construction equipment in accordance with the manufacturers' specifications.
• Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.
• Use late model engines.
• Use low emission diesel products.
• Use alternative fuels in construction equipment.
• Use engine retrofit technology to control emissions from off-road equipment.							

AQ-3c Reduce Diesel Emissions During Construction From On-Road Vehicles. For impacts on air quality from construction exhaust as a result of transportation network improvements and programs or development projects, during project-level CEQA review and construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce criteria pollutant and TAC impacts from on-road vehicles, including but not limited to: • Monitor idling time of diesel-powered trucks, and limit to no more than 2 minutes. • Provide clear signage for construction workers at all access points.	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Maintain and properly tune vehicles in accordance with the manufacturers' specifications. • Ensure that construction activity deliveries are scheduled during off-peak hours (e.g., 10 a.m. to 3 p.m.) and are coordinated to consolidate truck trips. When the movement of construction materials and/or equipment impacts traffic flow, provide temporary traffic control (e.g., flag person) to improve traffic flow. • Use late model engines (2010 or new model years). • Use low emission diesel products in on-road vehicles. • Use zero emission or near-zero emission technologies or alternative fuels in on-road vehicles. • Use engine retrofit technology on on-road vehicles.							
AQ-4 Reduce Exposure to Localized Particulate Emissions. During planning, design, and project-level CEQA review of transportation network improvements and programs, and during planning, design, and project-level CEQA review of development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential particulate matter concentration impacts of the project using applicable procedures and guidelines for such analyses. If exceedances of PM10 or PM2.5 standards are predicted, SANDAG shall, and other transportation project sponsors can and should, apply measures to reduce PM emissions, including but not limited to the following: • Design sites to locate sensitive receptors more than 500 feet of a freeway, 500 feet of urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. • Design sites to locate sensitive receptors more than 1,000 feet of a major diesel rail service or railyards. Where adequate buffer cannot be implemented, implement the following: • Install air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to indoor reduce pollution exposure for residents and other sensitive populations in buildings that are close to transportation network improvement projects. Use air filtration devices rated MERV-13 or higher. As part of implementing this	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
measure, require an ongoing maintenance plan for the building's Heating, Ventilation and Air Conditioning (HVAC) air filtration system. Air filtration devices rated MERV-13 are estimated to reduce indoor levels of particulates by 75 to 90 percent (CARB 2017b). • Plant trees and/or vegetation suited to trapping roadway air pollution and/or sound walls between sensitive receptors and the pollution source. This measure would trap pollution emitted from pollution sources such as freeways, reducing the amount of pollution to which residents and other sensitive populations would be exposed. The vegetation buffer should be thick, with full coverage from the ground to the top of the canopy (CARB 2017c, EPA 2016). Vegetation can be combined with sound walls to further reduce pollution exposure, particularly for locations immediately behind the barrier. • Design streets that have more open space and varied building heights. • Move bus stops and other gathering location farther from intersections.							
AQ-5a Reduce Exposure to Localized Toxic Air Contaminant Emissions. During planning, design, and project-level CEQA review of transportation network improvements and programs, SANDAG shall, and other transportation project sponsors can and should, evaluate the potential toxic air contaminant (TAC) impacts of the project using applicable procedures and guidelines for such analyses (for example, California Air Pollution Control Officers' Association, OEHHA, and/or EPA air toxics health risk assessment guidance). In addition, during planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should apply the above measures, and additional measures to reduce TAC emissions or exposure to TAC emissions, including but not limited to: • Reduce the potential for TACs to be introduced into buildings by all of the following: ○ Maintaining a positive air pressure within buildings that include sensitive receptors. ○ Achieving a performance standard of at least one air exchange per hour of fresh outside filtered air. ○ Achieving a performance standard of at least 4 air exchanges per hour of recirculation.	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
○ Achieving a performance standard of at least 0.25 air exchanges per hour of unfiltered air if the building is not positively pressurized. • Within developments, separate sensitive receptors from truck activity areas, such as loading docks and delivery areas. This measure would reduce exposure of residents and other sensitive receptors by locating sources of TACs associated with loading docks and delivery areas away from sensitive receptors. • Replace or retrofit existing diesel generators that are not equipped to meet CARB's Tier 4 emission standards. • Reduce emissions from diesel trucks using the project site through the following measures: ○ Install electrical hook-ups for electric or hybrid trucks at loading docks. Require trucks to use Transportation Refrigeration Units (TRUs) that meet Tier 4 emission standards. ○ Require truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels. ○ Prohibit trucks from idling for more than 2 minutes as feasible. This measure would reduce emissions of TACs from trucks and TRUs by reducing operations and requiring them to use electrical hookups. • Do not locate sensitive receptors in the same buildings as a perchloroethylene dry cleaning facility. This measure would reduce potential exposure of sensitive receptors to perchloroethylene from dry cleaning facilities. • Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year). This measure would reduce potential exposure of sensitive receptors to emissions from gas stations. • Ensure that private (individual and common) exterior open space, including playgrounds, patios, and decks, is shielded from stationary sources of air pollution by buildings or otherwise buffered to further reduce air pollution exposure for project							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
occupants. This measure would reduce the potential for exposure of residents and other sensitive populations to stationary sources of TAC emissions.							
AQ-5b. Reduce Exposure to Localized Toxic Air Contaminant Emissions during Railway Design. In order to help reduce localized toxic air contaminant (TAC) concentrations at sensitive receptors near the future proposed railway(s), SANDAG shall require the design of railway tunnels or other approaches to move emissions underground, where feasible, during individual project-level design. Furthermore, individual project-level design of railway tunnels or other underground features shall require that portals, adits, windows, and other venting features are located as far away as feasibly possible from nearby sensitive receptor(s).	X				X		
GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5a.							
GHG-5b Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5b.							
GHG-5d Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5d.							
GHG-5e Implement Measures to Reduce GHG Emissions from Transportation Projects. See Greenhouse Gas Emissions for Mitigation Measure GHG-5e.							
GHG-5f Implement Measures to Reduce GHG Emissions from Development Projects. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5f.							
TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects. See Transportation section for Mitigation Measure TRA-2.							
Biological Resources							
BIO-1a Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources.	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
During project planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid impacts on sensitive natural communities and regulated aquatic resources when feasible. Avoidance measures include, but are not limited to, the following: • Conduct early coordination with the Wildlife Agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands. • During the site identification and project design process, to the extent feasible, prioritize the least environmentally constrained site, and select a design that avoids and minimizes impacts on biological resources and NCCP lands, and maintains habitat integrity. • Confine development footprints to the minimum amount of undeveloped area necessary for construction and safe, reliable operation. Limit access routes and staging areas to existing roadways, and developed or disturbed areas. Direct drainages away from sensitive habitats, such as canyons. Clearly delineate all construction areas, staging areas, and access routes in the final engineering plans. • Limit grading and earth-moving activities to the permitted impact footprint. Install environmentally sensitive area fencing or flagging along the limits of disturbance prior to the start of construction to avoid incidental loss of sensitive habitat types. • Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special status species and natural communities detected during project surveys to the CNDDB.							
BIO-1b Provide Compensatory Mitigation. Where impacts are unavoidable, during project planning, design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation, as specified by and consistent with adopted MSCP or MHCP guidelines and agreements, applicable federal and	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
State regulatory requirements for mitigating impacts on regulated aquatic resources, applicable local regulations protecting sensitive natural communities, or through consultation with resource agencies. SANDAG shall, and other implementing agencies can and should, establish appropriate mitigation ratios where ratios have not already been established through ordinances and guidelines, specifically for impacts on sensitive coastal, riparian, and shrubland communities. SANDAG shall, and other implementing agencies can and should, design compensatory mitigation to result in the conservation, establishment, or creation of self-sustaining sensitive natural and native communities, replacing the lost habitat and/or habitat value as required to offset those lost from project implementation. Otherwise, mitigation measures would include the requirement for and financing of long-term conservation and management requirements of the mitigation projects.							

Sensitive Vegetation Communities For impacts outside the Coastal Zone, provide compensatory mitigation in the form of project- and habitat-specific onsite or offsite mitigation. Offsite mitigation would occur through several options, including (1) the purchase of credits at an existing authorized mitigation bank within or adjacent to the ecoregion or watershed within which the impacts occurred; (2) in lieu fee program; or (3) project-specific (permittee responsible) mitigation, such as habitat enhancement, establishment (creation), or re-establishment (restoration). Mitigation should occur as close to the impact and in the same local watershed as feasible, unless compelling ecological benefits, as supported by the state and federal wildlife agencies, would result from mitigation located in another area. Compensatory mitigation for impacts inside the North Coast Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP 2014) should be consistent with Chapter 6B Resources Enhancement and Mitigation Program. Compensatory mitigation for impacts inside the Coastal Zone and outside the PWP/TREP should be provided within the Coastal Zone as close as feasible to the impact. Consistent with the resource agencies approval and applicable adopted plans, ordinances, and policies, provide compensatory mitigation for sensitive upland vegetation communities through the following: ● Onsite restoration and post-restoration monitoring for temporary impacts using appropriate native species and natural habitat configurations similar to or better than those impacted. ● On- or offsite preservation of existing habitats through acquisition and/or restoration using EMP and other (e.g., project-specific) mitigation funds for permanent impacts. Protect mitigation lands in perpetuity (e.g., through a conservation easement or similar legal conservation assurance to be approved by the regulatory agencies), fund long-term management (e.g., through the establishment of an endowment for habitat management and for easement management), and adequately manage such lands to maintain the originally intended biological quality and function in perpetuity.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
● Offsite mitigation requirements met through EMP and/or other (e.g., project specific) mitigation funds. When mitigation is provided outside of an adopted NCCP/HCP plan area the following conditions should apply: ○ Give priority to mitigation lands connected to existing conserved open space. ○ Consider contributing to the establishment of large blocks of habitat or lands that are otherwise critical for covered species and/or providing for biological core areas and habitat linkages consistent with current regional conservation planning goals. ○ Mitigate impacts on critical habitat within the same Critical Habitat Unit where the impacts occurred. ● Purchase of habitat credits at an approved mitigation bank, or through payment into an in-lieu mitigation fee program applicable to the impacts and as approved by the Wildlife Agencies. *Regulated Aquatic Resources.* Construction within regulated aquatic resources would be subject to prior authorization by USACE, RWQCB, CDFW, and CCC (as applicable in the coastal zone). Consistent with the resource agencies' permitting and applicable adopted plans, ordinances, and policies, provide project-specific mitigation for impacts on regulated aquatic resources, including waters and wetlands, and associated state-regulated riparian habitat, through one of the following, in order of priority:							

Mitigation Measure	Implementation Timing				Responsible Party		
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● Purchase of credits at an existing authorized mitigation bank or in lieu fee program, except within the coastal zone. Provide compensatory mitigation for impacts inside the coastal zone at sites within the coastal zone close to the impact. Mitigation of impacts on aquatic resources within the coastal zone may require offsets outside the coastal zone and would be negotiated with the CCC on a case-by-case basis. ● Project-specific (permittee responsible) mitigation. Apply an appropriate mitigation ratio for regulated aquatic resources in consultation with the regulatory agencies (i.e., following the USACE Standard Operating Procedure and any other applicable standards) to ensure no net loss of wetlands functions and services, account for temporal losses, and set in coordination with USACE, RWQCB and CDFW. Impacts on vernal pools within the City of San Diego would require mitigation consistent with the VPHCP (City of San Diego 2017); impacts on vernal pools outside the City of San Diego would require permitting through the RWQCB.							
BIO-1c Prepare a Habitat Restoration Plan. During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation with and as approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a Habitat Mitigation and Monitoring Plan (HMMP) consistent with the requirements of and approved by USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands. This mitigation measure applies provided that mitigation does	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
not occur through credit purchase at a mitigation bank. The restoration plan should include the following: • Details regarding the location of the site, site conditions and functions, site preparation (e.g., grading, bio-engineering methods), recontouring, planting specifications (including native seed mixes and plant palettes), irrigation design (if determined necessary), and measures to control exotic vegetation. • Details on avoidance of impacts on any extant sensitive biological resources that may occur as the result of habitat restoration, including direct loss and indirect effects related to changes in hydrology and associated potential effects on species composition. • Identification of locally appropriate plant species for the plan, sourcing (e.g., seed collection, contract-growing of container plants), and outline of performance standards (success criteria). Success should be measured by comparing a similar, natural (undisturbed) reference site containing the same vegetation communities and located within the same watershed as the restoration site, and should use statistical metrics in consideration of the temporal difference between an established reference site and an immature restoration site. • Performance standards sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of applicable agency and adopted plans, ordinances, and policies. After final performance standards have been met and any relevant permitting agencies have approved the mitigation project as complete, the mitigation areas must be conserved and managed in perpetuity (see BIO-1d). • Maintenance and monitoring procedures (including post-restoration monitoring and reporting). Any habitat restoration and mitigation site should be monitored for a minimum of 5 years or as required by regulatory agencies, but continue maintenance and monitoring until performance standards are met. • Identification of remedial measures if the mitigation efforts fall short of the performance standards. Remedial measures typically include, but are not limited to, replanting, reseeding, topographical/surface contour adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Climate science and climate change resiliency and adaptation measures, to be developed as adaptive management strategies for restoration and long-term management planning to reflect the latest available information on climate change impacts and adaptation measures, such as seed storage and adaptation of the seed mixes and planting palettes to adapt to changing climate conditions and sea-level rise.							
BIO-1d Prepare Habitat/Long-Term Management Plans. During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation with and approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a Long-Term Management Plan (LTMP) consistent with the requirements of USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands; or a Habitat Management Plan (HMP) or Resources Management Plan (RMP) for upland mitigation areas. The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures, describe management in perpetuity of the mitigation and conservation areas, illustrate adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives. Management goals should include adaptive management measures for climate adaptation and resiliency. Furthermore, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, prepare a management cost analysis to identify long-term management costs pursuant to measures outlined in the LTMP, HMP, or RMP. Long-term management should be funded using endowments or other financial assurances to generate sufficient annual interest to manage mitigation areas in perpetuity. In addition to the funding requirements, the management plans should also identify the habitat manager and propose a site protection instrument, such as an agency-approved Conservation Easement (CE), restrictive covenant or other title	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
restriction that identifies the mitigation site to be conserved in perpetuity. In some cases, compensatory mitigation would occur through adding lands through public lands that are already preserved (e.g., National Wildlife Refuge).							
BIO-1e Implement Best Management Practices to Avoid Indirect Impacts. During planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, include location-specific measures to avoid and minimize construction-generated dust, erosion, runoff, and sedimentation, and exotic plant invasion, within or into sensitive natural habitats and jurisdictional waters. Location-specific measures include, but are not limited to, the following: • Place construction materials, staging, storage, dispensing, fueling, and maintenance activities in upland areas outside of sensitive habitat, and take adequate measures to prevent any runoff from entering regulated waters, including wetlands. • Fuel equipment on existing paved roads. Check contractor equipment for leaks prior to operation and repaired as necessary. • Monitor construction activities using a qualified biologist when construction is occurring in, or adjacent to, sensitive natural communities and grant the biologist the authority to stop work if it deviates from approved plans and mitigation measures. • Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory, including the development of an integrated invasive plant control plan describing protocols and enforcement schedules for maintenance, construction, and emergency activities working within and moving between important habitat areas.	X	X			X	X	X
BIO-2a Implement Design, Minimization, and Avoidance Measures for Special-Status Animal Species. During planning, design, project-level CEQA review, regulatory permitting process, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
County of San Diego, cities, and other local jurisdictions can and should, incorporate measures to avoid and minimize impacts on special-status animal species. *Construction* Construction measures include, but are not limited to, the following: • Avoid construction during the nesting or breeding season of special-status animal species. • If the nesting or breeding season cannot be avoided, conduct focused surveys (by certified biologists approved by the Wildlife Agencies) and implement noise attenuation measures (e.g., temporary noise barriers) if construction noise levels are found by the focused survey to disturb special-status animal species, specifically during the breeding season. • Backfill all wildlife pitfalls (trenches, bores, and other excavations) at the end of each work day. If backfilling is not feasible, slope all trenches, bores, and other excavations at a 3:1 ratio at the ends to provide wildlife escape ramps, or cover completely to prevent wildlife access. • Delineate permitted work areas, including staging areas, equipment access, and placement of soils, with fencing or stakes prior to construction to prevent access to areas occupied by special-status species. • Require monitoring of construction activities by qualified or certified biologists when construction occurs in, or adjacent to (i.e., within buffer areas approved by the regulatory agencies), areas suitable for or occupied by special-status species, with authority to stop work if it deviates from approved plans and mitigation measures. Avoidance buffers may vary by species and should be approved by the Wildlife Agencies. • Avoid nighttime construction or minimize lighting. When activities must occur at night, direct lighting (e.g., staging areas, equipment storage sites, roadway) downward and away from sensitive vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Remove spoils, trash, or any debris to an offsite, approved disposal facility. Contain trash and food items in closed containers and remove daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Prohibit workers from bringing pets and firearms to the site. • Clear vegetation outside of the typical breeding season of special-status animal species as determined by the Wildlife Agencies or qualified biologist. If activities must occur during special-status species breeding season timeframes, conduct a preconstruction survey by a qualified biologist to determine whether the species of concern, including special-status birds protected under the MBTA, are present within the proposed work area or appropriate buffer (buffer distance may vary depending on the type of activity and the species and other site conditions). If the species of concern are found on site, implement measures, surveys, and construction monitoring to avoid impacts as determined by the regulatory agencies and/or the qualified biologist. *Operation and Maintenance* Operation and maintenance measures include, but are not limited to, the following: • If permanent lighting is necessary, use motion sensitive lighting rather than steady burning, and direct downward and away from natural vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas. • In the event that vegetation clearing or other vegetation maintenance is required, schedule vegetation clearing outside special-status animal species breeding seasons. • Implement operational noise reduction measures described in Section 4.13, Noise and Vibration (see mitigation measure N-1a).							
BIO-2b Provide Compensatory Mitigation for Special-Status Plant Species. Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status plant species as specified through consultation with resource agencies, and	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
consistent with adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations. *Federally and/or State-Listed Plant Species* • If an individual project would result in take of a federally and/or state-listed plant species, consult with the Wildlife Agencies and/or require the applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, NCCP, Section 7, Section 10 HCP) prior to construction as required by State and federal law. Federally listed plant species may not fall under this requirement if no federal project nexus is provided. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. • Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts. • Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat, including, but not limited to, seed collection, salvage of root masses, translocation of transplantation of populations or plant parts, and planting seeds and/or root masses in an area with suitable conditions as approved by the Wildlife Agencies or authorized jurisdiction. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria. • Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, replanting and reseeding of appropriate habitat elements, and propagation and seed bulking programs. • Conserve any restoration and translocation sites in perpetuity, fund a long-term management endowment, identify a long-term habitat manager, and provide long-term adaptive habitat management measures through a Habitat Management Plan. *Non-Federally and/or Non-State-Listed Special-Status Plant Species* • For plant species covered by adopted NCCPs or other ordinances such as the San Diego County RPO, obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances. This may include species-specific mitigation for covered narrow endemic plant species pursuant to MSCP or MHCP requirements. • Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, translocation/transplantation, restoration, or creation of self-sustaining suitable habitat as described above for federally and state-listed species. Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.							
BIO-2c Provide Compensatory Mitigation for Special-Status Animal Species. Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status animal species as specified through consultation with resource agencies, and in adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations. *Federally and/or State Listed Animal Species*	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• If an individual project would result in take of a federally and/or state-listed animal species, consult with the Wildlife Agencies and/or require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by State and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the Wildlife Agencies. • Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available. • Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts. • Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat based on available scientific information and as recommended by the respective species experts. If appropriate and approved by the regulatory agencies, mitigation may include translocation (active or passive) of the species. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria. • Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, habitat restoration, and predator control programs. *Non-Federally and/or Non-State-Listed Special-Status Animal Species* • Obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances (such as the County RPO). • Follow guidelines that identify mitigation requirements, such as local biology guidelines and mitigation ordinances, or Memoranda of Understanding (MOU) between the respective jurisdiction and Wildlife Agencies. • Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat. Create species-specific breeding opportunities and protect mitigation areas from edge effects (e.g., roadkill). Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.							
BIO-3 Facilitate Wildlife Movement. During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement project designs that provide for continued movement of wildlife by limiting edge effects and assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are impacted, as determined by best available information, modeled wildlife corridors, linkages identified in adopted HCP/NCCPs, studies conducted by San Diego Management and Monitoring Program in collaboration with the U.S.G.S. Biological Resource Division or project-specific wildlife movement studies. Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking and consider balancing conservation and recreation (Mitrovich et al. 2020). Include adaptive management and monitoring measures in the	X				X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
CEQA review, mitigation measures and project design. Design measures include, but are not limited to, the following: • Allow corridor buffer zones and wide movement corridors to remain or incorporate periodic larger habitat patches along a corridor's length. • Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands. • Where feasible, prohibit night-time trail use, seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors. • As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces. • Use only native species for landscaping within at least 200 feet of identified wildlife corridors. • Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors. • Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. • Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e. rubberized asphalt), and traffic calming measures. • Minimize the number of road crossings through identified wildlife corridors. • Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure will be designed following the latest scientific							

Mitigation Measure	Implementation Timing				Responsible Party		
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information, and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, installing wildlife bridges or undercrossing, and managing in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors. • If the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings and/or other crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g. habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats. • Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors. • Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways. The inclusion of the above design features should result in an equal or net-benefit to wildlife movement compared to existing conditions. In addition, pursuant to the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands and areas identified as							

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core, linkages, wildlife corridors, or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.							
Cultural Resources							

CULT-1a Develop Project-Level Measures for Development Projects and Transportation Network Improvements.
During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a CEQA-defined historical resource or significantly affect a unique archaeological resource, the County of San Diego, cities, and other local jurisdictions can and should, or SANDAG shall, and other transportation project sponsors can and should, develop project-level protocols and mitigation measures, consistent with CEQA Guidelines Section 15126.4(b) and in consultation with the State Historic Preservation Officer (SHPO) as needed, to avoid substantial adverse changes to CEQA-defined historical resources and unique archaeological resources. The local lead agency can and should, SANDAG shall, and other transportation project sponsors can and should allow for adequate resources to identify (through survey, consultation, or other means) cultural resources in order to develop minimization and avoidance methods where possible, and will/can and should consult with appropriate Native American representatives to provide necessary input as to resources that are of concern. These may include natural areas that contain resources of importance to tribes if they are historical resources or unique archaeological resources. Project-level mitigation measures include, but are not limited to, the following:
Archaeological Resources
• Where feasible, avoid impacts on archaeological resources by preservation in place by:
  ○ Avoiding archaeological sites
  ○ Deeding archaeological sites into permanent conservation easements
  ○ Capping or covering archaeological sites with a layer of soil before building on the sites
	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
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• If preservation in place is not feasible, reduce impacts on archaeological sites by completing a data recovery program conducted in compliance with CEQA Guidelines Section 15126.4(b). (A data recovery program for archaeological sites consists of excavation of a percentage of the site—determined in consultation with the lead agency—to provide information necessary to answer significant research questions.) **Historic Architectural Resources** • Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction to reduce impacts on historic structures, and have a qualified architectural historian or historic architect review mitigation plans to review consistency with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. • If avoidance of a built historic resource is not feasible, apply additional mitigation options including, but not limited to, specific design plans for historic districts, or plans for alteration or adaptive reuse of a historical resource that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings. • If demolition of a historic structure must occur, apply mitigation options such as recordation including a building description, historical narrative, and photographic documentation of the building and appropriate as-built drawings similar to the Historic American Building Survey documentation outlined by the National Park Service (National Park Service 2015).							
CULT-1b Implement Monitoring and Data Recovery Programs for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should, or during construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement monitoring and data recovery measures to reduce impacts on both known and undiscovered CEQA-defined historical resources and unique archaeological resources, including but not limited to the following:	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
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• Require areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor if needed. • Should an archaeological deposit and/or feature be encountered during construction activities that is determined to be a historical resource or unique archaeological resource by a qualified archaeologist, stop ground-disturbing activities and prepare and/or implement an Archaeological Data Recovery Program (ADRP) in consultation with SHPO and/or, when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management. • Integrate curation of archaeological and/or historical artifacts and associated records in a regional center focused on the care, management, and use of archaeological collections if the artifact must be excavated. This does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the MLDs.							
Energy							
Mitigation measures are not required.							
Geology and Soils							
PALEO-1a Identify the Potential for Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, assess the potential for disturbing unique paleontological resources (e.g., fossils and fossiliferous deposits consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils) or affecting unique geological features (i.e., a geologic feature that is the best example of its kind locally or regionally, illustrates a geologic principle, provides a key piece of geologic information, is the "type locality" of a fossil or formation, or has high aesthetic appeal) in the project area. For project sites with	X	X			X	X	X

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a high probability of these resources being present, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist to conduct a field survey and recommend subsequent steps to be taken during project construction to reduce or avoid impacts on these resources—as described in mitigation measure PALEO-1b—in a report documenting the field survey, and with as-needed support from a registered geologist for unique geologic features not related to fossil localities or fossiliferous deposits.							
PALEO-1b Avoid or Reduce Impacts on Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements. If it is determined during planning, design, and project-level CEQA review that transportation network improvements or development projects would be located within an area that likely contains unique paleontological resources or unique geologic features (based on results of the work done in mitigation measure PALEO-1a), SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid or reduce impacts on these resources when feasible. If impacts cannot be avoided, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist prior to construction to: • Prepare a paleontological monitoring and mitigation plan, which will outline where monitoring should occur and procedures for discoveries, consistent with applicable regulations and guidelines. Such regulatory standards include the Antiquities Act of 1906, PRPA, and Public Resources Code requirements; regional and local policies of San Diego County and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Escondido, La Mesa, Lemon Grove, National City, Oceanside, San Diego, San Marcos, Santee, Solana Beach, and Vista; and guidelines of other transportation project sponsors such as the California Department of Transportation's Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance, Chapter 8: Paleontology (Caltrans 2014).	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
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• Establish procedures for monitoring and the possible preconstruction salvage of exposed unique resources if fossil-bearing rocks or unique geologic features have the potential to be affected. • Provide preconstruction coordination with contractors. • Be on site to observe during grading operations and oversee original cutting in previously undisturbed areas of sensitive geologic formations, temporarily halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, recover scientifically valuable specimens or ensure avoidance of the unique paleontological resource or unique geologic feature, and oversee fossil salvage operations and reporting.							
Greenhouse Gas Emissions							
GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans. No later than December 2023, SANDAG shall implement a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement the stated strategies or measures in local jurisdiction CAPs or GHG reduction plans. Examples of such projects to reduce GHG emissions include existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems, activities at the local level that reduce VMT, Smart Cities measures that result in the reduction of GHG, programs and infrastructure to divert organic waste from landfills, and tree planting. The new and/or revised grant program(s) shall: (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan's contribution to climate change.	X			X	X		

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To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG's satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding. Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction's adopted CAP or GHG reduction plan. Prior to December 2023, as part of next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program SANDAG shall: (1) continue to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and (2) make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions. Any new or updated CAP or GHG reduction plan receiving funding through this program shall also meet the following minimum criteria: • The CAP or GHG reduction plan shall be adopted by the jurisdiction's elected decision-making body. • The CAP or GHG reduction plan shall establish a locally appropriate 2030 GHG reduction target for communitywide GHG emissions derived from the State's legislative target for 2030 (as established by SB 32 or as amended by future legislation), and should establish long-term targets • The CAP or GHG reduction plan shall quantify, using substantial evidence, how local GHG reduction strategies, programs, and measures would meet or exceed the local GHG reduction target.							

Mitigation Measure	Implementation Timing				Responsible Party		
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• The CAP or GHG reduction plan shall establish a mechanism to monitor the plan's progress toward achieving the target, including reporting data to SANDAG consistent with, and inclusion in, the Climate Action Data Portal or similar database, and a requirement to amend the plan if it is not achieving adopted goals. Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively). SANDAG shall also pursue federal and State partnerships to leverage additional dollars for these programs. SANDAG shall document and report to the SANDAG Board of Directors the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis.							
GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure. SANDAG shall establish one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure. Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenants, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure. SANDAG shall include approximately $100 million by 2025 of the Electric Vehicle Program (Table 2-13 in Chapter 2 and Near-Term Action 9[b] in Appendix K), and approximately $5 million of Transportation Demand Management funding for an electric bike incentive program (Table 2-13 in Chapter 2).	X			X	X		

Mitigation Measure	Implementation Timing				Responsible Party		
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The funding for electric bikes will become available beginning in FY 2022 with the launch of a $500,000 pilot incentive program and will be expanded through FY 2025. This pilot program will reduce GHG emissions by providing funding for, at minimum, 200 electric bikes and associated services. The funding for zero-emission buses and infrastructure will become available in FY 2023 to enable investments in zero emission transit buses, zero emission school buses, and supporting infrastructure through partnerships with the transit agencies (the Metropolitan Transit System [MTS] and North County Transit District [NCTD]) and San Diego County Air Pollution Control District (APCD). This program will reduce GHG emissions by providing funding for, at minimum, 100 zero-emission buses, as well as associated fueling/charging infrastructure and services. Beginning in FY 2022 SANDAG will begin two planning strategies to inform transition to zero-emission goods movement: the California Energy Commission-funded Medium Duty/Heavy Duty EV Blueprint grant for San Diego Region in partnership with Port of San Diego, and the Caltrans- funded San Diego and Imperial Counties Sustainable Freight Implementation Strategy. SANDAG will also rely on the Portside Community Emissions Reduction Plan (CERP) and Maritime Clean Air Strategy (MCAS) to inform investment decisions. Investments in goods movement vehicle and infrastructure will begin in FY 2024. SANDAG shall also establish one or more programs to allocate approximately $30 million in funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles). Eligible entities could include, but are not limited to, school districts, water districts, local jurisdictions, TNCs, private businesses, and non-profit organizations. New funding will be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target. Beginning in FY 2023, SANDAG will formalize a partnership with CALeVIP San Diego County Incentive Project administrator to make available incentives for fleet charging infrastructure. Beginning in FY 2024, SANDAG will establish a vehicle incentive program							

Mitigation Measure	Implementation Timing				Responsible Party		
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that allocates funding incentives for public and private fleet vehicles. This program will reduce GHG emissions by providing funding for a minimum of 5,000 light-duty vehicles and/or chargers. To further support this mitigation measure, SANDAG shall also participate in federal and State processes to support transportation electrification as well as pursue federal, State, and local partnerships to leverage additional dollars for these programs.							
GHG-5c. Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere. Beginning immediately upon adoption of the proposed Plan and prior to December 2025 (adoption of the next Regional Plan), SANDAG shall establish a Nature-Based Climate Solutions Program that will restore or enhance natural infrastructure that uses or mimics natural processes to benefit people and wildlife. Through this program SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions. Examples include, but are not limited to, restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of fallow agricultural native coastal sage scrub and chaparral, and removal of fill within salt and freshwater and restoration with wetland habitat. Prior to implementation of any projects proposed for funding under this program, SANDAG shall prepare, or require the preparation of, studies demonstrating that such proposed projects would increase rates of carbon sequestration over baseline conditions. SANDAG shall document the proposed carbon sequestration for each project receiving funding under this program and provide a report to the SANDAG Board on an annual basis. SANDAG shall use the Nature-Based Climate Solutions Program (approximately $40 million) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Action 9(e) in Appendix K) to fund projects under this program. Additional funding could come from the TransNet Environmental Mitigation Program Fund for mitigation projects that require restoration and/or land management grants for the restoration of land to native	X			X	X		

Mitigation Measure	Implementation Timing				Responsible Party		
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habitat. SANDAG shall also pursue federal and State partnerships to leverage additional dollars for this program.							
GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. Subsequent to adoption of the proposed Plan and prior to January 2023, SANDAG shall adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and the associated GHG emissions. Investment in reliable technology and high-speed connectivity are critical to close the digital divide and the foundation of Smart Cities efforts to become more efficient, use less resources and reduce GHG. The Action Plan will identify specific actions, responsible parties, and a timeline for implementing the strategies identified in the Action Plan. Prior to December 2024, SANDAG commits to researching and evaluating methodologies for quantifying, where possible, the corresponding GHG reductions associated with improved access to remote services enabled by broadband (e.g., telehealth, remote work, distance learning, and other remote services). SANDAG shall implement the Next OS (approximately $32 million) identified in the proposed Plan (Table B-1, Page B-5 in Appendix K) to fund projects that advance Smart Cities efforts and close the digital divide. SANDAG shall also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs. SANDAG shall document SANDAG's funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis.	X			X	X		
GHG-5e. Implement Measures to Reduce GHG Emissions from Transportation Projects. During the planning, design, project-level CEQA review, construction, operation, and maintenance of transportation network improvements, SANDAG shall, and transportation project sponsors can and should, implement measures to reduce GHG emissions and	X	X	X	X	X	X	

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achieve zero-net energy, including but not limited to applicable transportation project measures from the California Air Pollution Control Officers Association's (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment's Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). GHG reduction measures include, but are not limited to, the following.
• Implement sustainable construction measures through construction bid specifications, including the following:
  ○ Use energy and fuel-efficient vehicles and equipment and/or use alternative fuel vehicles and equipment, where applicable.
  ○ Use lighting systems that are energy efficient, including light-emitting diode (LED) technology.
  ○ Use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements.
  ○ Recycle 50–75 percent of construction and demolition waste.
• Install efficient lighting (including LEDs) for traffic, street, and other outdoor lighting.
• Incorporate infrastructure electrification into project design (e.g., EV charging; charging for electric bikes) above minimum code requirements.
• Plan, design and construct all new, upgraded, and regularly maintained infrastructure with electricity demand shall demonstrate how such infrastructure will achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
• Incorporate and increase electric vehicle charging equipment and preferred EV parking spots into projects that include commuter parking areas.
• Include design measures (e.g., curb management strategies) to accommodate flexible fleets.
• Install solar photovoltaic canopies over parking areas.							

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• Design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. • Design measures to reduce water consumption, such as drought-resistant landscaping, smart irrigation systems, and other measures, including those listed in mitigation measures WS-1a and WS-1b in Section 4.18, Water Supply. • Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards or equivalent standards. • Funding for those measures that SANDAG selects would be included in individual project budgets.							

GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects. During the planning, design, project-level CEQA review, construction, and operation of development projects, the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to, applicable land use measures in CAPCOA's Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment's Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). These measures include, but are not limited to, the following.
• Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
  ○ Building or funding a major transit stop within or near development, in coordination with transit agencies.
  ○ Developing car-sharing and bike-sharing programs.
  ○ Providing pedestrian network improvements and a comprehensive bicycle network.
  ○ Providing traffic calming measures.
  ○ Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
	X	X	X	X			X

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○ Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network. ○ Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies. ○ Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy. ○ Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations. ○ Implementing measures to increase transit use through service frequency and affordability as identified through community engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations. ○ Building low stress bicycle networks including bike trails and connections, lanes, paring, and end of trip facilities. ○ Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets. ○ Implementing employer trip reduction measures to reduce employee trips and VMT such as vanpool and carpool programs, providing end-of-trip facilities, telecommuting, teleconferencing, and alternative work schedule programs. ○ Incorporating ride hailing and autonomous vehicle innovations. ○ Including design measures (e.g., curb management strategies) to accommodate flexible fleets. ○ Implementing a school bus program in areas currently not served by school buses. • Measures that reduce VMT through parking strategies based on the SANDAG Regional Parking Management Toolbox, including the following:							

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○ Parking pricing strategies consistent with the Toolbox. ○ Reduced minimum parking requirements. ○ Residential parking permit programs. ○ Designation of a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, with adequate passenger loading and unloading for those vehicles. ○ Adequate bicycle parking. ○ Other strategies in the SANDAG Regional Parking Management Toolbox. • Measures that reduce VMT through Transportation Systems Management (TSM), including measures included in Appendix DD of the proposed Plan. • Land use siting and design measures that reduce GHG emissions, including the following: ○ Developing on infill and brownfields sites. ○ Building high density and mixed-use developments near transit. ○ Developing within areas with high jobs gravity to increase destination accessibility. ○ Orienting development towards transit or an active transport corridor. ○ Retaining onsite mature trees and vegetation, and planting new trees. ○ Measures to plan, design, and build all new, renovated, and upgraded development and infrastructure with electricity demand to achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions. • Measures that increase vehicle efficiency or reduce the carbon content of fuels, including constructing EV charging, alternative fueling stations, or neighborhood electric vehicle networks or charging for electric bicycles consistent with SANDAG's regional readiness planning for alternative fuels. • Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.							

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• Measures to reduce water consumption, including those listed in mitigation measure WS-1a and WS-1b in Section 4.18.							
AQ-3b Reduce Diesel Emissions During Construction from Off-Road Equipment. See Air Quality section for Mitigation Measure AQ-3b.							
AQ-3c Reduce Diesel Emissions from On-Road Vehicles. See Air Quality section for Mitigation Measure AQ-3c.							
AQ-4 Reduce Exposure to Localized Particulate and/or TAC Emissions. See section for Mitigation Measure AQ-4.							
TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects. See Transportation section for Mitigation Measure TRA-2.							
WS-1a Implement Water Conservation Measures for Transportation Network Improvements. See Water Supply section for Mitigation Measure WS-1a.							
WS-1b Implement Water Conservation Measures for Development Projects. See Water Supply section for Mitigation Measure WS-1b.							
Hazards and Hazardous Materials							
Mitigation measures are not required.							
Hydrology and Water Quality							
Mitigation measures are not required.							

Mitigation Measure	Implementation Timing				Responsible Party		
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Land Use and Land Use Planning							
LU-1 Provide Access and Connections for Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, including new rail extensions, Mobility Hubs, and roadway widening improvements, SANDAG shall, and other transportation project sponsors can and should, design new transportation network improvements within established communities to avoid the creation of barriers that physically divide such communities. Where avoidance is not feasible, measures to reduce the creation of barriers that physically divide such communities should be considered, including but not limited to, the following: • Selecting alignments within or adjacent to existing public rights-of-way. • Designing sections above- or below-grade to avoid or reduce physical division of communities, where feasible. • Providing direct crossings, overcrossings, or undercrossings at regular intervals for various modes of travel (e.g., pedestrians/bicyclists, vehicles).	X				X	X	
Mineral Resources							
MR-1a Conserve Aggregate and Mineral Resources During Planning and Design of Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should avoid or reduce impacts on known aggregate and mineral resources and locally important mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize direct and indirect impacts on these lands. Aggregate and mineral resource areas, especially MRZ-2 areas, should be maintained in open space or other general plan land use and zoning designations that allow for extraction of mineral resources.	X						X
MR-1b Conserve Aggregate and Mineral Resources During Planning and Design of Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, avoid loss of known aggregate and mineral resources and locally important mineral resource recovery sites, where feasible.	X				X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
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Where avoidance is infeasible, SANDAG shall, and other transportation project sponsors can and should, minimize direct and indirect impacts on the availability of known resources and recovery sites through measures that include, but are not limited to, the following: • Designing transportation network improvements in a manner (such as buffer zones or the use of screening) that do not preclude adjacent or nearby extraction of aggregate and mineral resources following completion of the improvement and during long-term operations.							
Noise and Vibration							
NOI-1a Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement construction noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable noise standards or prevent substantial temporary increases in noise levels in the planning, design, project-level CEQA review, and construction of development projects or transportation network improvements. These measures should include, but are not limited to, the following. • Maintain construction equipment and vehicles per manufacturers' specifications and fit equipment with noise suppression devices (e.g., improved mufflers, equipment redesign, intake silencers, wraps, ducts, engine enclosures). • Minimize construction equipment idling when equipment is not in use. • Provide buffer zones or other techniques between stationary equipment (such as generators, compressors, rock crushers, and cement mixers) and the noise receptor. • For impact tools (e.g., jack hammers, pavement breakers, rock drills), use hydraulically or electrically powered tools; where use of pneumatic tools is unavoidable, use an	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
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exhaust muffler on the compressed air exhaust. Use external jackets on the tools themselves. Use quieter procedures such as drills rather than impact equipment. • For rock-crushing or screening operations, place material stockpiles as a noise barrier blocking line-of-sight between the operations and receptors. In addition, for pile driving or other activities generating greater than 90 dBA during construction of development projects or transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement noise reduction measures, including but not limited to, the following. • Erect temporary noise barriers around the noise generating activities, particularly adjacent to residential buildings. • Implement "quiet" pile driving technology (such as pre-drilling of piles, the use of more than one pile driver to shorten the total pile driving duration) or vibratory pile-driving, where feasible, in consideration of geotechnical and structural requirements and conditions. • Monitor the effectiveness of noise attenuation measures by performing compliance noise monitoring at noise-sensitive receptors during construction.							
NOI-1b Implement Operational Noise Reduction Measures for Transportation Network Improvements. During the planning, design, and project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement operational noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable noise standards or prevent substantial permanent increases in noise levels. These measures should include, but are not limited to, the following. • Utilize techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, building insulation, and traffic calming measures.	X	X			X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
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In addition, for railway projects, SANDAG shall, and other transportation project sponsors can and should, implement measures to substantially lessen noise levels to achieve FTA/FRA railway noise exposure thresholds during planning, design, and project-level CEQA review. These measures should include, but are not limited to, the following. • Use wheel treatments such as damped wheels and resilient wheels. • Use vehicle treatments such as vehicle skirts and under car acoustically absorptive material. • Establish sufficient buffer zones between railroad and receptors. • Use sound reduction barriers such as landscaped berms and dense plantings. • Install sound insulation treatments for impacted structures. • Implement FRA "quiet zone" requirements in cooperation with local jurisdictions (i.e., reducing or eliminating the requirement for train locomotives to blast their horns) for Plan improvements at new and existing at-grade rail crossings. • Conduct project-level noise analysis for new and expanded rail corridors and features such as new rail tracks and double-tracking to ensure that measures are implemented to substantially lessen noise levels that exceed applicable standards.							
NOI-1c Implement Operational Noise Reduction Measures for Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should implement noise reduction measures to meet local noise standards, including but not limited to, the following. • Use land use measures such as zoning, site design, and buffers to ensure that future development is noise compatible with adjacent transportation facilities and land uses. • Site noise-sensitive land uses away from noise-generating facilities. Once sited, orient outdoor use areas of land uses (e.g., backyards) away from adjacent noise sources to shield area with buildings, or construct noise barriers to reduce exterior noise levels.	X						X
NOI-2a Implement Construction Groundborne Vibration and Noise Reduction Measures.	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures during design, project-level CEQA review, and construction of transportation network improvements or development projects, to reduce groundborne vibration and noise levels generated by onsite construction equipment, including, but not limited to, the following. • Predrill pile holes within 300 feet of any sensitive receptor. • Where feasible, use soil mix wall for excavation. • Incorporate a comprehensive construction vibration specification into all construction bid documents. • Require contractor to assess potential for damage to buildings within 100 feet of a tunnel boring. • Require contractor to perform a physical survey to document existing condition of a building that might incur damage. • If pile driving and/or other vibration-generating construction activities are to occur within 60 feet of a historic structure whose integrity would be impaired by exceeding the vibration threshold for historic structures, implement measures to reduce vibration impacts, including but not limited to, the following. ○ Retain a structural engineer or other appropriate professional to determine threshold levels of vibration and cracking that would damage any historic structure, and design construction methods to not exceed the thresholds. ○ Require groundborne vibration monitoring of nearby historic structures. Implement a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for vibration damage to historic structures. ○ Require contractor to assess potential damage to buildings within 200 feet of areas where excavation requires the use of driven piles either by impact or vibratory methods.							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
NOI-2b Implement Groundborne Vibration and Noise-Reducing Measures for Rail Operations. SANDAG shall, and other transportation project sponsors can and should, implement vibration-reducing measures to meet FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, providing special track support systems such as floating slabs, resiliently supported ties, high-resilience fasteners, and ballast mats. In addition, rail operators can and should implement groundborne vibration and noise-reducing measures to meet applicable FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, the following. • Conduct rail grinding on a regular basis to keep tracks smooth. • Conduct wheel truing to re-contour wheels to provide a smooth running surface and removing wheel flats. • To reduce groundborne noise, achieve vibration isolation of the track from underlying surface using the following. o Highly resilient direct fixation fasteners o Rail suspended fastener system o Isolated slab track system o Floating slab track system	X	X	X		X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
Population and Housing							
POP-2a Design Development Projects to Reduce Displacement. During planning, design, and project-level CEQA review of land development projects, the County of San Diego, cities, and other local jurisdictions can and should develop design strategies to avoid or reduce substantial displacement of people or housing units, including affordable housing units, where consistent with overall goals to promote housing growth, including the provision of affordable housing. For development projects that would displace people or housing units, alternative designs to retain existing housing on site, alternative project site locations, and provision of replacement housing as a mitigation measure can and should be evaluated. While displacement should be considered during project evaluations, avoidance or reduction of displacement should not be employed where it would undermine achievement of housing goals, including the development of transit-oriented development and the provision of affordable housing.	X						X
POP-2b Design Transportation Network Improvement Projects to Reduce Displacement. SANDAG shall, and other transportation project sponsors can and should, identify feasible project alignments during planning, design, and project-level CEQA review that avoid or reduce permanent property acquisitions that would result in the substantial displacement of people or housing units. Where avoidance is not feasible, measures to reduce substantial displacement should be considered including, but not limited to, the following: • Selecting alignments within existing public ROWs. • Designing sections above- or below-grade to avoid property acquisition that would cause displacement of people or housing units, including affordable housing. • Selecting alignments within properties that result in the least amount of displacement. For example, acquiring vacant or undeveloped portions of property rather than portions occupied by housing units. • Work with local jurisdictions to identify opportunities to develop housing as part of transportation projects.	X				X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
Public Services and Utilities							
PS-1 Implement Mitigation Measures for New/Expanded Public Service Facilities. During planning, design, and project-level CEQA review of development of public facilities projects, the County of San Diego, cities, and other public service providers can and should implement mitigation measures to avoid or reduce significant environmental impacts associated with the construction of new or expanded public facilities. Mitigation measures should be implemented by public service providers directly responsible for the construction or expansion activities. Significant environmental impacts requiring mitigation may include, but are not limited to, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, transportation, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects and transportation network improvements.	X	X					X
REC-1 Implement Mitigation Measures for Parks and other Recreational Facilities. During planning, design, and project-level CEQA review of development projects and transportation network improvements and programs, the County of San Diego, cities, and other public service providers can and should, SANDAG shall, and other transportation project sponsors can and should implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. Mitigation measures could include expanding or improving existing recreation facilities to accommodate additional use, or building new recreation facilities.	X	X			X	X	X
U-1a Implement Mitigation Measures for New/Expanded Wastewater, Stormwater, Electrical, Natural Gas, and Telecommunications Facilities Associated with Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other wastewater, stormwater, and telecommunications management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded facilities. Mitigation measures should be implemented by utilities management agencies directly responsible for the approval and	X	X					X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
construction of new or expanded facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.							
U-1b Implement Mitigation Measures for New/Expanded Stormwater Facilities Associated with Transportation Network Improvements. During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, be required to implement stormwater BMPs during planning, design, project-level CEQA review, and project construction. Measures include, but are not limited to, implementation and construction of sand filters, bio strips, bioswales, detention basins, storage vaults, and infiltration basins, which would reduce pollutant runoff into the storm drain system.	X	X			X	X	
U-2a Implement Mitigation Measures for New/Expanded Solid Waste Facilities. During planning, design, and project-level CEQA review of solid waste facility projects, the County of San Diego, cities, and other solid waste management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded solid waste facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.	X						X
U-2b Reduce Construction Waste. During planning, design, and project-level CEQA review, and prior to the construction or demolition of transportation network improvement projects and development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures to reduce construction	X	X			X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
waste to comply with waste reduction goals identified by the state and local agencies, including but not limited to the following: • Ensure that source reduction techniques and recycling measures are incorporated into project construction/demolition. • Reuse and/or recycle construction and demolition waste. This mitigation measure would extend the life of existing landfills and delay the need to construct new or expanded landfills.							
U-2c Reduce Operational Waste. During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should integrate green building waste management measures such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED), Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures include, but are not limited to, the following: • Prepare and apply a waste management plan that promotes solid waste diversion. • Implement source reduction through (1) using materials that are more durable and easier to repair and maintain, (2) designing to generate less scrap material through dimensional planning, (3) increasing recycled content, (4) using reclaimed materials, and (5) using structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). • Reuse existing structures and shells in renovation projects. • Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable building components. • Develop an indoor recycling program and space.	X	X					X
Transportation							
TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects.	X		X		X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
During the project design and project-level CEQA review phases of transportation network improvements or land use development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement project-level VMT reduction measures in addition to those included in the Regional Plan. VMT reducing measures include, but are not limited to, the following: • **Require TDM Strategies –** SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible TDM strategies to help offset their impacts. This mitigation measure will further reduce the proposed Plan's VMT because the potential VMT reductions associated with four TDM programs, which include pooled rides (private), vanpool, carshare, and the implementation of a regional TDM ordinance, were not incorporated into ABM2+ . Strategies such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Plan can and should also be used, include walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, and bike sharing programs. • **Reduce Parking Minimums** – The County of San Diego, cities, and other local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 12.5 percent (CAPCOA 2010). • **Implement Additional Active Transportation Facilities Not Included in the Proposed Plan –** To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Plan includes funding for							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
Complete Streets investments in Mobility Hub areas including implementation of bicycle and pedestrian facilities that provide local connections throughout Mobility Hub areas; however, the associated VMT reductions from this funding could not be modeled, so this mitigation measure would achieve further VMT reductions. Direct access to bicycle facilities can reduce project-related VMT by 0.65 percent, while incorporating new pedestrian facilities can reduce project VMT by up to 2 percent (CAPCOA 2010). • **Road Diet and Traffic Calming –** The County of San Diego, cities, and other local jurisdictions can and should implement road diets or other traffic calming measures within their local roadway network, where feasible, to further reduce VMT-related impacts that may be associated with land development projects or local transportation projects. Road diet and traffic calming measures would also be eligible for Complete Streets funding in Mobility Hub areas. The reduction of existing travel lanes in favor of multi-modal facilities or additional public space can help to calm and deter vehicular trips within an area or along a roadway segment. Traffic calming measures can reduce VMT by 0.5 percent (CAPCOA 2010). It should be noted that the proposed Plan includes funding, through grants, for local jurisdictions to implement road diets.							
GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5a.							
GHG-5d Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5d.							
GHG-5f Implement Measures to Reduce GHG Emissions from Development Projects. See Greenhouse Gas Emissions section for Mitigation Measure GHG-5f.							
Tribal Cultural Resources							
TCR-1a Implement Tribal Cultural Resources Mitigation Measures for Development Projects and Transportation Network Improvements. During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a TCR,	X	X	X	X	X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors, can and should develop project-level protocols and mitigation measures with consulting tribes, consistent with PRC Section 21080.3.2(a) to avoid or reduce impacts on TCRs during construction and operation of development projects and transportation network improvements. The County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation projects sponsors can and should identify these resources through records searches, survey, consultation, or other means, in order to develop minimization and avoidance methods where possible, and consult with Native American tribes participating in AB 52 consultation to develop mitigation measures for TCRs that may experience substantial adverse changes. To assist AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should comply with the following best practices for complying with AB 52: • Get needed information in order to preserve the options of avoidance of cultural resources or preservation in place early in the planning process. • Build working relationships with tribes that are traditionally and culturally affiliated to the project area or to the agency's geographic area of jurisdiction. In consultation, agencies should deal with officially designated representatives of the tribe who have written designation to speak on behalf of the tribe. • Avoid inadvertent discoveries of Native American burials and work with tribes in advance to determine treatment and disposition if burials are inadvertently discovered. • Unless the tribe agrees in writing, the project applicant or the project applicant's legal advisors, using a reasonable degree of care, should maintain the confidentiality of the information exchanged for the purposes of preventing looting, vandalism or damage to a tribal cultural resource and should not disclose the information to a third party. In the absence of any specific mitigation measures developed during AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should develop standard mitigation measures as set forth in PRC Section 21084.3 (b).							

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
The following are standard mitigation measures for TCRs. 1. Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. 2. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: a. Protecting the cultural character and integrity of the resource b. Protecting the traditional use of the resource c. Protecting the confidentiality of the resource 3. Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. 4. Protecting the resource as agreed upon during the tribal consultation process.							
TCR-1b Implement Monitoring and Mitigation Programs for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should implement monitoring and mitigation measures to reduce impacts on both known and undiscovered TCRs, during construction and operation activities, as applicable, including but not limited to the following: • Require TCR areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor. • Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist	X	X	X	X	X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
is not present, shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in consultation with Native American tribes. • The qualified archaeologist shall be responsible for ensuring that all artifacts and records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate regional center focused on the care, management, and use of archaeological collections. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants. • Upon completion of all ground disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency which describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.							
Water Supply							
WS-1a Implement Water Conservation Measures for Transportation Network Improvements. SANDAG shall, and other transportation project sponsors can and should, implement feasible water conservation measures during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements, including, but not limited to, the following: • Comply with all prevailing State, regional, and local government plans, laws, and policies regarding water conservation and efficiency. • Install drip or other water-conserving or weather-based irrigation systems for landscaping.	X	X	X	X	X	X	

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent State, regional, and local government plans, laws, and policies. • Incorporate the use of reclaimed water (also known as recycled water) during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements to reduce the use of potable water.							
WS-1b Implement Water Conservation Measures for Development Projects. The County of San Diego, cities, and other local jurisdictions can and should implement feasible water conservation measures during planning, design, and project-level CEQA review of development projects, including, but not limited to, the following: • Install drip or other water-conserving or weather-based irrigation systems for landscaping. • Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent State, regional, and local government plans, laws, and policies. • Install low-flow plumbing fixtures. • Install water-efficient appliances. • Incorporate the use of reclaimed water. Measures to incorporate reclaimed water may include, but are not limited to, onsite water recycling; the use of recycled water to fill lakes, ponds, and ornamental fountains; the use of recycled water for irrigation, to mix concrete, and to control dust at construction sites; the use of recycled water for certain industrial processes and for flushing toilets and urinals in nonresidential buildings; and the use of recycled water for street sweeping purposes.	X		X	X			X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
WS-1c Ensure Adequate Water Supply for Development Projects. During planning, design, and project-level CEQA review for development projects, the County of San Diego, cities, and other local jurisdictions can and should ensure that adequate water supply will be available to meet or satisfy projected water demands, consistent with applicable UWMPs, Master Plans, and General Plan projections of water supply and demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, an SB 221 Water Supply Verification, or other water supply analysis.	X						X
WS-2 Implement Groundwater Measures to Ensure Sustainable Yield For Development Projects. The County of San Diego, cities, and other local jurisdictions can and should ensure sustainable yield of groundwater basins during planning, design, and project-level CEQA review of development projects, by taking measures including, but not limited to, the following: • Participate in a groundwater trading program to enable permanent transfer and potentially long-term and short-term lease of baseline pumping allocations to allow groundwater users or new development to purchase needed groundwater allocation from others. • Use drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and offsite mitigation.	X						X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.							
WS-3 Implement Measures for New or Expanded Water Facilities. During planning, design, and project-level CEQA review of development projects and water projects, MWD, SDCWA, the County of San Diego, cities, and other local jurisdictions can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded water facilities. Mitigation measures should be implemented by water management agencies directly responsible for the construction of new or expanded water facilities. Significant environmental impacts requiring mitigation may include but are not limited to air quality, noise, traffic, biological resources, cultural resources, paleontological resources, tribal cultural resources, energy, greenhouse gas emissions, hydrology and water quality, and water supply.	X	X					X
Wildfire							
WF-1 Reduce Wildfire Risk for Development and Transportation Projects. During planning, design, and project-level CEQA review of transportation network improvements or development projects located in SRAs or in LRAs classified as VHFHSZs, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions such as fire protection agencies can and should, ensure that project sponsors implement measures to reduce impacts from wildfires. Such measures include, but are not limited to, the following: • Establishing site-specific safety measures, such as fire protection plans, to protect local resources from wildfire. Fire protection plans should be based on appropriate wildfire modeling, and include information related to reducing ignition risks during construction and operation of facilities. • Adhering to the most updated building code requirements (usually updated every 3 years), including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.	X		X	X	X	X	X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
• Improving access by designing and improving roads, transit facilities, gates, and access plans to accommodate emergency response and evacuation if necessary. • Ensuring sufficient emergency water supply for existing and new projects by working with water management agencies and plans. • Enforcing defensible space regulations to keep overgrown and unmanaged vegetation and other flammable material away from structures.							
WF-2 Reduce Wildfire Risk Related to Wildfire-Associated Infrastructure Required to Support Development or Transportation Projects. During planning, design, and project-level CEQA review of transportation network improvements or development projects located in SRAs or in LRAs classified as VHFHSZs, the County of San Diego, cities, other local jurisdictions, and public service and utility providers can and should ensure that project sponsors implement measures to reduce impacts from wildfire-associated infrastructure. Such measures include, but are not limited to, the following: • Establishing site-specific safety measures, such as fire protection plans, for new infrastructure and facilities required to provide public services and utilities for new development in order to protect local resources from wildfire. • Adhering to wildfire safety and mitigation plans established by local utilities companies, including design and construction standards, inspection schedules, and emergency preparedness. • Adhering to the most updated building code requirements (usually updated every 3 years) for structures related to public services and infrastructure, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers. • Ensuring sufficient emergency water supply (local water providers) for existing and new projects.	X						X
WF-3 Reduce Post-Fire Risks Related to Flooding, Landslides, Slope Instability, or Drainage Changes for Development and Transportation Projects.	X				X		X

Mitigation Measure	Implementation Timing				Responsible Party		
	Planning/Design/ CEQA Review	Grading/ Construction	Post-Construction	Ongoing	SANDAG	Transportation Project Sponsor	Land Use Agency/ Special District
During planning, design, and project-level CEQA review of development projects or transportation network improvement projects in SRAs or in LRAs classified as VHFHSZs, SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, ensure that project applicants work with local communities to implement measures to reduce post-fire impacts. Such measures include, but are not limited to, the following: • Treating wildfire burned areas to control stormwater runoff prior to winter rains. • Restoring wildfire areas by planting native vegetation cover or encouraging the regrowth of native species using best practices as soon as possible to aid in control of stormwater runoff. • Reducing potential for future flood hazard by sufficient removal of dead, woody vegetation along watercourses following a catastrophic fire to reduce the risk of future catastrophic fires. • Including fire hazard reduction measures that balance forest health with fuel-reducing activities while considering the potential effect on flood management.							

APPENDIX P1
RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft Environmental Impact Report (Draft EIR) for San Diego Forward: The 2021 Regional Plan (the Regional Plan) was distributed for public review on August 27, 2021, for a 45-day public review period that ended October 11, 2021. The Draft EIR and all appendices were available for review online at www.sdforward.com; at San Diego Association of Governments (SANDAG) offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library facilitates inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the public comment period.

A total of 51 comment letters, web comments, or other written documents such as emails (hereinafter collectively referred to as "comment letters") were received before the close of the public review period. Table P-1 provides a list of all comments received, including the name of the public agency, organization, or individual that submitted the letter and the date of the letter. Each comment letter also has been assigned an identification number in Table P-1.

In this appendix, each comment letter is reproduced in its entirety and is aligned side-by-side with the response(s) to the letter. Where commenters provided multiple comments, each comment is identified with a bracket and an identifying number in the margin of the comment letter. All comment letters received on the Draft EIR were evaluated for significant environmental issues, and written responses to comments on environmental issues were prepared. In addition to comments related to environmental issues, several of the comment letters submitted on the Draft EIR also include individual comments on the content of the Plan itself that are not related to the adequacy of the Draft EIR. In those cases, this document identifies the specific reference number assigned to that comment in the matrix of Regional Plan comments and responses where the response can be found (e.g., "Please see the response to Plan comment 901"). For ease of reference the matrix of responses to comments on the Regional Plan is included as Appendix P.2 to the Final EIR.

MASTER RESPONSES

SANDAG has prepared the following two Master Responses dealing with common themes raised in the comment letters:

- Master Response 1: Draft EIR Evaluates a Reasonable Range of Alternatives
- Master Response 2: Mitigation Measures that Other Agencies "Can and Should" Implement

The text of each Master Response is provided below. Individual responses reference the Master Response number when all or part of a response is included within a Master Response (e.g., "Please see Master Response 1").

Table P1-1
List of Comment Letters on the Draft EIR for the Draft 2021 Regional Plan

Identification Number	Public Agency, Organization, or Individual	Date of Letter
1	Office of Joel Anderson	10/11/2021
2	Dr. Tim Bilash	10/11/2021
3	Patricia Borchmann	9/24/2021
4	Mike Brower	10/11/2021
5	Mike Bullock	10/11/2021
6	Climate Action Campaign	10/11/2021
7	City of Carlsbad	10/11/2021
8	Center for Biological Diversity	10/11/2021
9	California Department of Fish and Wildlife	10/11/2021
10	California Coastal Commission	10/11/2021
11	City of Coronado	10/6/2021
12	County of San Diego	10/11/2021
13	City of Del Mar	10/4/2021
14	Descanso Community Planning Group	10/4/2021
15	Endangered Habitats League	10/11/2021
16	Friends of Rose Creek	10/11/2021
17	Friends of Rose Canyon	10/11/2021
18	David Grubb (Quality of Life Coalition)	10/11/2021
19	Toshi Ishihara	9/17/2021
20	Jacumba Community Sponsor Group	10/11/2021
21	Craig Jones	9/17/2021
22	San Diego County Local Agency Formation Commission	9/30/2021
23	Libby Lucas	10/11/2021
24	James Marple	9/3/2021*
25	City of Oceanside	10/11/2021
26	City of Poway	10/11/2021
27	City of San Diego	10/11/2021
28	City of San Marcos	10/7/2021
29	Southern California Tribal Chairmen's Association	9/8/2021
30	San Diego County Air Pollution Control District	10/11/2021
31	San Diego County Regional Airport Authority	10/11/2021
32	San Diego Transportation Equity Working Group	10/8/2021
33	Sierra Club San Diego	10/11/2021
34	Chatten Brown, Carstens & Minteer LLP (on behalf of Sierra Club San Diego)	10/11/2021
35	Save our Forest and Ranchlands/Cleveland National Forest Foundation	10/7/2021
36	City of Solana Beach	10/11/2021
37	Southwest Wetlands Interpretive Association	10/11/2021

Identification Number	Public Agency, Organization, or Individual	Date of Letter
38	United States Fish and Wildlife Service	10/8/2021
39	Karin Zirk	10/10/2021
Comments Received via Website		
40	Unidentified Web Comment	9/17/2021
41	Unidentified Web Comment	9/20/2021
42	Bruce Higgins	8/28/2021
43	Brent Tanner	9/30/2021
44	Craig Forman	8/28/2021
45	John Wotzka	8/31/2021
46	James Ferguson	8/28/2021
47	Craig Nelson	8/31/2021
48	Philip Muniz	8/28/2021
49	Justin Wong	9/3/2021
50	Justin Wong	9/3/2021
51	Elizabeth Fattah	10/11/2021

*Original comment submitted by Mr. Marple was inadvertently left blank. SANDAG subsequently contacted Mr. Marple and received the full comment letter on November 11, 2021.

MASTER RESPONSE 1: DRAFT EIR EVALUATES A REASONABLE RANGE OF ALTERNATIVES

INTRODUCTION

Comments assert that the range of alternatives evaluated in the EIR does not meet the California Environmental Quality Act's (CEQA's) requirement to evaluate a reasonable range of potentially feasible alternatives that would avoid or substantially reduce the project's significant environmental impacts. Comments also assert that all alternatives evaluated in the Draft EIR are infeasible for financial and other reasons because they accelerate all transit and alternative transportation projects to the first 10 years of the Plan with insufficient funding. Comments also state that the Draft EIR should have considered a number of additional alternatives, including:

- A feasible alternative that would substantially reduce vehicle trips and vehicle miles traveled (VMT).
- Save Our Forests and Ranchlands' (SOFAR's) and Cleveland National Forest Foundation's (CNFF's) Climate, Housing, Transit Alternative.
- An alternative that substantially lessens significant impacts on biological resources.
- An alternative with VMT reduction features such as subsidized transit fares and microtransit.
- Southwest Wetlands Interpretive Association's (SWIA's) alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.
- An alternative that reduces greenhouse gas (GHG) emissions consistent with State goals or achieves net zero emissions.

As explained below, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider the alternatives listed above.

RANGE OF ALTERNATIVES

As discussed in Chapter 6, *Alternatives Analysis,* of the Draft EIR, nine potential alternatives were initially considered for further detailed analysis. Of these, three alternatives to the proposed Plan were evaluated in detail. In addition to the no project alternative, the alternatives evaluated in detail included an alternative that consists of the 2019 Federal Regional Transportation Plan (RTP) transportation network and land use pattern with new value pricing and user fees policies; and an alternative that consists of the proposed Plan transportation network, a land use pattern that restricts regional growth to mobility hubs, and includes more progressive value pricing and user fees policies than what is included in the proposed Plan. The three alternatives evaluated in detail are described in Draft EIR Section 6.2 (pages 6-2 through 6-8).

They are as follows:

- Alternative 1: No Project
- Alternative 2: 2019 Transportation Network with New Value Pricing and User Fee Policies
- Alternative 3: All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies

Draft EIR Section 6.5 (pages 6-9 to 6-16) explains why other alternatives suggested by the public during EIR scoping were not evaluated in detail, either because they did not meet the project objectives, they were potentially infeasible, or they were similar to the alternatives already evaluated in detail.

ALTERNATIVES RESPOND TO PUBLIC CONCERNS EXPRESSED DURING SCOPING

As the Draft EIR explains (p. 6-1), SANDAG listened to public input expressed during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, such as providing more compact land use patterns, substantially lowering transit fares, and substantially increasing the cost of driving.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Plan. Courts have noted that for complex projects with a wide scope, "it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects" (*Sierra Club v. City of Orange* (2008) 163 Cal. App. 4th 523).

FEASIBILITY OF ALTERNATIVES EVALUATED IN DETAIL

The feasibility of alternatives is considered twice in the CEQA process. At the outset, the Draft EIR considered a reasonable range of alternatives that are "potentially feasible" (CEQA Guidelines Section 15126.6(a)). At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).)

This final determination of feasibility may include policy considerations. Where the feasibility of alternatives evaluated in the EIR is dependent upon changes in existing laws, regulations, or funding patterns for transportation improvements, the SANDAG Board must consider the likelihood that such changes will occur within the time frame for implementation of relevant elements of the proposed Plan.

ALTERNATIVES SUGGESTED BY COMMENTERS

General Principles. Alternatives suggested by commenters include, but are not limited to:

- A feasible alternative that would substantially reduce vehicle trips and VMT.
- SOFAR's and CNFF's Climate, Housing, Transit Alternative.
- An alternative that substantially lessens significant impacts on biological resources.
- An alternative with VMT reduction features such as subsidized transit fares and microtransit.
- SWIA's alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.
- An alternative that reduces GHG emissions consistent with State goals or achieves net zero emissions.

Some of the alternatives suggested by commenters are variations of alternatives that the Draft EIR evaluated in detail. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR, or to consider additional potential alternatives that are not "considerably different" than those already evaluated in the EIR. Other alternatives suggested by commenters are alternatives to one component of the proposed Plan, e.g., transit-emphasis alternatives, rather than comprehensive alternatives addressing the Sustainable Communities Strategy (SCS) and highway network improvements as well as transit. To be legally adequate under federal transportation law and Senate Bill (SB) 375, the proposed Plan is required to address transit projects, highway projects, and sustainable land use patterns; all three components are integrated into the basic project objectives described in EIR Section 2.4 (page 2-6). An EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. Also, an EIR need not evaluate in detail alternatives that would not substantially lessen the proposed project's significant environmental impacts.

The potential alternatives proposed for evaluation in comments on the Draft EIR either are not considerably different than those evaluated in the Draft EIR, do not address all project components, do not meet most basic project objectives, do not substantially reduce the proposed Plan's significant impacts, and/or are infeasible. Selected individual potential alternatives are discussed below

Alternative that Substantially Reduces VMT Below Existing Levels

Commenters suggest the Draft EIR should have evaluated a project alternative that substantially reduces VMT below existing levels. Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the mobility hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower total VMT than the proposed Plan, though still above existing levels. An alternative including *further* VMT-reduction measures to reduce total VMT below existing levels is not currently feasible for several reasons, including:

- *Further* substantial changes needed in State and federal policy and legislation. These would include still *further* changes in State road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.
- Lack of funding for *further and accelerated* major transit service improvements (recognizing that, as discussed in additional detail in subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or

collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already raises the fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.
- Lack of authority for SANDAG and local governments to implement such *further* measures. For example, SANDAG has no authority to increase State road pricing, or require local governments to implement land use or parking policies.
- SANDAG's inability to control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, "CEQA is not intended as a population control measure" (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 220).

SOFAR's and CNFF's Climate, Housing, Transit Alternative

This alternative was proposed in scoping, but considered and rejected from detailed consideration in the Draft EIR; in response to a later Draft EIR comment letter reiterating it should have been included, further explanations for rejection are included in the Final EIR's responses to SOFAR's and CNFF's Draft EIR comment letter.

As explained in the Draft EIR (pp. 6-14 and 6-15), some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3. These include comprehensive transit investments in: high-speed commuter rail; tunneling and double-tracking where feasible; rail line straightening, higher-speed and higher-frequency transit with separate rights-of-way, fewer stops, grade separation, and new high-speed lines; a Central Mobility Hub that connects to the airport as well as to transit elements offering further interconnectivity throughout the San Diego region; and expanded local transit and shared mobility. The proposed Plan and Alternative 3 also include an intensified, compact land use, as well as expanded active transportation infrastructure improvements.

This alternative includes the following major components that were not included in the proposed Plan or EIR alternatives, for the reasons discussed below:

- A "transit first" plan that substantially reduces VMT and provides substantive benefits in transit/bike/walk mode share and advancing all transit projects to the first 10 years of the Plan.
- Prioritize transit/active transit over managed lanes.
- Accelerate implementation of the Los Angeles–San Diego–San Luis Obispo Rail Corridor (LOSSAN) double-track rail project and Miramar tunnel and rail line straightening project.

With regards to accelerating transit to the first 10 years of the Plan, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP), are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by the California Department of Transportation (Caltrans).

With regards to prioritizing transit over managed lanes and accelerated implementation of rail projects, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative. The model run assumed no new managed lanes (only transit lanes), and accelerated the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR's and CNFF's Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the Miramar Tunnel rail line results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

In summary, the Climate, Housing, Transit alternative was not selected for detailed consideration in the EIR because:

- Some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3.
- It is infeasible to accelerate transit to the first 10 years of the Plan and redirect all roadway funding to transit.
- The Climate, Housing, Transit alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.
- It is infeasible to achieve the GHG and VMT reduction goals proposed in the Climate, Housing Transit alternative; see Draft EIR p. 6-15 through 6-16 and the discussion below regarding the infeasibility of an alternative that reduces GHG emissions consistent with State goals.

Alternative that Substantially Lessens Significant Impacts on Biological Resources

A commenter suggested an alternative that would avoid or substantially lessen impacts on biological resources. As discussed in Section 4.4, *Biological Resources*, of the EIR the impacts on biological resources were analyzed at a programmatic level based on best available information. Impacts were analyzed based on the programmatic footprint developed for the 2021 Regional Plan, and mitigation measures were identified accordingly that achieve substantial reductions to impacts. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level.

The Plan places emphasis on maximizing the use of existing facilities and focusing growth within urban areas to preserve habitat and open space. In addition, Alternative 3 has a smaller footprint and would further reduce impacts on biological resources. In summary, the proposed Plan and Alternative 3 both substantially reduce

biological resources with the implementation of mitigation measures and the proposed footprints, and a new alternative that also reduces such impacts is not required for an adequate range of alternatives.

Alternative with Subsidized Transit Fares and Microtransit

Another commenter requested that alternatives that include features such as subsidized transit fares and microtransit be considered. SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, including subsidized transit fares and microtransit. As discussed in Chapter 6, Alternative 3 (All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies) includes free transit and microtransit by 2035. Because Alternative 3 would not reduce any of the Plan's significant impacts to less-than-significant levels, just modifying the transportation network to include subsidized transit fares and microtransit would not be enough to substantially reduce VMT and GHG emissions as compared to the proposed Plan.

In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by fiscal year (FY) 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, Metropolitan Transit System (MTS), and North County Transit District (NCTD) are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19.

SWIA's Alternative that Prioritizes Transit Over Managed Lanes, Institutes a Much More Rigorous Monitoring System, Adds a Regional Habitat Conservation Fund, and Ensures Enforcement of Plan Compliance

Reasons for not including each of the four components in an EIR alternative are discussed below. In addition, there is no evidence that collectively, they would substantially reduce any of the proposed Plan's significant impacts.

Prioritizing Transit over Managed Lanes

Comments suggest that the proposed Plan should prioritize transit over managed lanes**.** The Managed Lanes network of the proposed Plan uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and High-Occupancy Vehicles (HOVs) to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the Regional Plan.

As discussed above under SOFAR's and CNFF's Climate, Housing, Transit Alternative, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative, which focuses on prioritizing transit. The model run assumed no new managed lanes (only transit lanes), and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR's and CNFF's Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the two suggested rail projects results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

Furthermore, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved

or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network, as described further under the SOFAR and CNFF Climate, Housing, Transit Alternative above.

Monitoring System for Transportation System's Buildout and Performance

Comments suggest that SANDAG implement clear and definitive mechanisms to monitor future population growth, jobs, and housing development in accordance with the proposed Plan to ensure that transportation system investments are in line with development and growth trends.

As identified in Appendix B of the Regional Plan, SANDAG will continue to monitor the implementation of the Regional Plan on a 4-year cycle and make the data accessible to the public. Monitoring would occur 2 years after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for the SCS on a 2-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019). A performance monitoring report using the indicators from Appendix E of the Regional Plan is developed halfway between each 4-year regional plan cycle. The report is shared with the SANDAG Board of Directors to provide a high-level status update on critical areas across the region. This information helps inform the Board of Directors in their development of regional goals for the subsequent regional plan. The indicators use available observed data that also informs how each indicator is calculated. In summary, some specific feasible components of this alternative are already included in the proposed Plan.

Regional Habitat Conservation Fund

Comments suggest that an alternative that includes a regional habitat conservation fund be included in the EIR. Appendix AA of the Regional Plan describes the status of the Habitat Conservation Plans (HCPs) within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP has been granted "take" authorization for impacts on endangered and threatened species. By way of the take authorizations, the local jurisdictions have made commitments to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

SANDAG will continue its existing grant programs, partner with member agencies on State funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan. To meet the region's habitat conservation goals, the 2021 Regional Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, *Greenhouse Gas Emissions,* of the EIR), and $300–$500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

As such, because HCP funding is already included in the proposed Final Plan, no additional alternative with this component is necessary.

Ensuring enforcement

Comments suggest that an alternative should ensure enforcement of the jurisdictions' compliance with the Plan. Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement and monitor the objectives outlined in the 2021 Regional Plan as

those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Final 2021 Regional Plan.

The 2021 Regional Plan envisions forecasted growth to be concentrated in Mobility Hubs throughout the region, which will be implemented in close coordination with local jurisdictions to align with the unique needs of each community. Many Mobility Hubs are employment centers or other popular destinations, and SANDAG would work with local jurisdictions to update plans and policies to allow for more housing in these locations where feasible. Local jurisdictions maintain land use authority and are responsible for decisions regarding density, zoning, and housing policies.

In addition, for second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

In summary, a number of enforcement provisions are already included in the proposed Plan, and an additional alternative with this component is not required.

Alternative that Reduces GHG Emissions to Net Zero or Consistent with State Goals

Multiple commenters assert that the range of alternatives is not reasonable because the alternatives would still be inconsistent with statewide GHG reduction and climate goals. The Draft EIR Impact GHG-5 analysis explains why it is infeasible for the proposed Plan to be consistent with the State's ability to meet the 2030 reduction target of SB 32 and the long-term reduction goals of Executive Orders B-55-18 (2045) and S-3-05 (2050). Similar feasibility constraints apply to other potential proposed Plan alternatives. In addition, as identified in Section 4.8 of the EIR, the proposed Plan would reduce GHG emissions for all three horizon years. As discussed in the Draft EIR, p. 4.8-40, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. California's 2017 Climate Change Scoping establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and put post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California's natural and working lands, and sustainable solid waste management are among many actions the State must take. The State has not adopted a plan analogous to the 2017 Scoping Plan since that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

The proposed Plan would assist in meeting the statewide 2030 GHG target in putting statewide emissions on a downward trajectory toward statewide post-2030 goals by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375. However, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal. Available research and reports, discussed in detail in Section 4.8 of the EIR, indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies; large-scale deployment of new and existing technologies; and

the roles of local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions.

Furthermore, as discussed in Chapter 2, *Project Description*, of the EIR SANDAG updates the Regional Plan every 4 years, and future iterations of the Plan and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045. The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. As such, a proposed Plan alternative that further reduces GHG emissions consistent with State GHG reduction goals was not included for detailed consideration in the EIR because it is beyond SANDAG's or local agencies' current ability to implement.

MASTER RESPONSE 2: MITIGATION MEASURES THAT OTHER AGENCIES "CAN AND SHOULD" IMPLEMENT

INTRODUCTION

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. Many Draft EIR mitigation measures for second-tier projects, recognizing that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, state that such agencies "can and should" implement them. Comments assert that there is no guarantee these agencies will actually implement these mitigation measures, question whether they will be imposed on second-tier projects, and allege that, to the extent SANDAG has any discretion over awarding funds for such projects, SANDAG must require the mitigation measures as conditions of approval.

One comment asserted that "can and should" is discretionary language and makes the mitigation measure non-enforceable, and that SANDAG should mandate implementation of mitigation measures for its own projects and for other agencies implementing projects under the Regional Plan.

As discussed in the Draft EIR (page 4-4), SANDAG is responsible for implementing those mitigation measures within its responsibility, jurisdiction, and statutory authority. Mitigation can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines Section 15091 (a)(2)). In many instances, mitigation measures included in the EIR that would avoid or substantially lessen significant impacts of the proposed Plan fall under the responsibility and jurisdiction of other implementation agencies, such as cities, the County, Caltrans, public transit agencies, or other special districts. In other words, SANDAG will not be the lead agency for the majority of the second-tier projects that implement the proposed Plan.

Because other project agencies would be responsible for certain mitigation measures identified in this EIR, SANDAG in its CEQA findings may find that those measures, if feasible, can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2)). Further details regarding responsibilities for mitigation measure implementation will be provided in a separate mitigation monitoring and reporting program (MMRP) that the SANDAG Board of Directors will consider for approval in conjunction with approval of the proposed Plan.

EIR MITIGATION APPROACH

When CEQA findings are adopted, SANDAG will commit to those feasible mitigation measures that are within its responsibility and jurisdiction by making the finding that its mitigation measures "have been required in, or incorporated into, the project" (Public Resources Code Section 21081(a)(1); CEQA Guidelines Section 15092(a)(1)). For second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used.[1] Where SANDAG acts as a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

Therefore, the assertion that "can and should" language is unenforceable is incorrect, in that SANDAG would enforce these measures by requiring them as grant conditions for transportation projects whenever it has discretionary authority to do so.

When SANDAG makes "can and should" findings at the end of the CEQA process, there is no further requirement that SANDAG find that mitigation measures that are solely within the responsibility and jurisdiction of another agency have been incorporated into the project (Public Resources Code Section 21081; CEQA Guidelines Section 15091(a)(2)). Nevertheless, as discussed below, it is reasonable to expect that the other agencies will actually implement the mitigation measures assigned to them.

The Draft EIR (pages 4-3 through 4-4) describes the intended use of a mitigation measure and the general approach to the mitigation measures in the EIR.

> "The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement."
>
> "While the EIR provides as much detail as needed in the mitigation measures to evaluate their ability to avoid or substantially lessen impacts, some flexibility must be maintained to present mitigation approaches for impacts occurring under different circumstances. Many of the mitigation measures include lists of mitigation actions that can be implemented in connection with individual future transportation and development projects that would implement the proposed Plan; development projects would be undertaken under the land use authority of local governments. These individual future projects will occur over a wide and diverse geographic scope over the 30-year time span addressed in the proposed Plan. Some will require approvals from multiple public agencies, each with different legal, regulatory, or other authority relevant to the proposed Plan. Because the nature of individual future projects, resources, and legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely, the mitigation actions included, while generally feasible for many projects, may not be feasible for specific projects. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine

[1] SB 1703 consolidated the region's transit capital construction with SANDAG from the two transit operators. SANDAG also coordinates with Caltrans as the lead agency for highway projects. Local jurisdictions construct arterial and local roadway projects.

which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances.

GREENHOUSE GAS EMISSIONS MITIGATION

In addition, the Draft EIR (pages 4.8-35 and 4.8-36) explains the EIR's general approach to GHG mitigation. This approach is applicable to other significant impacts described in the EIR.

"Many features currently included in the proposed Plan (e.g., the SCS, increased transit, and active transportation investments) have the effect of reducing GHG emissions that might otherwise occur. Mitigation measures presented in this section are additional feasible GHG reduction measures not included in the proposed Plan that SANDAG would or other agencies could implement."

"While SANDAG has the authority to implement the mitigation measures it has committed to, it has no legal or jurisdictional authority to require other transportation project sponsors or local jurisdictions to implement mitigation measures for specific projects for which they have responsibility and jurisdiction. As explained in the introduction to Chapter 4, mitigation can include measures that are within the responsibility and jurisdiction of another public agency. SANDAG in its CEQA findings may find that those measures assigned to other agencies can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2))."

TRANSPORTATION PROJECT MITIGATION

SANDAG has limited authority to approve individual second-tier transportation network improvement projects in the RTP. Many individual transportation projects in the RTP would be implemented by Caltrans and local governments. For example, Caltrans would implement most of the managed lane projects, and local governments would implement the arterial project shown on Figures 2-23 through 2-25 of the EIR. As required by CEQA and agency-specific CEQA procedures (e.g., the Caltrans Standard Environmental Reference), these agencies routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, and the Draft EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them. Additionally, SANDAG is the direct source of funding (versus a pass-through agency) for TransNet grant programs funding local agency capital projects and will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

LAND USE PLAN AND PROJECT MITIGATION

SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS (Government Code Section 65080(b)(2)(K)). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the SCS, and SANDAG has no concurrent authority to mitigate the impacts of land use plans and policies. Local governments routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, and the Draft EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them.

A recent, relevant example of local government implementation of mitigation measures addressing the land use change and regional growth projected to occur as a result of implementation of local general plans is provided below.[2]

- An Air Quality Impact Analysis shall be prepared for projects within the General Plan Update boundary that exceed one of the air quality study trigger criteria in Table 4.3-12, Air Quality Impact Analysis Trigger Criteria.

Land Use	Project Site that would Trigger Air Quality Impact Assessment	Single Family Dwelling Unit Equivalent
Single Family Residential 300 du 1 du/1 du	300 du	1 du/1 du
Apartments: 6-20 du/acre	370 du	1 du/1.23 du
Apartments: – > 20 du/acre	420 du	1 du/1.4 du
Condominiums	370 du	1 du/1.23 du
Mobile Home Park	400 du	1 du/1.33 du
Supermarket	25,000 sf	1 du/83.33 sf
Restaurant, Fast Food w/drive through	6,500 sf	1 du/21.67 sf
Restaurant, Quality Sit Down	43,000 sf	1 du/143.33 sf
Neighborhood/County Park (undeveloped)	880 acres	1 du/2.93 acre
Motel	480 rooms	1 du/1.6 room
Standard Commercial Office (<100,000 sf per office site)	190,000 sf	1 du/633.33 sf
Neighborhood shopping center	35,000 sf	1 du/116.67 sf

- Siting Sensitive Receptors near sources of Toxic Air Contaminants. A Health Risk Assessment (HRA) shall be prepared by a qualified air quality professional for development of new sensitive receptors proposed in the General Plan Update planning area within 500 feet of a waste transfer facility. A Health Risk Assessment (HRA) shall be prepared for development of new sensitive receptors in the General Plan Update planning area proposed within one mile of industrial land uses, medical facilities, or research and development facilities that generate a potential source of Toxic Air Contaminants (TACs). The project shall not be considered for approval until an HRA has been completed and approved by the City. The methodology for the HRA shall follow the Office of Environmental Health Hazard Assessment and SDAPCD guidelines for the preparation of HRAs. If a potentially significant health risk is identified, the HRA shall identify appropriate measures to reduce the potential health risk to below a significant level, or the sensitive receptor shall be sited in another location.

PROJECT-SPECIFIC MITIGATION MEASURES MAY NOT APPLY TO EVERY PROJECT

Comments suggest that the text in the EIR should remove the "can and should" language and require all agencies to implement the mitigation measures. Although second-tier lead agencies routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, the Draft EIR recognizes that due to project- or site-specific circumstances, it may not be feasible for individual lead agencies to implement all of the "can and should" mitigation measures listed for a particular significant impact; in this case, the Regional Plan EIR programmatic mitigation measures still meet CEQA

[2] City of Escondido. 2015. *Escondido General Plan, Downtown Specific Plan and Climate Action Plan EIR, 4.3 Air Quality*. Available: https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUpdate/Vol1AirQuality.pdf.

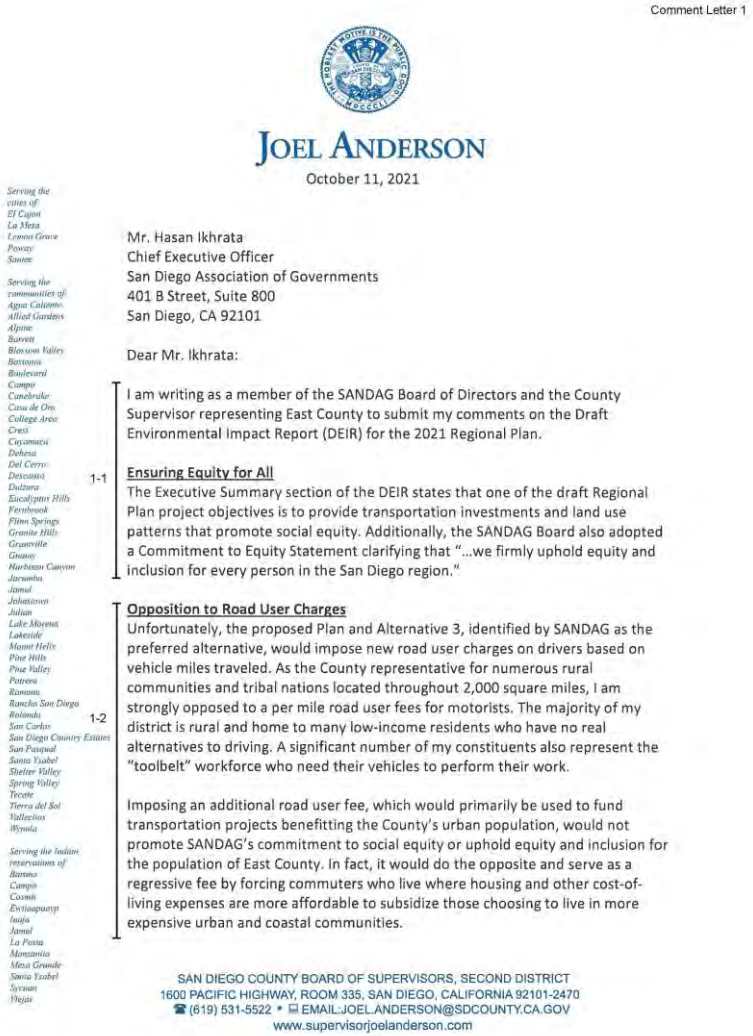
requirements, but in the later project-specific CEQA review, the Regional Plan EIR could not be used as a first-tier Program EIR for the significant impact proposed for mitigation. As stated on p. 4-4 of the Draft EIR:

> "Because the nature of individual future projects, resources and legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely, the mitigation actions included, while generally feasible for many projects, may not be feasible for specific projects. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances."

Similarly, lead and responsible agencies for an individual project will have to determine whether the lead agency, the project proponent, or another entity is responsible for implementation of particular mitigation measures.

COMMENT LETTERS AND RESPONSES

COMMENT LETTER 1: OFFICE OF JOEL ANDERSON



Comment Letter 1

JOEL ANDERSON

October 11, 2021

Serving the cities of: El Cajon, La Mesa, Lemon Grove, Poway, Santee

Serving the communities of: Agua Caliente, Allied Gardens, Alpine, Barrett, Blossom Valley, Bostonia, Boulevard, Campo, Canebrake, Casa de Oro, College Area, Crest, Cuyamaca, Dehesa, Del Cerro, Descanso, Dulzura, Eucalyptus Hills, Fernbrook, Flinn Springs, Granite Hills, Grantville, Guatay, Harbison Canyon, Jacumba, Jamul, Johnstown, Julian, Lake Morena, Lakeside, Mount Helix, Pine Hills, Pine Valley, Potrero, Ramona, Rancho San Diego, Rolando, San Carlos, San Diego Country Estates, San Pasqual, Santa Ysabel, Shelter Valley, Spring Valley, Tecate, Tierra del Sol, Vallecitos, Wynola

Serving the Indian reservations of: Barona, Campo, Cuyapaipe, Inaja, Jamul, La Posta, Manzanita, Mesa Grande, Santa Ysabel, Sycuan, Viejas

Mr. Hasan Ikhrata
Chief Executive Officer
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Dear Mr. Ikhrata:

I am writing as a member of the SANDAG Board of Directors and the County Supervisor representing East County to submit my comments on the Draft Environmental Impact Report (DEIR) for the 2021 Regional Plan.

1-1

Ensuring Equity for All

The Executive Summary section of the DEIR states that one of the draft Regional Plan project objectives is to provide transportation investments and land use patterns that promote social equity. Additionally, the SANDAG Board also adopted a Commitment to Equity Statement clarifying that "...we firmly uphold equity and inclusion for every person in the San Diego region."

1-2

Opposition to Road User Charges

Unfortunately, the proposed Plan and Alternative 3, identified by SANDAG as the preferred alternative, would impose new road user charges on drivers based on vehicle miles traveled. As the County representative for numerous rural communities and tribal nations located throughout 2,000 square miles, I am strongly opposed to a per mile road user fees for motorists. The majority of my district is rural and home to many low-income residents who have no real alternatives to driving. A significant number of my constituents also represent the "toolbelt" workforce who need their vehicles to perform their work.

Imposing an additional road user fee, which would primarily be used to fund transportation projects benefitting the County's urban population, would not promote SANDAG's commitment to social equity or uphold equity and inclusion for the population of East County. In fact, it would do the opposite and serve as a regressive fee by forcing commuters who live where housing and other cost-of-living expenses are more affordable to subsidize those choosing to live in more expensive urban and coastal communities.

SAN DIEGO COUNTY BOARD OF SUPERVISORS, SECOND DISTRICT
1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470
☎ (619) 531-5522 • EMAIL:JOEL.ANDERSON@SDCOUNTY.CA.GOV
www.supervisorjoelanderson.com

RESPONSE TO COMMENT 1-1

Social equity disparity analysis is required by both State and federal law via Title VI of the Civil Rights Act of 1964 and EO 12898. During the process of evaluating the proposed Plan, calculations were made to determine improvements in mobility by percent point difference, between a No-Build projection and the Build projection. SANDAG found marginal percentage point differences between each population, with slight advantages leaning in favor of low income, aging populations, and other disadvantaged populations. For more information regarding social equity, methodology, and State requirements see Appendix H, *Social Equity: Engagement and Analysis*, of the proposed Plan.

SANDAG works closely with the County of San Diego and tribal nations to ensure transportation needs are met. SANDAG is currently preparing a Digital Equity Strategy to support advancement of access to broadband in areas with insufficient access..

RESPONSE TO COMMENT 1-2

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

1-3 **Investing in Emerging Technologies**
Although micromobility options such as scooters and bicycles are not realistic options for most East County communities, I appreciate SANDAG's willingness to explore innovative solutions. I encourage you to continue to investigate the benefits and potential to invest in emerging technologies that lower emissions while maximizing the use of existing transportation infrastructure. One example is the emergence of autonomous electric vehicles that can be charged via renewable energy while providing convenient and equitable door-to-door transportation service to all San Diego County residents.

1-4 **Uphold Projects Promised in TransNet Program**
It is my understanding that SANDAG plans to eliminate over twenty projects included in the TransNet Extension Ordinance and Expenditure Plan approved by voters in 2004. Included in the list of canceled projects are several that, if eliminated, would adversely impact my district, which again, has almost no alternatives to motor vehicle use. I urge you to continue to move forward with the following projects, which were promised to the region's residents to secure their votes for TransNet:

- Interstate 8 Widening (2nd Street to Los Coches Road)
- State Route 52 Express Lanes (Interstate 15 to Interstate 805)
- Interstate 805/State Route 52 HOV Connectors
- State Route 94 Widening (State Route 125 to Steele Canyon)

1-5 **Investment in East County Transportation Options**
Although the draft Regional Plan proposes to focus significant funding on new rail and trolley line infrastructure along the region's coast, it does not include similar investments for alternative transportation options in East County. As a result, most of my constituents must continue to rely on motor vehicles for their commutes to work and school and for other daily mobility needs, as investments in freeways decrease and road user costs increase. This approach will increase traffic congestion in East County while impeding the region's efforts to meet vehicle miles traveled and emissions reductions goals or attempts to achieve carbon neutrality. Therefore, I urge you to consider adding alternative transportation infrastructure options in East County where feasible.

1-6 **Housing**
The Draft Regional Plan and DEIR make land use assumptions for jurisdictions based on Regional Housing Needs Allocations (RHNA). It is stated that the Mobility Hubs encourage a diversity of housing options, mixed-use development, and travel options within a centralized area. But the planning of transportation and housing does not match in the years 2025, 2035, or even 2050.

RESPONSE TO COMMENT 1-3

Transit Leap will offer people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services. Transit Leap includes Next Gen Rapid Bus Service, local bus, and Flexible Fleet services to complete the Transit Leap network. This bus network would offer faster and more reliable service with increased frequencies and longer service hours.
Flexible Fleets can range from bikes and scooters to autonomous shuttles that provide on-demand service that are ADA compliant and provide options for users that may not have access to a smartphone or internet device to hail a ride.

RESPONSE TO COMMENT 1-4

The TransNet measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. The remaining projects in the TransNet measure may not be constructed due to changes in regional needs, changes in State law, and technology advancements that would suggest a different transportation solution.

CAL536, shown in the 2021 Regional Transportation Improvement Program (RTIP), is a project for Operational Improvements to SR 52, which include a truck climbing lane, a bike lane, and an auxiliary lane. This project is currently expected to open to traffic in September of 2024. The project shown in the Regional Plan in 2035 includes the addition of three Managed Lanes to SR 52. When TransNet was adopted the anticipated future land use pattern included significant development in East County. Those developments are no longer expected due to expanded land preservation, slower regional growth rates, and state regulations focusing development near existing infrastructure. Many of the TransNet projects that have not yet been built were designed to support the East County growth that has not happened and is no longer anticipated.

The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development the proposed Plan.

RESPONSE TO COMMENT 1-5

The proposed Plan includes Mobility Hubs for East County which can facilitate creating additional economic opportunities within that hub.

Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. They offer on-demand travel options and supporting infrastructure to enhance connections to high-quality Transit Leap services while helping people make short trips around the community on Flexible Fleets. Mobility Hubs will be implemented in close coordination with local jurisdictions to align with the unique needs of each community.

Several corridors were evaluated for their travel times between the 2016 baseline and future build scenarios (2025, 2035, and 2050). Two of these corridors were rural corridors between Ramona and Downtown San Diego via SR 67 and El Cajon to Kearny Mesa. In both of those corridors travel times were improved for auto travel (both solo vehicle and carpool) for all three build scenarios compared to the base year. These travel times will be included in Appendix T of the Final Plan.

SANDAG is also developing a Flexible Fleet Implementation Strategic Plan to identify near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

Also, the proposed Plan has been shown to meet the State GHG goals (19% reduction from 2005 levels by 2035). While related, no VMT goals are included in the Plan

RESPONSE TO COMMENT 1-6

The 6th Cycle Regional Housing Needs Assessment (RHNA) Plan sets a strategy for sustainability that focuses housing and job growth in urban areas where there is existing and planned transportation infrastructure, protects the environment and helps ensure the success of smart growth land use policies by preserving sensitive habitat and open space, and addresses the housing needs of all economic segments of the population. In the long term, housing located near transit and jobs should provide opportunities for residents to take more trips by bus or train and live closer to where they work, reducing VMT and GHG emissions. A specific effort was made in the proposed Plan to match transportation with land use (including housing).

Mr. Hasan Ikhrata
October 11, 2021
Page 3

1-6 cont. For example, the DEIR states that most of the transportation network improvements in the next decade are addition of managed lanes along Interstate 5 through the **coastal cities** of Encinitas, Carlsbad, and Oceanside. Yet, the DEIR also states that the rates of housing unit increases are forecasted to be lower than the regional average in the **coastal cities** of Oceanside (8.4 percent), Carlsbad (14.2 percent), Encinitas (6.3 percent), Solana Beach (13.3 percent), Del Mar (6.4 percent), Coronado (9.5 percent), and Imperial Beach (18.7 percent).

1-7 Further, there is no mechanism to ensure the RHNA numbers are actually met by all jurisdictions. Until each city commits to meeting these RHNA numbers, the substantial housing shortage will continue. If, as the DEIR states in Chapter 4.14, that there will be no housing constructed in the unincorporated area from 2036 to 2050, each city should have a more comprehensive Housing Element that includes penalties for not meeting the planned growth.

1-8 The DEIR states that impacts related to induced substantial increases in population under the proposed Plan would be significant and unavoidable. As Lead Agency, SANDAG is required to consider all feasible mitigation measures. SANDAG should consider, develop, and adopt a mitigation measure that enacts a financial penalty for the cities that cannot meet their RHNA numbers.

Thank you for the opportunity to submit my comments on the Draft Environmental Impact Report for the 2021 Regional Plan. If you have any questions concerning my comments, please feel free to contact me at (619) 531-5522.

Sincerely,

Joel Anderson
Supervisor, Second District

Cc: Kirsten Uchitel, Associate Planner, SANDAG

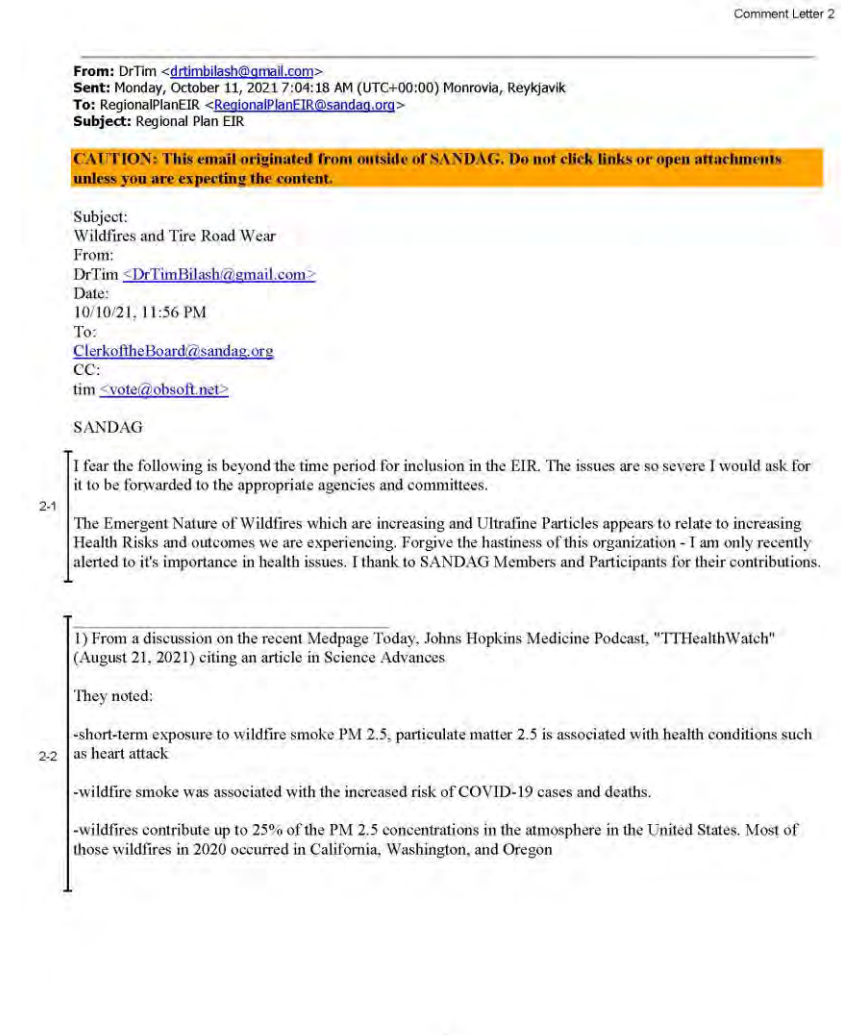
RESPONSE TO COMMENT 1-7

Land use authority is under the purview of local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement the housing objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Plan. SANDAG's Housing Incentive Program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs.

RESPONSE TO COMMENT 1-8

The commentor is requesting that SANDAG consider, develop, and adopt a mitigation measure that enacts a financial penalty for the cities that cannot meet their RHNA numbers. This mitigation measure is not within the authority of SANDAG to enact. SANDAG will continue to collaborate and coordinate with cities as applicable to meet RHNA numbers. Thank you for your comment, SANDAG appreciates your input.

COMMENT LETTER 2: DR. TIM BILASH



Comment Letter 2

From: DrTim <drtimbilash@gmail.com>
Sent: Monday, October 11, 2021 7:04:18 AM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Subject: Regional Plan EIR

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Subject:
Wildfires and Tire Road Wear
From:
DrTim <DrTimBilash@gmail.com>
Date:
10/10/21, 11:56 PM
To:
ClerkoftheBoard@sandag.org
CC:
tim <vote@obsoft.net>

SANDAG

2-1 I fear the following is beyond the time period for inclusion in the EIR. The issues are so severe I would ask for it to be forwarded to the appropriate agencies and committees.

The Emergent Nature of Wildfires which are increasing and Ultrafine Particles appears to relate to increasing Health Risks and outcomes we are experiencing. Forgive the hastiness of this organization - I am only recently alerted to it's importance in health issues. I thank to SANDAG Members and Participants for their contributions.

2-2 1) From a discussion on the recent Medpage Today, Johns Hopkins Medicine Podcast, "TTHealthWatch" (August 21, 2021) citing an article in Science Advances

They noted:

-short-term exposure to wildfire smoke PM 2.5, particulate matter 2.5 is associated with health conditions such as heart attack

-wildfire smoke was associated with the increased risk of COVID-19 cases and deaths.

-wildfires contribute up to 25% of the PM 2.5 concentrations in the atmosphere in the United States. Most of those wildfires in 2020 occurred in California, Washington, and Oregon

1

RESPONSE TO COMMENT 2-1

Thank you for your participation in the environmental review process. It is acknowledged that the body of knowledge regarding health risks associated with ultrafine particles originating from wildfires is rapidly evolving. Further elaboration regarding your concerns related to wildfires and ultrafine particles will be addressed in additional details in subsequent responses below.

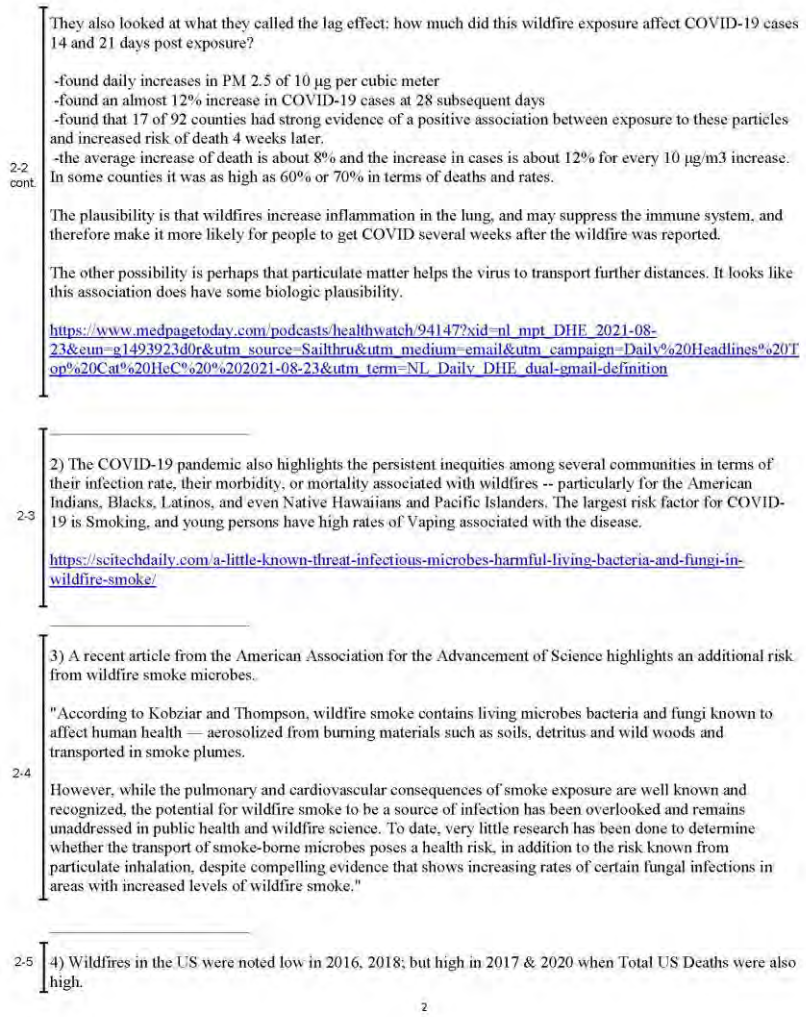
RESPONSE TO COMMENT 2-2

As shown in Table 4.3-7 of the EIR, PM2.5 emissions would decrease by 9 percent between 2016 and 2050. In addition, as discussed in additional detail in Section 4.19, *Wildfire*, regional growth, land use change, and transportation network improvements associated with the proposed Plan would expose additional people and structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildland. Wildfires would also potentially expose the region's population to harmful pollutant concentrations in the form of wildfire smoke. Mitigation measure WF-1 will reduce this impact by requiring measures to preclude or substantially reduce risks from wildland fires by requiring specific design features for new development and by requiring that adequate emergency response is in place to serve new development when wildfires occur. To the extent that these measures reduce risk of wildfire, they would also reduce the exposure of county residents to uncontrolled wildfire spread and to harmful pollutant concentrations in the form of wildfire smoke. However, given the uncertain nature of wildfires, it cannot be concluded that wildland fire risks and the risks associated with wildfire smoke pollution would be reduced to less than significant in all locations for all future development projects. Therefore, impacts remain significant and unavoidable.

The following text regarding newly published data concerning the association of elevated levels of PM2.5 from wildfires with increased incidence of COVID-19 was added to page 4.19-21 of Section 4.19, *Wildfire*:

<u>A recent study suggests that the airborne PM2.5 can carry harmful microbes as evidenced by an increase in fungal infections in areas</u>

characterized by recent wildfires (Kobziar and Thompson III, 2020). Another recent study showed an association between elevated levels of COVID-19 cases and high PM2.5 concentrations originating from wildfires in the four weeks after exposure in counties with large wildfires in 2020 (Zhou et al 2021).



They also looked at what they called the lag effect: how much did this wildfire exposure affect COVID-19 cases 14 and 21 days post exposure?

-found daily increases in PM 2.5 of 10 µg per cubic meter
-found an almost 12% increase in COVID-19 cases at 28 subsequent days
-found that 17 of 92 counties had strong evidence of a positive association between exposure to these particles and increased risk of death 4 weeks later.
-the average increase of death is about 8% and the increase in cases is about 12% for every 10 µg/m3 increase. In some counties it was as high as 60% or 70% in terms of deaths and rates.

2-2 cont.

The plausibility is that wildfires increase inflammation in the lung, and may suppress the immune system, and therefore make it more likely for people to get COVID several weeks after the wildfire was reported.

The other possibility is perhaps that particulate matter helps the virus to transport further distances. It looks like this association does have some biologic plausibility.

https://www.medpagetoday.com/podcasts/healthwatch/94147?xid=nl_mpt_DHE_2021-08-23&eun=g1493923d0r&utm_source=Sailthru&utm_medium=email&utm_campaign=Daily%20Headlines%20Top%20Cat%20HeC%20%202021-08-23&utm_term=NL_Daily_DHE_dual-gmail-definition

2) The COVID-19 pandemic also highlights the persistent inequities among several communities in terms of their infection rate, their morbidity, or mortality associated with wildfires -- particularly for the American Indians, Blacks, Latinos, and even Native Hawaiians and Pacific Islanders. The largest risk factor for COVID-19 is Smoking, and young persons have high rates of Vaping associated with the disease.

2-3

https://scitechdaily.com/a-little-known-threat-infectious-microbes-harmful-living-bacteria-and-fungi-in-wildfire-smoke/

3) A recent article from the American Association for the Advancement of Science highlights an additional risk from wildfire smoke microbes.

"According to Kobziar and Thompson, wildfire smoke contains living microbes bacteria and fungi known to affect human health — aerosolized from burning materials such as soils, detritus and wild woods and transported in smoke plumes.

2-4

However, while the pulmonary and cardiovascular consequences of smoke exposure are well known and recognized, the potential for wildfire smoke to be a source of infection has been overlooked and remains unaddressed in public health and wildfire science. To date, very little research has been done to determine whether the transport of smoke-borne microbes poses a health risk, in addition to the risk known from particulate inhalation, despite compelling evidence that shows increasing rates of certain fungal infections in areas with increased levels of wildfire smoke."

2-5 4) Wildfires in the US were noted low in 2016, 2018; but high in 2017 & 2020 when Total US Deaths were also high.

2

RESPONSE TO COMMENT 2-3

The referenced podcast, available at https://www.medpagetoday.com/podcasts/healthwatch/94147, discusses several different issues. The first issue discussed is the health effects of PM2.5 from wildfires. The large contribution of wildfires to PM2.5 levels in the western U.S. is outlined, and the adverse health effects are discussed. The second issue addressed in the podcast is inequalities in access to health care between different ethnic groups, and how these inequities have been exacerbated by COVID-19. These issue discussions are distinct however, and neither wildfires nor PM2.5 are mentioned in the healthcare inequality discussion. Also, note that under CEQA, social equity is not an environmental issue required to be analyzed in an EIR.

RESPONSE TO COMMENT 2-4

Recent data suggesting that airborne PM2.5 originating from wildfires can carry harmful microbes, as evidenced by an increase in fungal infections in areas characterized by recent wildfires, was added to the impact discussion of Section 4.19, *Wildfire*, of the Final EIR.

RESPONSE TO COMMENT 2-5

The association between more prevalent wildfires and increased deaths is acknowledged. The existing conclusions state that the healthcare effects of wildfire include increased risk of death.

As discussed above under response to comment Bilash 2-2, mitigation measure WF-1 will reduce wildfires by requiring measures to preclude or substantially reduce risks from wildland fires in VHFSZs by requiring specific design features for new development and by requiring that adequate emergency response is in place to serve new development when wildfires occur.

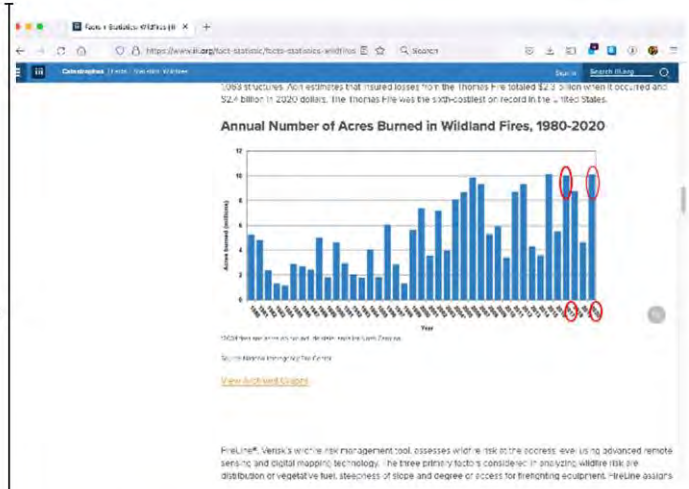
In addition, mitigation measure WF-2, as discussed in greater detail in Section 4.19, *Wildfire*, of the EIR, combined with other mitigation measures resulting from project-level CEQA conducted by the implementing agency, including adherence to existing fire prevention regulations and BMPs, will reduce the impact of transportation-related infrastructure on wildfire risk.

However, as noted in the EIR, because there are no other feasible mitigation measures to reduce the proposed Plan's contribution to

wildland fires to less than significant, impacts remain significant and unavoidable.

Thank you for providing a wide range of references for studies related to the effects of PM1, PM2.5, and PM10 on health and the environment. SANDAG will take these into consideration, as appropriate, during future air quality analyses.

2-5 cont.



https://www.iii.org/fact-statistic/facts-statistics-wildfires

3

2-5 cont.



https://www.prb.org/usdata/indicator/deaths/chart/

I have attached a wide range of references for these small particles. I believe this demands new resources to monitor and find ways to mitigate the severe environmental impacts of population expansion, transportation and encroachment into high fire areas and transporation roadwear pollution.

Please do not fail to include appropriate studies for these hazards.

Sincerely,
Timothy Bilash MD MS FACOG
drtimbilash@gmail.com

Attachments:
PMs.pdf 25.7 KB

4

References for PM1,2.5,10

PM10/25

Tires- An Emerging Threat to Our Waterways, Our Seafood, and Ourselves? | NRDC
https://www.nrdc.org/onearth/tires-emerging-threat-our-waterways-our-seafood-and-ourselves

Scientists point to chemical in car tires that's been killing coho salmon
https://www.opb.org/article/2020/12/04/scientists-point-to-chemical-in-car-tires-thats-been-killing-coho-salmon/

Tires tread on the environment - POLITICO
https://www.politico.eu/article/tires-plastic-circular-economy-waste-ocean-pollution/

Rubber in the environment Where the tread from our tires 'disappears' to
https://phys.org/news/2019-11-rubber-environment.html

Tires The plastic polluter you never thought about
https://www.nationalgeographic.com/environment/article/tires-unseen-plastic-polluter

Pollution from tire wear 1,000 times worse than exhaust emissions | Tire Technology International
https://www.tiretechnologyinternational.com/news/regulations/pollution-from-tire-wear-1000-times-worse-than-exhaust-emissions.html

Tyre and road wear particles (TRWP)
https://www.sciencedirect.com/science/article/pii/S0048969720313358

Brake and tire particles measured from on-road vehicles: Effects of vehicle mass and braking intensity
https://www.sciencedirect.com/science/article/pii/S2590162121000216

Air particulate matter and cardiovascular disease: the epidemiological, biomedical and clinical evidence
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4740122/

Particulates (PM10, PM 2.5)
https://www.michigan.gov/egle/0,9429,7-135-3310_70940-193454--,00.html

Particle Pollution
https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/particle-pollution

Brake and tire particles measured from on-road vehicles: Effects of vehicle mass and braking intensity
https://www.sciencedirect.com/science/article/pii/S2590162121000216

Research Synthesis #16-01 "Exposure to Fine Particulate Matter (PM2.5) Increases Health Risks for Californians"
https://ww2.arb.ca.gov/resources/documents/research-synthesis-16-01-exposure-fine-particulate-matter-pm25-increases-health

Health effects of PM2.5 emissions from on-road vehicles during weekdays and weekends in Beijing, China
https://www.sciencedirect.com/science/article/abs/pii/S1352231019308969

The health effects of ambient PM2.5 and potential mechanisms
https://pubmed.ncbi.nlm.nih.gov/26896893/

PM1

A work group report on ultrafine particles (American Academy of Allergy, Asthma & Immunology)
https://www.researchgate.net/profile/Bin-Zhao-63/post/How_dangerous_is_PM10_for_human/attachment/59d64a5879197b80779a4a10/AS%3A474912105209857%401490239277788/download/A+work+group+report+on+ultrafine+particles+%28American+Academy+of+Allergy%2C+Asthma+%26+Immunology%29+Why+ambient+ultrafine+and+engineered+nanoparticles+should+receive+special+attention+for+possible+adverse+health+outcomes+in+human+subjects%E5%89%AF%E6%9C%AC.pdf

Air Quality_ Community Engagement Helps Make the Invisible Visible _ Earthwatch
https://earthwatch.org/stories/air-quality-community-engagement-helps-make-invisible-visible?gclid=EAIaIQobChMI_oiBztir8wIV1CCtBh2SXAg8EAAYAiAAEgKECvD_BwE

Effects of ambient PM1 air pollution on daily emergency hospital visits in China: an epidemiological study
https://www.sciencedirect.com/science/article/pii/S2542519617301006

Exposure to submicron particles (PM1.0) from diesel exhaust and pollen allergens of human lung epithelial cells induces morphological changes of mitochondria tonifilaments and rough endoplasmic reticulum

https://pubmed.ncbi.nlm.nih.gov/24982222/

Finer particulate matter (PM1) could increase cardiovascular disease risk
https://www.sciencedaily.com/releases/2020/01/200129091444.htm

Is PM1 similar to PM2.5? A new insight into the association of PM1 and PM2.5 with children's lung function
https://www.sciencedirect.com/science/article/pii/S016041202032047X

PM1 – The new focus to protect human health
https://www.camfil.com/en/insights/standard-and-regulations/pm1-is-most-harmful

PM1 particles at coal- and gas-fired power plant work areas
https://pubmed.ncbi.nlm.nih.gov/22127876/

Seasonal concentration distribution of PM1.0 and PM2.5 and a risk assessment of bound trace metals in Harbin, China:
https://www.nature.com/articles/s41598-020-65187-7

Study shows PM1 air pollution is most harmful
https://usa.chinadaily.com.cn/china/2013-10/28/content_17061997.htm

The Three Types of Particulate Matter: All About PM10, PM2.5, and PM0.1
https://learn.kaiterra.com/en/air-academy/three-types-of-particulate-matter

Understanding Air Quality: What is PM10?
https://asthma.net/living/pm10-air-quality

What does PM 1 mean?
https://indianexpress.com/article/explained/what-does-pm-1-mean/

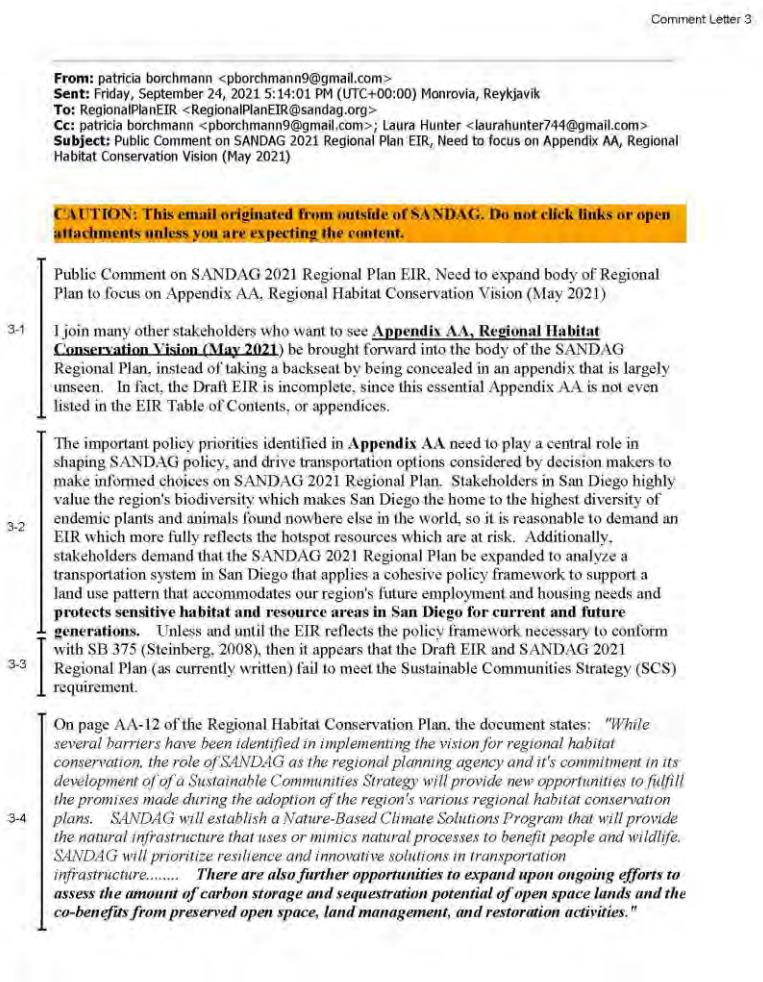
What is PM10 and PM2.5?
https://www.irceline.be/en/documentation/faq/what-is-pm10-and-pm2.5

PM1 in Ambient and Indoor Air—Urban and Rural Areas in the Upper Silesian Region, Poland
www.mdpi.com/2073-4433/10/11/662/pdf

A Work Group Report on Ultrafine Particles (AAAAI) Why Ambient Ultrafine and Engineered Nanoparticles Should Receive Special Attention for Possible Adverse Health Outcomes in Humans
https://pubmed.ncbi.nlm.nih.gov/27130856/

Tire dust is pollution, and this invention will help vehicles clean up as they go
https://www.greencarreports.com/news/1129809_tire-dust-is-pollution-and-this-invention-will-help-vehicles-clean-up-as-they-go

COMMENT LETTER 3: PATRICIA BORCHMANN



Comment Letter 3

From: patricia borchmann <pborchmann9@gmail.com>
Sent: Friday, September 24, 2021 5:14:01 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Cc: patricia borchmann <pborchmann9@gmail.com>; Laura Hunter <laurahunter744@gmail.com>
Subject: Public Comment on SANDAG 2021 Regional Plan EIR, Need to focus on Appendix AA, Regional Habitat Conservation Vision (May 2021)

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Public Comment on SANDAG 2021 Regional Plan EIR, Need to expand body of Regional Plan to focus on Appendix AA, Regional Habitat Conservation Vision (May 2021)

3-1 I join many other stakeholders who want to see **Appendix AA, Regional Habitat Conservation Vision (May 2021)** be brought forward into the body of the SANDAG Regional Plan, instead of taking a backseat by being concealed in an appendix that is largely unseen. In fact, the Draft EIR is incomplete, since this essential Appendix AA is not even listed in the EIR Table of Contents, or appendices.

3-2 The important policy priorities identified in **Appendix AA** need to play a central role in shaping SANDAG policy, and drive transportation options considered by decision makers to make informed choices on SANDAG 2021 Regional Plan. Stakeholders in San Diego highly value the region's biodiversity which makes San Diego the home to the highest diversity of endemic plants and animals found nowhere else in the world, so it is reasonable to demand an EIR which more fully reflects the hotspot resources which are at risk. Additionally, stakeholders demand that the SANDAG 2021 Regional Plan be expanded to analyze a transportation system in San Diego that applies a cohesive policy framework to support a land use pattern that accommodates our region's future employment and housing needs and **protects sensitive habitat and resource areas in San Diego for current and future generations.** Unless and until the EIR reflects the policy framework necessary to conform with SB 375 (Steinberg, 2008), then it appears that the Draft EIR and SANDAG 2021 Regional Plan (as currently written) fail to meet the Sustainable Communities Strategy (SCS) requirement.

3-3

3-4 On page AA-12 of the Regional Habitat Conservation Plan, the document states: *"While several barriers have been identified in implementing the vision for regional habitat conservation, the role of SANDAG as the regional planning agency and it's commitment in its development of of a Sustainable Communities Strategy will provide new opportunities to fulfill the promises made during the adoption of the region's various regional habitat conservation plans. SANDAG will establish a Nature-Based Climate Solutions Program that will provide the natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure..... **There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities."***

RESPONSE TO COMMENT 3-1

Appendix AA is part of the proposed Plan, which the EIR analyzes. Therefore, the EIR does not need to include Appendix AA because, by default, it is part of the Plan analysis. A description of conservation efforts as a key component of SANDAG's Sustainable Communities Strategy, including benefits to habitat preservation from the SCS land use pattern, has been added to Chapter 2 of the proposed Plan.

RESPONSE TO COMMENT 3-2

An analysis of biological impacts has been provided in Section 4.4, *Biological Resources,* of the EIR that addresses "hotspot resources," including sensitive vegetation communities, endemic plants and animals, and special-status species. These hotspot resources are conserved through the NCCPs and subregional plans, the approved documents of which are described in the EIR (see Section 4.4.2 of the EIR), and addressed in Impact BIO-4. For example, the California's NCCP Program focuses largely on conserving large areas of native habitat and the habitats that link those areas to help preserve California's native fauna and flora at the landscape and regional levels. While NCCPs are governed by the California NCCP Act, the FESA requires the issuance of HCPs. The proposed Plan protects the County's sensitive biological resources through consistency with the NCCPs, and commits to funding and implementing future conservation efforts, including $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, *Greenhouse Gas Emissions,* of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

RESPONSE TO COMMENT 3-3

The proposed Plan meets SB 375 requirements. The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels,

as mandated by SB 375. Implementation of the proposed Plan would not conflict with SB 375 emission reduction targets for 2035 because it would result in a 20 percent reduction in per capita CO_2 emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction for the SANDAG region.

Also, SB 375 requires that the collective land use plans of the region identify areas sufficient to house all economic segments of the population. The 6th Cycle Regional Housing Needs Assessment (RHNA) Plan sets a strategy for sustainability that focuses housing and job growth in urban areas where there is existing and planned transportation infrastructure, protects the environment and helps ensure the success of smart growth land use policies by preserving sensitive habitat and open space, and addresses the housing needs of all economic segments of the population. In the long term, housing located near transit and jobs should provide opportunities for residents to take more trips by bus or train and live closer to where they work, reducing VMT and GHG emissions.

RESPONSE TO COMMENT 3-4

As an initial matter, this comment raises issues with the proposed Plan, not the Draft EIR.

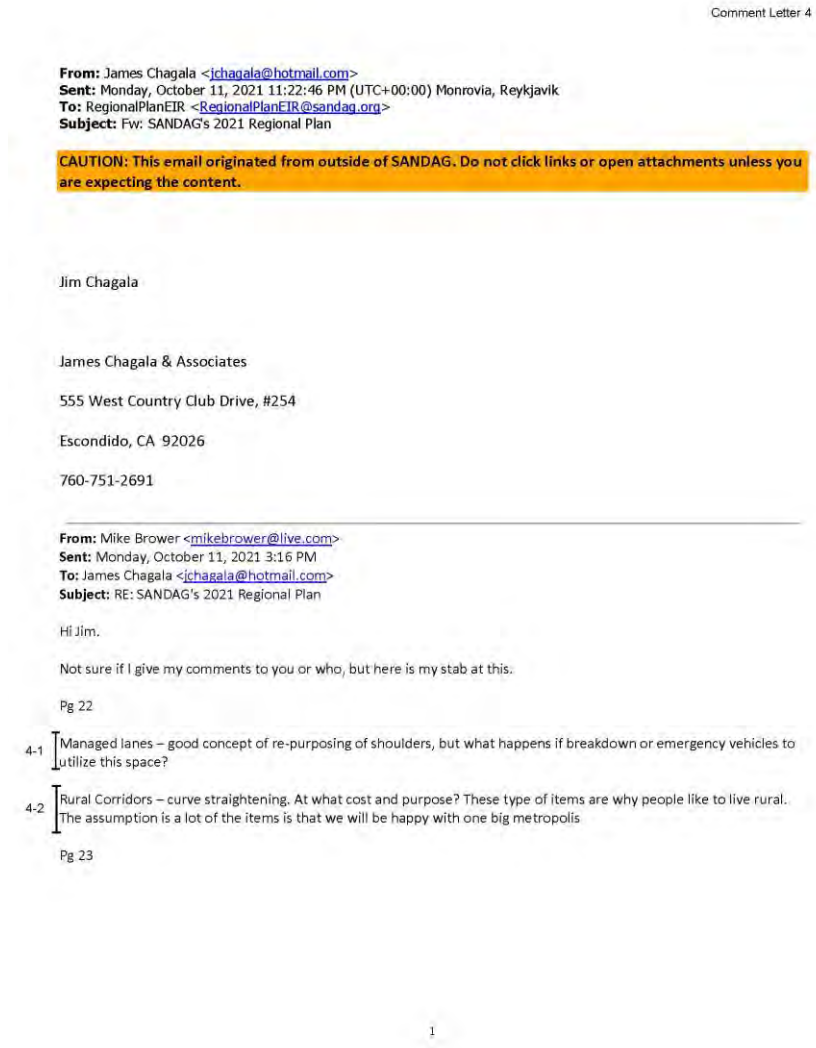
Multiple resource topic discussions in the EIR and Appendix C, *Climate Change Projections, Impacts, and Adaptation,* acknowledge that increased temperatures and decreased rainfall will likely result in decreased plant productivity and reproduction. As fewer or less robust plants pull less carbon dioxide out of the atmosphere, soil erosion and loss will increase and there will be less carbon from dead plants available to become incorporated into the soil, thus reducing soil carbon sequestration. As such, SANDAG acknowledges that it is important to continue monitoring innovative new technologies and methods of increasing carbon storage and sequestration potential in the region. SANDAG, in collaboration with relevant resource agencies, will present additional details as a part of the Nature-Based Climate Solutions Program. As detailed in response to comment Borchmann 3-2, SANDAG has committed to funding future habitat conservation, land acquisition, and land management and monitoring to conserve and manage the County's biodiversity in perpetuity.

3-4 cont.

My personal observation is the current SANDAG 2021 Regional Plan fails to meet the promises outlined in Appendix AA, Regional Habitat Conservation Vision, and is unacceptable in it's current form. Please do not allow a substandard Regional Plan by SANDAG diminish the unparalleled biodiversity hotspot characteristics in San Diego that are found nowhere else in the world. We are counting on SANDAG to honor the promises and opportunities identified in Appendix AA to protect and preserve natural resources in San Diego for current, and future generations. .

Thank you for thoughtful consideration of my personal comments.

COMMENT LETTER 4: MIKE BROWER



Comment Letter 4

From: James Chagala <jchagala@hotmail.com>
Sent: Monday, October 11, 2021 11:22:46 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Subject: Fw: SANDAG's 2021 Regional Plan

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Jim Chagala

James Chagala & Associates

555 West Country Club Drive, #254

Escondido, CA 92026

760-751-2691

From: Mike Brower <mikebrower@live.com>
Sent: Monday, October 11, 2021 3:16 PM
To: James Chagala <jchagala@hotmail.com>
Subject: RE: SANDAG's 2021 Regional Plan

Hi Jim.

Not sure if I give my comments to you or who, but here is my stab at this.

Pg 22

4-1 Managed lanes – good concept of re-purposing of shoulders, but what happens if breakdown or emergency vehicles to utilize this space?

4-2 Rural Corridors – curve straightening. At what cost and purpose? These type of items are why people like to live rural. The assumption is a lot of the items is that we will be happy with one big metropolis

Pg 23

1

RESPONSE TO COMMENT 4-1

The comments in this letter relate to the contents of the proposed Plan, and not the analysis contained within the Draft EIR.

Many of the Complete Corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs.

SANDAG will continue to coordinate with Caltrans for detailed engineering and environmental studies for Managed Lanes projects.

Public safety impacts of the proposed Plan are discussed in Section 4.16, *Transportation,* of the Draft EIR, specifically under Impact TRA-3, which analyzes any increases in hazards due to design features.

RESPONSE TO COMMENT 4-2

Rural corridors, such as SR 67, include investments such as shoulder widening, curve realignment, and technology improvements to address safety and operational improvements to facilitate ingress/egress during peak travel and emergency evacuation conditions. The costs of the rural corridor projects in the proposed Plan range from $1M to approximately $700M.



4-3 Smart Infrastructure – question the privacy laws on this about monitoring people. How did this really work in the public emergency situation of COVID App and tracking? (I don't think it did).

4-4 Electric Vehicle Infrastructure – while the system is needed for Public Charging it needs to be fee based or privately operated as fee based (this is not addressed in the commentary). The CA grid cannot accommodate current demand, so this needs to be addressed as well.

Pg 24

4-5 Commuter Rail – would think I-15 up to Escondido would be included here

Pg 26

Mobility Hubs

4-6 Safe Streets – with volume of people expected, just like, Grand Central or Penn Station in NY, these Hubs will require additional security and needs to be addressed

Supporting Amenities – should be pay for use vs taxes to masses

Pg 38

Regional Pricing Strategy

4-7 Trains, buses, public transportation, etc to pay for themselves and not subsidized by add'l or current taxes (current drivers pay similarly). (Pg 46 and other mentions are subsidies nor fare or fee). These items need clarified.

Road User charges vs an additional fee should be implemented by removing the CA gas tax.

4-8 What is not mentioned that I can see is dealing with the current I-5, I-15, Hwy 78, I-8 congestion. While this is the future plan, this issue exists now and will for most of our future as well.

If I need help understanding my role, please let me know.

Thanks

4-9 I will also go back to my comments of our meeting. The governmental entities, in this case SANDAG, need to be financially conscience and responsible as well.

From: James Chagala <jchagala@hotmail.com>
Sent: Tuesday, September 7, 2021 4:33 PM
To: Sponsor Group 2 <SponsorGroup2@groups.outlook.com>
Subject: Fw: SANDAG's 2021 Regional Plan

These are more details on the SANDAG plan. Please review as comments are due October 12. This is only one stage and there will be other points to comment. I will be establishing a subcommittee on September 23 to deal with this, so be thinking if you would like to be involved. The members we recommended in August are also eligible, as you do not have to be a member of the group to serve on a sub-committee.

2

RESPONSE TO COMMENT 4-3

SANDAG will rely on coordination with other agencies in California and the State Department of Transportation to integrate the selection of technology, collection methods, and account management. California has strict data privacy laws to protect consumer privacy. In line with this, SANDAG remains committed to protecting personal privacy, and it will be a strong consideration for SANDAG and other agencies around California when selecting technology and methods to administer the program.

RESPONSE TO COMMENT 4-4

The proposed Plan commits SANDAG to making investments to support the region's transition to electric cars, trucks, and buses. As SANDAG develops vehicle and infrastructure programs, it will continue to coordinate with SDG&E as well as community choice energy (CCE) providers in the region on their programs to provide clean power and manage load. San Diego Community Power is committed to providing entirely clean and renewable electricity by 2035 or sooner, and the State requires utilities, including SDG&E, to provide a minimum of 50 percent renewable power by 2030 leading up to the State's carbon neutrality goal for 2045.

In addition to regional scale load management that is led by the utility, CCEs, and larger power users, SANDAG's EV programs will encourage the use of load management tools and integrated renewable energy at the project level. SANDAG's current EV charger rebate program is the CALeVIP San Diego County Incentive Project, with information available at https://calevip.org/incentive-project/san-diego-county. This and future charger programs will provide rebates for workplace chargers to enable a greater number of drivers to charge during the day when renewable energy is most available.

SANDAG continues to support progress toward an adequate EV charging infrastructure for both freight and passenger vehicles in collaboration with public agency and private industry stakeholders. This support includes planning through the Comprehensive Multimodal Corridor Plans (CMCPs) that include federally designated zero-emission vehicle corridors and commensurate charging infrastructure as well as the development of a Blueprint for Medium-/Heavy-Duty (MD/HD) ZEV Infrastructure. A SANDAG Board resolution was passed to work collaboratively to establish the framework and agreement for a joint EV

charging incentive program with the California Energy Commission, County Air Pollution Control District, and Center for Sustainable Energy as part of the Regional Vehicle Charging Program partnership program. SANDAG will continue to coordinate with Caltrans in their efforts to plan the deployment of potential medium- and heavy-duty truck charging infrastructure in conjunction with parking identified through the California State Truck Parking Study that is currently underway.

RESPONSE TO COMMENT 4-5

Regarding commuter rail along the I-15 corridor, the I-15 Corridor is difficult to serve with rail because of the development patterns that resulted in widely spread out communities. This area is served by Rapid bus routes, which will be expanded in the future with more services. However, the California High Speed Rail project is reflected in Figure 2.3 of the proposed Plan as it is slated to connect Los Angeles to San Diego via the Inland Empire with stations planned in Murrieta/Temecula and Escondido, which would provide some rail service in the vicinity of I-15. This project would be implemented and funded by the California High Speed Rail Authority. SANDAG will track the project as it is developed by the State.

RESPONSE TO COMMENT 4-6

Mobility Hubs will be centers of activity where transportation investments of the proposed Plan will come together along with strategic decisions about land use. Each Mobility Hub will require different services and amenities depending on the surrounding community. SANDAG will work closely with local jurisdictions, community members, and other stakeholders within each Mobility Hub area to identify specific needs of the area, such as safety, security, accessibility, first-last mile connections, and increased amenities.

Each regional Mobility Hub coverage area was identified based on a variety of factors, including existing and projected population and job growth along with information on where and how people travel. Many existing trip destinations fall within areas that have been identified as a regional Mobility Hub, yet some of these communities lack convenient transit service or safe streets to walk, bike, or use other micro-mobility options.

RESPONSE TO COMMENT 4-7

Various funding sources are being considered to implement the proposed Plan. The proposed Plan assumes local, State, and federal

revenue sources including sales tax, impact fees, fuel tax, tolls, passenger fares, fees, general funds, ridehailing service fees, a road usage charge, cap and trade, and financing. New sources of revenue such as the road usage charge or a new sales tax will be studied and will include input from the public and other stakeholders.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals such as GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle – the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenue currently funds different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources.

The road usage charge, which is being studied by both the federal and State governments, is being considered to replace an old tax system that is no longer relevant. SANDAG recognizes that this is a challenge and respects the concerns raised. SANDAG is committed to having authentic dialogues to work through the challenges and create a revenue system that is flexible, sustainable, equitable, and fair to all.

Fare subsidies would likely be attached to sales tax measures, but could be paid for by other sources as they become available.

Further details regarding funding and revenue can be found in Appendix V of the proposed Plan..

RESPONSE TO COMMENT 4-8

State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing VMT and GHG emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling, and public transit). These bold changes are necessary to address unprecedented challenges facing the region and state. SANDAG understands the near-term need for congestion relief and is working to

find near-term ways to implement flexible fleet pilot projects and expand service and frequency of public transportation.

RESPONSE TO COMMENT 4-9

SANDAG will maintain transparency with the public and stakeholders regarding funding sources for projects outlined in the proposed Plan through associated project and program implementation, in addition to activities related to the development of Plan updates.

thanks,

Jim Chagala

James Chagala & Associates

555 West Country Club Drive, #254

Escondido, CA 92026

760-751-2691

From: Turner, Jessica <Jessica.Turner@sdcounty.ca.gov>
Sent: Tuesday, September 7, 2021 7:25 PM
To: Alyssa Burley (Valle De Oro) <alyssa@alyssaburley.com>; Billie Jo Jannen (Campo) <campoplanninggroup@nym.hush.com>; Bob Uribe (Potrero) <rduribej@gmail.com>; Carol Hake (Lakeside) <lakesidecpg@gmail.com>; Cherry Diefenbach (Jacumba) <csdiefenbach@sbcglobal.net>; Dan Neirinckx (Jamul-Dulzura) (jdcpgsd2@gmail.com) <jdcpgsd2@gmail.com>; Delores Harmes (Valley Center) <dee.valleycenter@gmail.com>; Donna Tisdale <tisdale.donna@gmail.com>; Douglas S. Dill <theddills@att.net>; Eileen Delaney (Fallbrook) <Eileen.Fallbrook@gmail.com>; Harriet G. Taylor <harriettaylor@cox.net>; Jan Hedlun (Potrero) <janwrites2013@yahoo.com>; Jim Chagala (Hidden Meadows) <jchagala@hotmail.com>; Jim Custeau (Spring Valley) <jimcusteausvcpg@cox.net>; Karen Binns (Twin Oaks) <royalviewranch@aol.com>; Kerry Forrest <descansocpg@gmail.com>; Kiki Munshi (Julian) <kiki@skagenranch.com>; Kristi Mansolf (Ramona) <kmansolf@gmail.com>; Patrick Brown <patrickeng@sbcglobal.net>; Paul T. Georgantas <Georgantas@aol.com>; Rebecca Falk <rebfalk7@gmail.com>; Robert Carlyle <rcarlyle@outlook.com>; Robin Joy Maxson (Ramona) <robinjoymaxson@gmail.com>; Sanda Farrell (Twin Oaks) <slfarrell@cox.net>; Stephen Stonehouse <stephen.stonehouse@cox.net>; Steve Norris (Bonsall) <stevenorris.bsg@gmail.com>; Travis Lyon <travislyonacpg@gmail.com>; Vern Denham <PineValleyPlanningGroup@gmail.com>; Wally Riggs <wrplanning@gmail.com>
Cc: Tessitore, Lynnette <Lynnette.Tessitore@sdcounty.ca.gov>; Christman, Scott <Scott.Christman@sdcounty.ca.gov>
Subject: SANDAG's 2021 Regional Plan

Good Afternoon,

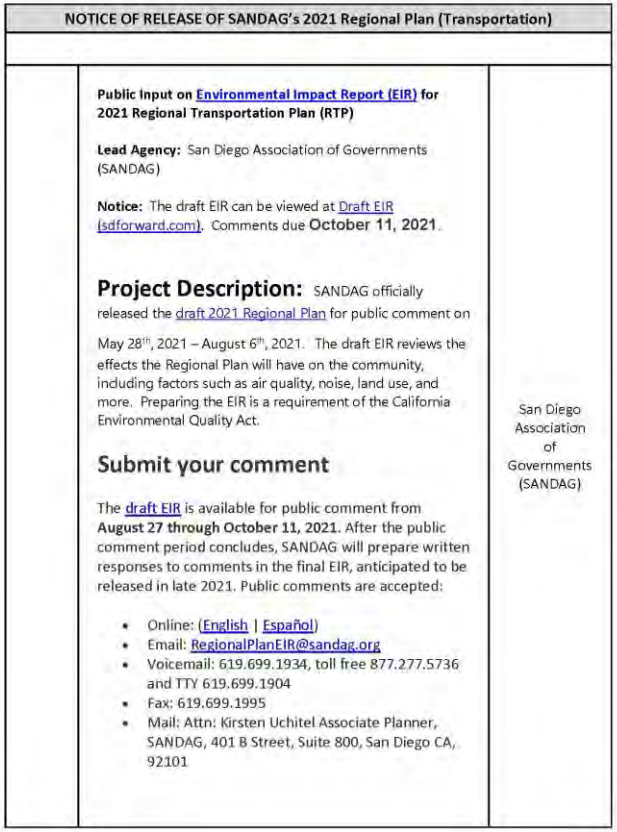
Staff has requested that I send the below information.

If you have questions, please contact Lynnette Tessitore, Chief of Long Range Planning, at lynnette.tessitore@sdcounty.ca.gov.

Thank you,

Jessica Turner
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123
858-495-5336

3



NOTICE OF RELEASE OF SANDAG's 2021 Regional Plan (Transportation)

Public Input on Environmental Impact Report (EIR) for 2021 Regional Transportation Plan (RTP)

Lead Agency: San Diego Association of Governments (SANDAG)

Notice: The draft EIR can be viewed at Draft EIR (sdforward.com). Comments due **October 11, 2021**.

Project Description: SANDAG officially released the draft 2021 Regional Plan for public comment on May 28th, 2021 – August 6th, 2021. The draft EIR reviews the effects the Regional Plan will have on the community, including factors such as air quality, noise, land use, and more. Preparing the EIR is a requirement of the California Environmental Quality Act.

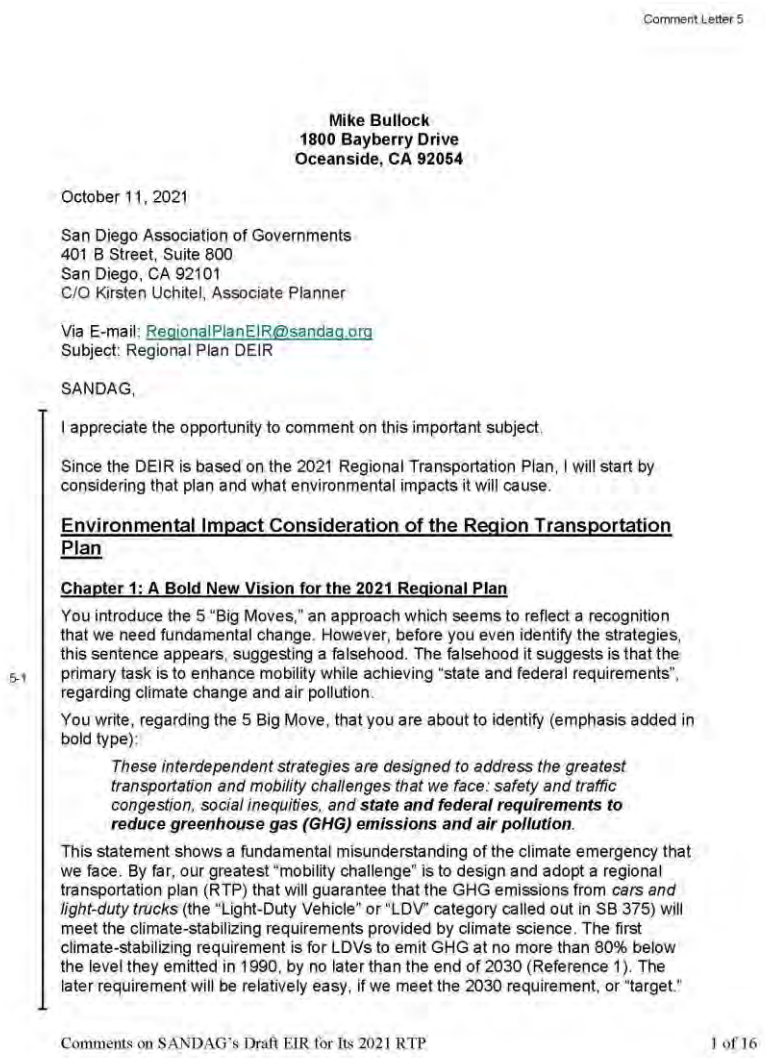
Submit your comment

The draft EIR is available for public comment from **August 27 through October 11, 2021.** After the public comment period concludes, SANDAG will prepare written responses to comments in the final EIR, anticipated to be released in late 2021. Public comments are accepted:

- Online: (English | Español)
- Email: RegionalPlanEIR@sandag.org
- Voicemail: 619.699.1934, toll free 877.277.5736 and TTY 619.699.1904
- Fax: 619.699.1995
- Mail: Attn: Kirsten Uchitel Associate Planner, SANDAG, 401 B Street, Suite 800, San Diego CA, 92101

San Diego Association of Governments (SANDAG)

COMMENT LETTER 5: MIKE BULLOCK



Comment Letter 5

Mike Bullock
1800 Bayberry Drive
Oceanside, CA 92054

October 11, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101
C/O Kirsten Uchitel, Associate Planner

Via E-mail: RegionalPlanEIR@sandag.org
Subject: Regional Plan DEIR

SANDAG,

I appreciate the opportunity to comment on this important subject.

Since the DEIR is based on the 2021 Regional Transportation Plan, I will start by considering that plan and what environmental impacts it will cause.

Environmental Impact Consideration of the Region Transportation Plan

Chapter 1: A Bold New Vision for the 2021 Regional Plan

5-1 You introduce the 5 "Big Moves," an approach which seems to reflect a recognition that we need fundamental change. However, before you even identify the strategies, this sentence appears, suggesting a falsehood. The falsehood it suggests is that the primary task is to enhance mobility while achieving "state and federal requirements", regarding climate change and air pollution.

You write, regarding the 5 Big Move, that you are about to identify (emphasis added in bold type):

> *These interdependent strategies are designed to address the greatest transportation and mobility challenges that we face: safety and traffic congestion, social inequities, and* ***state and federal requirements to reduce greenhouse gas (GHG) emissions and air pollution****.*

This statement shows a fundamental misunderstanding of the climate emergency that we face. By far, our greatest "mobility challenge" is to design and adopt a regional transportation plan (RTP) that will guarantee that the GHG emissions from *cars and light-duty trucks* (the "Light-Duty Vehicle" or "LDV" category called out in SB 375) will meet the climate-stabilizing requirements provided by climate science. The first climate-stabilizing requirement is for LDVs to emit GHG at no more than 80% below the level they emitted in 1990, by no later than the end of 2030 (Reference 1). The later requirement will be relatively easy, if we meet the 2030 requirement, or "target."

RESPONSE TO COMMENT 5-1

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles.

Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6, *Alternatives Analysis*.

5-1 cont.

The later requirement is to have LDVs and all other GHG emitters emit no more than what can be offset by carbon sequestration. This is the "net zero" emission level of 2045 or perhaps 2050. Often, governments only speak of the "net zero" requirement of 2045 or 2050, without mentioning the more-difficult 2030 requirement. This may be because plans to achieve the 2030 requirement must be built upon the math connecting fleet efficiency in year 2030 and the per-capita driving in 2030 with the 2030 climate-stabilization requirement. The math must account for the percent of our electricity that is renewable.

Therefore, the math must derive the following two items:

- So-called, "fleet efficiency" (CO2 emitted per mile of all the cars on the road, for a given year, given the percent of electricity that is from renewables) and
- per-capita driving

that will combine to achieve the "80% below 1990 level" requirement.

5-2

The peer-reviewed Reference 1 does this. It shows 4 cases of fleet-efficiency requirements and the per-capita driving that could be allowed, given the 2030, climate-stabilization requirement stated above.

For the benefit of readers that don't want to look at Reference 1, here is Table 1, showing the 4 cases:

Table 1 4 Cases that Support the 2030 Climate-Stabilizing Requirement

Note: Purple denotes difficult; red, Impossible.

	Case Designations			
	Balanced_1	Balanced_2	2005 Driving	Mary Nichols
% Renewable Electricity	65.0%	90.0%	90.0%	90.00%
% ZEVs, Year 2016	2.0%	2.0%	2.0%	2.70%
% ZEVs, Year 2017	2.0%	2.0%	2.0%	2.70%
% ZEVs, Year 2018	3.0%	3.0%	3.0%	5.11%
% ZEVs, Year 2019	4.0%	4.0%	4.0%	7.53%
% ZEVs, Year 2020	8.0%	8.0%	8.0%	9.94%
% ZEVs, Year 2021	20.0%	15.0%	82.0%	12.35%
% ZEVs, Year 2022	35.0%	25.0%	97.0%	14.75%
% ZEVs, Year 2023	55.0%	45.0%	99.0%	17.16%
% ZEVs, Year 2024	80.0%	70.0%	99.0%	19.58%
% ZEVs, Year 2025	94.0%	95.0%	99.0%	22.00%
% ZEVs, Year 2026	97.0%	97.0%	99.0%	37.60%
% ZEVs, Year 2027	98.0%	98.0%	99.0%	53.20%
% ZEVs, Year 2028	99.0%	99.0%	99.0%	68.80%
% ZEVs, Year 2029	99.0%	99.0%	99.0%	84.40%
% ZEVs, Year 2030	99.0%	99.0%	99.0%	100.00%
% Reduction in Per-Capita Driving With Respect to Year 2005	32.0%	32.0%	0%	50.5%

Comments on SANDAG's Draft EIR for Its 2021 RTP 2 of 16

RESPONSE TO COMMENT 5-2

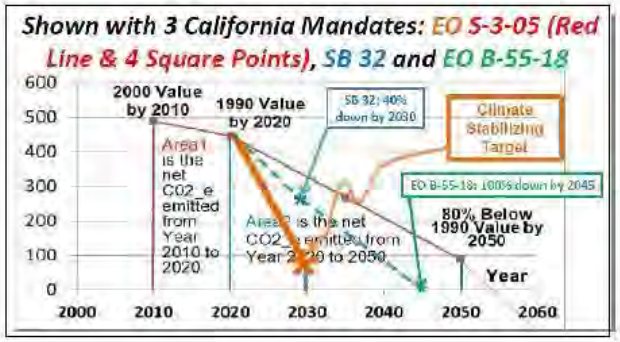
This comment provides background information about Reference 1, but does not identify any specific deficiencies in the EIR's GHG impact analysis. SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of state legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

The only difference between the "Balanced_1" case and the "Balanced_2" case is the increased percentage of electricity that is from renewables, goes from 85% to 90%. That improvement allows the per-cent of new cars that are ZEVs to increase at a less-difficult pace. The "2005 Driving" case is done to prove that it is not feasible. It proves that we must reduce driving. The Mary Nichols case is based on statements made by the retired CARB Chair. CARB does not seem capable of understanding the more-complex 2030 requirement. Therefore, I doubt that Former-Chair Nichols understood that her schedule would need per-capita driving to drop 50.5%, which would be very difficult. CARB and indeed the state of California seem to be pretending that if we achieve the net-zero requirement by 2045, the earth's climate will not destabilize. However, SANDAG cannot go along with this misinformation.

The derivation of the 2030 climate-stabilizing requirement (target) is shown on Page 6 of Reference 1. Reference 2 is used to present Reference 1. The derivation of the 2030 climate-stabilizing requirement (target) is shown on Slides 11 and 12 of Reference 2. That result is shown here in Figure 1.

5-2 cont.

Figure 1 The 2030 Climate Stabilization Target Compared to State Mandates



5-3 It should be noted that Reference 1 is exactly what the most important environmental-advocacy organization in California, the California Democratic Party (the CDP, AKA the CADEM) has in their Platform. The Party Platform is their official policy. This can be seen in Reference 3, where it says, "*Demand a state plan specifying how cars and light-duty trucks can meet climate-stabilizing targets by defining enforceable measures to achieve necessary fleet efficiency and per-capita driving limits.*"

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RESPONSE TO COMMENT 5-3

This comment provides information about the California Democratic Party platform. The "Plan" noted in the comment is a policy position by a private organization and is not a "state plan."

5-3 cont. Such a plan is noted here as a "Plan". CARB has no such Plan. Nor does SANDAG. Given our climate predicament, any project that needs an EIR, that has to do with driving, needs such a Plan. If any discretionary project that has to do with driving needs an EIR, such as the RTP being considered, if it cannot be shown to conform to such a plan, then it must be assumed to be contributing to climate destabilization.

Critical Information Left Out of Chapter 1 and the Regional Transportation Plan (RTP)

Many of the fatal errors of Chapter 1, and the RTP/DEIR in general, can be attributed to the RTP not explaining, up front, the parameter of humanity's Code Red Climate Emergency, as if it plays no role in writing an EIR for the 2021 Regional Transportation Plan. At the front of the RTP's EIR, the following information is needed.

5-4 Figure 2 shows the rise of the world's atmospheric CO2 over the last 50 years. Figure 3 shows both atmospheric temperature (averaged over a year and averaged over the earth, derived from an isotope analysis) and atmospheric CO2 (from air bubbles in ice-core samples), over 800,000 years. It could be noted that our species is only around 300,000 years old. Figure 3 shows that when climate deniers say that climate is always changing and so therefore climate change is normal, they are correct, except for one important consideration. There is nothing normal about the outrageous, recent run-up of atmospheric CO2, to over 410 PPM, in such a short time that it appears to be an instantaneous spike, on Figure 3. Figure 4 shows just 1% (which is just 1,000 years) of the distance on Figure 3, from current time to 100,000 years into the past. For Figure 4, the conventions have been switched: the red line is the earth's atmospheric CO2 and temperature is blue. Figure 4 shows that the CO2 spike is the result of our combustion of fossil fuels because it starts at the start of our industrial revolution. Figure 4 covers the time of the development of our civilization. It shows that everything was normal until about 150 years ago, which is the start of our industrial revolution, when we started to burn fossil fuels. By doing extensive calculations, we know how much CO2 we have produced from the combustion of fossil fuels. Then, by directly measuring the atmospheric CO2 and the acidity of the oceans, we know where that CO2 currently resides. We also know that atmospheric CO2 traps heat. There is no doubt that we have an Anthropogenic Global Warming catastrophe in the making. We are living in a spike of CO2. Neither the magnitude nor the slope have occurred in millions of years. Achieving climate-stabilizing requirements (targets) is our only hope.

5-5 It should also be clearly stated that LDVs, by far, emit more GHG than any other category of emission. Electricity emits the 2nd most. However, electricity has a good chance to achieve the 2030 climate-stabilization requirement derived in Reference 1 and shown in Figure 1. Unfortunately, that cannot be said for LDVs. The implementation of Reference 1 or some other Plan like Reference 1 is our only hope, for LDVs.

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RESPONSE TO COMMENT 5-4

Consistent with CEQA requirements, the Draft EIR properly describes the proposed Plan, evaluates the significant environmental impacts of the proposed Plan, and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

RESPONSE TO COMMENT 5-5

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego Region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EOs B -30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

5-6

Figure 2 Atmospheric CO2, Increasing Over Recent Decades

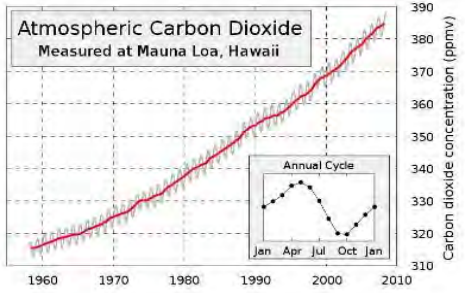
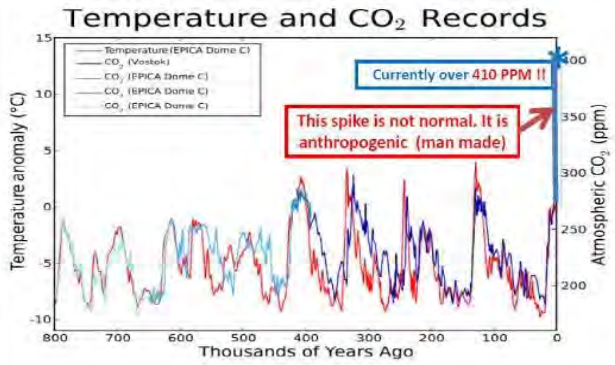


Figure 3 Atmospheric CO2 and Mean Temperature, from 800,000 Years Ago, with Current CO2 Spike



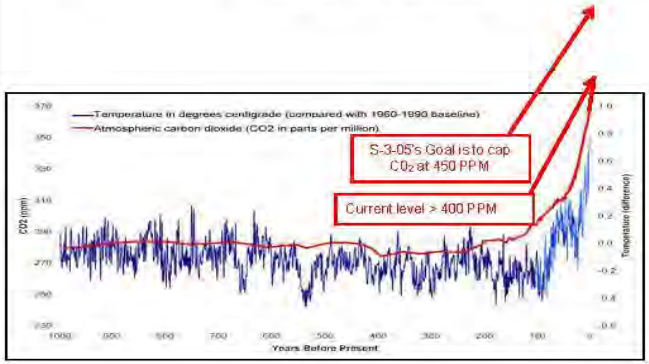
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RESPONSE TO COMMENT 5-6

In the Draft EIR, SANDAG properly evaluates the significant environmental impacts of the proposed Plan and concludes that the proposed Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6. Also, please see response to comment Bullock 5-5.

5-6 cont

Figure 4 **Atmospheric CO2 and Mean Temperature, Over the Last 1,000 Years**



Primary Challenges Misstated

Figure 5 is from Section 1 of the EIR of the RTP. It is said to show our "three primary challenges"

Our *Code Red Climate emergency* is mankind's primary challenge. It means that our *Region's* primary challenge is to do its part to ensure that the emission of GHG from our LDVs support climate stabilization.

5-7 Reference 1 shows how that can be done. We will need to significantly reduce VMT, as proven in Reference 1 and as shown in Table 1. When that is done, there will be no congestion and, given that fact, it is not correct to assert that *Congestion* is a primary challenge. *Social Equity* is a goal, like "*Democracy*" or "*Equal Opportunity*" that we must always move towards, as fast as we can. However, when "*Social Equity*" is discussed in the context of our Anthropogenic climate change problem, the harm of living close to pollution caused by our reliance on fossil fuels is often mentioned. That harm will be reduced and, in some cases (refineries will be closed), eliminated, if we meet our climate-change challenge. The largest "*Social Inequity*" would be climate destabilization because it would cause a "devastating collapse of the human population" to quote from the June 2008 issue of *Scientific American's* article, *Ethics and Economics of Climate Change*. Many reliable sources write that human extinction will be an outcome of climate change failure, which is the path we are on now. This will be the ultimate *inequity* if it happens and make no mistake, it will probably happen.

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RESPONSE TO COMMENT 5-7

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego Region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EOs B -30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

The purpose of the Draft EIR is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (PRC Section 21002.1[a]). The Draft EIR analyzes the significant environmental effects of the proposed Plan, identifies feasible mitigation measures to avoid or reduce these impacts, and presents alternatives to the proposed Plan that could avoid or reduce significant impacts.

In the Draft EIR, SANDAG properly evaluated the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identified mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

Climate destabilization, as described in Reference 1, will end most life forms and almost certainly our own species. This environmental impact must be fully explained in a legal EIR. The DEIR has no such discussion or explanation.

5-7 cont.

Figure 5 The DEIR's Erroneous Claim of "Three Primary Challenges", for our Region



Need to Reimagine

I agree with Chapter 1's Page 7 statement that there is an "urgent need to reimagine our regional transportation system".

Reimagine Example Left Out

5-8 That is one of the places (Chapter 1's Page 7) where SANDAG should state that we must stop widening freeways. Instead of widening freeways, as called for in the current, fatally flawed, version of the *Transnet* sales tax, we should be reducing the size of our freeways. The well-understood principal of *Induced Traffic Demand* informs us that adding more lanes will not reduce congestion, but it will increase VMT. *Induced Traffic Demand* also informs us that removing lanes will not increase congestion, but it will decrease VMT. As shown in Reference 1 and Table 1, we must reduce VMT. The *Transnet Ordinance* can be changed in an emergency. We have an emergency.

Vision, Goals, Strategies, and Actions Are Useless if Our Earth's Climate is Destabilized

5-9 Page 13 starts a discussion which seems to be written for some other planet or for some other time on our planet. Climate destabilization would lead to a collapse of our human population that would lead to our extinction. Therefore, Page 13's

- *Vision, Goals, Strategies, and Actions*

must be replaced with

- *A Requirement, Vision, Goals, Strategies, and Actions.*

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RESPONSE TO COMMENT 5-8

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D to the proposed Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

Where possible, the Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network. Improvements to the freeway system in the proposed Plan are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel.

RESPONSE TO COMMENT 5-9

This comment addresses the proposed Plan and aforementioned information about Reference 1. No further response is required.

5-9 cont.

The *Requirement* is to ensure that our transportation system supports the climate-stabilization requirement of 2030, as shown in Figure 1 of this letter. Reference 1 shows how this can be done, for LDVs. Most of the fleet-efficiency requirements are show in Table 1 of this letter. (All of the needed fleet-efficiency requirements are described in Reference 1.) Table 1 also shows the driving reduction that is computed in Reference 1. It is a 32% reduction in per-capita VMT, with respect to year 2005. It's expressed using the SB 375 conventions for expressing driving reductions. Even though SB 375 states that it is about a *GHG* reduction, it is really about a *VMT* reduction, because SB 375 clearly states that the Metropolitan Planning Organizations (MPOs, like SANDAG) can take no credit for GHG reductions accomplished by the state. The state has the fleet-efficiency responsibility. The Metropolitan Planning Organizations (MPOs, like SANDAG) have the responsibility to reduce driving. Therefore, the SB 375 reductions in LDV GHG must be produced by SANDAG measures to reduce LDV VMT. In other words, SANDAG's responsibility is to reduce driving.

5-10

The Fatal Flaw of Not Saying What's Important

On Page 13 of Chapter 1, it says, "The 2021 Regional Plan reduces per capita GHG emissions from cars and light duty trucks by 20% below 2005 by 2035". The document does not say whether-or-not this is enough to support climate stabilization. Tragically, it is *not* enough to support climate stabilization. The 2030 climate-stabilization requirement is derived in Reference 1 and is shown in Figure 1 of this letter.

5-11

Similarly, Chapter 1 lists key goals, policies, and Executive Orders that were considered. They are shown in Figure 6.

The problem is that the document is supposed to be an EIR, which is to say it must report on the environmental impacts of what is being done. The environmental impacts are what will happen in the physical world, not in the legislative or judicial world. To figure out what will happen in the physical world, the resulting emissions need to be compared to what the climate scientist are telling us we must accomplish if we want to stabilize the climate at a livable level.

That information is nowhere to be found in the current DEIR. That is clearly illegal because the decision makers and the public need to understand what will happen to our planet if all transportation planning followed the path described by SANDAG as in the "cumulative effects" consideration.

5-12

The "cumulative impacts" consideration means that no one can get by using an argument that a discretionary project being considered is "too small to matter".

Figure 6 is an admission of guilt because it is described as containing SANDAG's "key goals". No climate-stabilization requirement is listed. SANDAG might be, technically, within CEQA law for the 2045 to 2050 requirement of zero net emissions because this happens to be covered by the EO B-55-18 executive order. However, SANDAG needs to state that zero net emissions by 2045 is our second climate-stabilizing target and that is covered by EO B-55-18. Where SANDAG clearly is in violation of CEQA law is that it does not state that the industrialized world's first climate-stabilization requirement (target), which is for 2030, is to emit GHG at no more than 80% below

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RESPONSE TO COMMENT 5-10

Draft EIR Section 4.16 (Impact TRA-2) properly analyzed whether the proposed Plan would achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals, finding a significant and unavoidable transportation impact. Nevertheless, Impact TRA--2 does show that the proposed Plan would achieve substantial reductions in per capita VMT.

RESPONSE TO COMMENT 5-11

This comment addresses the proposed Plan and aforementioned information about Reference 1. Also, please see response to comment Bullock 5-7.

RESPONSE TO COMMENT 5-12

The purpose of the Draft EIR is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (PRC Section 21002.1[a]). Consistent with CEQA requirements, the Draft EIR analyzes the significant environmental effects of the proposed Plan, identifies feasible mitigation measures to avoid or reduce these impacts, and presents alternatives to the proposed Plan that could avoid or reduce significant impacts.

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan, including using a net-zero significance threshold (Impact GHG-1), and concludes that the Plan would have significant and unavoidable GHG emissions impacts (Impact GHG-5). The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

what we emitted in 1990. SANDAG needs to redo its RTP using a Plan like that shown in Reference 1.

Figure 6 SANDAG's Admission of Guilt Because These Do NOT Cover Achieving the Industrial World's 2030 Climate-Stabilizing Target.

Key State goals, policies, and Executive Orders considered in the 2021 Regional Plan:

- SB 375 and SCS Program and Evaluation Guidelines
- California Assembly Bill 805 (Gonzalez Fletcher, 2017): identification of disadvantaged communities, inclusion of strategies to reduce pollution exposure in those communities, and use of a skilled and trained workforce
- 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations[5]
- California Transportation Plan 2050
- California Senate Bill 32 (Pavley, 2016): Reduce GHG emissions 40% below 1990 levels by 2030
- EO B-55-18: Carbon Neutrality by 2045
- EO S-3-05: Reduce GHG emissions 80% below 1990 levels by 2050
- EO N-79-20: 100% zero-emission vehicle sales by 2035
- EO N-82-20: Conserve at least 30% of California's land and coastal waters by 2030

5-12 cont.

Achieving the industrialized world's 2030 Climate-Stabilizing Requirement would obviously be a "Key policy" and accomplishment for SANDAG. Figure 6 and the stated organization of the DEIR means that there is no need for me to read further to know that SANDAG has made no effort to consider what it would take for the RTP to conform to achieving the 2030, climate-stabilizing requirement. Page 13 of Chapter 1 presents the RTP's Visions and Goals. There is nothing there about stabilizing the climate at a livable level. That is shown in Figure 6, which is taken from Chapter 1 of the RTP.

Also, Chapter 2 is defined on Page 15 of Chapter 1. It says there that Chapter 2, the Transportation Plan's Regional Sustainable Community Strategy (SCS, which is required by SB 375), describes "the land use strategies, and programs that will achieve our Vision and Goals."

5-13

Chapter 1 has described SANDAG's "Vision and Goals". None of them include achieving the 2030 climate-stabilizing requirement, or "target".

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RESPONSE TO COMMENT 5-13

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

The proposed Plan was developed through a data driven planning process. The forecasted development pattern for the proposed Plan's SCS is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity. The SCS land use pattern uses areas in the region known as Mobility Hubs to concentrate future development. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. The SCS land use pattern represents a continuing trend in the San Diego region to provide more housing and job opportunities in the existing urbanized areas of the region.

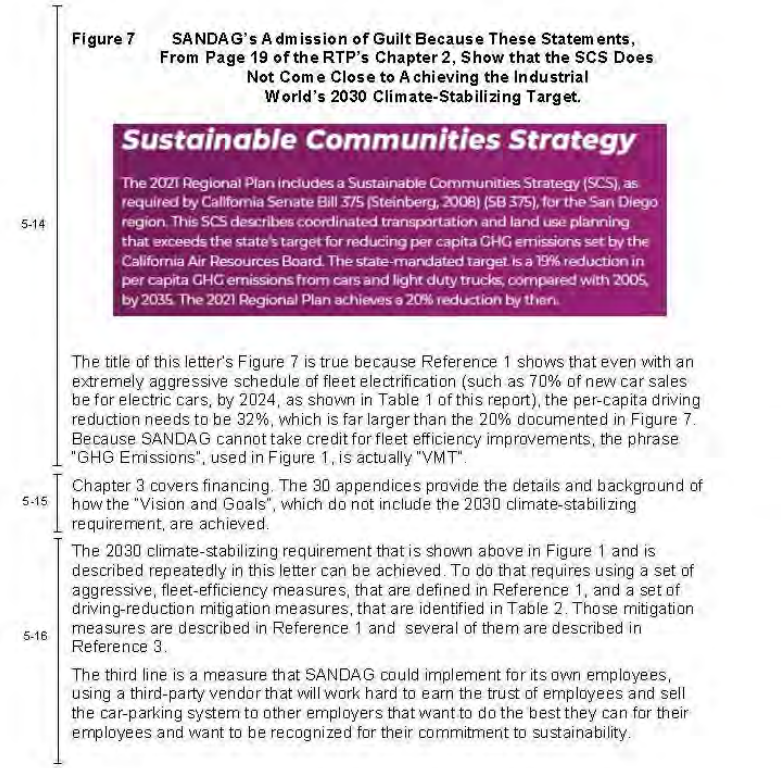


Figure 7 SANDAG's Admission of Guilt Because These Statements, From Page 19 of the RTP's Chapter 2, Show that the SCS Does Not Come Close to Achieving the Industrial World's 2030 Climate-Stabilizing Target.

Sustainable Communities Strategy

The 2021 Regional Plan includes a Sustainable Communities Strategy (SCS), as required by California Senate Bill 375 (Steinberg, 2008) (SB 375), for the San Diego region. This SCS describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by the California Air Resources Board. The state-mandated target is a 19% reduction in per capita GHG emissions from cars and light duty trucks, compared with 2005, by 2035. The 2021 Regional Plan achieves a 20% reduction by then.

5-14

The title of this letter's Figure 7 is true because Reference 1 shows that even with an extremely aggressive schedule of fleet electrification (such as 70% of new car sales be for electric cars, by 2024, as shown in Table 1 of this report), the per-capita driving reduction needs to be 32%, which is far larger than the 20% documented in Figure 7. Because SANDAG cannot take credit for fleet efficiency improvements, the phrase "GHG Emissions", used in Figure 1, is actually "VMT".

5-15

Chapter 3 covers financing. The 30 appendices provide the details and background of how the "Vision and Goals", which do not include the 2030 climate-stabilizing requirement, are achieved.

5-16

The 2030 climate-stabilizing requirement that is shown above in Figure 1 and is described repeatedly in this letter can be achieved. To do that requires using a set of aggressive, fleet-efficiency measures, that are defined in Reference 1, and a set of driving-reduction mitigation measures, that are identified in Table 2. Those mitigation measures are described in Reference 1 and several of them are described in Reference 3.

The third line is a measure that SANDAG could implement for its own employees, using a third-party vendor that will work hard to earn the trust of employees and sell the car-parking system to other employers that want to do the best they can for their employees and want to be recognized for their commitment to sustainability.

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RESPONSE TO COMMENT 5-14

SB 375 required CARB to set regional targets for reducing GHG emissions from passenger vehicle use. SANDAG's State-mandated target is to reduce regional emissions of GHGs from cars and light trucks by 15 percent, per capita, by 2020, compared with a 2005 baseline (CARB 2017). By 2035, a 19 percent reduction is required. The Sustainable Communities Act does not require CARB to establish post-2035 targets.

To achieve the targets, SANDAG and other MPOs are required to develop an SCS as a component of the RTP. The SCS is required by Government Code Section 65080(b)(2)(B) to:

- Identify the general location of uses, residential densities, and building intensities within the region.
- Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population.
- Identify areas within the region sufficient to house an 8-year projection of the regional housing need for the region.
- Identify a transportation network to serve the transportation needs of the region.
- Gather and consider the best practically available scientific information regarding resource areas and farmland in the region.
- Consider specified State housing goals.
- Set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks, to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by CARB.
- Allow the RTP to comply with federal Clean Air Act requirements related to air quality conformity.

Appendix D of the proposed Plan documents compliance with these SCS requirements and provides SCS-related background information.

RESPONSE TO COMMENT 5-15

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 5-16

In the Draft EIR, SANDAG properly evaluated the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts.

The Draft EIR then identified mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

SANDAG developed a *Parking Strategies for Smart Growth* guide, referenced on page 4.16-13 of the Draft EIR, as part of its *Planning Tools for the San Diego Region*. This guide provides a benchmark and compares the various parking regulations within the region, as well as how those regulations compare to national standards. Additionally, the guide provides example policies on how jurisdictions can implement smart growth parking policies and programs. SANDAG also developed a regional Parking Management Toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. One of the proposed Plan's implementation strategies includes updating the Toolbox to account for newer modes and more flexible curb space strategies.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

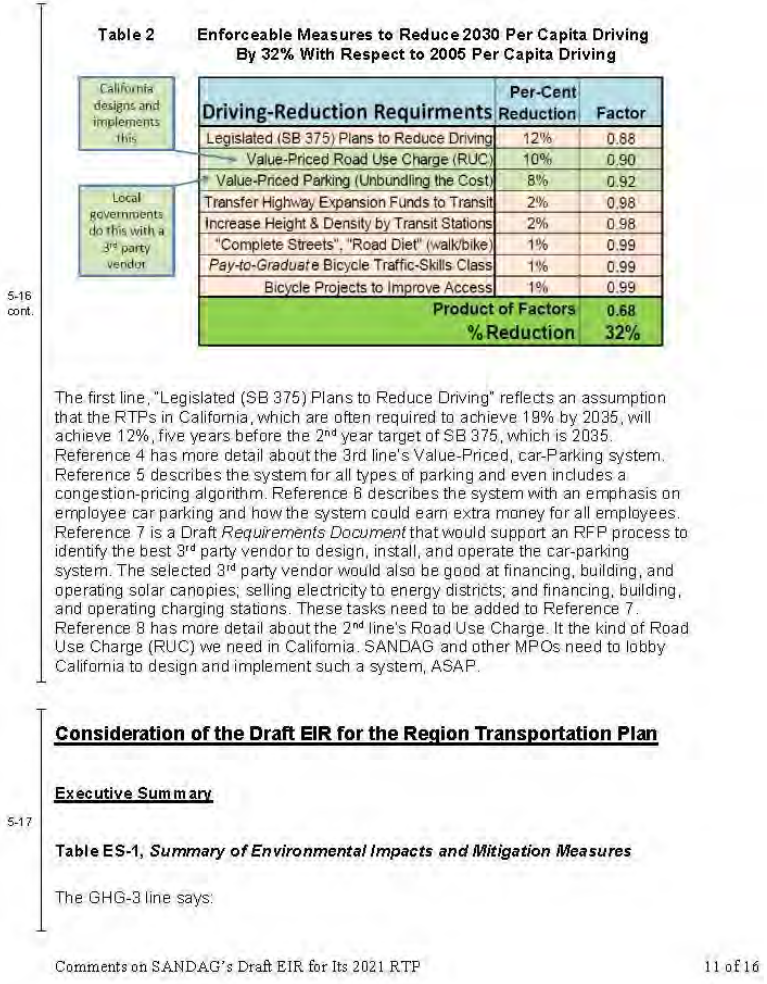


Table 2 Enforceable Measures to Reduce 2030 Per Capita Driving By 32% With Respect to 2005 Per Capita Driving

California designs and implements this

Local governments do this with a 3rd party vendor

Driving-Reduction Requirments	Per-Cent Reduction	Factor
Legislated (SB 375) Plans to Reduce Driving	12%	0.88
Value-Priced Road Use Charge (RUC)	10%	0.90
* Value-Priced Parking (Unbundling the Cost)	8%	0.92
Transfer Highway Expansion Funds to Transit	2%	0.98
Increase Height & Density by Transit Stations	2%	0.98
"Complete Streets", "Road Diet" (walk/bike)	1%	0.99
*Pay-to-Graduat*e Bicycle Traffic-Skills Class	1%	0.99
Bicycle Projects to Improve Access	1%	0.99
Product of Factors		**0.68**
% Reduction		**32%**

The first line, "Legislated (SB 375) Plans to Reduce Driving" reflects an assumption that the RTPs in California, which are often required to achieve 19% by 2035, will achieve 12%, five years before the 2nd year target of SB 375, which is 2035. Reference 4 has more detail about the 3rd line's Value-Priced, car-Parking system. Reference 5 describes the system for all types of parking and even includes a congestion-pricing algorithm. Reference 6 describes the system with an emphasis on employee car parking and how the system could earn extra money for all employees. Reference 7 is a Draft *Requirements Document* that would support an RFP process to identify the best 3rd party vendor to design, install, and operate the car-parking system. The selected 3rd party vendor would also be good at financing, building, and operating solar canopies; selling electricity to energy districts; and financing, building, and operating charging stations. These tasks need to be added to Reference 7. Reference 8 has more detail about the 2nd line's Road Use Charge. It the kind of Road Use Charge (RUC) we need in California. SANDAG and other MPOs need to lobby California to design and implement such a system, ASAP.

5-16 cont.

Consideration of the Draft EIR for the Region Transportation Plan

Executive Summary

5-17

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*

The GHG-3 line says:

Comments on SANDAG's Draft EIR for Its 2021 RTP 11 of 16

RESPONSE TO COMMENT 5-17

This comment addresses the Draft EIR Executive Summary, Table ES-1, Summary of Environmental Impacts and Mitigation Measures (pages ES-4 to ES-24) and asserts that achieving the GHG emissions reductions level of Impact GHG-3 (at least 30 percent reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions [2016]) would not be consistent with reducing emissions 80 percent below 1990 levels by 2030, which the commenter refers to as the "industrialized world's 2030 climate stabilizing requirement." As explained in the Draft EIR (page 4.8-28), Impact GHG-3 is based on the target that the SANDAG Board of Directors asked staff to consider when drafting the 2021 Regional Transportation Plan (SANDAG Board Resolution No. 2021-17). Moreover, the Draft EIR also includes four other significance criteria to evaluate GHG emissions generated under implementation of the proposed Plan, including Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California's targets and goals for Statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State's ability to achieve the Statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).

This comment also addresses Impact GHG-5 in Table ES-1, and asserts that the GHG mitigation measures summarized in the table are too vague, with a specific reference to mitigation measure TRA-2, Achieve Further VMT Reductions for Transportation and Development Projects. As explained on Draft EIR page ES-3, this table provides a summary of environmental impacts and mitigation measures to avoid or reduce significant impacts. The full text of mitigation measure TRA-2, which includes a detailed list of project-level VMT reduction measures that SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, implement during the project design and project-level CEQA review phase of transportation network improvements and land development projects (Draft EIR pages 4.16-53 to 4.16-54). No further response is required.

GHG-3 Conflict with or impede achievement of an at least 30% reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions (2016)

There are no mitigation measures and yet the "Level of Significance After Mitigation" is shown to be "Less-than-significant impact in 2035."

California did not meet its 2020 EO S-3-05 target, which was our 1990 emission level, until around 2019. (This was a case were California achieved a target early.) Therefore, our emission in 2016 exceeded our 1990 level of emission. Therefore, only achieving a "*30% reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions (2016)*" would be an unmitigated environmental disaster. If other MPOs followed this example, we would be unable to stabilize our climate because we would be well past our (the industrialized world's) 2030 climate-stabilizing requirement, of 80% below our 1990 level. 5-17 cont.

The line for GHG-5 is too vague, in terms of mitigation measures. To have any hope of achieving significant reductions by 2030, measures need to be mature enough to start soon. The mitigation measures shown in this line are little more than wishful thinking. As San Diego County Superior Court Judge Taylor wrote in a ruling in favor of the plaintiffs in their CEAQ complaint against the County's woefully inadequate Climate Action Plan, "enforceable measures are needed now". That ruling was issued 9 years ago. SANDAG too often does not listen to me or others that urge enforceable measures that can be started now.

SANDAG instead seems to like words like (these are also from the GHG-5's, "mitigation measures"):

> *TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects*",

How would that be done? The "measure" is too ill defined to have any value.

Alternative 3 should be improved upon to conform with Reference 1 and then implemented as fast as possible. TRANSNET need to be modified to align with the improved-upon Alternative 3. 5-18

Table 2-8, *Proposed Plan Estimated SB 375 Greenhouse Gas Emissions Reductions for Cars and Light Trucks*

5-19

The Proposed Plan's 2035 reduction of 20% is so small that it would help to bring about an environmental disaster.

Phased Next OS Network Improvements and Investments, Page 2-66

Comments on SANDAG's Draft EIR for Its 2021 RTP 12 of 16

RESPONSE TO COMMENT 5-18

Please refer to Master Response 1 for discussion regarding accelerating elements of the Plan. There are constraints on when money becomes available during the lifespan of the proposed Plan. The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development the proposed Plan.

This comment and your support for Alternative 3 is noted for the record and will be forwarded to the SANDAG Board of Directors for its consideration prior to making a decision on adoption of the proposed Plan.

RESPONSE TO COMMENT 5-19

Implementation of the proposed Plan would result in a 20 percent reduction in per capita CO_2 emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction set by CARB for the SANDAG region.

As discussed in Section 4.8 of the EIR, however, the proposed Plan's GHG emissions would be inconsistent with the State's ability to achieve the goals of EO B-55-18 and S-3-05. Mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan's GHG emissions with the State's ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, implementation of the many other changes required to achieve these goals is beyond SANDAG's and local agencies' current jurisdiction and authority. As such, impacts were identified as significant and unavoidable.

Considering our 2030 climate-stabilization target and the derivations of Reference 1, the car-parking system described in References 1 through 7 needs to have numerous successful implementations and be well on the way to being widely implemented by 2025. The words "dynamic curb management", for 2035, is not encouraging. The car-
5-20 parking system proposed by this letter and since 2010 by this author certainly includes dynamic curb management. However, SANDAG needs to reach out to get help on this important aspect of the Next OS. I hope we can meet soon.

Likewise, on Pages 2-66 to 2-67 and on Page 2-71 to 2-72, there are hopeful signs that SANDAG could help to foster the changes we need. I would love to meet to discuss these topics.

Climate Change Destabilization Could Include our Weather

Page 3-1 has a description of our current climate and how climate change could change our weather. It needs a statement that destabilization of climate systems (such as the melting of our permafrost or unleashing large amounts of methane from
5-21 beneath our artic region, or burning up an enormous expanse of forests, including our Amazon rain forest) could cause much larger variations if these destabilizing systems accelerate and set off other climate-destabilizing systems. The freeze experienced by Texas and measurement of 120 Degrees in Canada show that, when it comes to climate, we are already in uncharted territory. The description of San Diego County's "current climate" needs a statement that, given the fact that our atmospheric CO2 is at 420 PPM, when it should be at 280 PPM, we really don't know what might be possible, in terms of current weather.

Mitigation Measures for *Existing* Development

On Page 4-3, it says, "The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement."

5-22 This will be too little too late and it is an arbitrary decision to do what is easiest. It does not make sense, given the fact of our Code Red Climate Emergency, as explained in this letter. For example, TDM Ordinances need to apply to *existing* developments. SANDAG should provide no help to municipal governments that fail to have a powerful TDM for their own employees, to set an example, for other employers. The TDM would include the car-parking system described in Reference 1 – 7. SANDAG should do this for their own employees, ASAP, using Reference 7 to start the generation of a Systems Definition document to support an RFP process to identify a good 3rd party vendor.

4.8's Paragraph on "Global Climate Change"

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RESPONSE TO COMMENT 5-20

Thank you for providing the included resources for SANDAG's consideration. Between now and 2050, it is anticipated that the drive alone mode share will be significantly reduced. Cars will still play a part in the mobility ecosystem, but effective parking and curb management strategies will be needed as multimodal options within communities increase. The key will be to make the right amount of parking available when it is needed and price it so that alternative commutes are encouraged, and accessibility, equity, and economic development are promoted. Tiered pricing will need to be implemented; for example, free and lower priced parking in outlying, more suburban communities including "gateway" (i.e., end-of-line Transit Leap stations) compared to market-rate pricing in our urban core and other denser communities.

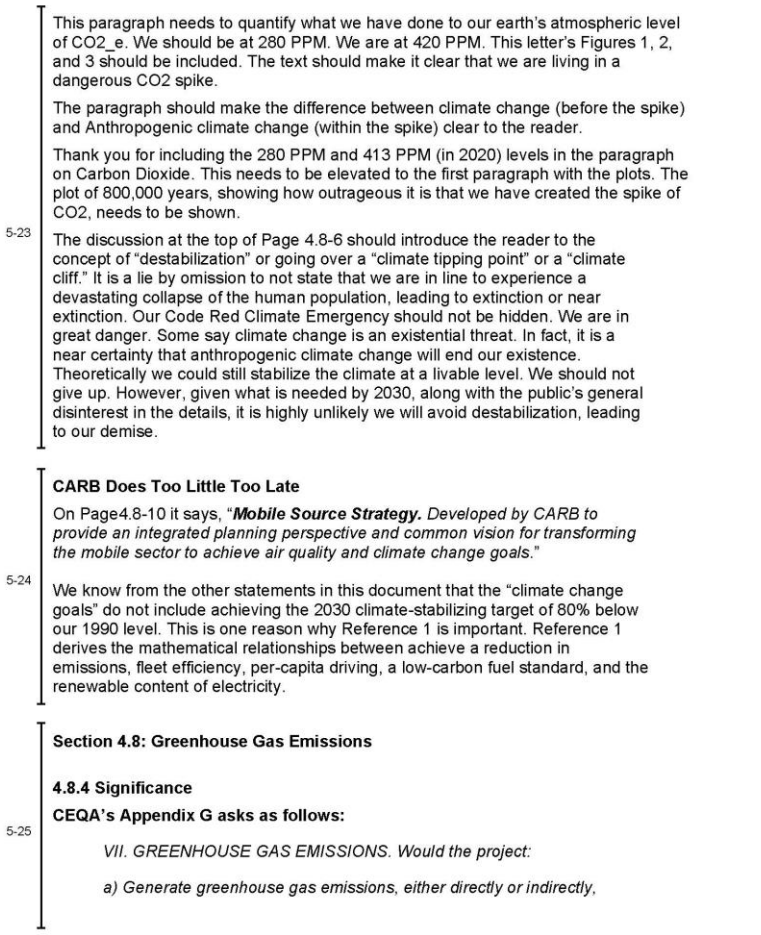
Parking Management is one of the key policy areas included in the proposed Plan. As part of the Plan, SANDAG has designated program funding towards working with local jurisdictions to implement parking management strategies such as parking pricing. In addition, SANDAG develops technical resources to provide jurisdictions with guidance on implementing parking policies, such as the 2014 Parking Management Toolbox. One of the proposed Plan's implementation strategies includes updating the Toolbox to account for newer modes and more flexible curb space strategies.

RESPONSE TO COMMENT 5-21

Appendix C, *Climate Change Projections, Impacts, and Adaptation*, of the EIR describes how climate may change in the San Diego region in the future due to the effects of global warming, and how those changes could affect each of the resource areas discussed in the EIR. The EIR sections evaluate whether the proposed Plan would exacerbate a climate change impact (e.g., creating more housing development in high wildfire risk zones).

RESPONSE TO COMMENT 5-22

The Plan proposes a Transportation Demand Management Ordinance that would require employers over a certain size to provide transportation benefits and amenities that encourage sustainable transportation choices. These types of TDM ordinances exist in other regions across the state. A near-term implementation action is to complete a Transportation Demand Management Ordinance Policy Analysis. This policy analysis would detail the employers that the



This paragraph needs to quantify what we have done to our earth's atmospheric level of CO2_e. We should be at 280 PPM. We are at 420 PPM. This letter's Figures 1, 2, and 3 should be included. The text should make it clear that we are living in a dangerous CO2 spike.

The paragraph should make the difference between climate change (before the spike) and Anthropogenic climate change (within the spike) clear to the reader.

Thank you for including the 280 PPM and 413 PPM (in 2020) levels in the paragraph on Carbon Dioxide. This needs to be elevated to the first paragraph with the plots. The plot of 800,000 years, showing how outrageous it is that we have created the spike of CO2, needs to be shown.

5-23 The discussion at the top of Page 4.8-6 should introduce the reader to the concept of "destabilization" or going over a "climate tipping point" or a "climate cliff." It is a lie by omission to not state that we are in line to experience a devastating collapse of the human population, leading to extinction or near extinction. Our Code Red Climate Emergency should not be hidden. We are in great danger. Some say climate change is an existential threat. In fact, it is a near certainty that anthropogenic climate change will end our existence. Theoretically we could still stabilize the climate at a livable level. We should not give up. However, given what is needed by 2030, along with the public's general disinterest in the details, it is highly unlikely we will avoid destabilization, leading to our demise.

CARB Does Too Little Too Late

On Page4.8-10 it says, "***Mobile Source Strategy.*** *Developed by CARB to provide an integrated planning perspective and common vision for transforming the mobile sector to achieve air quality and climate change goals.*"

5-24 We know from the other statements in this document that the "climate change goals" do not include achieving the 2030 climate-stabilizing target of 80% below our 1990 level. This is one reason why Reference 1 is important. Reference 1 derives the mathematical relationships between achieve a reduction in emissions, fleet efficiency, per-capita driving, a low-carbon fuel standard, and the renewable content of electricity.

Section 4.8: Greenhouse Gas Emissions

4.8.4 Significance

CEQA's Appendix G asks as follows:

5-25

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly,

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ordinance would apply to and mechanisms for implementation and enforcement.

RESPONSE TO COMMENT 5-23

This comment addresses the discussion of "Global Climate Change" in Draft EIR Section 4.8.1 (page 4.8-1) and asserts that additional context should be included in this section, including comparison of existing emissions concentrations to pre-industrial levels and information about climate "destabilization" or "tipping points." This section of the DEIR has been revised as follows to include additional information on the latest climate change science as reported by the IPCC in August 2021.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution. <u>According to the Intergovernmental Panel on Climate Change (IPCC), human influence has warmed the climate at a rate that is unprecedented in at least the last 2000 years (IPCC 2021). In addition, the IPCC reported with high confidence that in 2019 CO2 concentrations were higher than at any time in at least 2 million years, and reported with very high confidence that 2019 concentrations of CH4 and N2O were higher than at any time in at least 800,000 years (IPCC 2021).</u> Rising atmospheric concentrations of GHGs in excess of natural levels enhance the greenhouse effect, which contributes to global warming of the Earth's lower atmosphere. This warming induces large-scale changes in ocean circulation patterns, precipitation patterns, global ice cover, biological distributions, and other changes to the Earth's system that are collectively referred to as *climate change*. <u>The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years (IPCC 2021). The IPCC also reports that many changes in the climate system become larger in direct relation to increasing global warming, including increases in the frequency and intensity of hot extremes, marine heatwaves, and heavy precipitation, agricultural and ecological droughts in some regions, and proportion of intense tropical cyclones, as well as reductions in Arctic sea ice, snow cover, and permafrost (IPCC 2021). In addition, low-likelihood outcomes, such as ice sheet collapse, abrupt ocean circulation changes, some compound extreme events and warming substantially larger than the assessed *very likely* range of future warming cannot be ruled out (IPCC 2021).</u> Climate change impacts in this analysis are evaluated in the relevant resource sections (e.g., climate change effects

to water supply are discussed in Section 4.18, *Water Supply*, and climate change's influence on wildfire are discussed in Section 4.19, *Wildfire*, and similarly for other sections) and covered in detail in the *Climate Change Projections, Impacts and Adaptation* report in Appendix C.

RESPONSE TO COMMENT 5-24

is commenter asserts that the Mobile Source Strategy, which is a plan prepared by CARB to identify the level of transition to cleaner mobile source technologies needed to achieve California air quality, climate change, and community risk reduction goals, does not include a "2030 climate-stabilizing target of 80% below our 1990 level." The 2020 Mobile Source Strategy was approved by the CARB Board on October 28, 2021. This comment is not related to the adequacy of the Draft EIR and no further response is required.

RESPONSE TO COMMENT 5-25

This comment references OPR's Discussion Draft report on CEQA and Climate Change and asserts that "a project that will have significant impacts on driving" is required to "conform to a plan showing how LDVs (light-duty vehicles) can achieve our climate-stabilizing targets…" Refer to response to comment Bullock 5-22, which explains that the Draft EIR includes Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California's targets and goals for statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State's ability to achieve the statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).

that may have a significant impact on the environment?

Considering cumulative effects of the proposed RTP, the answer is yes, especially for LDVs. The next question about conflicting with an applicable plan does not matter, given the result of the "letter a" criterion.

Section XVII also applies because it explicitly mentions cumulative impacts and asks:

> c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Nothing short of a full exchange of nuclear weapons could be worse for people than climate destabilization.

From OPR's Reference 9 with emphasis added:

> Each public agency that serves as a CEQA lead agency should develop its own approach to performing a climate change analysis for projects that generate greenhouse gas emissions. A consistent approach should be applied for the analysis of projects, and the analysis must keep apace with scientific knowledge and regulatory schemes. (*Cleveland National Forest Foundation v. San Diego Assn. of Governments*, *supra*, 3 Cal.5th at 519.) For these projects, compliance with CEQA entails three basic steps: identify and quantify the greenhouse gas emissions; determine the significance of those emissions **in the context of climate change**; and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.

5-25 cont.

"In the context of climate change" means that the climate science must be applied to the situation. From that, to be legal, a project that will have significant impacts on driving, including its feasible (technologically possible and cost effective) mitigation measures, must conform to a plan showing how LDVs can achieve our climate-stabilizing targets, especially our 2030 target because it occurs so soon. This again shows the importance of Reference 1 or some other such Plan.

Thank you for Tables 4.8-7 and 4.8-8 showing the importance of reducing VMT.

5-26

Table 4.8-9 is key. However, its results are insufficient to support climate stabilization. Reference 1 shows we need a 32% value by 2030, which is 5 years sooner than 2035.

Figure 7 shows that the DEIR does not consider what the climate scientists are telling us, which is what we must achieve to stabilize the climate at a livable level. The state mandates shown are not enough to achieve our 2030 climate-stabilizing requirement, which is to emit at a level that is no more than 80% below our 1990 emission level.

5-27

Figure 7 SANDAG's DEIR Section on GHG Does NOT Consider Achieving the Industrial World's 2030 Climate-Stabilizing Target.

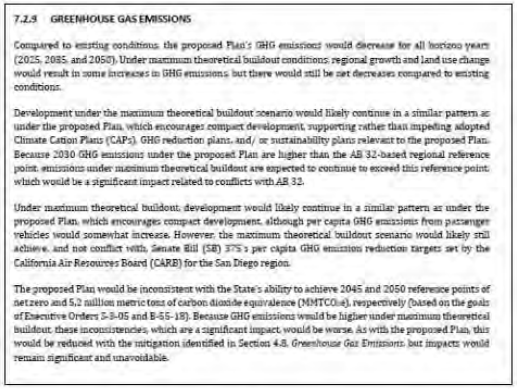
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RESPONSE TO COMMENT 5-26

The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels, as mandated by SB 375. Reducing GHG emissions and achieving State goals related to carbon neutrality requires actions at all levels of government. SANDAG looks to support and encourage local jurisdictions, State agencies, and other partners to reduce emissions beyond what is achieved by the proposed Plan. The proposed Plan would provide travelers with more travel and mobility options in residential and employment centers that can lead to a reduction in VMT.

RESPONSE TO COMMENT 5-27

This comment addresses Draft EIR Chapter 7, *Other Considerations Required by CEQA*, Section 7.2.9, which evaluates GHG emissions impacts under a maximum theoretical buildout scenario, and asserts that "state mandates" are insufficient to reduce 2030 emissions to no more than 80 percent below 1990 emissions levels. Refer to response to comment Bullock 5-22, which explains that the Draft EIR includes Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California's targets and goals for statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State's ability to achieve the statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).



7.2.5 GREENHOUSE GAS EMISSIONS

Compared to existing conditions, the proposed Plan's GHG emissions would decrease for all horizon years (2025, 2035, and 2050). Under maximum theoretical buildout conditions, regional growth and land use change would result in some increases in GHG emissions, but there would still be net decreases compared to existing conditions.

Development under the maximum theoretical buildout scenario would likely continue in a similar pattern as under the proposed Plan, which encourages compact development, supporting rather than impeding adopted Climate Action Plans (CAPs), GHG reduction plans, and/ or sustainability plans relevant to the proposed Plan. Because 2030 GHG emissions under the proposed Plan are higher than the AB 32-based regional reference point, emissions under maximum theoretical buildout are expected to continue to exceed this reference point, which would be a significant impact related to conflicts with AB 32.

Under maximum theoretical buildout, development would likely continue in a similar pattern as under the proposed Plan, which encourages compact development, although per capita GHG emissions from passenger vehicles would somewhat increase. However, the maximum theoretical buildout scenario would likely still achieve, and not conflict with, Senate Bill (SB) 375's per capita GHG emission reduction targets set by the California Air Resources Board (CARB) for the San Diego region.

The proposed Plan would be inconsistent with the State's ability to achieve 2045 and 2050 reference points of net zero and 5.2 million metric tons of carbon dioxide equivalence (MMTCO2e), respectively (based on the goals of Executive Orders S-3-05 and B-55-18). Because GHG emissions would be higher under maximum theoretical buildout, these inconsistencies, which are a significant impact, would be worse. As with the proposed Plan, this would be reduced with the mitigation identified in Section 4.8, *Greenhouse Gas Emissions*, but impacts would remain significant and unavoidable.

5-27 cont.

The second paragraph states that the 2030 emissions under the proposed Plan are higher than the AB 32-based regional reference point. Figure 1 of this letter shows that this means the 2030 value is worse than the SB 32 value (40% down from the 1990 value) which is much more emission than the climate-stabilizing value of 80% down.

In Closing

Thank you for your leadership in performing your critical work. Thank you for reading this material and for providing the comments and response as required for any comment letter on a DEIR. Please let me know if you would like to meet to discuss this letter or related topics.

5-28 Regards,

Mike Bullock
1800 Bayberry Drive
Oceanside, CA 92054
760-754-8025

References

5-29 All references were attached to the email sent with this letter. They are all available from Mike Bullock at mike_bullock@earthlink.net.

Comments on SANDAG's Draft EIR for Its 2021 RTP 16 of 16

RESPONSE TO COMMENT 5-28

Thank you again for your participation in the environmental review process and for the detailed comments for SANDAG's consideration. Please continue to follow along in this process by visiting SDForward.com.

RESPONSE TO COMMENT 5-29

SANDAG has reviewed the attached reference documents and responded above to those Draft EIR comments that cite or use information from these references documents. No responses to the attachments specifically have been included because they do not contain comments specific to the EIR and/or proposed Plan.

COMMENT LETTER 6: CLIMATE ACTION CAMPAIGN



Comment Letter 6

CLIMATE ACTION CAMPAIGN

October 11, 2021

SANDAG Regional Plan EIR
C/O Kirsten Uchitel, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: Climate Action Campaign Comments, Draft Environmental Impact Report for San Diego Forward: The 2021 Regional Plan

Dear Kirsten Uchitel,

Climate Action Campaign is a watchdog organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

On behalf of Climate Action Campaign, I am writing to comment on Section 4.8, which evaluates the potential impacts of the proposed Plan related to greenhouse gas emissions.

6-1 The most up to date climate science states that we must achieve Zero Carbon as soon as possible to stave off the most devastating impacts of the climate crisis, such as wildfires, dangerous air quality, extreme heat, sea-level rise, and more. These have and will impact the San Diego region's Communities of Concern first and worst.

Transportation accounts for 40% of the region's greenhouse gas emissions, more than any other sector by far. As such, we are pleased to see that the draft 2021 Regional Plan is aligned with the CARB-mandated 19% emissions reduction from the transportation sector from 2005 levels by 2035, per SB 375.

However, as outlined in impact GHG-5, this Plan is inconsistent with SB 32, and with Executive Orders S-3-05 and B-55-18.

6-2 We are aware that achieving these targets will require unprecedented action in every sector and at all levels of government. However, SANDAG will need to oversee the near elimination of emissions from the transportation sector in San Diego, by mid-century. This Plan alone will not achieve that goal.

6-3 State experts have made it clear that aggressive VMT reduction is needed to achieve state climate goals. We urge SANDAG to put the region on track to achieve a Zero Carbon region in this and future Regional Plans by further maximizing investments in VMT-reduction strategies and mode shift away from fossil fuel cars and into bike, walk, and transit. These investments must be prioritized in historically underinvested Communities of Concern.

RESPONSE TO COMMENT 6-1

Thank you for your comment. SANDAG appreciates your input and support of the proposed Plan.

RESPONSE TO COMMENT 6-2

As noted in the comment and as detailed in Section 4.8, *Greenhouse Gas Emissions*, the proposed Plan would be inconsistent with the State's ability to achieve the goals of SB 32, EO B-55-18, and S-3-05. The comment also states that the proposed Plan alone will not achieve these goals. As discussed under Impact GHG-5, additional mitigation measures have been identified at the Plan- and project-specific levels to substantially lessen the amount of proposed Plan GHG emissions in 2030, 2045, and 2050. Furthermore, as discussed in Chapter 2, *Project Description*, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045.

This comment addresses the proposed Plan and is not related to the adequacy of the EIR.

RESPONSE TO COMMENT 6-3

This comment addresses the proposed Plan and is not related to the adequacy of the EIR.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the proposed Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, are reflected in Appendix A, Attachment 1 of the proposed Plan.

6-4 Finally, critical to a more sustainable, equitable region is increased affordable housing at existing and future transit stops. The Sustainable Communities Strategy should include a suite of aggressive policies that stop sprawl and support infill. Smart land use is essential to slashing emissions.

6-5 This plan represents an important first step in the shift away from auto-centric planning, and towards a more climate-just, climate-ready transportation future. We look forward to continued engagement with this critical plan, to ensure it is as strong as possible for climate action.

Sincerely,

Noah Harris,
Policy Advocate
Climate Action Campaign

RESPONSE TO COMMENT 6-4

This comment addresses the proposed Plan and is not related to the adequacy of the EIR.

Appendix B of the proposed Plan presents the Implementation Action strategies proposed to incentivize sustainable growth and development in the San Diego region.

RESPONSE TO COMMENT 6-5

Thank you for your participation in this process and for your organization's support of the proposed Plan

COMMENT LETTER 7: CITY OF CARLSBAD



Comment Letter 7

City of Carlsbad

Oct. 11, 2021

SANAG Regional Plan EIR
San Diego Association of Governments
401 B Street, Suite 800
San Diego CA 92101
C/O Kirsten Uchitel, Associate Planner.
Via: RegionalPlanEIR@sandag.org

RE: City of Carlsbad Comments on Draft Environmental Impact Report for the 2021 Regional Plan

Dear Ms. Uchitel:

7-1 The City of Carlsbad ("city") appreciates the opportunity to provide comments on the draft Program Environmental Impact Report ("PEIR") for the 2021 Regional Plan ("Plan"), dated Aug. 27, 2021. This is an important plan for the region and will guide the next phase of growth for the member agencies of the San Diego Association of Governments ("SANDAG"), including the city. An effectively designed and implemented regional transportation plan would help ensure improved transportation options for area residents, businesses and other community members, as well as meaningful reductions in greenhouse gas ("GHG") emissions and improved quality of life as we grow our communities.

The city previously submitted comments on the Plan to SANDAG staff on August 6, 2021 (Attachment 1), expressing multiple concerns about the Plan, its implementation and its potential impacts on the environment. Additionally, the city sent a follow up letter on September 30, 2021 (Attachment 2), to clarify the city does not wish to remove El Camino Real (project CB32) from the Regional Arterials Project List. Copies of the city's prior letters are included here as Attachment 1 and Attachment 2, respectively. Both letters are incorporated herein by this reference as additional comments on the adequacy of the PEIR and should be included in the administrative record of SANDAG's proceedings concerning the Plan and the PEIR.

7-2 The California Environmental Quality Act ("CEQA") is intended "to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.App.3d 247, 259.) With narrow exceptions, CEQA requires an EIR whenever a public agency proposes to approve or to carry out a project or activity that may have a significant effect on the environment. (CEQA Guidelines § 15002(f).) The basic purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect that a proposed project or activity is likely to have on the environment and to identify ways in which the significant effects might be reduced or avoided. (Public Resources Code § 21061; CEQA Guidelines § 15003.) The EIR and its associated process create layers of accountability and must "reflect a good faith effort at full disclosure." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712, citing CEQA Guidelines § 15151.) The EIR process must provide meaningful information for an environmental assessment so that the public will know the basis on which decisions are made on a proposed project or activity and can respond accordingly to action with which it disagrees.

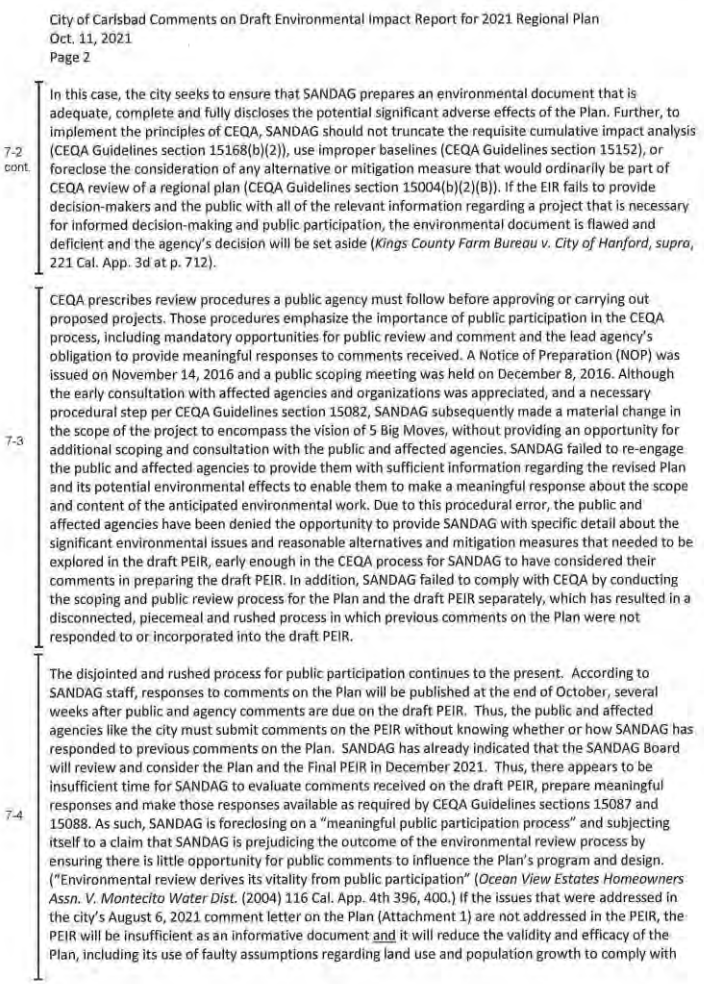
Transportation & Community Development Departments
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2710 t

RESPONSE TO COMMENT 7-1

This comment includes opening remarks and describes prior letters submitted to SANDAG. No further response is required.

RESPONSE TO COMMENT 7-2

This comment largely describes the CEQA framework under which the proposed Plan and Final EIR have been developed. The Final EIR informs decisionmakers and the public generally of the significant environmental effects of the proposed Plan, identifies ways to minimize the significant effects, and describes reasonable alternatives to the proposed Plan (CEQA Guidelines Section 15121(a)). The Final EIR properly considers cumulative impacts (CEQA Guidelines Section 15168(b)(2)), identifies a baseline (CEQA Guidelines Section 15125), describes a range of reasonable alternatives to the proposed Plan (CEQA Guidelines Section 15126.6), and describes feasible mitigation measures that would minimize significant adverse environmental impacts (CEQA Guidelines Section 15126.4).



City of Carlsbad Comments on Draft Environmental Impact Report for 2021 Regional Plan
Oct. 11, 2021
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7-2 cont.

In this case, the city seeks to ensure that SANDAG prepares an environmental document that is adequate, complete and fully discloses the potential significant adverse effects of the Plan. Further, to implement the principles of CEQA, SANDAG should not truncate the requisite cumulative impact analysis (CEQA Guidelines section 15168(b)(2)), use improper baselines (CEQA Guidelines section 15152), or foreclose the consideration of any alternative or mitigation measure that would ordinarily be part of CEQA review of a regional plan (CEQA Guidelines section 15004(b)(2)(B)). If the EIR fails to provide decision-makers and the public with all of the relevant information regarding a project that is necessary for informed decision-making and public participation, the environmental document is flawed and deficient and the agency's decision will be set aside (*Kings County Farm Bureau v. City of Hanford, supra*, 221 Cal. App. 3d at p. 712).

7-3

CEQA prescribes review procedures a public agency must follow before approving or carrying out proposed projects. Those procedures emphasize the importance of public participation in the CEQA process, including mandatory opportunities for public review and comment and the lead agency's obligation to provide meaningful responses to comments received. A Notice of Preparation (NOP) was issued on November 14, 2016 and a public scoping meeting was held on December 8, 2016. Although the early consultation with affected agencies and organizations was appreciated, and a necessary procedural step per CEQA Guidelines section 15082, SANDAG subsequently made a material change in the scope of the project to encompass the vision of 5 Big Moves, without providing an opportunity for additional scoping and consultation with the public and affected agencies. SANDAG failed to re-engage the public and affected agencies to provide them with sufficient information regarding the revised Plan and its potential environmental effects to enable them to make a meaningful response about the scope and content of the anticipated environmental work. Due to this procedural error, the public and affected agencies have been denied the opportunity to provide SANDAG with specific detail about the significant environmental issues and reasonable alternatives and mitigation measures that needed to be explored in the draft PEIR, early enough in the CEQA process for SANDAG to have considered their comments in preparing the draft PEIR. In addition, SANDAG failed to comply with CEQA by conducting the scoping and public review process for the Plan and the draft PEIR separately, which has resulted in a disconnected, piecemeal and rushed process in which previous comments on the Plan were not responded to or incorporated into the draft PEIR.

7-4

The disjointed and rushed process for public participation continues to the present. According to SANDAG staff, responses to comments on the Plan will be published at the end of October, several weeks after public and agency comments are due on the draft PEIR. Thus, the public and affected agencies like the city must submit comments on the PEIR without knowing whether or how SANDAG has responded to previous comments on the Plan. SANDAG has already indicated that the SANDAG Board will review and consider the Plan and the Final PEIR in December 2021. Thus, there appears to be insufficient time for SANDAG to evaluate comments received on the draft PEIR, prepare meaningful responses and make those responses available as required by CEQA Guidelines sections 15087 and 15088. As such, SANDAG is foreclosing on a "meaningful public participation process" and subjecting itself to a claim that SANDAG is prejudicing the outcome of the environmental review process by ensuring there is little opportunity for public comments to influence the Plan's program and design. ("Environmental review derives its vitality from public participation" (*Ocean View Estates Homeowners Assn. V. Montecito Water Dist.* (2004) 116 Cal. App. 4th 396, 400.) If the issues that were addressed in the city's August 6, 2021 comment letter on the Plan (Attachment 1) are not addressed in the PEIR, the PEIR will be insufficient as an informative document and it will reduce the validity and efficacy of the Plan, including its use of faulty assumptions regarding land use and population growth to comply with

RESPONSE TO COMMENT 7-3

This comment inaccurately characterizes the 5 Big Moves as a material change to the scope of the project in the NOP issued on November 14, 2016. In fact, the 5 Big Moves are planning strategies used to develop the proposed Plan, which consists of the Regional Transportation Plan and Sustainable Communities Strategy that identify the San Diego region's future transportation investments and growth through 2050 as described in the NOP.

The statement that the public and affected agencies have been denied the opportunity to provide SANDAG with specific detail about the significant environmental issues and reasonable alternatives and mitigation measures is also inaccurate. As noted by the comment, SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse (Clearinghouse) at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017.

The NOP provided formal notification consistent with the CEQA Guidelines to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR will be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG

with specific comments and questions on the scope and content of this EIR. Appendix A to the Final EIR summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

In addition, SANDAG noticed and held a public scoping meeting, consistent with CEQA (PRC Section 21083.9), on December 8, 2016, at SANDAG's office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

The comment also mischaracterizes the CEQA requirements for review of the Draft EIR. There is no CEQA requirement to conduct the public

comment period for the Draft EIR required by CEQA Guidelines Section 15087 simultaneously with the public comment period required by Government Code Section 65080 for the proposed Plan. There is also no CEQA requirement for comments on the Draft Plan to be responded to or incorporated into the Draft EIR. The Draft EIR properly evaluates the Draft Plan and preparation of each has run concurrently consistent with CEQA Guidelines Section 15004. SANDAG has evaluated comments received on environmental issues and prepared written responses consistent with CEQA Guidelines Section 15088. Responses to comments received on the Draft EIR are included herein (Appendix P.1 of this Final EIR)..

RESPONSE TO COMMENT 7-4

This comment mischaracterizes the process for public participation in the Draft and Final EIRs. There is no CEQA requirement to conduct the public comment period for the Draft EIR required by CEQA Guidelines Section 15087 simultaneously with the public comment period required by Government Code Section 65080 for the proposed Plan. There is also no CEQA requirement for comments on the Draft Plan to be responded to or incorporated into the Draft EIR. The Draft EIR properly evaluates the Draft Plan and preparation of each has run concurrently consistent with CEQA Guidelines Section 15004. SANDAG has evaluated comments received on environmental issues and prepared written responses consistent with CEQA Guidelines Section 15088. Responses to comments received on the Draft EIR are included herein (Appendix P.1 of this Final EIR), and responses to comments received on the proposed Plan are included in Appendix P.2 of the Final EIR.

This comment also incorrectly asserts that the EIR uses faulty land use assumptions. Government Code Section 65080(b)(2)(B) provides that an SCS "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan.

Specific to public outreach conducted by SANDAG, there have been extensive opportunities for meaningful public participation in the proposed Plan and EIR. SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of an NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR will be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG's office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

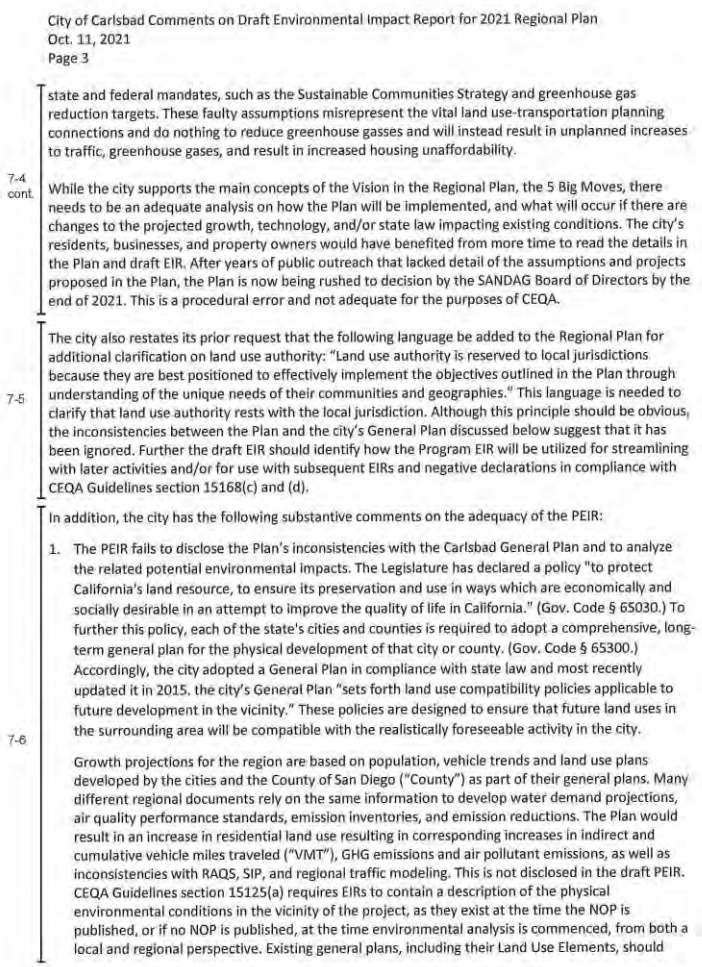
To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability (NOA) for the Draft EIR in local newspapers on August 27, 2021, and mailed the

NOA to an extensive distribution list. SANDAG also filed a Notice of Completion (NOC) with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021.

The Draft EIR and all appendices were available for review online at www.sdforward.com, at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101, and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment Period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting where decision makers will consider certification of the Final EIR and adoption of the proposed Plan.



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state and federal mandates, such as the Sustainable Communities Strategy and greenhouse gas reduction targets. These faulty assumptions misrepresent the vital land use-transportation planning connections and do nothing to reduce greenhouse gasses and will instead result in unplanned increases to traffic, greenhouse gases, and result in increased housing unaffordability.

7-4 cont. While the city supports the main concepts of the Vision in the Regional Plan, the 5 Big Moves, there needs to be an adequate analysis on how the Plan will be implemented, and what will occur if there are changes to the projected growth, technology, and/or state law impacting existing conditions. The city's residents, businesses, and property owners would have benefited from more time to read the details in the Plan and draft EIR. After years of public outreach that lacked detail of the assumptions and projects proposed in the Plan, the Plan is now being rushed to decision by the SANDAG Board of Directors by the end of 2021. This is a procedural error and not adequate for the purposes of CEQA.

7-5 The city also restates its prior request that the following language be added to the Regional Plan for additional clarification on land use authority: "Land use authority is reserved to local jurisdictions because they are best positioned to effectively implement the objectives outlined in the Plan through understanding of the unique needs of their communities and geographies." This language is needed to clarify that land use authority rests with the local jurisdiction. Although this principle should be obvious, the inconsistencies between the Plan and the city's General Plan discussed below suggest that it has been ignored. Further the draft EIR should identify how the Program EIR will be utilized for streamlining with later activities and/or for use with subsequent EIRs and negative declarations in compliance with CEQA Guidelines section 15168(c) and (d).

In addition, the city has the following substantive comments on the adequacy of the PEIR:

1. The PEIR fails to disclose the Plan's inconsistencies with the Carlsbad General Plan and to analyze the related potential environmental impacts. The Legislature has declared a policy "to protect California's land resource, to ensure its preservation and use in ways which are economically and socially desirable in an attempt to improve the quality of life in California." (Gov. Code § 65030.) To further this policy, each of the state's cities and counties is required to adopt a comprehensive, long-term general plan for the physical development of that city or county. (Gov. Code § 65300.) Accordingly, the city adopted a General Plan in compliance with state law and most recently updated it in 2015. the city's General Plan "sets forth land use compatibility policies applicable to future development in the vicinity." These policies are designed to ensure that future land uses in the surrounding area will be compatible with the realistically foreseeable activity in the city.

7-6

Growth projections for the region are based on population, vehicle trends and land use plans developed by the cities and the County of San Diego ("County") as part of their general plans. Many different regional documents rely on the same information to develop water demand projections, air quality performance standards, emission inventories, and emission reductions. The Plan would result in an increase in residential land use resulting in corresponding increases in indirect and cumulative vehicle miles traveled ("VMT"), GHG emissions and air pollutant emissions, as well as inconsistencies with RAQS, SIP, and regional traffic modeling. This is not disclosed in the draft PEIR. CEQA Guidelines section 15125(a) requires EIRs to contain a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published, or if no NOP is published, at the time environmental analysis is commenced, from both a local and regional perspective. Existing general plans, including their Land Use Elements, should

RESPONSE TO COMMENT 7-5

The following language has been added to Chapter 2 of the proposed Plan: "Land use authority is reserved for local jurisdictions under state law, and because they understand the unique needs of their communities and geographies."

The comment inaccurately suggests that the City's General Plan has been ignored in the developing the proposed Plan. SANDAG relied upon local general plans and other factors to develop the forecasted development pattern for the region consistent with Government Code Section 65080(b)(2)(B). Consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11, *Land Use*, of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

The Draft EIR identifies how it can be utilized for streamlining with later activities and/or for use with subsequent environmental analyses in Section 2.6.1.

RESPONSE TO COMMENT 7-6

Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

Government Code Section 65080(b)(2)(B) provides that an SCS "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and

policies in the Plan. As the comment notes, the SCS land use pattern focuses growth and development in the Mobility Hub areas.

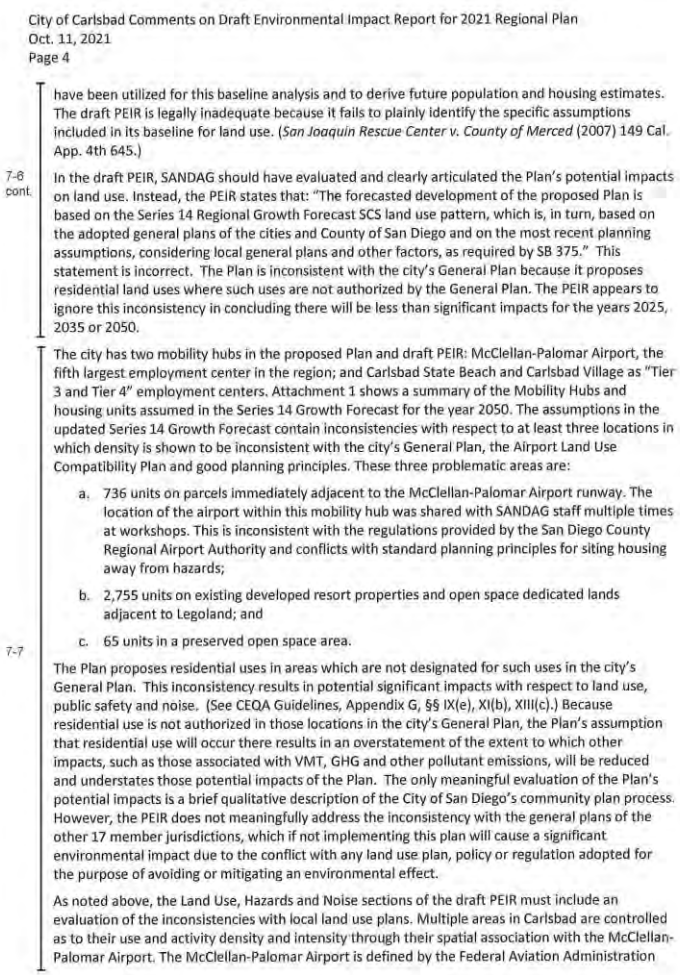
In July 2018, SANDAG received the RHNA Determination from the California Department of Housing and Community Development, requiring that the region plan for 171,685 housing units during the sixth housing element cycle, which covers the years 2021 through 2029. As described on page 4.14-9 of the Draft EIR, the SANDAG Board of Directors adopted the 6th Cycle RHNA Plan in July of 2020, which allocates housing units to jurisdictions based on each jurisdiction's share of transit and jobs within the region. The proposed Plan also accommodates the 6th Cycle RHNA Plan allocations consistent with Government Code section 65080(b)(2)(B).

This comment inaccurately asserts that the Draft EIR does not disclose analysis of VMT, GHG and air pollutant emissions, and inconsistencies with RAQs, SIP, and regional traffic modeling. The EIR evaluates each and the relevant identified impacts in Sections 4.3 (*Air Quality*), 4.8 (*Greenhouse Gas Emissions*), 4.11 (*Land Use*), 4.14 (*Population and Housing*), and 4.16 (Transportation), as well as Chapter 5 (*Cumulative Impact Analysis*), among others.

This comment also inaccurately asserts that the Draft EIR does not disclose the land use assumptions in the identified baseline for the proposed Plan. Section 3.3 describes the Existing Land Use and Development Patterns as of 2016, the year in which the NOP for this EIR was published. In addition, Figure 4.11-1 in Section 4.11 depicts the land use pattern for the entire San Diego region in 2016.

The comment inaccurately suggests that the City's General Plan has been ignored in the developing the proposed Plan. SANDAG relied upon local general plans and other factors to develop the forecasted development pattern for the region consistent with Government Code Section 65080(b)(2)(B). The thresholds for land use analysis in Appendix G of the CEQA Guidelines include an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans or other local planning

documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.



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have been utilized for this baseline analysis and to derive future population and housing estimates. The draft PEIR is legally inadequate because it fails to plainly identify the specific assumptions included in its baseline for land use. (*San Joaquin Rescue Center v. County of Merced* (2007) 149 Cal. App. 4th 645.)

7-6 cont. In the draft PEIR, SANDAG should have evaluated and clearly articulated the Plan's potential impacts on land use. Instead, the PEIR states that: "The forecasted development of the proposed Plan is based on the Series 14 Regional Growth Forecast SCS land use pattern, which is, in turn, based on the adopted general plans of the cities and County of San Diego and on the most recent planning assumptions, considering local general plans and other factors, as required by SB 375." This statement is incorrect. The Plan is inconsistent with the city's General Plan because it proposes residential land uses where such uses are not authorized by the General Plan. The PEIR appears to ignore this inconsistency in concluding there will be less than significant impacts for the years 2025, 2035 or 2050.

The city has two mobility hubs in the proposed Plan and draft PEIR: McClellan-Palomar Airport, the fifth largest employment center in the region; and Carlsbad State Beach and Carlsbad Village as "Tier 3 and Tier 4" employment centers. Attachment 1 shows a summary of the Mobility Hubs and housing units assumed in the Series 14 Growth Forecast for the year 2050. The assumptions in the updated Series 14 Growth Forecast contain inconsistencies with respect to at least three locations in which density is shown to be inconsistent with the city's General Plan, the Airport Land Use Compatibility Plan and good planning principles. These three problematic areas are:

a. 736 units on parcels immediately adjacent to the McClellan-Palomar Airport runway. The location of the airport within this mobility hub was shared with SANDAG staff multiple times at workshops. This is inconsistent with the regulations provided by the San Diego County Regional Airport Authority and conflicts with standard planning principles for siting housing away from hazards;

b. 2,755 units on existing developed resort properties and open space dedicated lands adjacent to Legoland; and

7-7 c. 65 units in a preserved open space area.

The Plan proposes residential uses in areas which are not designated for such uses in the city's General Plan. This inconsistency results in potential significant impacts with respect to land use, public safety and noise. (See CEQA Guidelines, Appendix G, §§ IX(e), XI(b), XIII(c).) Because residential use is not authorized in those locations in the city's General Plan, the Plan's assumption that residential use will occur there results in an overstatement of the extent to which other impacts, such as those associated with VMT, GHG and other pollutant emissions, will be reduced and understates those potential impacts of the Plan. The only meaningful evaluation of the Plan's potential impacts is a brief qualitative description of the City of San Diego's community plan process. However, the PEIR does not meaningfully address the inconsistency with the general plans of the other 17 member jurisdictions, which if not implementing this plan will cause a significant environmental impact due to the conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As noted above, the Land Use, Hazards and Noise sections of the draft PEIR must include an evaluation of the inconsistencies with local land use plans. Multiple areas in Carlsbad are controlled as to their use and activity density and intensity through their spatial association with the McClellan-Palomar Airport. The McClellan-Palomar Airport is defined by the Federal Aviation Administration

RESPONSE TO COMMENT 7-7

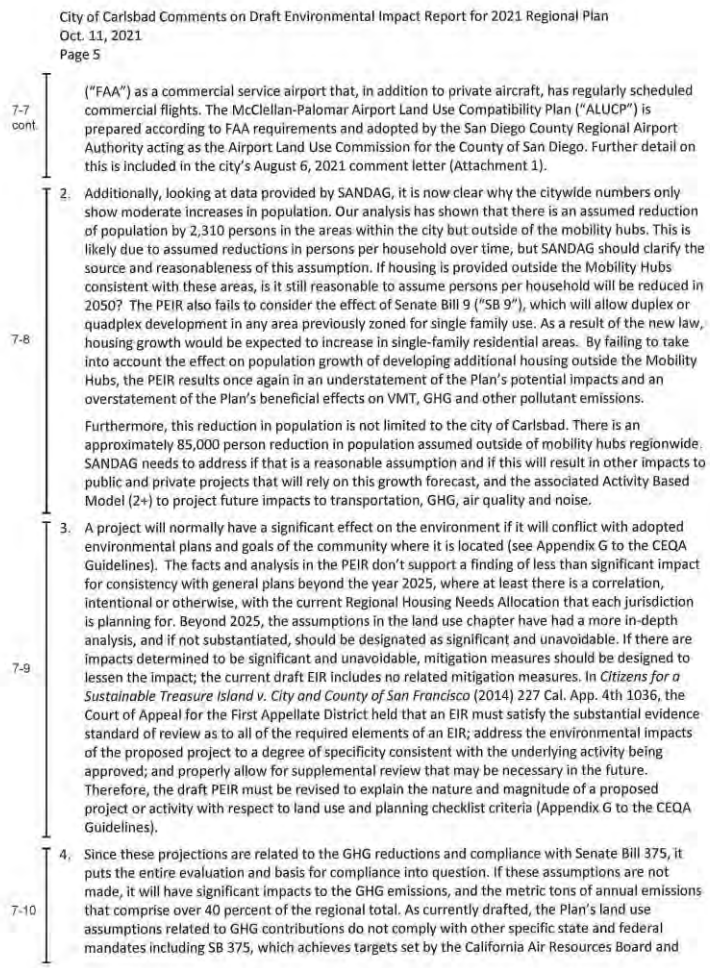
Government Code Section 65080(b)(2)(B) provides that an SCS "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan.

This comment mischaracterizes the impact of the land use assumptions underlying the proposed Plan on the VMT, GHG, and air quality resource analyses included in the Draft EIR. The proposed Plan focuses growth and development in the Mobility Hub areas. The allocation of housing units to subregional areas represents general areas projected for future growth, not specific parcels, for future housing development or housing unit type. Specifically, outputs are generated at the Master Geographic Reference Area (MGRA)-level for use as inputs to SANDAG's Activity Based Model (ABM). MGRAs are comparable in size to census blocks and cover the entire region. A number of land uses at the parcel level, aggregated up, comprise these general areas and VMT, GHG, and air quality impacts are analyzed at the regional level consistent with the programmatic nature of this EIR.

For Carlsbad, the SCS land use pattern forecasts 6,575 housing units from 2016 to 2050, which is within the total housing unit capacity of the City's general plan as provided to SANDAG (6,992 housing units) and accommodates the City's RHNA allocation of 3,873 housing units by 2035. The precise zoning at the parcel level is within local jurisdictions' land use authority. As such, future development projects would undergo separate, project-specific environmental review, and any impacts associated with conflicts with land use plans, policies or regulations, including the general plan and any applicable airport land use compatibility plans, would be evaluated and mitigated when the timing, location, and other specifications of a specific project have been defined.

The thresholds for land use analysis in Appendix G of the CEQA Guidelines include an evaluation of whether the project causes a

significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant General Plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.



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("FAA") as a commercial service airport that, in addition to private aircraft, has regularly scheduled commercial flights. The McClellan-Palomar Airport Land Use Compatibility Plan ("ALUCP") is prepared according to FAA requirements and adopted by the San Diego County Regional Airport Authority acting as the Airport Land Use Commission for the County of San Diego. Further detail on this is included in the city's August 6, 2021 comment letter (Attachment 1).

7-7 cont.

2. Additionally, looking at data provided by SANDAG, it is now clear why the citywide numbers only show moderate increases in population. Our analysis has shown that there is an assumed reduction of population by 2,310 persons in the areas within the city but outside of the mobility hubs. This is likely due to assumed reductions in persons per household over time, but SANDAG should clarify the source and reasonableness of this assumption. If housing is provided outside the Mobility Hubs consistent with these areas, is it still reasonable to assume persons per household will be reduced in 2050? The PEIR also fails to consider the effect of Senate Bill 9 ("SB 9"), which will allow duplex or quadplex development in any area previously zoned for single family use. As a result of the new law, housing growth would be expected to increase in single-family residential areas. By failing to take into account the effect on population growth of developing additional housing outside the Mobility Hubs, the PEIR results once again in an understatement of the Plan's potential impacts and an overstatement of the Plan's beneficial effects on VMT, GHG and other pollutant emissions.

7-8

Furthermore, this reduction in population is not limited to the city of Carlsbad. There is an approximately 85,000 person reduction in population assumed outside of mobility hubs regionwide. SANDAG needs to address if that is a reasonable assumption and if this will result in other impacts to public and private projects that will rely on this growth forecast, and the associated Activity Based Model (2+) to project future impacts to transportation, GHG, air quality and noise.

3. A project will normally have a significant effect on the environment if it will conflict with adopted environmental plans and goals of the community where it is located (see Appendix G to the CEQA Guidelines). The facts and analysis in the PEIR don't support a finding of less than significant impact for consistency with general plans beyond the year 2025, where at least there is a correlation, intentional or otherwise, with the current Regional Housing Needs Allocation that each jurisdiction is planning for. Beyond 2025, the assumptions in the land use chapter have had a more in-depth analysis, and if not substantiated, should be designated as significant and unavoidable. If there are impacts determined to be significant and unavoidable, mitigation measures should be designed to lessen the impact; the current draft EIR includes no related mitigation measures. In *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal. App. 4th 1036, the Court of Appeal for the First Appellate District held that an EIR must satisfy the substantial evidence standard of review as to all of the required elements of an EIR; address the environmental impacts of the proposed project to a degree of specificity consistent with the underlying activity being approved; and properly allow for supplemental review that may be necessary in the future. Therefore, the draft PEIR must be revised to explain the nature and magnitude of a proposed project or activity with respect to land use and planning checklist criteria (Appendix G to the CEQA Guidelines).

7-9

4. Since these projections are related to the GHG reductions and compliance with Senate Bill 375, it puts the entire evaluation and basis for compliance into question. If these assumptions are not made, it will have significant impacts to the GHG emissions, and the metric tons of annual emissions that comprise over 40 percent of the regional total. As currently drafted, the Plan's land use assumptions related to GHG contributions do not comply with other specific state and federal mandates including SB 375, which achieves targets set by the California Air Resources Board and

7-10

RESPONSE TO COMMENT 7-8

Proposed Plan Appendix F, *Series 14 Regional Growth Forecast and SCS Land Use Pattern*, details the development of the population and job growth projections that are reflected in the Draft EIR. The Series 14 Regional Growth Forecast aligns with the regional population projection from the California Department of Finance released in January 2020 and reflects population declines or lower population growth in certain areas in the region. These assumptions, described in Regional Plan Appendix F, include an increase in the region's vacancy rate to 4 percent by 2040, an accounting of vacation rentals and second homes as "unoccupiable," and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036. Data for all the counties in the United States show that as the population ages, household size declines, and the Series 14 Regional Growth Forecast assumes that due to the aging population in the region, a similar pattern will be observed. This is achieved by converging to household formation rates from the 2010 decennial census by 2035, which are held at that level through the end of the forecast.

With respect to SB 9, this State legislation was approved in September 2021 and will not take effect until January 1, 2022. The Series 14 Regional Growth Forecast incorporates assumptions for about accessory dwelling units (ADUs) occurring in the local jurisdictions as potential future capacity for housing unit development in recognition of recent legislation that had already been passed at the state level when the forecast was developed. ADUs were assumed to be available on 5 percent of all single-family lots in the region that were 5,000 square feet or larger. This equates to about 20,000 additional units of housing unit capacity throughout the region outside of the rural villages in the unincorporated area. This is consistent with a report from the San Diego Housing Commission that projected a rate of ADUs occurring on about 5 percent of available single-family zoned parcels. Including lots 5,000 square feet or larger ensures that ADUs are assumed to be possible in all areas of the region, including the more urbanized areas where lot size is smaller.

Specific to the SCS Land Use Pattern and its beneficial effects, SB 375 requires the SCS to "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a

feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan by focusing growth and development in mobility hub areas. Here, the comment describes a speculative impact resulting from SB 9.

With respect to future development projects, the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR do not analyze project-specific impacts of future development projects implemented by the local jurisdictions or private developers.

RESPONSE TO COMMENT 7-9

This comment inaccurately generalizes the thresholds for land use analysis in Appendix G of the CEQA Guidelines. The thresholds do not include evaluating consistency with the "goals of the community," but rather an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. To reflect the programmatic level of analysis and the unique characteristics of the proposed Plan, this EIR analyzed whether implementation of the proposed Plan would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation (including, but not limited to, the general plan, LCP, or zoning ordinance) and result in a physical change to the environment not already addressed in the other resource chapters of this EIR.

The thresholds for land use analysis in Appendix G of the CEQA Guidelines include an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans or other local planning documents. Consistency of

individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.

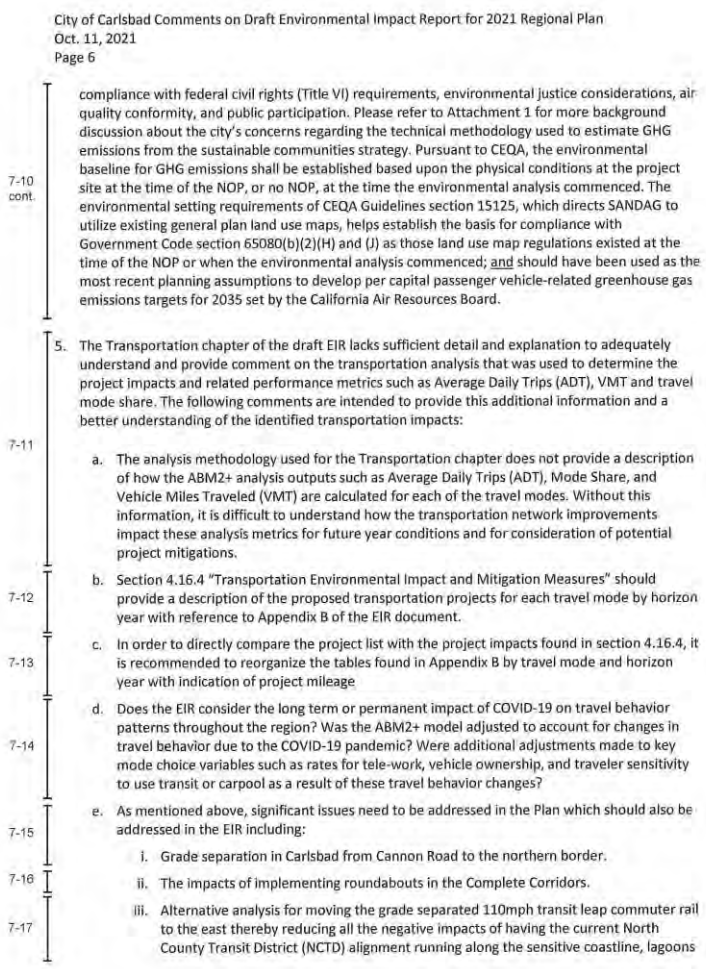
RESPONSE TO COMMENT 7-10

This comment asserts that the land use assumptions of the proposed Plan do not comply with State and federal mandates including SB 375, federal civil rights (Title VI) requirements, environmental justice considerations, air quality conformity, and public participation. The comment also asserts that CEQA Guidelines Section 15125 regarding discussion of the environmental setting in an EIR "helps establish the basis for compliance" with Government Code requirements regarding the planning assumptions of the proposed Plan's SCS, and that existing general plan land use maps "should have been used as the most recent planning assumptions" to develop 2035 GHG targets set by CARB.

The proposed Plan has been prepared in compliance with applicable State and federal requirements, as explained below. Proposed Plan Appendix D describes how the proposed Plan fulfills the requirements of an SCS as described in SB 375, including requirements for public involvement. The proposed Plan's compliance with SB 375 requirements for public involvement are further documented in proposed Plan Appendix G. Proposed Plan Appendix G also addresses how the proposed Plan's Public Involvement Program is consistent with Title VI of the federal Civil Rights Act of 1964 (42 USC 2000d), Executive Order 12898 on Environmental Justice, and other relevant laws and guidance to ensure social equity, environmental justice, and accessibility in the planning process. Refer to proposed Plan Appendix H for information about social equity and the proposed Plan.

Proposed Plan Appendix F describes how data used to develop the SCS land use pattern are based on the most recent planning assumptions, considering local general plans and other factors, per SB 375 (Government Code Section 65080[b][2][B]). Contrary to the commenter's assertion, CEQA requirements regarding discussion of the environmental setting in an EIR have no relationship to SB 375 requirements to use the most recent planning assumptions in an SCS.

Proposed Plan Appendix C describes how the proposed Plan complies with transportation air quality conformity determination requirements by providing a demonstration of conformity for the 2008 and 2015 ozone NAAQS for the proposed Plan.



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compliance with federal civil rights (Title VI) requirements, environmental justice considerations, air quality conformity, and public participation. Please refer to Attachment 1 for more background discussion about the city's concerns regarding the technical methodology used to estimate GHG emissions from the sustainable communities strategy. Pursuant to CEQA, the environmental baseline for GHG emissions shall be established based upon the physical conditions at the project site at the time of the NOP, or no NOP, at the time the environmental analysis commenced. The environmental setting requirements of CEQA Guidelines section 15125, which directs SANDAG to utilize existing general plan land use maps, helps establish the basis for compliance with Government Code section 65080(b)(2)(H) and (J) as those land use map regulations existed at the time of the NOP or when the environmental analysis commenced; and should have been used as the most recent planning assumptions to develop per capital passenger vehicle-related greenhouse gas emissions targets for 2035 set by the California Air Resources Board. 7-10 cont.

5. The Transportation chapter of the draft EIR lacks sufficient detail and explanation to adequately understand and provide comment on the transportation analysis that was used to determine the project impacts and related performance metrics such as Average Daily Trips (ADT), VMT and travel mode share. The following comments are intended to provide this additional information and a better understanding of the identified transportation impacts: 7-11

   a. The analysis methodology used for the Transportation chapter does not provide a description of how the ABM2+ analysis outputs such as Average Daily Trips (ADT), Mode Share, and Vehicle Miles Traveled (VMT) are calculated for each of the travel modes. Without this information, it is difficult to understand how the transportation network improvements impact these analysis metrics for future year conditions and for consideration of potential project mitigations.

   b. Section 4.16.4 "Transportation Environmental Impact and Mitigation Measures" should provide a description of the proposed transportation projects for each travel mode by horizon year with reference to Appendix B of the EIR document. 7-12

   c. In order to directly compare the project list with the project impacts found in section 4.16.4, it is recommended to reorganize the tables found in Appendix B by travel mode and horizon year with indication of project mileage 7-13

   d. Does the EIR consider the long term or permanent impact of COVID-19 on travel behavior patterns throughout the region? Was the ABM2+ model adjusted to account for changes in travel behavior due to the COVID-19 pandemic? Were additional adjustments made to key mode choice variables such as rates for tele-work, vehicle ownership, and traveler sensitivity to use transit or carpool as a result of these travel behavior changes? 7-14

   e. As mentioned above, significant issues need to be addressed in the Plan which should also be addressed in the EIR including: 7-15

      i. Grade separation in Carlsbad from Cannon Road to the northern border. 7-16

      ii. The impacts of implementing roundabouts in the Complete Corridors.

      iii. Alternative analysis for moving the grade separated 110mph transit leap commuter rail to the east thereby reducing all the negative impacts of having the current North County Transit District (NCTD) alignment running along the sensitive coastline, lagoons 7-17

RESPONSE TO COMMENT 7-11

Footnote 2 on page 4.16-1 of the Final EIR has been updated to include the following link which provides a detailed description of the background, data sources, methodologies, and outputs associated with ABM2+.

Link:
https://www.sandag.org/index.asp?subclassid=120&fuseaction=home.subclasshome.

RESPONSE TO COMMENT 7-12

References to Appendix B have been added to pages 4.16-31, 4.16-35, and 4.16-39 of the Draft EIR. As the comment notes, the references have been added to direct the reader to the descriptions of the proposed transportation projects for each travel mode by horizon year.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed 2021 Regional Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 7-13

Appendix A of the proposed Plan has been revised to present proposed transportation projects for each travel mode by horizon year.

RESPONSE TO COMMENT 7-14

Due to data/survey availability, ABM2+ largely relies on pre-pandemic survey (2016/2017 household behavior, 2019 SB1 TNC, and 2015 transit onboard surveys); therefore, the pandemic's impact on behaviors such as transit/carpool usage and auto ownership are not reflected in ABM2+. Based on information from the National Household Travel Survey, California Household Travel Survey, 2016/17 Household Behavior Survey, and the ACS, SANDAG developed a telework trend to project future telework rates. Researchers from the Institute of Transportation Studies at UC Irvine reviewed and confirmed the telework assumptions used in the proposed Plan. The increase of telework has a had steady increase that is reflected in ABM2+. It is

unclear what long-term travel behavior has changed as a result of the pandemic and if that change will be the "new normal." SANDAG has a plan to update ABM2+ to ABM3 to reflect the "new normal" travel behaviors, once surveys conducted in a new normal year become available. The new normal condition is important for creating a long-range planning model. It is unclear at this moment, when and if the new normal has arrived and any modifications to the telework assumption used in ABM2+ would be speculative.

RESPONSE TO COMMENT 7-15

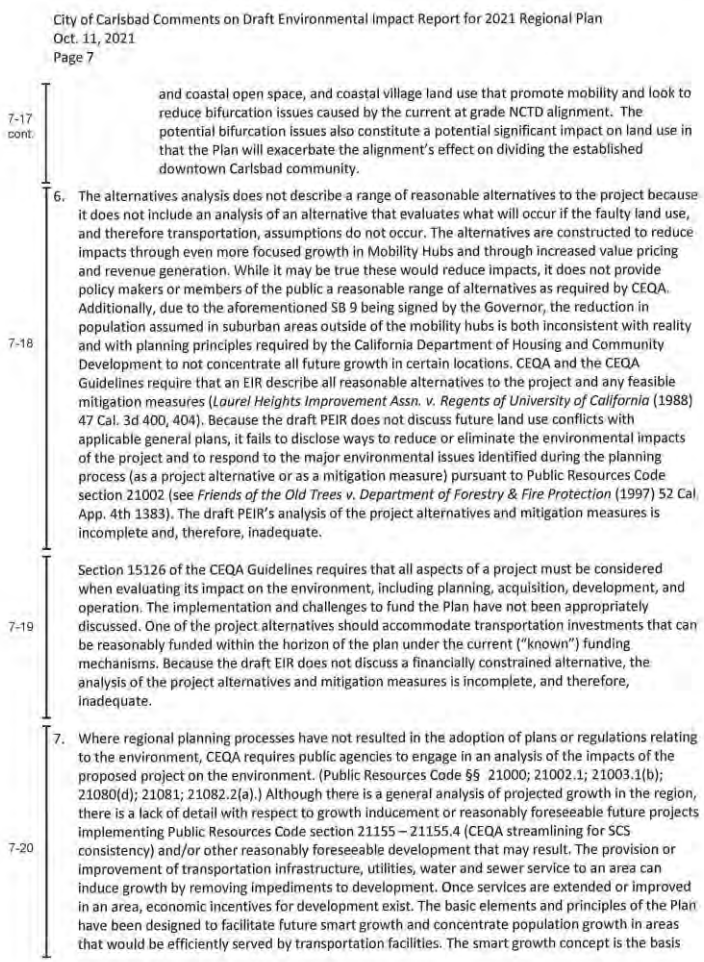
The proposed Plan includes a funding category for grade separations on the LOSSAN Corridor (included in Commuter Rail Route 398). Leucadia Boulevard grade separation is included in 2035 plus two yet to be determined locations by 2050. These would be determined at a later date. The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a programmatic document, and specific details concerning project-level impacts and mitigation will be evaluated during project-level environmental review (including Commuter Rail Route 398 project-level analysis).

RESPONSE TO COMMENT 7-16

Roundabouts, curb extensions, and similar traffic calming measures are included in the Mobility Hub complete streets investments as a means for slowing vehicular traffic in neighborhoods where a higher volume of multimodal travel to/from key destinations, particularly active transportation, is anticipated. The locations for these improvements are not defined in the proposed Plan and would be done in coordination with local jurisdictions.

RESPONSE TO COMMENT 7-17

The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a programmatic document, and specific details concerning project alternatives will be evaluated during project-level environmental review.



City of Carlsbad Comments on Draft Environmental Impact Report for 2021 Regional Plan
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7-17 cont.

and coastal open space, and coastal village land use that promote mobility and look to reduce bifurcation issues caused by the current at grade NCTD alignment. The potential bifurcation issues also constitute a potential significant impact on land use in that the Plan will exacerbate the alignment's effect on dividing the established downtown Carlsbad community.

7-18

6. The alternatives analysis does not describe a range of reasonable alternatives to the project because it does not include an analysis of an alternative that evaluates what will occur if the faulty land use, and therefore transportation, assumptions do not occur. The alternatives are constructed to reduce impacts through even more focused growth in Mobility Hubs and through increased value pricing and revenue generation. While it may be true these would reduce impacts, it does not provide policy makers or members of the public a reasonable range of alternatives as required by CEQA. Additionally, due to the aforementioned SB 9 being signed by the Governor, the reduction in population assumed in suburban areas outside of the mobility hubs is both inconsistent with reality and with planning principles required by the California Department of Housing and Community Development to not concentrate all future growth in certain locations. CEQA and the CEQA Guidelines require that an EIR describe all reasonable alternatives to the project and any feasible mitigation measures (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 400, 404). Because the draft PEIR does not discuss future land use conflicts with applicable general plans, it fails to disclose ways to reduce or eliminate the environmental impacts of the project and to respond to the major environmental issues identified during the planning process (as a project alternative or as a mitigation measure) pursuant to Public Resources Code section 21002 (see *Friends of the Old Trees v. Department of Forestry & Fire Protection* (1997) 52 Cal. App. 4th 1383). The draft PEIR's analysis of the project alternatives and mitigation measures is incomplete and, therefore, inadequate.

7-19

Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The implementation and challenges to fund the Plan have not been appropriately discussed. One of the project alternatives should accommodate transportation investments that can be reasonably funded within the horizon of the plan under the current ("known") funding mechanisms. Because the draft EIR does not discuss a financially constrained alternative, the analysis of the project alternatives and mitigation measures is incomplete, and therefore, inadequate.

7-20

7. Where regional planning processes have not resulted in the adoption of plans or regulations relating to the environment, CEQA requires public agencies to engage in an analysis of the impacts of the proposed project on the environment. (Public Resources Code §§ 21000; 21002.1; 21003.1(b); 21080(d); 21081; 21082.2(a).) Although there is a general analysis of projected growth in the region, there is a lack of detail with respect to growth inducement or reasonably foreseeable future projects implementing Public Resources Code section 21155 – 21155.4 (CEQA streamlining for SCS consistency) and/or other reasonably foreseeable development that may result. The provision or improvement of transportation infrastructure, utilities, water and sewer service to an area can induce growth by removing impediments to development. Once services are extended or improved in an area, economic incentives for development exist. The basic elements and principles of the Plan have been designed to facilitate future smart growth and concentrate population growth in areas that would be efficiently served by transportation facilities. The smart growth concept is the basis

RESPONSE TO COMMENT 7-18

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible.

This comment incorrectly asserts that the EIR uses faulty land use assumptions. Government Code Section 65080(b)(2)(B) provides that an SCS "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan.

With respect to SB 9, this State legislation was approved in September 2021 and will not take effect until January 1, 2022. The Series 14 Regional Growth Forecast incorporates assumptions about ADUs occurring in the local jurisdictions as potential future capacity for housing unit development in recognition of recent legislation that had already been passed at the state level when the forecast was developed. ADUs were assumed to be available on 5 percent of all single-family lots in the region that were 5,000 square feet or larger. This equates to about 20,000 additional units of housing unit capacity throughout the region outside of the rural villages in the unincorporated area. This is consistent with a report from the San Diego Housing Commission that projected a rate of ADUs occurring on about 5 percent of available single-family zoned parcels. Including lots 5,000 square feet or larger ensures that ADUs are assumed to be possible in all areas of the region, including the more urbanized areas where lot size is smaller.

This comment also inaccurately characterizes the discussion in *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376. The Court does not state that CEQA requires an EIR to describe *all* reasonable alternatives to the project. Rather, the Court in *Laurel Heights* stated that "[a]n EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988)

47 Cal. 3d 376, 404). Moreover, CEQA Guidelines Section 15126.6 specifically states that "[a]n EIR need not consider every conceivable alternative to a project."

Consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.

RESPONSE TO COMMENT 7-19

This comment mischaracterizes the requirements for a financially constrained RTP and inaccurately states that the implementation and challenges to fund the proposed Plan have not been appropriately discussed. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). New funding sources are revenues that do not currently exist or that may require additional steps before the MPO or transit agency can commit such funding to transportation project. (2017 RTP Guidelines for MPOs). Strategies for ensuring their availability must be identified and future revenues may be projected based on historical trends, including consideration of past legislative or executive actions (2017 RTP Guidelines for MPOs). The level on uncertainty in projects based on historical trends is generally greatest for revenues in the "outer years" (10 years or more) of an RTP. Appendix V of the proposed Plan explains the anticipated revenues to fund implementation of the proposed Plan. Table V.3 describes the availability assumptions for new revenue sources identified in Appendix V.

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible.

RESPONSE TO COMMENT 7-20

Population and growth impacts are analyzed in Section 4.14 of the EIR. As stated on pages 4.14-16 and 4.14-17: "the regional growth and land use change forecasted in the proposed Plan would be implemented by local jurisdictions through local plans and individual development

projects, and most transportation network improvements would be implemented by transportation project sponsors other than SANDAG. The proposed Plan has been developed to accommodate forecasted regional growth and failing to do so would be inconsistent with the federal and State requirements for RTPs. In addition, precluding growth would conflict with the requirements to provide sufficient housing for the region's population contained in SB 375. As discussed in Section 4.14.2, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan."

This comment also addresses future transit priority projects. As described above, future development projects would be implemented by local jurisdictions. CEQA Guidelines Sections 21155 through 21155.4 identify CEQA streamlining provisions for transit priority projects that are consistent with an MPO's SCS that has been accepted by CARB. Figures D.8 and D.9 in Appendix D of the proposed Plan identify potential areas for transit priority projects. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. SANDAG looks forward to coordinating with the City on future Plan updates.

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for the framework for prioritizing public land use and transportation investments in the region. The smart growth concept identifies areas where smart growth development exists or could be built and provides a basis for planning transportation facilities and transit services in the proposed Plan. Smart growth areas identified receive prioritized infrastructure investments and transit services to support smart growth. This carries true to those smart growth areas that are accommodated by existing general plans, and for other areas that are not covered by existing general plans. CEQA requires that an EIR discuss the ways in which the proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the environment surrounding the project. CEQA requires this discussion to include ways in which a project would remove obstacles to population growth or encourage and facilitate other activities that could significantly affect the environment (CEQA Guidelines section 15126.2(d)). The level of detail should reflect the level contained in the plan or plan element being considered (*Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351), inclusive of new smart growth areas as designated.

7-20 cont.

City staff looks forward to working with SANDAG on improving mobility and land use access in the region and building sustainable, equitable and healthy modes of transportation. We appreciate the opportunity to comment on the Plan that will help the region realize these goals. While at the same time, city staff also looks forward to helping SANDAG advance a legally adequate PEIR to support the disclosure and decision-making process. Since the major premise of CEQA is that it "be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language" (*Friends of Mammoth v. Board of Supervisors*, supra, 247, 259), SANDAG should take all action necessary to alert the decision-makers and the public to the environmental changes associated with the project (*County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810). There is no shortcut to CEQA - the EIR process protects not only the environment by also informed self-government (*Laurel Heights Improvement Assn. v. Regents of University of California*, supra, 376, 392). The SANDAG Board must certify that the final PEIR has been completed in compliance with CEQA and that it considered all of the information in the final EIR before approving or disapproving the project. As of this writing, the draft PEIR is not in compliance with CEQA.

7-21

If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or, if you need additional information related to comments on the land use assumptions, please contact Eric Lardy, Principal Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,

JEFF MURPHY
Community Development Director

TOM FRANK
Transportation Director/City Engineer

RESPONSE TO COMMENT 7-21

SANDAG has fully complied with the requirements of CEQA in the preparation of the Draft and Final EIRs for the proposed Plan.

Regarding disclosure of the proposed Plan's physical impacts on the environment in the Draft and Final EIRs, SANDAG has disclosed impacts and identified mitigation measures for impacts on aesthetics and visual resources; agricultural and forestry resources; air quality; biological resources; cultural resources; energy; geology, soil, and paleontological resources; GHG; hazards and hazardous materials; land use; mineral resources; noise and vibration; population and housing; public services and utilities; transportation; tribal cultural resources; water supply; wildfire; and cumulative impacts, and has identified alternatives to the proposed Plan consistent with CEQA, the CEQA Guidelines, and the discussion in *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247 referenced in the comment. For clarity with respect to the cited discussion in *County of Inyo v. Yorty* (1973) 32 Cal.App. 3d 795, the court states that an EIR is an "environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return" (*County of Inyo v. Yorty*, p. 810). The court also cites an earlier version of PRC Section 21000, which states that the government of the state should "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state" (*County of Inyo v. Yorty*, p. 802). The court in *County of Inyo v. Yorty* does not state that lead agencies "should take all action necessary to alert decision-makers and the public to the environmental changes associated with the project," contrary to the comment's assertion.

Prior to consideration and certification of the Final EIR, and consistent with the discussion in *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, SANDAG will provide the SANDAG Board of Directors with a Final EIR completed in compliance with CEQA Guidelines Section 15132 that reflects SANDAG's independent judgment and analysis as required by CEQA Guidelines Section 15090 (a). SANDAG will also present the SANDAG Board of Directors with Findings consistent with CEQA Guidelines Section 15091, a Statement of Overriding Considerations consistent with Section 15093, and a Mitigation Monitoring and Reporting Program consistent with Section 15097 prior to the SANDAG Board of Directors' consideration of the proposed Plan and Final EIR.

Attachments:

1. City of Carlsbad Comment Letter on Draft Regional Plan (Aug. 6, 2021)
2. City of Carlsbad Comment Letter – Regional Arterials (Sept. 30, 2021)

cc: Scott Chadwick, City Manager
Celia Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Donnell, Senior Planner
Corey Funk, Associate Planner



Attachment A

City of Carlsbad

Aug. 6, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego CA 92101
Via: SDForward@sandag.org

RE: City of Carlsbad Comments on Draft 2021 Regional Plan

To Whom it May Concern,

7-22

The City of Carlsbad appreciates the opportunity to provide comments on the draft 2021 Regional Plan ("Plan"). This is an important plan for this region and will guide the next phase of growth for the member agencies of the San Diego Association of Governments ("SANDAG"). An effectively designed and implemented regional transportation plan would help ensure improved transportation options for area residents, businesses and other community members; meaningful reductions in greenhouse gas ("GHG") emissions; and improved quality of life as we grow our communities.

The City of Carlsbad ("city") is submitting comments based on the policies, projects, programs and other improvements included in the Plan. Our agency's comment letter is divided into two sections. The first section seeks clarity and other considerations that pertain to our agency's review of the Plan. The second section identifies the city's preliminary comments and recommendations.

Implementing the regional transportation network outlined in the Plan requires municipalities to support the regional vision and deliver on local infrastructure and services like the priority bus routes, local bus services, and pedestrian and cycling connections to major transit infrastructure. These components, which are delivered by municipalities, are essential to creating a coherent and comprehensive local transportation network that feeds into regional services. For that reason, an effective public review of the Plan should involve a transparent and thorough process for identifying and evaluating potential hazards, physical changes to the environment and indirect (off-site and cumulative) impacts that might result from implementation activities that may reasonably occur with the Plan.

The city's residents, businesses and other community members will greatly benefit from the involvement and technical assistance from the prospective Draft Environmental Impact Report ("EIR"). Therefore, what follows in this correspondence represents our agency's preliminary comments and recommendations. The city reserves the right to add, amend, change or replace comments and recommendations based on additional review and understanding of the Plan and the environmental analysis provided under the California Environmental Quality Act ("CEQA").

The city thanks SANDAG staff for meeting with city staff on Aug. 2, 2021, to discuss some of these comments in advance of this letter. Following that meeting, SANDAG provided language that they may recommend adding to the Regional Plan for additional clarification on land use authority. The language is, "Land use authority is reserved to local jurisdictions because they are best positioned to effectively implement the objectives outlined in the Plan through understanding of the unique needs of their communities and geographies." This language will be helpful to clarify that land use authority rests with

Transportation & Community Development Departments
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RESPONSE TO COMMENT 7-22

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Please see responses to L59 through L74 in Appendix P.2.

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2. The city has three mobility hubs, associated with the Employment Centers Published supporting the SANDAG Regional Plan.[1] McClellan-Palomar Airport is the fifth largest employment center in the region, with Carlsbad State Beach and Carlsbad Village as "Tier 3 and Tier 4" employment centers. The city thanks SANDAG for providing data for analysis to determine impacts and provide for accurate comments on the Plan. Attachment 2 shows a summary of the Mobility Hubs and housing units assumed in the Series 14 Growth Forecast for the year 2050. In summary:
    a. The assumptions in the updated Series 14 Growth Forecast contain inconsistencies with the city's General Plan. The Carlsbad Palomar Major Employment Mobility Hub does include increases in density beyond what the citywide numbers appear to show when they are looked at in more detail.
        i. There are three locations in which density is shown to be inconsistent with good planning principles, the city's General Plan and the Airport Land Use Compatibility Plan. The three most problematic areas (shown in Attachment 3) are:
            1. 736 units on parcels immediately adjacent to the McClellan-Palomar Airport runway. The location of the airport within this mobility hub was shared with SANDAG staff multiple times at workshops. This is inconsistent with the regulations provided by the San Diego County Regional Airport Authority and conflicts with standard planning principles for siting housing away from hazards.
            2. 2,755 units on existing developed resort properties and open space dedicated lands adjacent to Legoland.
            3. 65 units in a preserved open space area.
        ii. SANDAG should provide additional detail why units were assumed in these areas, what planning principles those decisions were based on, and how SANDAG expects this to be implemented.
        iii. Concentration of units in the mobility hubs alone appears to conflict with the direction received from the California Department of Housing and Community Development ("HCD") to implement new Affirmatively Furthering Fair Housing ("AFFH"), which seeks to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice and opportunity for all Californians. The allocations of land use provided by SANDAG seem to focus all the higher density housing into one area of the city. (This is one of the largest points of analysis that each jurisdiction in the region needs to respond to in order to receive a certified Housing Element.)
    b. Additionally, looking at the detailed data provided by SANDAG, it is now clear why the citywide numbers only show moderate increases in population. Our analysis has shown that there is an assumed reduction of population by 2,310 persons in the areas within the city but outside of the mobility hubs. This is likely due to assumed reductions in persons per household over time, but SANDAG should clarify the source and reasonableness of this assumption. If housing is not provided consistent with these areas, is it still reasonable to assume persons per household will be reduced in 2050?

7-22 cont.

[1] SANDAG Website: Employment Centers SANDAG :: PROJECTS :: San Diego's Regional Planning Agency

Attachment A

the local jurisdiction. The city still offers the following comments with the intent to support development of a defensible and realistic regional plan.

SECTION 1: CLARITY AND OTHER CONSIDERATIONS

City staff have attended the series of workshops that SANDAG hosted during the public review period, and respectfully starts this section with several questions related to the process of the Plan and the Draft EIR. By way of introduction, a jurisdiction's General Plan, such as the city's General Plan, identifies the expected population of the city and any lands outside of the city limits but within their Sphere of Influence where future growth is anticipated to occur. The city's General Plan identifies the subject area adjacent to the McClellan-Palomar Airport for development under the designation for limited and light industrial use.

For future land use planning, land use assumptions must reasonably proxy and be generally consistent with local planning standards and programs, to be considered growth accommodating rather than growth inducing. SANDAG has the authority under Government Code Section 65584 to determine existing and projected housing needs, as well as the share of housing needs to be allocated to cities and counties, but it is unclear if SANDAG has jurisdiction to allocate new housing growth to areas in a manner not consistent with Government Code Section 65584. Attachment 1 includes additional information on the applicable Government Code and standards. Therefore, and as indicated above, the build-out of properties within the Business Park and flight activity zone must be done in accordance with the city's General Plan Land Use Diagram, as amended, in accordance with city approval.

7-22 cont.

The initial questions on the planning process associated with developing the Plan are provided below:

1. The SANDAG website states, "The SANDAG Sustainable Communities Strategy and Final EIR from its 2015 Regional Plan will remain valid and in compliance for purposes of state funding eligibility and other state and federal consistency purposes until the SANDAG Board of Directors adopts a new Regional Plan and EIR, provided those actions are completed by the end of December 2021." SANDAG needs to clarify how the Draft EIR, Response to Comments and Adoption will be completed this year and what will occur if they are not completed by the end of this year. Additionally, please clarify when the Draft EIR will be available; it is difficult to completely assess the full impacts of this plan when the public review of the documents is piecemealed.
    a. SANDAG should clarify how public comments on the Plan are going to be addressed in the Draft EIR prior to its release.
    b. In the Draft EIR, SANDAG needs to clearly articulate the impacts to land use and if the Plan will cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern appears to be inconsistent with the city's General Plan and rezone program to accommodate the Regional Housing Needs Assessment, as well as the general plans of other jurisdictions such as the cities of Coronado, Del Mar and the County of San Diego. The Draft EIR should clarify how implementation of this Plan can occur if those changes are not made.

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c. Furthermore, this reduction in population is not limited to the City of Carlsbad. There is an approximately 85,000 reduction in population assumed outside of mobility hubs regionwide. SANDAG needs to address if that is a reasonable assumption and if this will result in other impacts to public and private projects that will rely on this growth forecast, and the associated Activity Based Model (2+) to project future impacts to transportation, GHG, air quality and noise.
d. The forecast has decreased in future population based on current trends, but it is not clear if there is enough housing provided with reductions and increases in some jurisdictions. Will the reduced amount of housing that will be provided result in an increased exacerbation of the affordability crisis?
e. There is a lack of clarity about how the Plan would be implemented at the municipal level. SANDAG should develop an approach for engaging with municipalities to ensure local support for delivering the regional transportation network. Staff from local jurisdiction have the knowledge and ability to share where there are land use assumptions that conflict with planning and zoning laws. Our analysis focused on the City of Carlsbad, but if these types of assumptions are made regionwide, it presents flaws in the overall analysis. These flaws put the assumed reductions in vehicle miles traveled ("VMT") and ability to implement the Regional Plan into question.

3. The area designated is controlled for use and activity density and intensity through its spatial association with the McClellan-Palomar Airport. The McClellan-Palomar Airport is defined by the Federal Aviation Administration ("FAA") as a commercial service airport that, in addition to private aircraft, has regularly scheduled commercial flights to Los Angeles International Airport ("LAX"). The McClellan-Palomar Airport Land Use Compatibility Plan ("ALUCP") is prepared according to FAA requirements and adopted by the San Diego County Regional Airport Authority acting as the Airport Land Use Commission for the County of San Diego.
   a. The ALUCP provides measures to minimize the public's exposure to excessive noise and safety hazards within areas around the airport and identifies areas likely to be impacted by noise and flight activity created by aircraft operations at the airport. These impacted areas include the Airport Influence Area ("AIA"), the Clear Zone and the Flight Activity Zone.
   b. Within the AIA, the ALUCP establishes six safety zones for the purpose of evaluating safety compatibility of new/future land use actions. The safety zone boundaries depict relative risk of aircraft accidents occurring near the airport and are derived from general aviation aircraft accident location data and data regarding the airport's runway configuration and airport operational procedures. The ALUCP limits development intensities in these zones by imposing floor area and lot coverage maximums, by incorporating risk reduction measures in the design and construction of buildings, and/or by restricting certain uses altogether. For example, all residential and virtually all non-residential uses are considered incompatible land uses in some zones, while considered to be either compatible or conditionally compatible with the airport in other zones. Attachment 4 shows the McClellan-Palomar Airport, noise contours and SANDAG's proposed housing units.
   c. If the proposed SANDAG land use assumptions are endorsed, an amendment to the city's General Plan would be required to change the land use designation to Mixed-Use Commercial or residential land uses within the existing Business Park in order to effectuate the underlying assumptions of SANDAG staff. This is not a realistic

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assumption. Further, the protected airspace referenced in the AIA and the ALUCP must also be amended based on SANDAG's regional planning assumptions. (The FAA establishes airspace protection zones in the airspace above and surrounding airports in order to protect aircraft from obstructions such as buildings, towers, etc. in navigable airspace.)

d. When a General Plan is adopted or amended, the allowable growth pattern of an area is identified and the expansion or updating of the various land uses as specified in the General Plan can occur throughout the planning horizon. Without such growth considerations, the expansion or intensification of existing land uses could be considered "growth inducing." Unplanned and uncontrolled growth may have significant adverse impacts on the environment. CEQA requires a discussion of how a "project" could increase population, employment or housing growth in surrounding areas and the impacts resulting from this growth. The CEQA Guidelines indicate that a "project" would normally have a significant effect on the environment if it would induce substantial growth or a substantial concentration of population.

4. At this point, it is not clear if SANDAG's assumptions adequately contemplate the development patterns included in the Sustainable Communities Strategy ("SCS")/Regional Transportation Plan ("RTP"), and Regional Air Quality Strategy ("RAQS"), local climate action planning business-as-usual estimates, sub-regional traffic modeling, or the airspace assumptions of AIA and the ALUCP.
5. The city seeks clarity on the Plan's underlying assumptions made to justify the proposed extensive high-speed rail network considering the significant changes in travel behavior which have occurred throughout the region as a result of the COVID-19 pandemic and due to the advancements in disruptive technologies such as telecommuting, autonomous vehicles, microtransit, etc.

7-22 cont.

   a. Recent North County Transit District ("NCTD") Coaster ridership data show riders are not returning to riding the Coaster in comparison to other modes of travel as shown in Attachment 5.
   b. This question is consistent with comments made by SANDAG's panel expert Bob Poole regarding the impact of the COVID-19 pandemic on transit ridership and mega-transit projects. (See comments by Bob Poole during the March 12, 2021 presentation to SANDAG starting at timestamp 1:30 p.m.: https://youtu.be/q-e6bNY5J_8?t=5410)

6. The city seeks clarity on why an alternatives analysis was not conducted with consideration of other transit alternatives such as automated /shared vehicle technologies and personalized zero emissions transit programs that are capable of utilizing the existing regional freeway infrastructure in response to these recent developments explained in the above comment.
7. The city seeks clarity on why the Plan does not incorporate policies to promote roundabouts over signalized intersections and include a budget line item under the Complete Corridors to fund the construction of roundabouts at new locations and to replace signalized intersections when found feasible. This clarification would support the Federal Highway Administration ("FHWA")'s project for *Accelerating Roundabout Implementation in the United States* and the County of San Diego Air Pollution Control Board's support for implementing roundabouts to address GHG and reduce fatalities.
8. The city seeks clarity on the project phasing proposed within the Plan. Specifically, the city is seeking to understand the timing of implementation of unfunded TransNet projects related to

Attachment A

the new projects presented within the Regional Plan. To support this, the city is requesting that SANDAG input the information requested in Table 1 (Attachment 6).

9. The city seeks specific data on the proposed 200 miles of rail service contemplated in the Plan. To support this, the city is requesting that SANDAG input the information requested in Table 3 (Attachment 7). Specific questions:
    a. Please provide more information about the scope of the high-speed rail alignments, potential vehicle technologies and their cost estimates.
    b. Will the Coaster keep the same rail alignment?
    c. What funding is programmed or planned for the Carlsbad Village railroad trench and the other projects along the current NCTD/Coaster Service right-of-way?
    d. Will some of the tracks be at grade with fencing and trains traveling at 110 miles per hour speeds?

SECTION 2: COMMENTS AND RECOMMENDATIONS

In addition to the comments on process and the Draft EIR provided above, city staff remain concerned that there is not enough detail on the feasibility of implementation of this significant shift in transportation strategy. On specific content in the plans, we outline our recommendations and comments below:

7-22 cont.

1. *Paying for the Plan:*

   The draft 2021 Regional Plan sets out an ambitious plan to build and operate a region-wide system of transportation projects, programs and other improvements. This is a substantial role for SANDAG to play in supporting both the construction and operation of these projects, programs and other improvements. SANDAG should set annual revenue targets to directly fund everything and should approve any recommended sustainable revenue tools to help meet these targets. Many of the funding strategies will require legislative changes, or voter-approved taxation. SANDAG should clarify what will occur if the funding is not available, if opposition to projects stops them from construction, and if General Plans in the region are not modified to implement the Plan.

2. *Appendix D: Sustainable Community Strategy Documentation:*

   Appendix D includes the Sustainable Communities Strategy, which outlines assumptions included in the Activity Based Model 2+ ("ABM 2+"), updated for this. This model will be necessary for use by publicly and privately initiated land use projects preparing documents for consistency with VMT/CEQA Guidelines and Traffic Impact Analysis ("TIA") Evaluations. City staff respectfully request direction from SANDAG on how to conduct modeling with the service bureau and how to factor in these assumptions applied to ABM 2+. Specifically, the addition of pricing, parking costs for coastal communities, 10% teleworking and micromobility. SANDAG should provide direction on how this could be worked into General Plans that are updated every 5-20 years.

3. *Appendix A: Transportation Projects, Programs, and Phasing:*

   Trips to and from school sites result in a significant congestion, VMT generation, and peak hour delay throughout the region. Additional funding and projects should be recommended with a specific focus on improving safety and multimodal access in and around school sites along with programs to incentivize non-single occupancy vehicle trips to schools.

Attachment A

Table A.11: Given the proven success of the Carlsbad Connector microtransit pilot program, the city agrees with the Plan's recommendations to provide similar on-demand microtransit systems throughout North County at all mobility hub sites and major transit centers.

Table A.13: The segment of El Camino Real between Poinsettia Lane and Camino Vida Roble is proposed to be widened from two to three lanes to prime arterial standards. With the adoption of the city's General Plan, the city has determined that the widening of this portion of El Camino Real is not feasible due to constrained right-of-way and would result in negative impacts to other travel modes. City staff recommend removal of this proposed project recommendation CB32 (that is, a 'do nothing' scenario, or appraise and evaluate different mobility projects and/or alternative designs).

The preferred Interstate-5 freeway alternative identified in the North Coast Corridor ("NCC") Final EIR/EIS is the refined 8+4 Buffer alternative, with four freeway lanes and two managed lanes in each direction and completion by 2035. Appendix A, Table A.5 describes NCC project IDs CC004, 007 - 009 as "8F to 6F+4ML" with completion by 2050. While this might lead to further study, it is not clear why there is a different freeway configuration (i.e., reduction in freeway lanes) proposed. How does a reduction in lanes continue to meet NCC potential project benefits of maintaining or improving traffic operations and improving the safe and efficient regional movement of people and goods?

4. *Active Transportation:*

7-22 cont

The city appreciates the Regional Plan's overall approach of providing a connected network of high-quality bicycle facilities throughout the region. Regional bikeways are recommended throughout the city including along Palomar Airport Road which will provide a key east-west connection and El Camino Real which will provide a new north-south bikeway connection through the city. Both roadways are proposed to include "on-street bikeways". Due to the high traffic volumes and vehicle speeds experienced along most of both corridors, the city recommends considering "off-street bikeways" or Class I facilities where feasible in order to stimulate the shift from personal motor vehicle use to people choosing to bike.

It is extremely important that municipal transportation plans align with regional transportation plans to achieve regional goals for land use and transportation and to promote the region working together to build a cohesive regional transportation network. Considering there are currently no mechanisms in place to ensure municipalities coordinate local transportation plans with regional planning documents, the Plan should provide an approach on how SANDAG plans to engage with municipalities, especially in areas of potential disagreement or conflict (as aforementioned in this subsection and others). It is also recommended that the Plan provide additional direction regarding the application of protected bikeways in a variety of applicable contexts. While vertical measures such as soft hit posts may be appropriate in lower volume and lower speed roadways, arterial roadways with high traffic volumes and high speeds warrant much more substantial physical protection from vehicles. In addition, special consideration should be given at intersections and driveways which may be impacted due to the additional width and visibility impacts created by protected bikeways.

City staff look forward to working with SANDAG on improving mobility and land use access in the region and building sustainable, equitable and healthy modes of transportation, and we appreciate the opportunity to comment on the Plan that will help the region realize these goals.

Attachment A

If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or if you need additional information related to comments on the land use assumptions, please contact Eric Lardy, Principal Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,

MDS
For

JEFF MURPHY
Community Development Director

7-22 cont.

TOM FRANK
Transportation Director/City Engineer

Attachments:

1. Government Code 65020 (S.B. 375) Summary
2. City of Carlsbad Mobility Hubs
3. City of Carlsbad – Palomar Airport Road Mobility Hub Analysis
4. Palomar-McLellan Airport Flight Paths
5. Recent NCTD Coaster Ridership Data
6. Table 1 - Project Data Request
7. Table 3 - Detail of Proposed Rail Lines

cc: Scott Chadwick, City Manager
Celia Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Donnell, Senior Planner
Corey Funk, Associate Planner

Attachment A

Attachment 1: Government Code 65020 (S.B. 375) Summary

Government Code section ("GOV §") 65080, also referred to as California Senate Bill 375 (Steinberg, 2008) ("SB 375"), is one area of law that provides SANDAG with guidance to which a regional transportation plan must be developed.

Among other things, the regional transportation plan that is developed "shall be an internally consistent document" (GOV § 65080 (b)) and shall include a "sustainable communities strategy prepared by each metropolitan planning organizations as follows" (GOV § 65080 (b)(2)(B)):

> *Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01 , (vi) consider the state housing goals specified in Sections 65580 and 65581, (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).*

7-22 cont.

The 2021 draft Regional Transportation Plan includes a Sustainable Communities Strategy ("SCS"), as required by SB 375 for the San Diego region (herein after called "draft Regional Plan"). The draft Regional Plan indicates that "SB 375 requires the SCS to include a pattern for forecasted growth and development that accomplishes the following: 1) When combined with the transportation network, the SCS will achieve the regional GHG emission–reduction targets; 2). The SCS accommodates the Regional Housing Needs Assessment ("RHNA") Determination; and 3) The SCS utilizes the most recent planning assumptions. (Reference p. 19 of the 2021 Regional Plan.)

Predicting the effect of transportation plans or projects on land uses and land use planning is critical to developing context sensitive solutions for transportation projects. Therefore, utilization of the most recent planning assumptions is not only necessary but is required as specifically stated therein GOV § 65080. If inconsistencies are found in the land use assumptions or adverse impacts are anticipated, SANDAG should be actively engaged in the development of measures to address these issues.

The SANDAG Board of Directors approved the final RHNA plan with the final housing unit allocation on July 10, 2020, which was based on the most recent land use planning assumptions and an adopted methodology to allocate housing in accordance with GOV §§ 65584.04(d and m). The City of Carlsbad received a total RHNA allocation of 3,873 units as a result of RHNA plan adoption. The adopted April 6, 2021 city's Housing Element accommodates its housing needs through current zoning and other programs

City of Carlsbad Comment Letter August 6, 2021

as needed to meet the city's RHNA obligation at all income levels. The land use inputs derived from this local planning document constitutes the most recent land use assumptions. On July 13, 2021 the Department of Housing and Community Development found "the adopted housing element is in substantial compliance with State Housing Element Law (Article 10.6 of the Gov. Code).

The most recent planning assumptions are critical for the development of the draft Regional Plan as the document must comply with other specific state and federal mandates including a SCS per California Senate Bill 375, which achieves GHG emissions reduction targets set by the California Air Resources Board and compliance with federal civil rights (Title VI) requirements, environmental justice considerations, air quality conformity, and public participation. To monitor compliance and attainment of state reduction goals in GHG, GOV § 65080 (b)(2)) requires that:

> *(H) Prior to adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.*
>
> *(J)(i) Prior to starting the public participation process adopted pursuant to subparagraph (F), the metropolitan planning organization shall submit a description to the state board of the technical methodology it intends to use to estimate the greenhouse gas emissions from its sustainable communities strategy and, if appropriate, its alternative planning strategy.*

7-22 cont.

There is inevitably some uncertainty regarding the use of projected future conditions. However, what is certain is that the project will not operate under the conditions that exist today. There will be new residential and employment growth in the intervening years between now and the proposed build-out of the draft Regional Plan. Nonetheless, projections utilized should represent the best available information assembled by the local agencies with jurisdiction and expertise. Judgments about land use assumptions utilized in the draft Regional Plan should be based on and supported by facts, adopted plans, and "most recent planning assumptions," rather than speculation and personal opinions. The land use assumptions for "uses, residential densities, and building intensities within the region" (as required by GOV § 65080 (b)(2)(B)(i)) should also be the same, as that provided to the state board (as required per GOV §§ 65080 (b)(2)(H and J) in estimating and analyzing GHG from the SCS and the effect on growth and whether the effects of that growth would be significant in the context of the region's plans, natural setting, and growth patterns. Ultimately, the SCS must demonstrate whether SANDAG can meet the per capita passenger vehicle-related GHG emissions targets for 2035 set by the California Air Resources Board ("CARB").

SB 375 directs CARB to accept or reject the determination of SANDAG that its SCS submitted to CARB would, if implemented, achieve the region's GHG emissions reduction targets. CARB's technical evaluation of SANDAG's draft Regional Plan would be based on all the evidence provided, including the models, the data inputs and assumptions, the SCS strategies, and the performance indicators.

The transportation and planning assumptions are also extremely important as it is relied on for other master planning exercises. The Regional Air Quality Strategy ("RAQS") relies on information from CARB and SANDAG for information regarding projected growth in the cities and San Diego County. This in turn is utilized to address other state requirements, including the San Diego portion of the California State Implementation Plan ("SIP") and promulgating their own rules and regulations regarding air quality in the region or to address federal requirements.

Attachment A

Attachment 1: Government Code 65020 (S.B. 375) Summary

The analysis of land use impacts for transportation projects is guided by FHWA Technical Advisory T 6640.8 and the CEQA Guidelines.

Under the FHWA Technical Advisory T 6640.8 (G)(1), Guidance for Preparing and Processing Environmental, states:

> *This discussion [of land use] should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. These plans and policies are normally reflected in the area's comprehensive development plan, and include land use, transportation, public facilities, housing, community services, and other areas.*
>
> *The land use discussion should assess the consistency of the alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section [23 U.S. Code §] 134. The secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for each alternative, including adverse effects on existing communities. Where possible, the distinction between planned and unplanned growth should be identified.*

7-22 cont.

There is also a requirement to analyze the land use planning inconsistencies per CEQA Guidelines § 15126.2(a), which specifies that an EIR for a proposed project include:

> *The Significant Environmental Effects of the Proposed Project. An EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example, the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.*

Since the new land use assumptions are being utilized, as described by this letter, the EIR that is prepared shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. The following are the basic steps in analyzing land use impacts as part of the community impact assessment process:

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Attachment 1: Government Code 65020 (S.B. 375) Summary

7-22 cont.

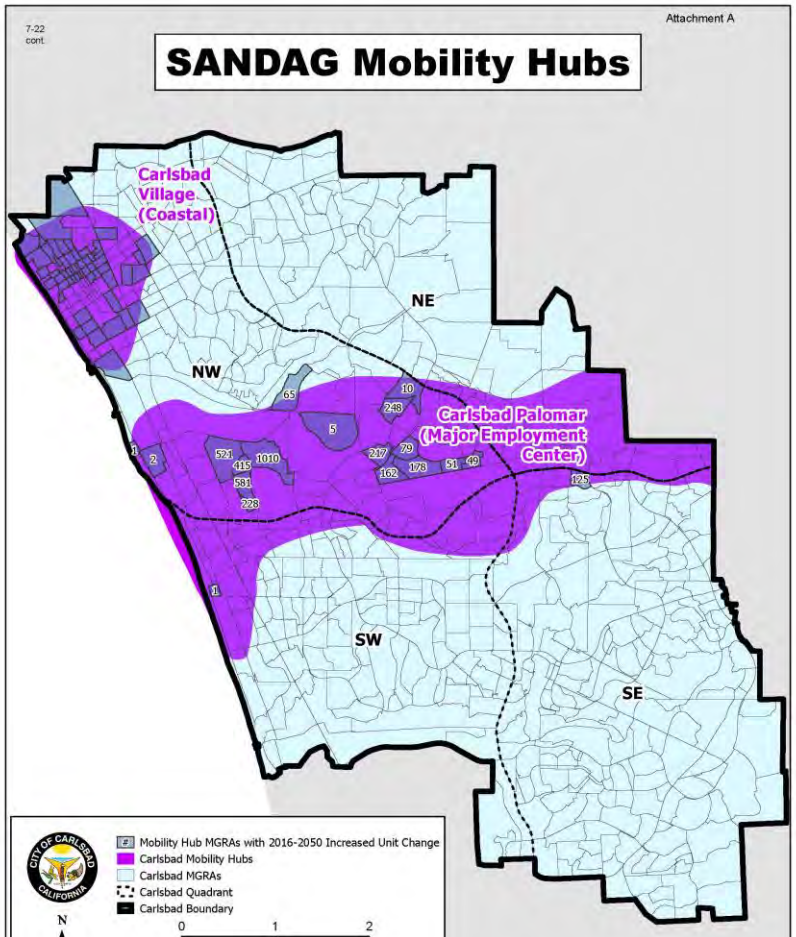
1. Inventory the existing land use patterns (including undeveloped land), development trends, and transportation systems. The inventory of existing land uses should include the following land use types: residential, commercial, industrial, recreational, institutional, public services, community services, emergency services, transportation, utilities, agriculture, and undeveloped land in the study area. The study area should include the surrounding community that is generally associated with the project area within which community impacts could occur. The inventory should also address development trends and identify recent developments in the study area to include the development's name, size, status (planned, built, under construction), and the jurisdiction in which it is located. A map showing the location of existing and planned land uses in the area should also be prepared.
2. Determine whether the project is consistent with local and regional policies that govern land use and development. For the consistency analysis, the policies and programs considered in the analysis should include: transportation plans and programs (MTPs/RTPs and MTIPs/RTIPs), regional growth plans, local General Plans that establish land use and growth management policies for the study area, and any specific or pipeline development proposals. This analysis should also include a discussion of consistency with the Coastal Zone Management Act of 1972, California Coastal Act of 1976, the National Wild and Scenic Rivers Act (16 USC 1271) and the California Wild and Scenic Rivers Act (Pub. Res. Code § 5093.50 et seq.). After preparing a preliminary list of relevant plans to be considered in the analysis, the SANDAG planner should meet with the staff of the various agencies to review the list to determine if it is complete and revise the list as necessary.
3. Assess the changes that would occur in land uses and growth with and without the project.
4. The draft Regional plan and each project alternative should be considered separately since the results may be different.
5. Develop measures to avoid, minimize, and/or mitigate potential adverse effects.

The resulting environmental analysis should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. These plans and policies are normally reflected in local General Plans. If found to be consistent, then the findings in the EIR should be documented in the report and no further analysis or action is necessary. When found not to be inconsistent with a policy or program, then consideration must be given to modifying the draft Reginal Plan alternative to make it consistent, or measures to address the inconsistency must be developed. SANDAG should be actively engaged in the development of measures to address these issues and be prepared to assess the consistency of the draft Regional Plan and alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section 23 U.S. Code § 134. For any new land use growth assumptions, the secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for the draft Regional Plan and each alternative, including adverse effects on existing communities. The results should be shared with the public during the public involvement process, e.g., at community meetings, etc. Public input should be considered by SANDAG and if necessary, the findings of the analysis should be revised to reflect information gained through the public involvement process.

City of Carlsbad Comment Letter August 6, 2021

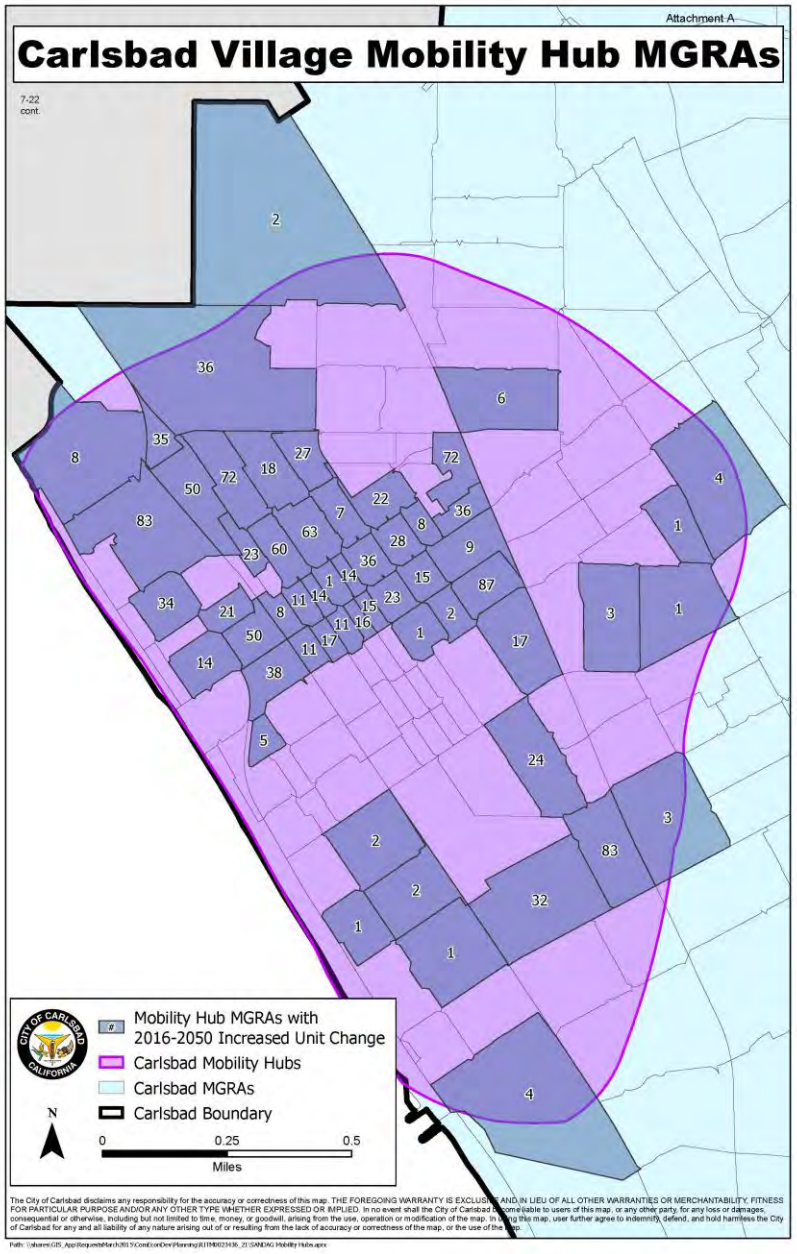
Attachment A

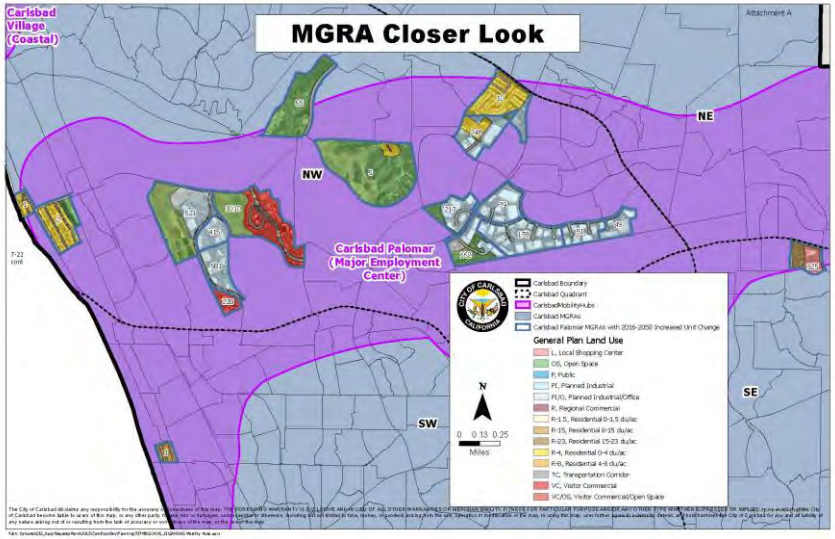
7-22 cont.

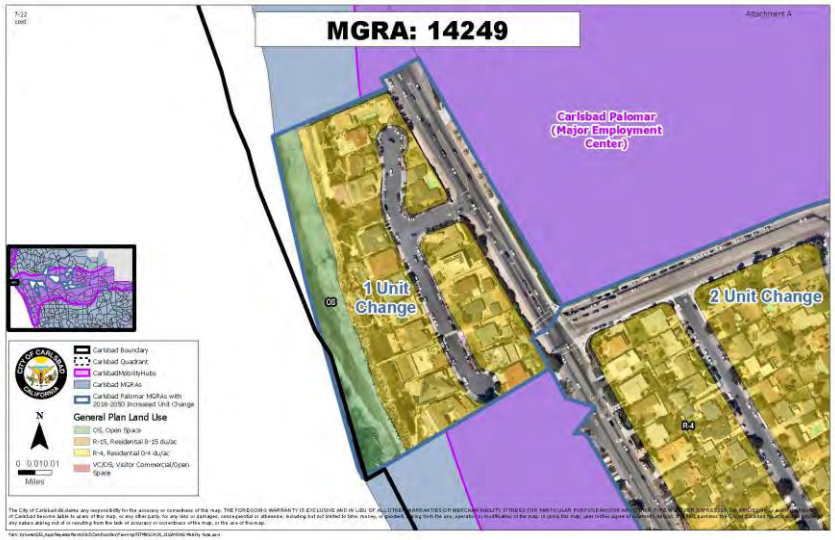


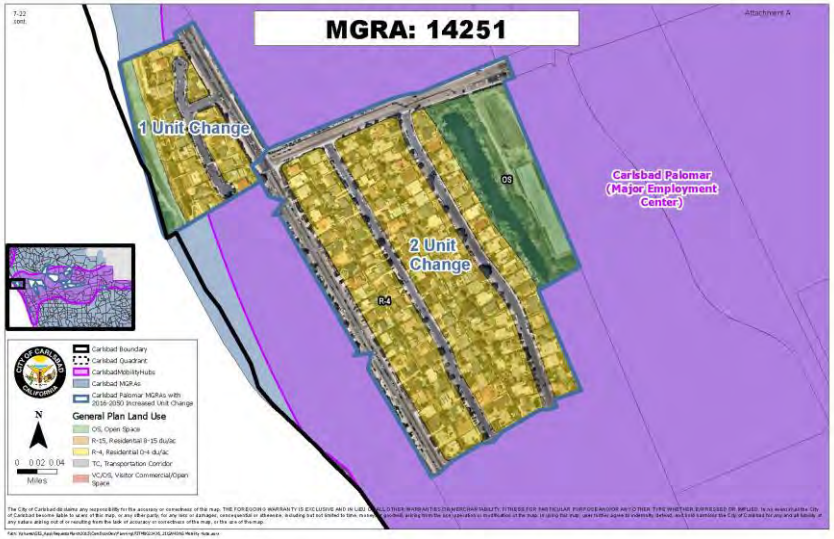
Hub Name	Hub Type	Total Population 2016	Total Houses 2016	Total Population 2025	Total Houses 2025	Total Jobs 2025	Total Population 2035	Total Houses 2035	Total Jobs 2035	Total Population 2050	Total Houses 2050	Total Jobs 2050
Carlsbad Village	Coastal	14087	6430	15095	6539	9290	16177	7075	9667	17293	7607	10044
Carlsbad Palomar	Major Employment Center	12853	5475	12275	5461	61074	19465	8503	67005	21080	9265	72900
N/A	Outside of Hubs	86239	34247	88793	35855	13896	84039	35855	14345	83929	35855	14900
N/A	All of Carlsbad	113179	46152	116163	47855	84260	119681	51433	91017	122302	52727	97844

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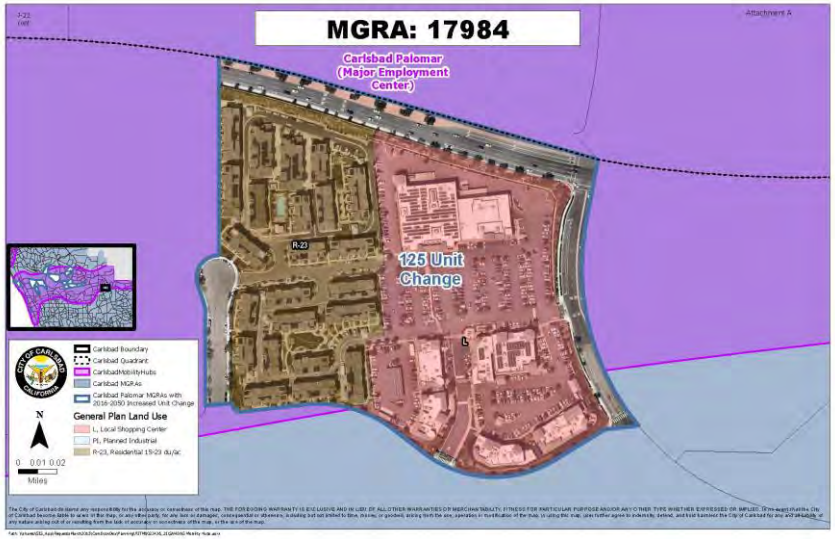

Attachment A
Carlsbad Village Mobility Hub MGRAs
7-22
cont
Mobility Hub MGRAs with
2016-2050 Increased Unit Change
Carlsbad Mobility Hubs
Carlsbad MGRAs
Carlsbad Boundary
N
0
0.25
0.5
Miles
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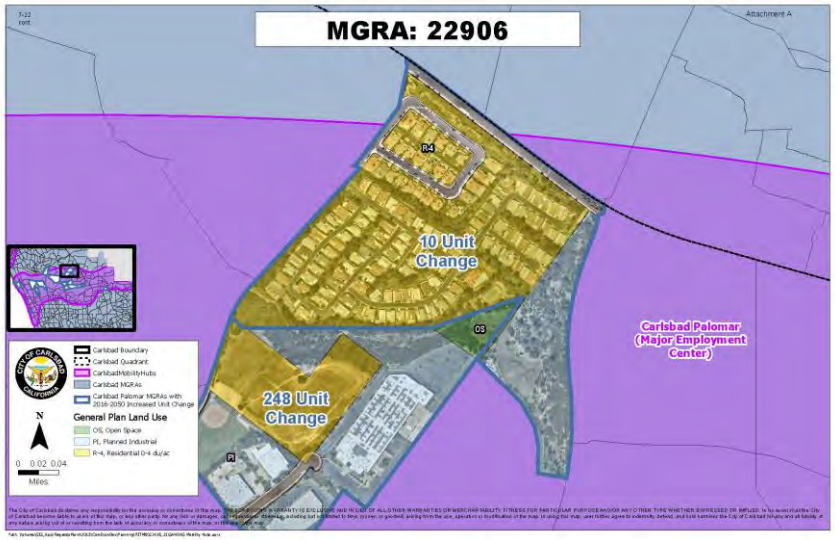

MGRA Closer Look
Carlsbad Village (Coastal)
Carlsbad Palomar (Major Employment Center)
NE
NW
SE
SW
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
L, Local Shopping Center
OS, Open Space
P, Public
PI, Planned Industrial
PI/O, Planned Industrial/Office
R, Regional Commercial
R-1.5, Residential 0-1.5 du/ac
R-15, Residential 8-15 du/ac
R-23, Residential 15-23 du/ac
R-4, Residential 0-4 du/ac
R-8, Residential 4-8 du/ac
TC, Transportation Corridor
VC, Visitor Commercial
VC/OS, Visitor Commercial/Open Space
N
0 0.13 0.25
Miles


MGRA: 14249
Carlsbad Palomar (Major Employment Center)
1 Unit Change
2 Unit Change
OS
R-4
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
R-15, Residential 8-15 du/ac
R-4, Residential 0-4 du/ac
VC/OS, Visitor Commercial/Open Space
N
0 0.010.01
Miles

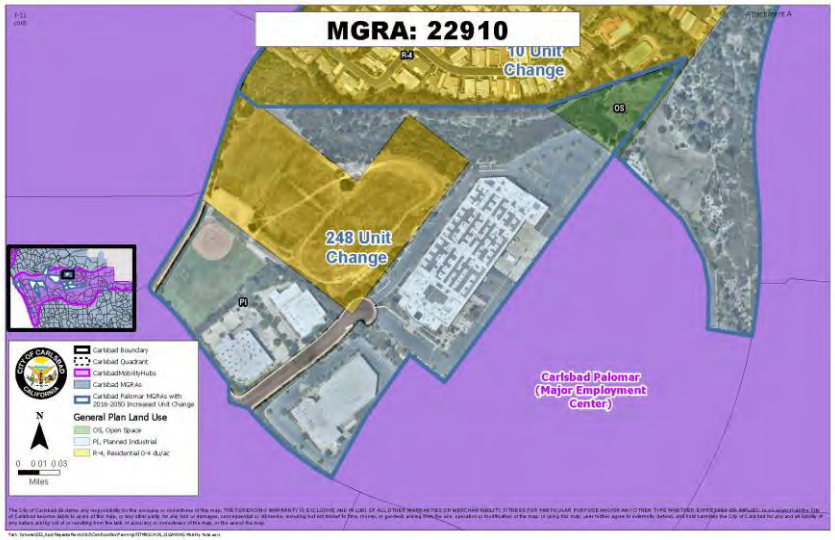

MGRA: 14251
1 Unit Change
2 Unit Change
Carlsbad Palomar (Major Employment Center)
OS
R-4
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
R-15, Residential 8-15 du/ac
R-4, Residential 0-4 du/ac
TC, Transportation Corridor
VC/OS, Visitor Commercial/Open Space
N
0 0.02 0.04
Miles

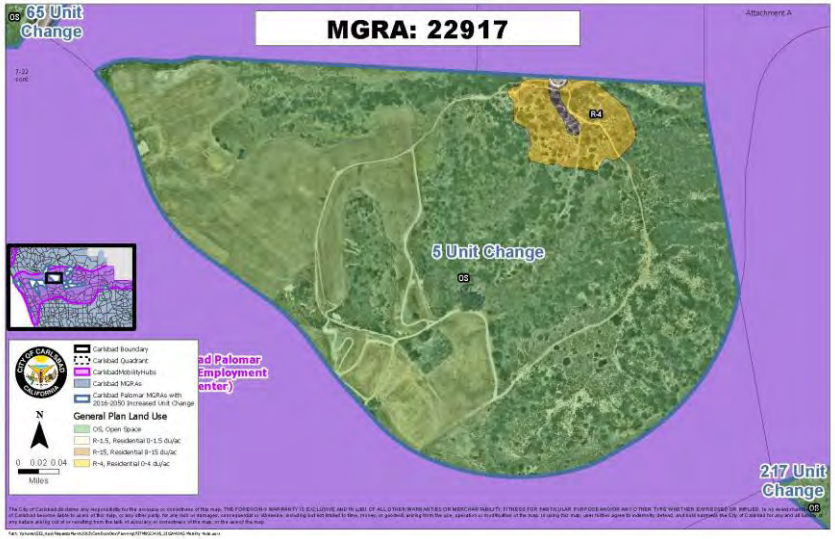

MGRA: 14265
VC
TC
Carlsbad Palomar (Major Employment Center)
1 Unit Change
R-8
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
R-8, Residential 4-8 du/ac
TC, Transportation Corridor
VC, Visitor Commercial
N
0 0.010.01
Miles

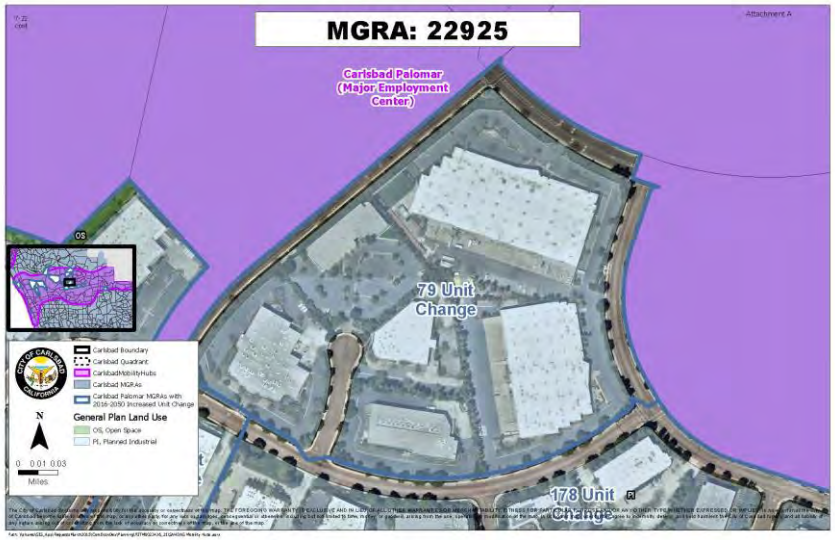

MGRA: 17984
Carlsbad Palomar (Major Employment Center)
125 Unit Change
R-23
L
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
L, Local Shopping Center
PI, Planned Industrial
R-23, Residential 15-23 du/ac
N
0 0.01 0.02
Miles

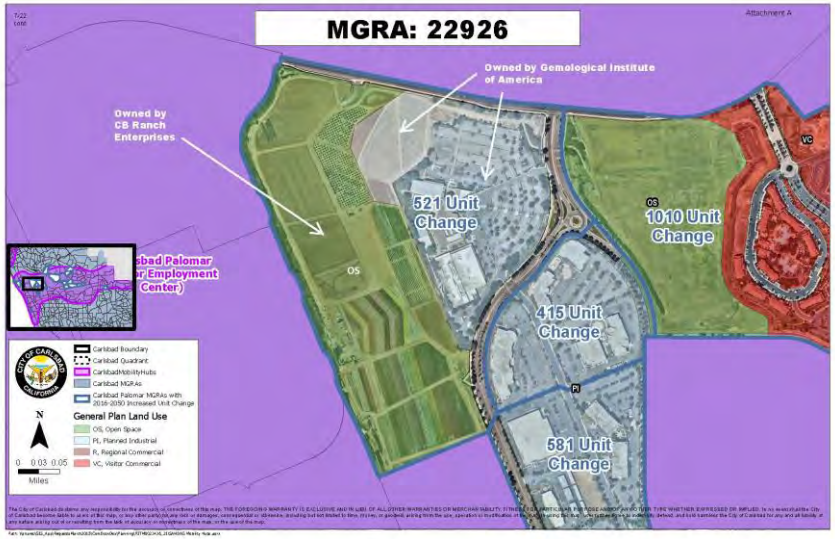

MGRA: 22906
R-4
10 Unit Change
OS
Carlsbad Palomar (Major Employment Center)
248 Unit Change
PI
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
R-4, Residential 0-4 du/ac
N
0 0.02 0.04
Miles

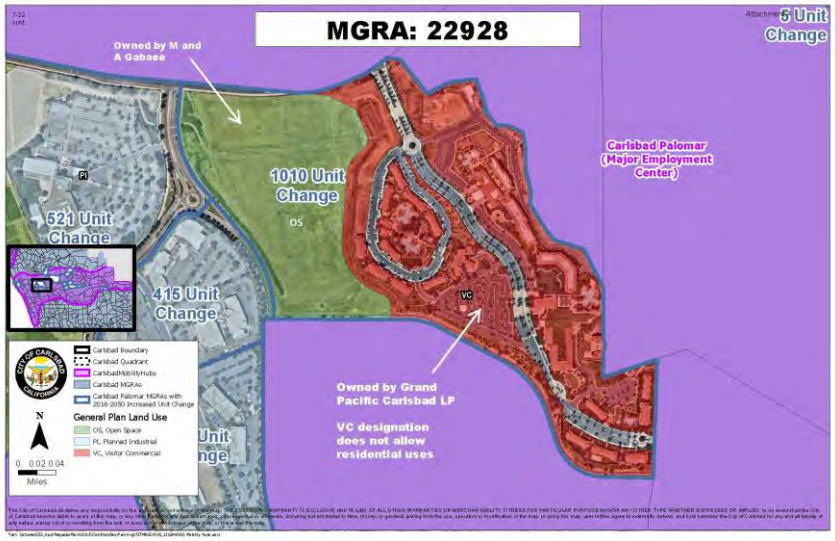

MGRA: 22902
Majority owned by State of CA
65 Unit Change
Small portion owned by Kelly Land Co. and Agua Hedionda Lagoon Foundation
Carlsbad Palomar (Major Employment Center)
5 Unit Change
OS
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
R-15, Residential 8-15 du/ac
N
0 0.02 0.04
Miles


MGRA: 22910
R4
10 Unit Change
OS
248 Unit Change
PI
Carlsbad Palomar (Major Employment Center)
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
R-4, Residential 0-4 du/ac
N
0 0.01 0.03
Miles

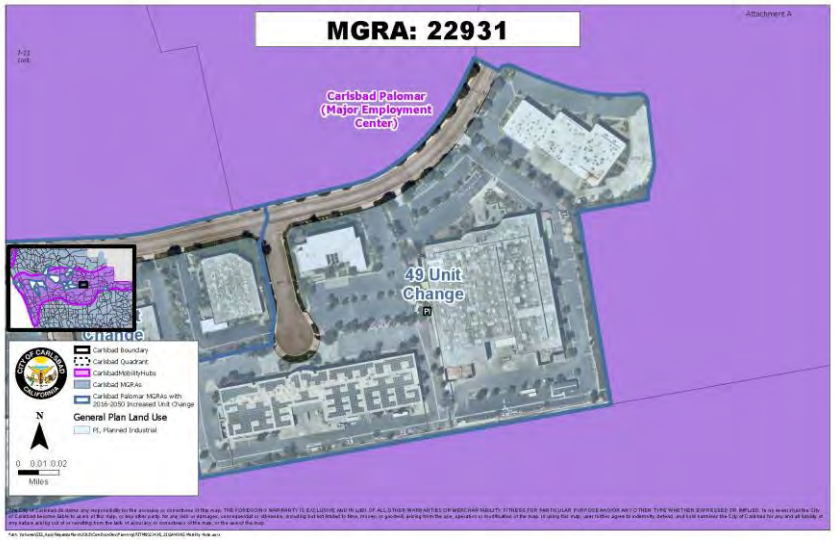

MGRA: 22917
65 Unit Change
5 Unit Change
217 Unit Change
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
R-1.5, Residential 0-1.5 du/ac
R-15, Residential 8-15 du/ac
R-4, Residential 0-4 du/ac
Miles


MGRA: 22925
Carlsbad Palomar (Major Employment Center)
79 Unit Change
178 Unit Change
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
Miles

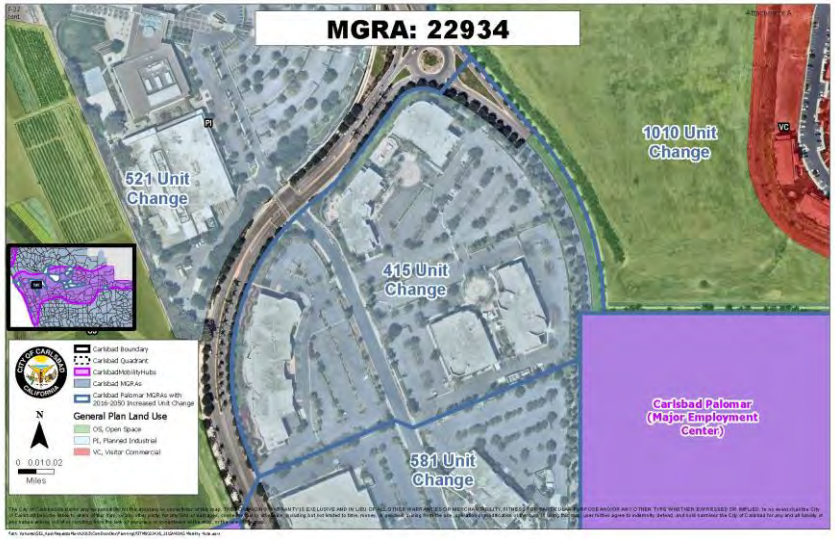

MGRA: 22926
Owned by Gemological Institute of America
Owned by CB Ranch Enterprises
521 Unit Change
1010 Unit Change
415 Unit Change
581 Unit Change
OS
VC
PI
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
R, Regional Commercial
VC, Visitor Commercial
Miles

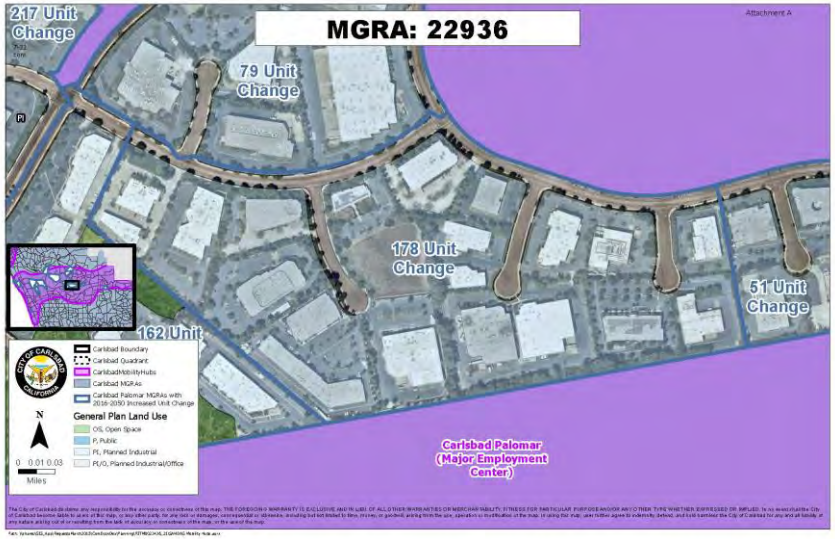

MGRA: 22928
Owned by M and A Gabaee
1010 Unit Change
521 Unit Change
415 Unit Change
5 Unit Change
Carlsbad Palomar (Major Employment Center)
Owned by Grand Pacific Carlsbad LP
VC designation does not allow residential uses
OS
VC
PI
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
VC, Visitor Commercial
Miles


MGRA: 22930
5 Unit Change
217 Unit Change
79 Unit Change
178 Unit Change
162 Unit Change
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
PI/O, Planned Industrial/Office
Miles

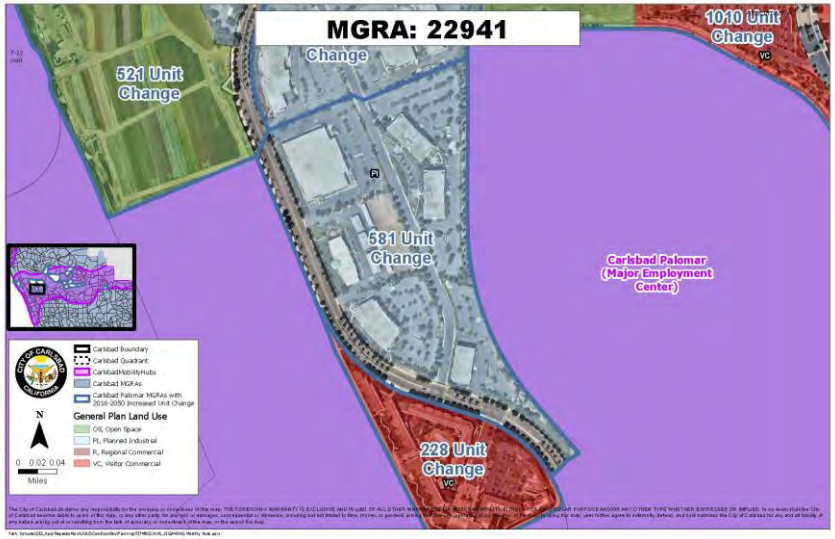

MGRA: 22931
Carlsbad Palomar (Major Employment Center)
49 Unit Change
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
PI, Planned Industrial
Miles


MGRA: 22933
217 Unit Change
79 Unit Change
162 Unit Change
178 Unit Change
P/O
OS
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
P, Public
PI, Planned Industrial
P/O, Planned Industrial/Office
N
0 0.01 0.03
Miles

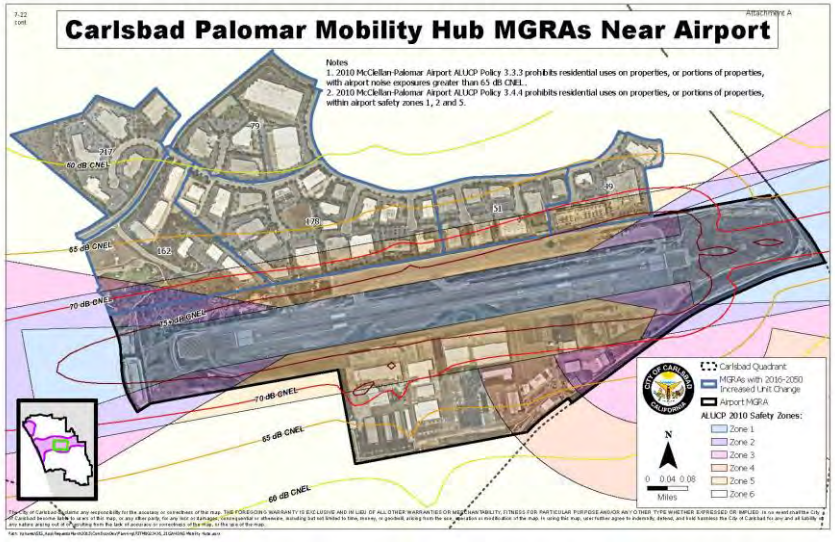

MGRA: 22934
1010 Unit Change
521 Unit Change
415 Unit Change
581 Unit Change
Carlsbad Palomar (Major Employment Center)
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
VC, Visitor Commercial
N
0 0.01 0.02
Miles


MGRA: 22936
217 Unit Change
79 Unit Change
178 Unit Change
51 Unit Change
162 Unit
Carlsbad Palomar (Major Employment Center)
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
P, Public
PI, Planned Industrial
PI/O, Planned Industrial/Office
Miles


MGRA: 22937
51 Unit Change
49 Unit Change
Carlsbad Palomar (Major Employment Center)
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
P, Public
PI, Planned Industrial
Miles


MGRA: 22941
521 Unit Change
581 Unit Change
1010 Unit Change
228 Unit Change
Carlsbad Palomar (Major Employment Center)
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
R, Regional Commercial
VC, Visitor Commercial
N
0 0.02 0.04
Miles


MGRA: 22947
581 Unit Change
228 Unit Change
Carlsbad Boundary
Carlsbad Quadrant
CarlsbadMobilityHubs
Carlsbad MGRAs
Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change
General Plan Land Use
OS, Open Space
PI, Planned Industrial
VC, Visitor Commercial
N
0 0.01 0.02
Miles


Carlsbad Palomar Mobility Hub MGRAs Near Airport
Attachment A
Notes
1. 2010 McClellan-Palomar Airport ALUCP Policy 3.3.3 prohibits residential uses on properties, or portions of properties, with airport noise exposures greater than 65 dB CNEL.
2. 2010 McClellan-Palomar Airport ALUCP Policy 3.4.4 prohibits residential uses on properties, or portions of properties, within airport safety zones 1, 2 and 5.
60 dB CNEL
65 dB CNEL
70 dB CNEL
75 dB CNEL
Carlsbad Quadrant
MGRAs with 2016-2050 Increased Unit Change
Airport MGRA
ALUCP 2010 Safety Zones:
Zone 1
Zone 2
Zone 3
Zone 4
Zone 5
Zone 6
N
0 0.04 0.08
Miles

Attachment A Attachment 5

PLEASE NOTE: PRELIMINARY RIDERSHIP DATA - UNAUDITED AND SUBJECT TO ADJUSTMENTS

Month	COASTER - TOTAL RIDERSHIP			
	FY21	FY20	Variance	%
July	10,263	149,515	(139,252)	(93.1%)
Aug	9,412	133,482	(124,070)	(92.9%)
Sept	10,020	114,233	(104,213)	(91.2%)
Oct	10,968	111,045	(100,077)	(90.1%)
Nov	9,232	94,551	(85,319)	(90.2%)
Dec	7,519	83,951	(76,432)	(91.0%)
Jan	6,848	98,791	(91,943)	(93.1%)
Feb	7,866	91,845	(83,979)	(91.4%)
Mar	11,203	46,510	(35,307)	(75.9%)
Apr	15,184	5,244	9,940	189.5%
May	19,214	6,207	13,007	209.6%
June**	44,978	8,734	36,244	415.0%
YTD Total	162,707	0	(781,401)	
FY Total	162,707	944,108		

**Not final as of July 19, 2021

Month	COASTER - WEEKDAY			
	FY21	FY20	Variance	%
July	10,263	131,218	(120,955)	(92.2%)
Aug	9,412	112,100	(102,688)	(91.6%)
Sept	10,020	92,159	(82,139)	(89.1%)
Oct	10,968	105,601	(94,633)	(89.6%)
Nov	9,232	80,912	(71,680)	(88.6%)
Dec	7,519	75,534	(68,015)	(90.0%)
Jan	6,848	89,920	(83,072)	(92.4%)
Feb	7,866	84,613	(76,747)	(90.7%)
Mar	11,203	44,368	(33,165)	(74.7%)
Apr	15,184	5,244	9,940	189.5%
May	17,221	6,207	11,014	177.4%
June**	35,192	8,734	26,458	302.9%
YTD Total	150,928	0	(685,682)	
FY Total	150,928	836,610		

7-22 cont.

**Not final as of July 19, 2021

Month	COASTER - SATURDAY			
	FY21	FY20	Variance	%
July	-	9,415	(9,415)	(100.0%)
Aug	-	14,348	(14,348)	(100.0%)
Sept	-	8,449	(8,449)	(100.0%)
Oct	-	3,247	(3,247)	(100.0%)
Nov	-	8,385	(8,385)	(100.0%)
Dec	-	4,387	(4,387)	(100.0%)
Jan	-	3,218	(3,218)	(100.0%)
Feb	-	5,181	(5,181)	(100.0%)
Mar	-	665	(665)	(100.0%)
Apr	-	0	0	
May	1,387	0	1,387	
June**	5,881	0	5,881	
YTD Total	7,268	0	(50,027)	
FY Total	7,268	57,295		

**Not final as of July 19, 2021

Month	COASTER - SUNDAY			
	FY21	FY20	Variance	%
July	-	8,882	(8,882)	(100.0%)
Aug	-	7,034	(7,034)	(100.0%)
Sept	-	13,625	(13,625)	(100.0%)
Oct	-	2,197	(2,197)	(100.0%)
Nov	-	5,254	(5,254)	(100.0%)
Dec	-	4,030	(4,030)	(100.0%)
Jan	-	5,653	(5,653)	(100.0%)
Feb	-	2,051	(2,051)	(100.0%)
Mar	-	1,477	(1,477)	(100.0%)
Apr	-	0	0	
May	606	0	606	
June**	3,905	0	3,905	
YTD Total	4,511	0	(45,692)	
FY Total	4,511	50,203		

**Not final as of July 19, 2021

Attachment A

7-22 cont.

ATTACHMENT 6 – Project Data Request

Table 1: Project Information Request

Project	Estimated Total Project Cost	Current Planned Year of Construction	Draft RTP Assumed Year of Construction	Assumed Federal/State Matching Funding (%)
San Dieguito Lagoon Double Track and Platform				
Batiquitos Lagoon Double Track and Bridge Replacement				
Eastbrook to Shell Double Track				
Carlsbad Village Trench				
La Costa to Swami Double Track				
San Onofre Bridge Replacements				
Rose Canyon Bridge Replacements				

Attachment A

ATTACHMENT 7 – Detail of Proposed Rail Lines

Table 3: Detail of Proposed Rail Lines

	Rail Mode (CR, LR, HSR, Hybrid)	Directional Miles	% of Directional Miles Grade Separated/Tunnel	Number of Stations	Average Distance Between Stations	Average Speed Operated	Interoperable with COASTER equipment (Y/N)
New Rail Line							

7-22 cont.

City of Carlsbad

Sept. 30, 2021

San Diego Association of Governments
401 B street, Suite 800
San Diego, CA 92101
Via: SDForward@sandag.org

RE: City of Carlsbad Comments on Draft 2021 Regional Plan

7-23

To whom it may concern,

This letter serves to inform SANDAG that the City does not wish to remove project CB32 from the Regional Arterials Project list.

Please disregard the comment regarding project CB32 from the attached letter sent to SANDAG on Aug. 6, 2021.

Thank you for bringing this to our attention, and please contact me if you have any other questions regarding the 2021 Regional Plan comment letter.

Best Regards,

Tom Frank, PE
Transportation Director/City Engineer

Attachment A: Letter to SANDAG dated Aug. 6, 2021

cc: Scott Chadwick, City Manager
Celia Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public works
Mike Strong, Assistant Director, Community Development

Public Works Branch – Transportation Department
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2766

RESPONSE TO COMMENT 7-23

This comment is not related to the adequacy of the Draft EIR.

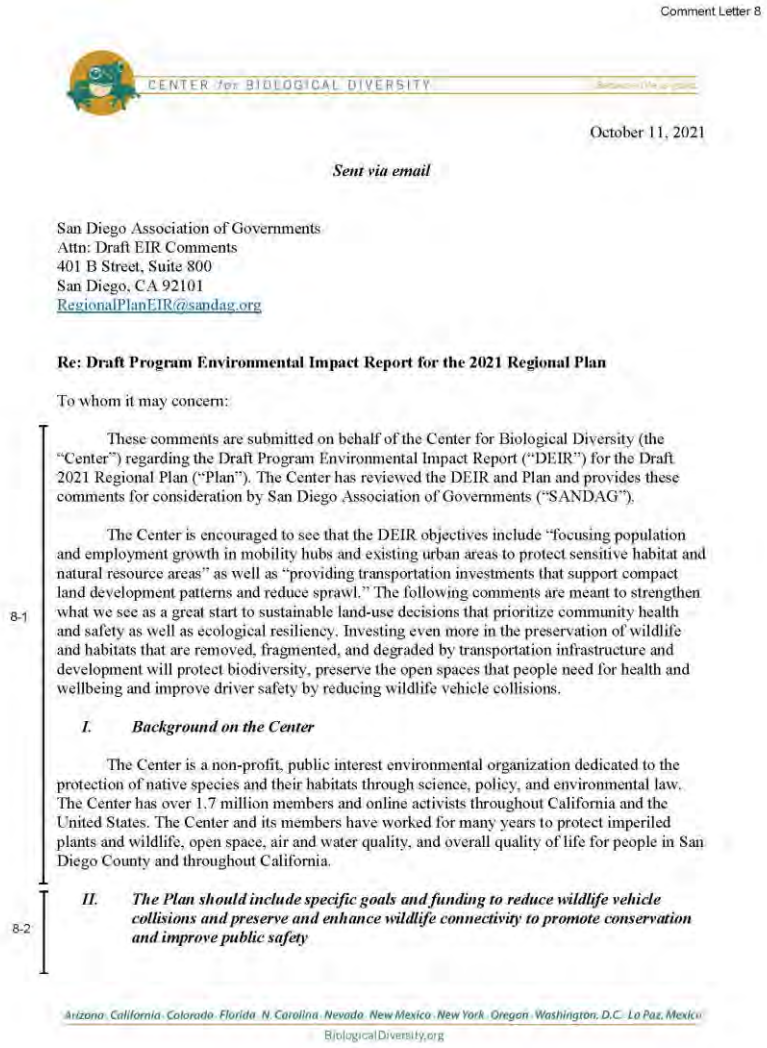
Project CB32 remains on the list of Regional Arterials projects in the proposed Plan.

City of Carlsbad

cc: Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Donnell, Senior Planner
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Public Works Branch – Transportation Department
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COMMENT LETTER 8: CENTER FOR BIOLOGICAL DIVERSITY



Comment Letter 8

CENTER for BIOLOGICAL DIVERSITY

October 11, 2021

Sent via email

San Diego Association of Governments
Attn: Draft EIR Comments
401 B Street, Suite 800
San Diego, CA 92101
RegionalPlanEIR@sandag.org

Re: Draft Program Environmental Impact Report for the 2021 Regional Plan

To whom it may concern:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Draft Program Environmental Impact Report ("DEIR") for the Draft 2021 Regional Plan ("Plan"). The Center has reviewed the DEIR and Plan and provides these comments for consideration by San Diego Association of Governments ("SANDAG").

The Center is encouraged to see that the DEIR objectives include "focusing population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas" as well as "providing transportation investments that support compact land development patterns and reduce sprawl." The following comments are meant to strengthen what we see as a great start to sustainable land-use decisions that prioritize community health and safety as well as ecological resiliency. Investing even more in the preservation of wildlife and habitats that are removed, fragmented, and degraded by transportation infrastructure and development will protect biodiversity, preserve the open spaces that people need for health and wellbeing and improve driver safety by reducing wildlife vehicle collisions.

8-1

I. Background on the Center

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in San Diego County and throughout California.

II. The Plan should include specific goals and funding to reduce wildlife vehicle collisions and preserve and enhance wildlife connectivity to promote conservation and improve public safety

8-2

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BiologicalDiversity.org

RESPONSE TO COMMENT 8-1

Thank you for the Center for Biological Diversity's review of the Draft EIR and expressed support for the EIR objectives. The conservation of native species and their habitat is a key component of SANDAG's Sustainable Communities Strategy. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and fewer impacts on native habitat and species. Appendix AA, *Regional Habitat Conservation Vision,* of the proposed Plan describes the region's efforts to develop and implement a system of open space for conservation of San Diego's unique biodiversity. Detailed responses to the Center for Biological Diversity's other comments can be found below.

RESPONSE TO COMMENT 8-2

Thank you for your comment and the valuable citations that document the effects of habitat fragmentation on biological resources. The commenter has requested *"… SANDAG to add preservation of existing intact habitat and enhancement of wildlife connectivity at existing barriers, as an additional priority [of the Plan]."*

The San Diego region has 30-year history of conservation planning for multiple species and their habitats, including the identification of an interconnected wildlife preserve system aimed at promoting connectivity and decrease the negative effects of habitat fragmentation. As documented in Appendix AA of the proposed Plan, SANDAG continues to be committed to funding regional conservation efforts that include wildlife corridors, and states that "the regional habitat conservation efforts have envisioned "hubs" of protected natural lands connected by wildlife movement corridors." In order to conserve the region's biodiversity, the EIR describes the proposed Plan's intent to conserve unfragmented lands and cores and linkages consistent with adopted local NCCP Subarea Plans. The Plan encapsulated this intent within the Connect and Respect objectives of the Regional Vision (see Appendix AA).

To help meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation,

management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). This funding is estimated to be sufficient to provide all the local funding needed to implement the habitat conservation plans as envisioned. Specific details would start to be developed immediately upon adoption as part of the near-term action items of the proposed Plan (Appendix B of the Plan).

At the project-level, as discussed in Section 4.4 of the EIR, projects that implement the proposed Plan will have to discuss impacts on the project on the conservation plans that include direct loss of habitat and species and indirect impacts such as promoting fragmentation and hindering wildlife movement. Furthermore, projects that bring high speed vehicles in proximity to wildlife life will have to address safety from collisions. This analysis would need to be included, as appropriate, into the subsequent (i.e., second tier) environmental review that will occur at the project level. Measures included in mitigation measure BIO-3 address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies.

8-2 cont.

The Center is encouraged to see that "protecting natural lands to absorb carbon and protect communities from the impacts of climate change" (Plan, Chapter 2, Page 35) is a priority in the Plan. However, **we urge SANDAG to add preservation of existing intact habitat and enhancement of wildlife connectivity at existing barriers, as an additional priority.**

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Brehme et al., 2013; Ceia-Hasse et al., 2018; Haddad et al., 2015; Marsh & Jaeger, 2015; Mitsch & Wilson, 1996; Trombulak & Frissell, 2000; van der Ree et al., 2011). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Brehme et al., 2018; Cushman, 2006), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al., 2010; Kantola et al., 2019; Loss et al., 2014), and alter pollinator behavior and degrade habitats (Aguilar et al., 2008; Goverde et al., 2002; Trombulak & Frissell, 2000). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al., 2019).

8-3

Beyond direct impacts, edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks, 2002; Delaney et al., 2010; J. S. Lee et al., 2012; Riley et al., 2006; Smith et al., 2015, 2017; Vickers et al., 2015; Wang et al., 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Benítez-López et al., 2010; Cushman, 2006; Kociolek et al., 2011; Slabbekoorn & Ripmeester, 2008). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2003)

8-4

Furthermore, making roads more permeable for wildlife by prioritizing the construction of effective wildlife crossing infrastructure will help improve driver safety and save people money. From 2015 to 2018 more than 25,000 wildlife vehicle collisions with large mammals were reported in California, resulting in human deaths, injuries, and property damages estimated to be worth more than $1 billion (Shilling et al., 2017, 2018, 2019). Alarmingly, many of these types of collisions go unreported. State Farm estimated more than 92,000 deer collision insurance claims during that same time frame (State Farm Insurance, 2016, 2018). And while car strikes can be immediately fatal for wildlife, many animals that are struck by vehicles may survive the collision but then slowly die from their injuries away from the road (T. S. Lee et al., 2021). Additional deaths from collisions include young that are orphaned and unable to survive

RESPONSE TO COMMENT 8-3

Thank you for the Center of Biological Diversity's participation in the environmental review process. Further elaboration regarding your organization's comments are addressed in subsequent responses below. SANDAG appreciates the summary of and citations for edge effects and potential effects of limiting wildlife movement.

RESPONSE TO COMMENT 8-4

SANDAG appreciates the summary and citations for potential effects on wildlife movement.

after their parent is killed. Such data should not be ignored in planning a regional transportation plan where lack of wildlife connectivity is causing harm to wildlife, ecosystems, and people.

In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Cushman et al., 2013; Heller & Zavaleta, 2009; Krosby et al., 2018). Increasing variability and extremes in temperature, wind, and precipitation are all products of a warming climate, leaving species struggling to adapt. As a result, species' genes are changing, physiological and physical features such as body size are changing, ranges are shifting as species try to maintain a suitable climate space, and numerous species are expressing new breeding and migration behaviors (Scheffers et al., 2016). Reportedly, climate change is already impacting 82% of key ecological processes that form the foundation of healthy ecosystems (Scheffers et al., 2016). If climate change goes unabated, more than one third of all plant and animal species could become extinct in the next 50 years (Román-Palacios & Wiens, 2020). Wildlife connectivity is critical for biodiversity resilience and climate change adaptability. A permeable landscape that has multiple pathways or linkages between habitat patches allows a wide variety of species to adjust to shifts in resource availability (Mcrae et al., 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008). Multiple connections help populations persist after extreme events worsened by climate change. During floods, landslides or wildfires, these pathways provide escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008). Prior to roads and development severely fragmenting and degrading habitats, a species could persist because individuals from neighboring populations would be able to recolonize an area that experiences a local extinction. But without adequate connectivity, recolonization and species persistence are improbable.

8-4 cont.

If the Plan truly aims to promote sustainable land-use, increase driver safety and mitigate impacts of climate change, then enhancing wildlife connectivity must be stated as a priority. **This should include funding that would go towards identifying roadkill hotspots; implementing wildlife crossing infrastructure** (e.g., upgrading existing culverts to make them more wildlife-friendly, installing crossings and directional fencing at roadkill hotspots, etc.) in those hotspots; and **protecting, managing, and restoring lands in perpetuity on both sides of the constructed wildlife crossings to facilitate wildlife movement**. Wildlife crossing structures have been shown to be a cost-effective means of reducing such collisions and facilitating wildlife movement. States that have invested in wildlife crossing infrastructure, like Utah, Colorado, and Wyoming, have seen 81-98.5% reductions in wildlife vehicle collisions on sections of highways where they have implemented wildlife crossings (Bissonette & Rosa, 2012; Kintsch et al., 2019, 2021; Sawyer et al., 2012; Kintsch et al., 2021). The savings over the long-term from the avoided wildlife vehicle collisions more than pay for the upfront costs to build the crossings (Center for Large Landscape Conservation, 2020). Priority implementation action #9 ("Expand regional programs on low-carbon transportation options, roadway safety and maintenance, and nature-based climate solutions") should include wildlife crossing infrastructure as a safety measure and the proposed Plan's $441 billion going towards maintaining and optimizing the existing system should specifically allocate funding towards implementing wildlife crossing infrastructure.

8-5

RESPONSE TO COMMENT 8-5

This comment addresses the proposed Plan and is not related to the adequacy of the EIR. The comment asserts that the proposed Plan must enhance and fund wildlife connectivity. Appendix AA of the proposed Plan describes the status of the HCPs within the region and states SANDAG's commitment to funding regional conservation efforts that include wildlife corridors. For additional elaboration regarding habitat fragmentation and project-specific mitigation, please see response to comment CBD 8-2.

IV. The DEIR fails to adequately describe, assess, and mitigate impacts to wildlife movement and habitat connectivity.

The DEIR states that the MSCP cores and linkages maps (City of San Diego 1998) and the climate resilient wildlife movement models developed by San Diego State University (SDSU 2019), were used for the quantitative analysis of connectivity. Although these are important resources to identify areas for wildlife movement, there are additional resources that are additive and therefore should also be included when assessing the impact to wildlife connectivity in the area. For example, the UC Davis Road Ecology Center's reports on wildlife vehicle collisions and roadkill hotspots also provide information regarding where wildlife are moving and being hit on roads (Shilling et al., 2017, 2018, 2019). And UC Davis and The Nature Conservancy researchers helped to define a connectivity "roadmap" for mountain lions across the region, and they identified where safe crossings can occur and where barrier effects are present (Vickers, 2020). These data should be considered when assessing the region's wildlife connectivity and
8-6 barriers to connectivity.

In addition, the DEIR states that the statewide habitat connectivity model and the SC Wildlands linkages models are "relatively coarse-scaled" (DEIR at 4.4-36) and therefore were excluded from the analysis. But both the SC Wildlands' 2008 South Coast Missing Linkages Report and CDFW's 2019 Areas of Conservation Emphasis data (which include terrestrial connectivity) are often used in such analyses; they provide more recent models compared to the 1998 MSCP cores and linkages maps by the City of San Diego and should be included here, or a more thorough explanation of why they are inappropriate to use here should be provided. Also, because San Diego County is located within the Pacific Flyway and is important for global connectivity for millions of birds that migrate along the West Coast, areas identified as Important Bird Areas (IBAs) by Audubon should also be included in the connectivity analysis. And there are likely other studies that provide more information regarding important wildlife connectivity throughout the region. The Plan and DEIR should provide the best available science when describing existing conditions and assessing potential impacts of the Plan. The DEIR fails to do this by only providing a fraction of the available information regarding wildlife movement and habitat connectivity.

The DEIR states that a total of 6,617 acres by 2025; 3,519 acres from 2026-2035; and 633 acres from 2036-2050 of mapped wildlife connectivity areas will be impacted by regional growth and transportation network improvements, but it does not provide the map of essential connectivity areas that would be impacted. This omission prevents the public from understanding
8-7 where these development footprints overlap with connectivity areas or if the footprints are designed in a way to avoid and/or minimize impacts to wildlife connectivity. This information is essential to quantifying the impact and creating targeted mitigation measures. In addition, the number of acres that will be lost in connectivity areas due to growth could be much greater if other connectivity areas mentioned above and IBAs are included in the analysis.

The DEIR downplays and dismisses the impacts of the transportation projects on wildlife connectivity, stating that "transportation network improvements that would impact wildlife
8-8 corridors are planned for existing highways, transit projects, or arterials that already act as wildlife barriers. Widening these transportation corridors would not necessarily cut off these

RESPONSE TO COMMENT 8-6

SANDAG appreciates the citations provided, including studies conducted by UC Davis Road Ecology Center, and the "roadmap" for mountain lions developed by UC Davis and The Nature Conservancy (Vickers 2020). Although some of the Shilling et al. studies were conducted in Northern California, they still provide valuable information for the design of wildlife crossings to avoid noise and light pollution, and to appropriately mitigate for impacts on wildlife movement. These citations have been included in mitigation measure BIO-3 as references to be consulted when developing project-specific wildlife crossing design.

The EIR uses best available data at the time the analysis was conducted. The Vickers 2020 dataset was not included in the county-wide wildlife movement model analyzed in this EIR because the data were not available yet at the time the model was produced (Jennings pers. comm.). The Vickers (2020) and Shilling (2019) data were used for local modeling (for example modeling conducted for SR 67), but a county-wide model using these datasets has not yet been developed. However, SANDAG has committed to funding regional conservation efforts that include wildlife corridors, and states that "the regional habitat conservation efforts have envisioned "hubs" of protected natural lands connected by wildlife movement corridors"(see Appendix A of the propose Plan). Please see also response to comment CBD 8-2 regarding habitat fragmentation.

SANDAG agrees that the South Coast Mission Linkages Report and CDFW Area of Conservation Emphasis data provide valuable information on wildlife corridors and linkages. EIR preparers reviewed and evaluated these and many more studies providing information on wildlife movement and connectivity in San Diego County on a programmatic level. However, the recent model prepared by SDSU provides more detailed and County-specific data on wildlife movement. The model was specifically prepared with the goal to provide climate change resiliency and adaptation. It incorporates the information from the referenced studies and builds upon them. Therefore, SANDAG did not evaluate the South Coast Wildlands and CDFW studies independently but rather used them in coordination with the SDSU

model. See also response to comment USFWS 38-12, which discusses the data used in the EIR for MHCP cores and linkages.

The Pacific Flyway is addressed in the EIR. It is described on page 4.4-39. Impacts are discussed on pages 4.4-98 and 4.4-106. Furthermore, the Audubon Society identifies Important Bird Areas (IBA) in San Diego County. All IBAs identified in the Plan footprint are either not developable (i.e., lakes, reservoirs, lagoons, and bays), or are already conserved through various designations (e.g., National Wildlife Refuges, State Preserves, City of San Diego Cornerstone Lands, etc.) and included in the Conserved Lands layers that were part of the GIS dataset analyzed in both Impact BIO-3 and Impact BIO-4 (see also Figure 4.4-16). A reference to the Audubon IBAs has been added to the text.

RESPONSE TO COMMENT 8-7

Figure 4.4-15 in the Final EIR has been updated to show the transportation network footprint impacts on wildlife connectivity areas. The model used for identification of wildlife corridors and linkages encompasses the most recent data available for San Diego County, including the Audubon IBAs (by way of the Conserved Lands layer), and therefore reflects a conservative assessment of impacts. In reality, once projects evaluate avoidance measures under project-specific CEQA and include wildlife corridor designs in the project design, the impacts on wildlife movement, corridors, and linkages are expected to be much less than reported in the EIR. A statement explaining the likely overestimation of impacts is included in the Impact BIO-3 direct impact section.

RESPONSE TO COMMENT 8-8

SANDAG acknowledges that widening of infrastructure would discourage wildlife movement (see the following statement on Draft EIR pages 4.4-99/100: “they may make existing crossings less attractive for use by wildlife species, and the greater width may lead to additional highway mortality for terrestrial and avian species that attempt to cross transportation corridors at grade.” Measures required under mitigation measure BIO-3 address design considerations to facilitate wildlife movement based on best available studies, including wildlife movement studies. In response to this comment, the following text has been added to measure BIO-3: <u>Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking and consider balancing conservation and recreation (Mitrovich et al. 2020). Include</u>

adaptive management and monitoring measures in the CEQA review, mitigation measures, and project design.

The participation of other project sponsors in the implementation of the EIR and mitigation measures is addressed in Section 4, *Environmental Impact Analysis Approach*. Specifically, the section identifies the following: "The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement." Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level. In addition, please see Master Response 2.

For more information regarding the use of "can and should" language regarding mitigation measures for other responsible agencies, please see Master Response 2.

corridors because bridges that would be widened would likely be designed to allow for continued wildlife movement" (DEIR at Page 4.4-99). Such claims are unsubstantiated and dismiss how species move through landscapes. Widening transportation corridors can make a once feasible passage completely infeasible and the assumption that such widenings "would likely be designed to allow for continued wildlife movement" is not substantiated with the necessary information for the public to determine that this would indeed be true. While the DEIR states that SANDAG "shall implement project designs that provide for continued movement of wildlife," it also says that "other transportation project sponsors can and should," which suggests that not all network improvements will implement such measures.

8-8 cont.

SANDAG must also analyze and fully mitigate impacts of the Plan on local mountain lions in the Santa Ana Mountains (SAM) and the Eastern Peninsular Range (EPR) because they are provisionally listed under the California Endangered Species Act ("CESA"). Under CESA, SANDAG may not approve projects (including the Plan) that could jeopardize the continued existence of protected populations or result in destruction of essential habitat (Cal. Fish & Game Code § 2053(a) and ABAG must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity (Cal. Fish & Game Code § 2054). The Santa Ana Mountains puma population is of particular concern. According to the 2019 CESA petition (Yap et al., 2019):

> The SAM mountain lion population has been found to have the lowest genetic diversity of all populations in California, with levels nearly as low as the endangered Florida panther (Benson et al., 2019; Ernest et al., 2014; Gustafson et al., 2017, 2018). This population is also estimated to have a low effective population size (Ne = 5.1 to 15.6) and high levels of relatedness and inbreeding (Ernest et al. 2014; Gustafson et al. 2018; Benson et al. 2019). The SAM population was found to be a genetic sink population, with limited gene flow with the EPR population (Gustafson et al. 2018). In a 16-year study (2001-2016) seven migrants (out of 146 sampled animals), were detected via genetics and GPS collar tracking to have crossed the I-15 between the EPR and SAM (three males from the EPR to SAM, four males from the SAM to the EPR); only one migrant is known to have reproduced (Gustafson et al. 2017). Low genetic diversity and effective population size in the SAM are indicative of a genetic bottleneck that is estimated to have occurred 40-80 years ago, around the time when urban development and multi-lane highway construction boomed in Southern California (Ernest et al. 2014; Gustafson et al. 2018). This population was also found to be largely disconnected from all the other California populations, along with the EPR population.
>
> A recent population viability analysis found that if the population remains isolated with little or no immigration (similar to what is currently being observed in the area), the population could experience further genetic erosion, with 28-49% loss of predicted heterozygosity within 50 years (Benson et al. 2019). When considering just demographic processes with little or no immigration and no inbreeding depression, the population was predicted to have a 16-21% chance of extinction within 50 years. However, to avoid inbreeding depression in wild

8-9

RESPONSE TO COMMENT 8-9

SANDAG appreciates your concern regarding the peril of the Santa Ana Mountains and Eastern Peninsula Range mountain lion population.

Since 2012 SANDAG has funded work totaling $989,384 by Winston Vickers and his team at UC Davis Wildlife Health Center to research mountain lions in the San Diego Region. The conclusions of these studies showed: (1) low annual survival rates for mountain lion populations both east and west of I-15, primarily due to interactions with humans – collisions with vehicles and mortalities secondary to depredation permits being the most prominent causes of death, and (2) connectivity between conserved habitat areas is severely compromised, especially between San Diego, Orange, and Riverside (Vickers 2020). The two major connections into San Diego County are through Orange County into Camp Pendleton and then through San Luis Rey River. The other contention is outside of San Diego County located in Riverside County and connects Camp Pendleton/Fallbrook to lands east of I-15 and Palomar Mountain. The projects in the Plan are outside these identified connections and, therefore, would not further impede existing movements of mountain lion in these two corridors.

This work is being done as part of SANDAG's commitment to funding regional conservation efforts under its TransNet-funded Environmental Mitigation Program (EMP), which is referenced in the EIR (pg. 4.4-53), together with its implementing entity, the San Diego Monitoring and Management Program (SDMMP). The SDMMP's charter is "to assist with the alignment of regional efforts to implement activities identified in the Management Strategic Plan" (MSP, SDMMP 2017). The MSP identifies priority species, and has developed and is currently developing, best management practices (BMPs) and protocols for sensitive plants and animals, wildlife movement, fire management, and grazing management" (EIR page 4.4-54). The MSP identifies the MSCP-covered mountain lion as a high priority species (SL Category) and has conducted and is currently conducting studies identifying connectivity and genetics of mountain lions in San Diego County. These studies and other best available information will be considered on the project-specific level as identified in mitigation measure BIO-3.

Lastly, please note that Fish and Game Code Sections 2053(a) and 2054 are statements of legislative intent.

8-9 cont.

populations, loss in heterozygosity should be less than 5-10% over 100-200 years (Benson et al., 2016; Soule et al., 1986), which suggests that inbreeding depression in the SAM population is a strong possibility. In addition, evidence of potential inbreeding depression has been observed in the population (*e.g.*, kinked tails coupled with low genetic diversity, Figure 2, Ernest et al. 2014). When inbreeding depression was considered in the population viability analysis, population growth will likely decline and chances of extinction within 50 years is predicted to be 100%, with a median time to extinction of 11.7 years (Benson et al. 2019).

To improve the outlook for local mountain lions and prevent their extirpation, transportation and land-use planning in the SANDAG region must proactively account for puma movement and behavioral needs.

8-10

The DEIR's proposed mitigation measures are vague and insufficient to mitigate impacts to special-status species and sensitive habitats, designated critical habitat, and wildlife movement and habitat connectivity. For example, BIO-1b states that SANDAG shall "design compensatory mitigation to result in the conservation, establishment, or creation of self-sustaining sensitive natural and native communities, replacing the lost habitat and/or habitat value as required to offset those lost from project implementation" (DEIR, Page 4.4-75). However, there is no detail on how this will be measured assessed or maintained over time. Additionally, mitigation measure BIO-2 calls for the "establishment of appropriate habitat mitigation ratios," but it does set a minimum threshold. Avoidance of impacts to sensitive habitats and designated critical habitat should be prioritized, after which in-kind mitigation should be a minimum of 3:1 given that critical habitat is designated for threatened and endangered species that are on a trajectory towards extinction without protective action and are already struggling to survive in the long-term, and 5:1 for off-site restoration or habitat creation with continued monitoring, adaptive management strategies, and well-defined success criteria, to be funded in perpetuity (not just for five years).

The DEIR lacks sufficient mitigation for wildlife connectivity as well. **It should require project proponents to implement wildlife connectivity into the design and budget of the projects when planning starts**, being sure to consider the local, regional, and global context of landscape connectivity for a given project in a given area. Opportunities to upgrade existing culverts or implement directional fencing to guide animals to existing culverts or underpasses, as outlined in BIO-3 Mitigation Measures, should be actively sought when conducting maintenance, expansion, or enhancement projects on existing roads. Additionally, acquiring habitat on both sides of wildlife crossings should also be prioritized. And the different needs of the diverse species should be taken into account when designing crossings for wildlife passage. For example, mountain lions have been documented using culverts that are about 4 meters (~13 feet) in diameter (Clevenger & Waltho, 2005; Kintsch & Cramer, 2011; Riley et al., 2018), while smaller animals, including small mammals, reptiles, and amphibians, might require smaller passageways to actually use them. In addition, smaller species with poor dispersal abilities would require more frequent intervals of crossings to increase their chances of finding a crossing compared to more mobile animals, like mountain lions or deer. And for some amphibian and reptile species, such as California red-legged frogs and western pond turtles, undercrossings could include elevated roads or tunnels with grated tops so that the light and moisture inside the

RESPONSE TO COMMENT 8-10

Mitigation ratios cannot be identified on a programmatic basis due to the widely differing circumstances of second-tier transportation and land use projects. The appropriate mitigation ratios will be calculated on a project-specific level based on regulatory agency requirements, and will be applied consistent with local requirements and ordinances. Mitigation measure BIO-3 requires incorporation of wildlife connectivity into project design on a project-specific level and identifies ways to do so (see response to comment CDB 8-12). Mitigation measure BIO-1b states that using approved mitigation banks is the preferable alternative to provide compensatory mitigation. Approved mitigation banks, through the approval process with the Wildlife Agencies, are required to monitor, manage and maintain in perpetuity the biological resources for which mitigation credits were approved by the Wildlife Agencies. The Wildlife Agencies monitor the mitigation banks' commitments on an annual basis by way of annual reports prepared by the mitigation banks' management entity; all management entities managing mitigation banks must also be approved by the Wildlife Agencies. Furthermore, mitigation measure BIO-1b also identifies "requirement for and financing of long-term conservation and management requirements of the mitigation projects." Mitigation measures BIO1-c and BIO-1d provide detail on the compensatory mitigation requirements in the form of native habitat restoration planning and design, and the requirement for long-term management and monitoring in perpetuity to assure that all mitigation continues to function over time. Text was added to mitigation measure BIO-1a to require early coordination with the Wildlife Agencies and respective local jurisdictions to design alignments (see also response to comment CDFW 9-8).

8-10 cont. crossings are similar to that of the ambient environment (Brehme & Fisher, 2020; Langton & Clevenger, 2021).

Mitigation Measure BIO-3 should include long-term monitoring of the crossing structures to help understand if the crossings are effective and/or how to improve upon them so that animals use the crossings and roads are safer for wildlife and people. And while Mitigation Measure BIO-3 includes maintenance of the crossing infrastructure, such maintenance should include adaptive management so that lessons learned from the monitoring can be applied to improve functionality of the crossings. Protecting, managing, and restoring lands in perpetuity on both sides of the constructed wildlife crossings should also be included to facilitate wildlife movement. Mitigation Measure BIO-3 should also include measures to reduce impacts of light and noise in connectivity areas and at crossing infrastructure both during construction and operation of projects. Some examples of noise and light mitigation that are not already provided include:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury vapor fixtures for outdoor lighting.
- Design exterior lighting to confine illumination to the project site.
- Provide structural and/or vegetative screening from light-sensitive uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

8-11

- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- Install temporary noise barriers during construction
- Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools.
- Use rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

RESPONSE TO COMMENT 8-11

Mitigation measure BIO-3 provides programmatic mitigation measures to reduce indirect impacts on wildlife movement corridors. Monitoring and adaptive management was added to the text (see response to comment CBD 8-8). Avoidance, minimization, and mitigation of indirect impacts on wildlife, including mitigation for noise and light impacts, will be addressed at the project-specific CEQA level. These include specific requirements, including prohibiting night-time trail use, use of shielded and dimmed lighting and non-reflective surfaces near wildlife corridors, and installing physical barriers to limit encroachment by humans and noise pollution on wildlife corridors.

In addition, please see response to comment USFWS 38-7, which further describes how the EIR addresses impacts on wildlife movement corridors.

8-11 In addition, Mitigation Measure BIO-3 should include banning the use of anticoagulant rodenticides, at least in areas near open space and identified connectivity areas. Secondary poisoning has been documented in many non-target animals, especially predators (e.g., coyotes (Riley et al., 2003), bobcats (Riley et al., 2007; L E K Serieys et al., 2015; Laurel E.K. Serieys et al., 2021), San Joaquin kit fox (McMillin et al., 2008), California fishers (Gabriel et al., 2012), raptors (Lima & Salmon, 2010), and many more). And a recent study found that rodenticides contributed to reduced functional connectivity in an already constrained landscape (Laurel E.K. Serieys et al., 2021). Therefore, to reduce edge effects of roads and development on wildlife and wildlife movement, the use of anticoagulant rodenticides should be restricted.

The Center appreciates SANDAG's efforts and vision towards wildlife-friendly growth, but more can be done to protect biodiversity and ensure public safety. Here the Center aims to provide just a few examples of how the mitigation measures provided in the DEIR could be more robust and effective at minimizing impacts to sensitive and special-status species, designated critical habitat, and wildlife connectivity. But these recommendations are not comprehensive, and further assessments and analyses should be conducted by SADNAG to improve the Plan and the DEIR to adequately disclose, assess, and mitigate impacts to wildlife connectivity due to the proposed Plan.

8-12 ***V. Conclusion***

Thank you for the opportunity to submit comments on the DEIR and the 2021 Regional Plan. We look forward to working with SANDAG to foster land use policy and growth patterns that promote the preservation and enhancement of wildlife movement and habitat connectivity, facilitate public health and safety, and move towards the State's biodiversity conservation and climate change goals. Please add the Center to your notice list for all future updates to the Plan and do not hesitate to contact the Center with any questions at the emails listed below.

Sincerely,

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RESPONSE TO COMMENT 8-12

lease see Chapter 4, *Environmental Impact Analysis Approach*, for more discussion regarding SANDAG's approach to proposed mitigation measures. In addition, specific text has been added to mitigation measure BIO-3, including the following:

Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking, identify corridor widths and wildlife crossing structures, and consider balancing conservation and recreation (Mitrovich et al. 2020) in project design. Include adaptive management and monitoring measures in the CEQA review, mitigation measures and project design.

- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit night-time trail use, enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.
- As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.
- Incorporate dimmed, shielded and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
- Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devises on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms,

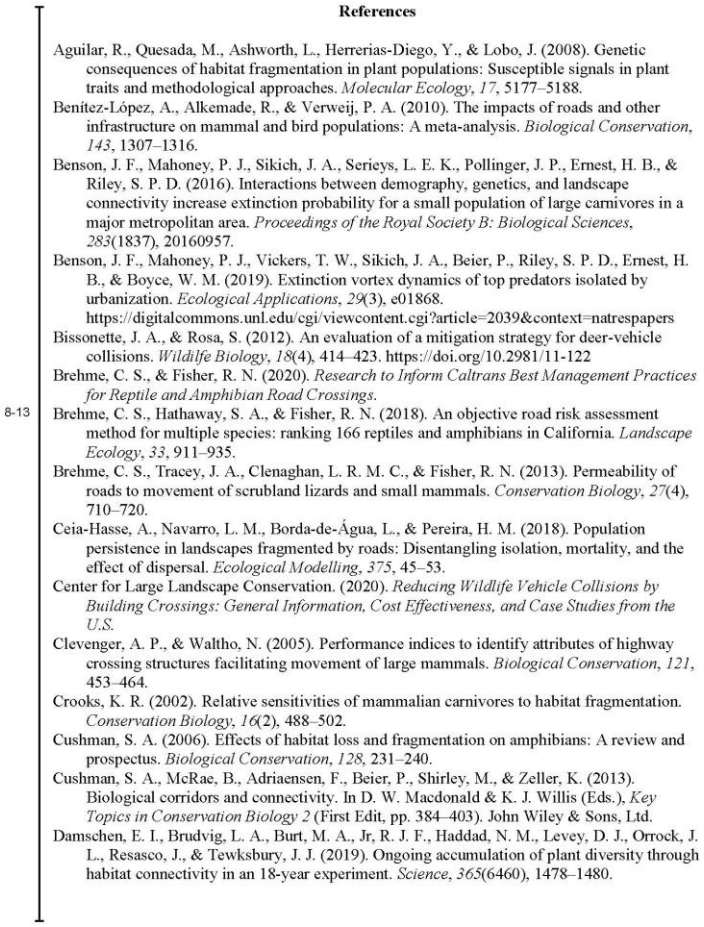
dense plantings, sound walls, reduced-noise paving materials (i.e. rubberized asphalt), and traffic calming measures.

- Minimize the number of road crossings through identified wildlife corridors.
  - Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure shall be designed following the latest scientific information, and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, install wildlife bridges or undercrossing, and manage in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors.
  - If the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings and/or other crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g. habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats.
  - Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.
  - Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways.

Furthermore, additional language was added to ban anticoagulant rodenticides as follows:

> Pursuant to the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands and areas identified as core, linkages, wildlife corridors or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.

The EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.



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RESPONSE TO COMMENT 8-13

SANDAG appreciates the depth of resources provided for consideration and they have been reviewed accordingly. No responses to the attachments specifically have been included because they do not contain comments specific to the EIR and/or proposed Plan. No further response is required.

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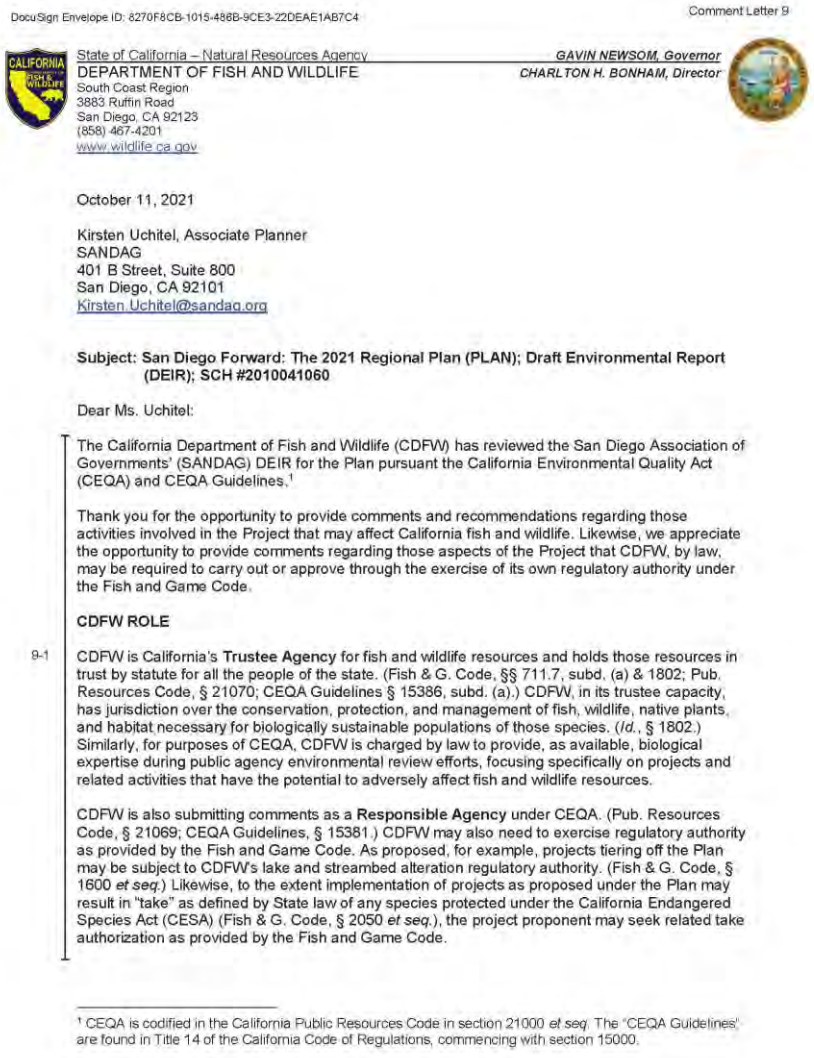
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8-13 cont. Yap, T. A., Rose, J. P., & Cummings, B. (2019). *A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA).*

COMMENT LETTER 9: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE



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Comment Letter 9

State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 11, 2021

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Subject: San Diego Forward: The 2021 Regional Plan (PLAN); Draft Environmental Report (DEIR); SCH #2010041060

Dear Ms. Uchitel:

The California Department of Fish and Wildlife (CDFW) has reviewed the San Diego Association of Governments' (SANDAG) DEIR for the Plan pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

9-1 CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may also need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, projects tiering off the Plan may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 *et seq.*) Likewise, to the extent implementation of projects as proposed under the Plan may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), the project proponent may seek related take authorization as provided by the Fish and Game Code.

[1] CEQA is codified in the California Public Resources Code in section 21000 *et seq.* The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

RESPONSE TO COMMENT 9-1

Thank you for CDFW's participation in the environmental review process and the identification of your organization's role and objectives. Further elaboration regarding your organization's comments is addressed in the responses below.

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CDFW also administers the Natural Community Conservation Planning (NCCP) program. The area encompassed by the Plan is located within planning areas for several NCCP plans within San Diego County (County), including the adopted Multiple Species Conservation Program (MSCP) and Multiple Habitat Conservation Program (MHCP), as well as the draft North County (NC) MSCP and East County (EC) MSCP.

PROJECT DESCRIPTION SUMMARY

Proponent: San Diego Association of Governments (SANDAG)

Objective: The Plan is an update to San Diego Forward: The 2015 Regional Plan adopted in October 2015, and the 2019 Federal Regional Transportation Plan, adopted in October 2019. The DEIR analyzes the significant environmental impacts of the proposed 2021 Plan, which focuses on developing an integrated planning strategy for achieving sustainability in the areas of land use decisions, housing development, and planned transportation for the San Diego region through 2050. The planning strategies also focus on coordinating and managing the region's transportation networks, services and program, along with emphasizing the role of public transit in the process. Regional transportation challenges addressed in the Plan include economic and social inequities, climate change, public health, and safety. The Plan creates an integrated transportation system throughout the 11 Major Travel Corridors of the San Diego region, specifically: South Bay to Sorrento; Central Mobility Hub; State Route 125 (SR 125); Interstate 15 (I-15); Interstate 5 (I-5) North Coast Corridor; State Route 94 (SR 94); Interstate 8 (I-8); Coast, Canyons, and Trails; State Route 56 (SR 56); San Vicente; and North County.

9-1 cont.

The DEIR functions as a Programmatic EIR under CEQA Guidelines Section 15168 for streamlining future projects. The DEIR provides a foundation for second-tier CEQA documents for subsequent projects, but does not analyze the project-specific impacts of individual projects.

The planning horizon of the proposed Plan is 2050. The programmatic and long-term nature of the proposed Plan necessitates a general and at times qualitative approach to the evaluation of impacts. The DEIR analyzes impacts for the two main physical components of the proposed Plan, as well as the combined impacts of these components: regional growth and land use change, and transportation network improvements and programs. SANDAG is required to update the Plan every 4 years, in collaboration with the 18 cities and the County, along with regional, state, and federal partners.

Location: The Plan encompasses the entirety of San Diego County, which is more than 4,200 square miles in area. Most of the urban development lies in the western portion of San Diego County near the coast. Development inland in the eastern portion of the region is less dense and has a more rural character. The boundaries of the Plan include the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and unincorporated areas within the County. Over half of the total land area in the region is not available for public development, including public lands, dedicated parks and open space, lands constrained for environmental reasons, and military use.

Biological Setting: The DEIR identifies 17 vegetation types in three categories in the San Diego Region: Wetlands and Riparian (Beach/Coastal Dunes/Saltpan/Mudflats, Marsh, Meadows and Seeps, Open Water and Streams, Riparian Forest/Woodland, Riparian Scrub, Vernal Pools), Uplands (Chaparral, Coastal Scrub, Desert Dunes, Desert Scrub, Oak Woodlands,

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Forest/Woodland, Grasslands), and Other Cover Types (Agriculture, Disturbed Habitat, Urban/Developed). As indicated in the DEIR, 34 federally or state-listed or candidate plant species and approximately 244 additional special-status plant species have known distributions within the County. Twenty-nine (29) federally and/or state-listed or candidate animal species have potential to be found within the County, as year-round residents or as migrants. An additional 138 special-status wildlife species have known distributions within the County.

Wildlife movement occurs along landscape features (e.g., wildlife corridors, habitat linkages) within the boundaries of the Plan. The various County NCCP plans, both adopted and still in draft, identify landscape-level biological linkages that serve to connect large tracts of core habitat. These linkages allow species movement over time between habitat patches that would otherwise be disconnected. Wildlife corridors contribute to population viability by assuring genetic exchange between populations, providing access to adjacent habitat areas for foraging and mating, allowing for a greater carrying capacity, and providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes, such as wildfires. Corridors also allow species to adapt to climate change because many habitats could lose their original value as the climate changes and force species range shifts into more hospitable areas or climates. The DEIR focuses on the qualitative and quantitative analysis of landscape level regional wildlife movement and habitat linkages rather than specific local corridors (e.g., small canyons, ephemeral drainages); the latter would be evaluated individually during project-level CEQA review.

9-1 cont.

The Biological Resources section of the DEIR projects significant and unavoidable impacts in 2025, 2035, and 2050 to natural resources from projects tiering from the Plan.

BIO-1 projects significant and unavoidable impacts to sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS and state or federally regulated waters and wetlands through direct removal, filling, hydrological interruption, or other means. BIO-1 mitigation measures include: design, minimization, and avoidance measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources; provision of compensatory mitigation; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.

BIO-2 projects significant and unavoidable direct and indirect impacts to certain species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or listed by CDFW or USFWS, including their federally designated critical habitat, or species that are considered sensitive in CEQA Guidelines Section 15380. BIO-2 mitigation measures include: design, minimization, and avoidance measures for Special Status animal species; provision of compensatory mitigation for Special Status plant and animal species; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.

BIO-3 projects significant and unavoidable impacts to the movement of native resident or migratory fish and wildlife species, to established native resident or migratory wildlife corridors, and to the use of native wildlife nursery sites. Mitigation would involve facilitation of wildlife movement.

BIO-4 projects that no conflicts with any approved HCPs, NCCPs, other conservation plans, and local biological protection policies and ordinances would occur. The DEIR states that

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9-1 cont. encroachment into hardline preserve areas would not conflict with HCPs because biologically equivalent or superior compensation of habitat or project redesign would be required when there is encroachment into hardline preserve areas. Thus, BIO-4 projects less than significant impacts. The draft NC and EC MSCPs were not included in this analysis.

9-2 CDFW's primary concerns with respect to climate change in San Diego County are the effects on biodiversity, special status plant and wildlife species, natural vegetation communities, and connections which maintain viable movement corridors between blocks of conserved habitat. Because climate change may impact species directly or indirectly by altering the distribution of vegetation types, promoting non-native species, duration and severity of drought, and increased frequency or magnitude of fires, CDFW considers the use of regional scale, multiple species conservation plans to be a valuable tool to guard against the effects of climate change.

Timeline: The 2021 RP projects impacts forward to 2050. SANDAG is required to update the RP every 4 years.

COMMENTS AND RECOMMENDATIONS

9-3 It is the policy of the Department to promote and foster the development of planning strategies at the ecosystem level through active participation in local development of regional NCCPs, which often include innovative multiple species habitat conservation planning efforts (e.g., MSCP). The success of these plans is reliant on maintaining core biological resource areas and habitat linkages that are essential to the long-term biological viability of associated flora and fauna. Many of those projects defined within the Plan extend through diverse and biologically valuable habitats, consequently the need for comprehensive planning and creative designs solutions will be essential to ensure goals and objectives articulated in current and draft NCCP/HCP efforts are not undermined. CDFW believes the Plan provides a unique opportunity to develop and refine the SANDAG policies and strategies that could lead to more effective implementation of resource conservation and species protection. This includes compliance with State and Federal endangered species acts, approved NCCP/HCPs (e.g., County of San Diego's and City of San Diego's approved MSCP and several others) and the in-process NC and EC MSCPs. Our comments below are intended to complement existing work to date and provide guidance to reduce the potential for any subsequent conflict that could occur between existing and/or future plans, and other regulations for species protection (e.g., MSCP/MHCP, Lake and Streambed Alteration Agreements under Fish and Game Code §1600 et seq., Fish and Game Code §3500, et seq., etc.) that have received, or are anticipated to receive, State and Federal permits.

CDFW offers the comments and recommendations below to assist SANDAG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Recommendations may also be included to improve the document.

9-4 I. **Mitigation Measure or Alternative and Related Impact Shortcoming**

COMMENT #1: The DEIR does not analyze potential conflicts with draft MSCPs.

Issue: The Biological Resources section of the DEIR states that conflicts with unapproved or unadopted plans do not require analysis under CEQA (CEQA Guidelines Section 15125(d)(e)). The NC and EC MSCP plans have not yet been implemented; however, in March 2021, the County of San Diego reinstated the Planning Agreements with the USFWS and CDFW for both draft plans. The County has completed the NC MSCP conservation design and identified

RESPONSE TO COMMENT 9-2

SANDAG appreciates CDFW's concerns with respect to climate change and its effects on the region's biodiversity. SANDAG has included a climate Adaptation and Resilience Program in the proposed Plan. In addition, please see Appendix C of the EIR, *Climate Change Projections, Impacts, and Adaptation*, which provides the framework for the exacerbation of climate change effects analyzed in the environmental impact analysis sections of the EIR's Chapter 4.

RESPONSE TO COMMENT 9-3

SANDAG appreciates CDFW's intentions to complement existing work and provide guidance to reduce the potential for conflict between existing and future plans and regulations for species protections.

RESPONSE TO COMMENT 9-4

This comment expresses concern that the Draft EIR does not analyze potential conflicts with draft MSCPs. Under CEQA and the CEQA Guidelines, only conflicts with adopted HCPs are considered potentially significant. See CEQA Guidelines Appendix G question IVe; see also CEQA Guidelines Section 15125(d)(e)) and *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134.

Regarding concern about continuing and funding the development of NCCP/HCP planning efforts, the transportation network and the land use pattern proposed in the SCS does not impact the ability of the local jurisdictions to seek a regional funding source, and, therefore, there is no impact under CEQA and no required mitigation. However, the final Plan has included a commitment to fund habitat conservation, management, and monitoring of the HCPs and regional preserve system under a new funding allocation that when combined with the nature-based climate solutions program and habitat mitigation for transportation projects would total $3 billion, as described in Appendix A of the proposed Plan. Furthermore, SANDAG has committed to monitor the implementation of the SCS on a two-year cycle pursuant to AB 1730 (Gonzalez 2019).

Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.

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Kirsten Uchitel
SANDAG
October 11, 2021
Page 5 of 8

priority areas for conservation that are being considered in the CEQA analysis of development projects within the NC MSCP planning area. While a planning effort for the eastern portions of the San Diego region was considered by the County of San Diego in 2008, the EC MSCP planning efforts have slowed. However, preliminary conservation design was completed for this area and identified focused areas for conservation that are considered during CEQA analysis as described above for the North County.

Specific impact:

Why impact would occur: Lack of analysis of future conflicts with the draft NC and EC MSCP plans may inhibit forward planning for preservation, acquisition, management and monitoring of open space and biological resources and funding opportunities for support of these conservation actions.

9-4 cont.

Evidence impact would be significant: The *TransNet* Extension Ordinance and Expenditure Plan, approved countywide by voters in November 2004, includes an Environmental Mitigation Program (EMP) which is a funding allocation category for the costs to mitigate habitat impacts for regional transportation projects. The EMP is a unique component of the *TransNet* Extension in that it goes beyond traditional mitigation for transportation projects by including a funding allocation for habitat acquisition, management, and monitoring activities as needed to help implement the MSCP and MHCP, including subarea plans issued under these subregional planning efforts. This funding allocation is tied to mitigation requirements and the environmental clearance approval process for proposed transportation projects. Additionally, SANDAG has been discussing funding needs for planning and implementation of regional conservation efforts throughout San Diego County, including the monitoring and management of regional preserves. CDFW strongly supports completion of NCCP/HCP planning efforts, and believes that development of a regional funding source to support implementation of these plans, should be seen as a critical component of the San Diego Forward program.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Mitigation Measure #1:

9-5

To reduce impacts to less than significant: The proposed Plan covers areas that are critical to the assembly of the County's Multiple Species Conservation Program (MSCP), including NC and EC plans and establishment of Preserve areas. We recommend the DEIR analyze the effects of the proposed Plan on the NC and EC MSCP plans, Preserve assembly, and full implementation of the plans. Any effect (direct or indirect) of the Plan on these draft NCCPs should be evaluated (and mitigated, if necessary). SANDAG staff should coordinate with County staff as well as the U.S. Fish and Wildlife Service and CDFW (jointly, the Wildlife Agencies) to best determine how to evaluate these draft NCCPs in the Plan and DEIR.

Additional Recommendations

Recommendation #1: Regional Wildlife Movement Corridor Map

9-6

The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 361 of the DEIR) as well as corresponding text on page 362 should be expanded to include certain omitted linkages prior to publication of the final EIR. Connectivity throughout the subregional MHCP should be included; for example, connections through Oceanside for coastal California gnatcatcher

RESPONSE TO COMMENT 9-5

This comment recommends that the Draft EIR analyze the impact of the proposed Plan on the unadopted, draft versions of the North County and East County MSCP plans. Please see response to comment CDFW 9-4 above and USFWS 38-4.

RESPONSE TO COMMENT 9-6

In response to this comment, the MHCP core and linkage areas (BCLA) have been added to Figure 4.4-15. The MHCP core and linkages mapping includes the gnatcatcher stepping stones, based on an analysis specifically conducted for the City of Oceanside to inform the preserve design for the MHCP (Bailey and Mock 1998). Under the discussion of the MHCP, the gnatcatcher stepping stones are discussed; text has been added to clarify that the stepping stone concept was included in the MHCP core and linkage map.

The comment asserts that the linkage along I-15 through North County is not referenced in the text. Mention of the I-15 linkage (Santa Ana – Palomar) is included in the text on pages 4.4-103 and 4.4-115. The I-15 linkage is also included on Figure 4.4-16 as part of the model prepared by Jennings (2020). No GIS data currently exist on the Jacumba-Sierra Juarez linkage to Mexico, but the Jennings (2020) model that is analyzed in the EIR includes the US-side of the linkage. With respect to the Santa Ana–Palomar and Jacumba-Sierra Juarez linkage, please see response to comment USFWS 38-12.

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9-6 cont.

(*Polioptila californica californica*) should be added to the map. The map is also missing the linkage along the I-15 through North County and there is no reference to it in the text. Additionally, it is not clear if MHPA areas on the map shown near the Border include the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep (*Ovis canadensis nelsoni)* and whether this is included in the areas referenced in the text on page 362 under the Las Californias Binational Conservation Initiative section. Last, the DEIR should recognize that additional areas for wildlife movement may be subsequently identified through future studies and/or become necessary as a result of future urbanization/development in the County. Thus projects which tier off the final EIR may need to address wildlife corridor issues beyond just the corridors identified in the DEIR.

9-7

Recommendation #2: Los Angeles–San Diego–San Luis Obispo (LOSSAN) Commuter Rail Corridor Alignment

Past impacts to coastal resources by rail projects have been significant, and improvements proposed by the Plan are important elements which address removal of serious impediments to restoration of coastal wetlands, as well as removing rail elements from other sensitive habitats. The DEIR discusses major rail-related transportation network improvements, including continued double-tracking at certain locations on the LOSSAN rail corridor and construction of the Del Mar Tunnel. SANDAG has been considering alternatives that would direct the railroad inland and out of Los Peñasquitos Lagoon. However, Figures 2-32, 2-33, and 2-34 in the DEIR show the alignment of the LOSSAN corridor along the coast. We encourage SANDAG to include the proposed realignments in the DEIR maps and clarify which alignment is included in the quantification of impacts.

9-8

Recommendation #3: 2. New commuter and light rail alignments proposed through the City of San Diego
CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the City of San Diego to design alignments that avoid sensitive resources and preserved lands.

9-9

Recommendation #4: 3. Proposed upgrade of SPRINTER Rail segments to double tracks
The North County Transit District's (NCTD) east-west SPRINTER hybrid rail spans 22 miles and connects Oceanside, Vista, San Marcos, and Escondido, serving 15 stations along the Highway 78 corridor. The addition of a second rail to existing SPRINTER tracks could potentially impact riparian corridors in the cities of Oceanside and Vista. CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the cities of Oceanside and Vista to minimize impacts to sensitive resources as feasible.

9-10

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

RESPONSE TO COMMENT 9-7

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the plan include site-specific transportation network improvements and development projects. Specific projects under the proposed Plan, including the potential LOSSAN double-tracking alignments and the Del Mar Tunnel would be subject to project-specific environmental review, and the alignment, alternatives, and biological resources analysis will be included in the project-specific environmental review.

RESPONSE TO COMMENT 9-8

SANDAG appreciates your input and suggestion. Early coordination with the Wildlife Agencies and the City of San Diego to design alignments that avoid sensitive resources and preserved lands would occur on the project-specific level once a project has been further designed. In response to this comment, the following revision was made to mitigation measure BIO-1a, first bullet point:

- Conduct early coordination with the Wildlife Agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands.

RESPONSE TO COMMENT 9-9

This comment suggests that SANDAG coordinate with the Wildlife Agencies and cities of Oceanside and Vista to minimize impacts on riparian corridors from the addition of a second rail to the SPRINTER tracks. Language has been added to measure Bio-1a as included under Comment CDFW 9-8.

RESPONSE TO COMMENT 9-10

Reporting of special-status species to the CNDDB would occur for each specific project on a project-specific analysis level. In response to this comment, the following revision was made to mitigation measure BIO-1a, last bullet point:

- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special-status species and natural communities detected during project surveys to the CNDDB.

Thank you for your comment, SANDAG appreciates your input.

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FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

9-10

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist SANDAG in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Meredith Osborne, Environmental Scientist, at Meredith.Osborne@wildlife.ca.gov.

Sincerely,

DocuSigned by:
David Mayer
D70084520375406...

David Mayer
Environmental Program Manager I
South Coast Region

ec: CDFW
David Mayer, San Diego – David.Mayer@wildlife.ca.gov
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Attachments

A. CDFW Comments and Recommendations

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Attachment A: CDFW Comments and Recommendations

		Recommendations/Mitigation Measures	Timing	Responsible Party
9-11	Mitigation Measure #1	The DEIR should analyze the effects of the proposed Regional Plan on the draft NC and EC MSCPs, Preserve assembly, and full implementation of the plans. Any effect (direct or indirect) of the Plan on these draft NCCPs should be evaluated (and mitigated, if necessary). SANDAG staff should coordinate with County staff and the Wildlife Agencies to best determine how to evaluate the NC MSCP and the EC MSCP in the Plan and DEIR.	Prior to release of the final EIR	SANDAG
9-12	Recommendation #1	The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 361 of the DEIR) as well as corresponding text on page 362 should be expanded to include all omitted linkages, including MHCP connectivity, I-15 linkage through North County, and North/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep.	Prior to release of the final EIR	SANDAG
9-13	Recommendation #2	CDFW recommends SANDAG to include proposed realignments of the LOSSAN corridor away from the coast and Los Peñasquitos Lagoon in the DEIR and maps and clarify which alignment is included in the quantification of impacts.	Prior to release of the final EIR	SANDAG
9-14	Recommendation #3	CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the City of San Diego to design alignments within the City of San Diego that avoid sensitive resources and preserved lands.	Prior to construction	SANDAG
9-15	Recommendation #4	CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the cities of Oceanside and Vista to minimize impacts from addition of a second rail to existing SPRINTER rails to sensitive resources as feasible.	Prior to construction	SANDAG

RESPONSE TO COMMENT 9-11

Please see response to comment CDFW 9-4.

RESPONSE TO COMMENT 9-12

Please see response to comment CDFW 9-6.

RESPONSE TO COMMENT 9-13

Please see response to comment CDFW 9-7.

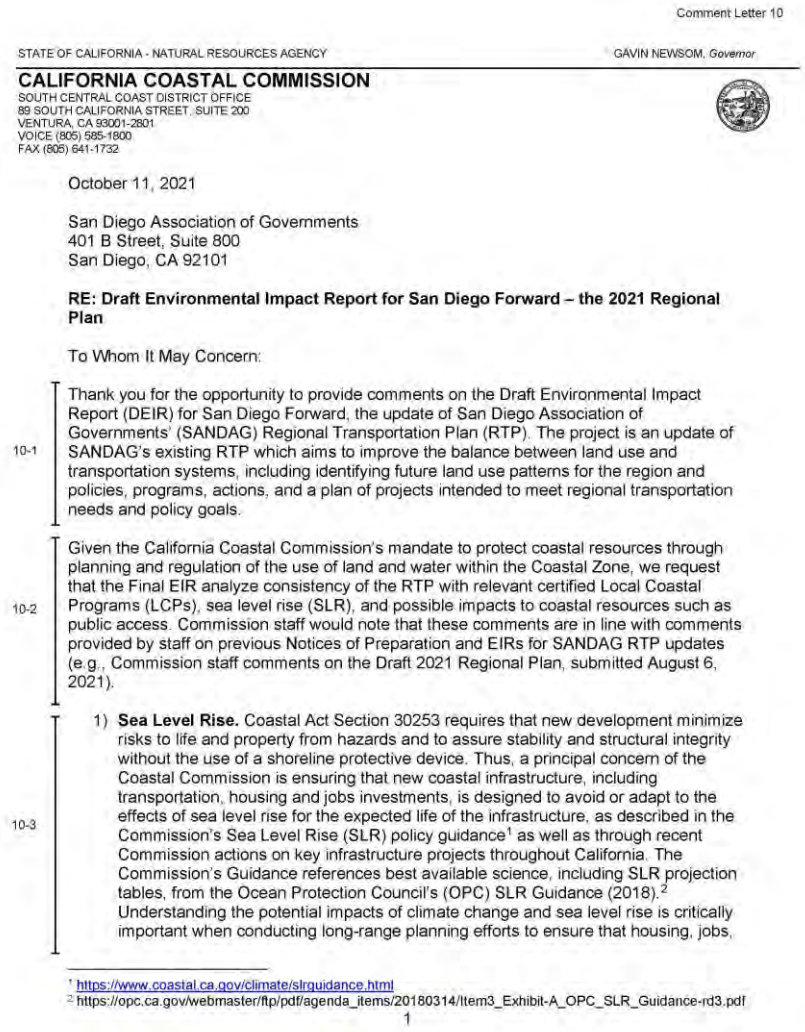
RESPONSE TO COMMENT 9-14

Please see response to comment CDFW 9-8.

RESPONSE TO COMMENT 9-15

Please see response to comment CDFW 9-8.

COMMENT LETTER 10: CALIFORNIA COASTAL COMMISSION



Comment Letter 10

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT OFFICE
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October 11, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

RE: Draft Environmental Impact Report for San Diego Forward – the 2021 Regional Plan

To Whom It May Concern:

10-1 Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for San Diego Forward, the update of San Diego Association of Governments' (SANDAG) Regional Transportation Plan (RTP). The project is an update of SANDAG's existing RTP which aims to improve the balance between land use and transportation systems, including identifying future land use patterns for the region and policies, programs, actions, and a plan of projects intended to meet regional transportation needs and policy goals.

10-2 Given the California Coastal Commission's mandate to protect coastal resources through planning and regulation of the use of land and water within the Coastal Zone, we request that the Final EIR analyze consistency of the RTP with relevant certified Local Coastal Programs (LCPs), sea level rise (SLR), and possible impacts to coastal resources such as public access. Commission staff would note that these comments are in line with comments provided by staff on previous Notices of Preparation and EIRs for SANDAG RTP updates (e.g., Commission staff comments on the Draft 2021 Regional Plan, submitted August 6, 2021).

10-3 1) **Sea Level Rise.** Coastal Act Section 30253 requires that new development minimize risks to life and property from hazards and to assure stability and structural integrity without the use of a shoreline protective device. Thus, a principal concern of the Coastal Commission is ensuring that new coastal infrastructure, including transportation, housing and jobs investments, is designed to avoid or adapt to the effects of sea level rise for the expected life of the infrastructure, as described in the Commission's Sea Level Rise (SLR) policy guidance[1] as well as through recent Commission actions on key infrastructure projects throughout California. The Commission's Guidance references best available science, including SLR projection tables, from the Ocean Protection Council's (OPC) SLR Guidance (2018).[2] Understanding the potential impacts of climate change and sea level rise is critically important when conducting long-range planning efforts to ensure that housing, jobs,

[1] https://www.coastal.ca.gov/climate/slrguidance.html
[2] https://opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf

1

RESPONSE TO COMMENT 10-1

Thank you for your comments and consideration of the proposed Plan.

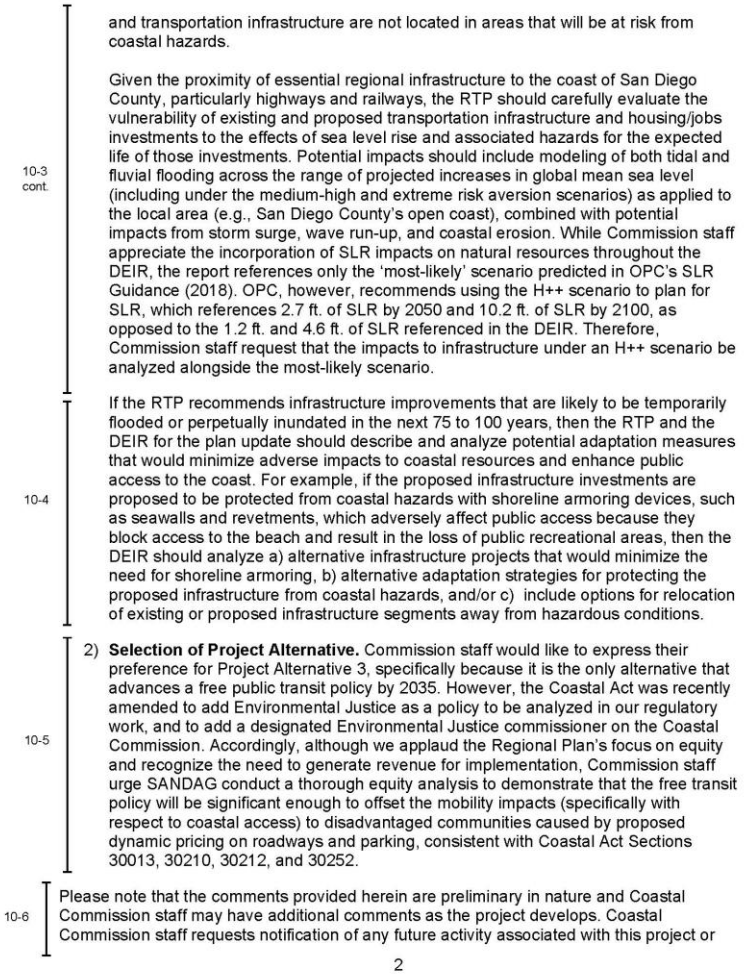
RESPONSE TO COMMENT 10-2

Consistency of the proposed Plan with relevant Local Coastal Programs was analyzed in Section 4.11, *Land Use,* of the Draft EIR. In addition, sea level rise, including exacerbation of climate change effects, and potential impacts on coastal resources are also addressed throughout the document, including in Section 4.1, *Aesthetics and Visual Resources*; Section 4.4, *Biological Resources*, Section 4.7, *Geology and Soils*, Section 4.10, *Hydrology and Water Quality*, as well as Section 4.11. For more information related to sea level rise, please see responses to comments CCC 10-3 and 10-4, below.

RESPONSE TO COMMENT 10-3

It is SANDAG's understanding that the H++ sea level rise scenario is generally used for projects with a lifespan beyond 2050 that have high consequences if damaged (for example, major airports or hazardous waste sites) and little to no adaptive capacity. The EIR did not include the H++ scenario in the climate change appendix due to its unknown probability and the fact that it is more relevant in the second half of the century. Because the EIR time horizon only goes out to 2050, SANDAG did not think the H++ scenario was appropriate to include.

The H++ scenario was not further analyzed due to the evolving nature of the science and the significant uncertainty associated with that scenario. In 2019, new science was published that reduces the likelihood of the H++ scenario (Edwards, T.L., M.A. Brandon, G. Durand, N.R. Edwards, N.R. Golledge, P.B. Holden, I.J. Nias, A.J. Payne, C. Ritz, and A. Wernecke. 2019. Revisiting Antarctic Ice Loss Due to Marine Ice-Cliff Instability. *Nature* 566:58–64, doi:10.1038/s41586-019-0901-4).



and transportation infrastructure are not located in areas that will be at risk from coastal hazards.

Given the proximity of essential regional infrastructure to the coast of San Diego County, particularly highways and railways, the RTP should carefully evaluate the vulnerability of existing and proposed transportation infrastructure and housing/jobs investments to the effects of sea level rise and associated hazards for the expected life of those investments. Potential impacts should include modeling of both tidal and fluvial flooding across the range of projected increases in global mean sea level (including under the medium-high and extreme risk aversion scenarios) as applied to the local area (e.g., San Diego County's open coast), combined with potential impacts from storm surge, wave run-up, and coastal erosion. While Commission staff appreciate the incorporation of SLR impacts on natural resources throughout the DEIR, the report references only the 'most-likely' scenario predicted in OPC's SLR Guidance (2018). OPC, however, recommends using the H++ scenario to plan for SLR, which references 2.7 ft. of SLR by 2050 and 10.2 ft. of SLR by 2100, as opposed to the 1.2 ft. and 4.6 ft. of SLR referenced in the DEIR. Therefore, Commission staff request that the impacts to infrastructure under an H++ scenario be analyzed alongside the most-likely scenario.

10-3 cont.

If the RTP recommends infrastructure improvements that are likely to be temporarily flooded or perpetually inundated in the next 75 to 100 years, then the RTP and the DEIR for the plan update should describe and analyze potential adaptation measures that would minimize adverse impacts to coastal resources and enhance public access to the coast. For example, if the proposed infrastructure investments are proposed to be protected from coastal hazards with shoreline armoring devices, such as seawalls and revetments, which adversely affect public access because they block access to the beach and result in the loss of public recreational areas, then the DEIR should analyze a) alternative infrastructure projects that would minimize the need for shoreline armoring, b) alternative adaptation strategies for protecting the proposed infrastructure from coastal hazards, and/or c) include options for relocation of existing or proposed infrastructure segments away from hazardous conditions.

10-4

2) **Selection of Project Alternative.** Commission staff would like to express their preference for Project Alternative 3, specifically because it is the only alternative that advances a free public transit policy by 2035. However, the Coastal Act was recently amended to add Environmental Justice as a policy to be analyzed in our regulatory work, and to add a designated Environmental Justice commissioner on the Coastal Commission. Accordingly, although we applaud the Regional Plan's focus on equity and recognize the need to generate revenue for implementation, Commission staff urge SANDAG conduct a thorough equity analysis to demonstrate that the free transit policy will be significant enough to offset the mobility impacts (specifically with respect to coastal access) to disadvantaged communities caused by proposed dynamic pricing on roadways and parking, consistent with Coastal Act Sections 30013, 30210, 30212, and 30252.

10-5

Please note that the comments provided herein are preliminary in nature and Coastal Commission staff may have additional comments as the project develops. Coastal Commission staff requests notification of any future activity associated with this project or

10-6

2

RESPONSE TO COMMENT 10-4

The effects of sea level rise on each individual environmental topic studied in the EIR is included in Sections 4.1 through 4.19 as well as in Appendix C of the EIR. In addition, Table C-2 in Appendix C of the EIR identifies all of the EIR resource topic sections that incorporate the effects of climate change–caused sea level rise. Appendix C also provides a description of scientific studies related to sea level rise in California and the San Diego region, including the California Coastal Commission's Sea Level Rise Policy Guidance and 2017 Draft Residential Adaptation Policy Guidance documents. As acknowledged in the EIR, particularly in Section 4.10, *Hydrology and Water Quality,* project footprints that lie in low elevations directly adjacent to the coast and within 100-year flood hazard areas would be susceptible to flooding and the effects of sea level rise. Tables 4.10-10 through 4.10-12 in the EIR show transportation network improvements in the 100-year floodplain. Design practices employed in accordance with the local HMP; Caltrans standards; and other related regulations and programs, including FHWA, FTA, and Caltrans policies on adapting to climate change, sea-level rise, and flooding, would be required. Compliance with applicable regulatory requirements and implementation of design measures, safety ordinances, and water quality requirements described above and in Section 4.10.2 would ensure that regional growth and land use changes as well as transportation network improvements would minimize impacts related to flooding. In addition, proposed improvements within coastal zones will undergo separate CEQA analysis, at which time, additional potential adaptation measures may be developed in conjunction with applicable resource agencies, including the California Coastal Commission.

Furthermore, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including infrastructure investments within the coastal zone, would be subject to project-specific environmental review. During project-specific environmental review, alternatives to specific infrastructure projects would be identified to minimize the significant impacts of the project, including any potential need for shoreline

armoring, alternative adaptation strategies to protect the project from coastal hazards, and/or alternate locations.

RESPONSE TO COMMENT 10-5

SANDAG acknowledges the Coastal Commission's support for Project Alternative 3 and the free public transit policy. The proposed Plan provides a framework for meeting its stated goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies, and programs will confirm SANDAG's commitment to fully realizing the strategies in the proposed Plan. As described in Chapter 2.0, *Project* Description, of the EIR, as an implementation action SANDAG will evaluate the transition to free public transit and develop a Value Pricing and Fee Implementation Strategy. As part of the implementation process, SANDAG will be conducting ongoing analyses to assess mobility and transit improvements, including those related to improving access for disadvantaged communities. For example, SANDAG is currently working with the Social Equity Working Group to develop near-term solutions to address transit service improvements, amenities, and subsidized transit fares. Appendix U, *Cost Estimation Methodology,* Table U.2, in the proposed Plan, captures the transit fare subsidies to riders throughout FY2026–FY2050. For more information on the Value Pricing and User Fee Implementation and the Regional Fare Impact Study, please see Appendices B and U of the proposed Plan.

RESPONSE TO COMMENT 10-6

It is noted that the comments provided are preliminary and that they do not represent the opinion of the Coastal Commission itself but rather Coastal Commission staff. Thank you for your comments and consideration of the proposed Plan.

10-6 cont.

related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you for the opportunity to comment on the DEIR.

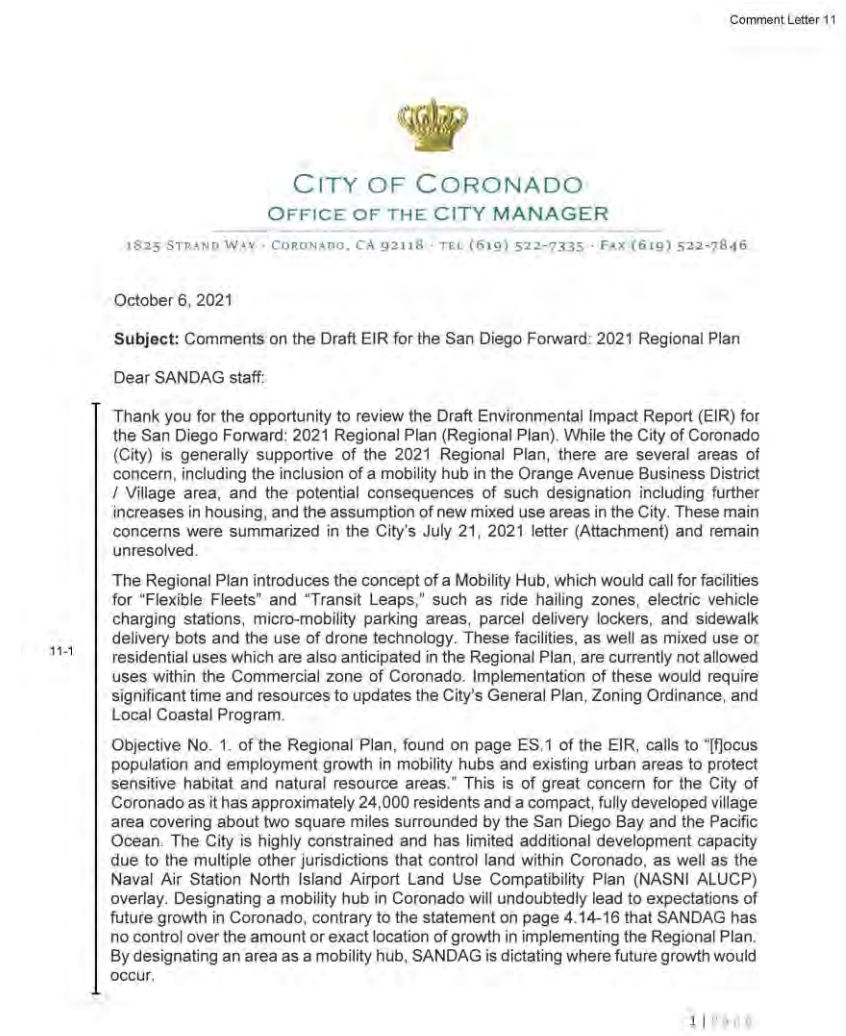
Sincerely,

Trevor Hill
Transportation Program Analyst

Cc:
Tami Grove, Statewide Development and Transportation Program Manager, CCC
Shannon Fiala, Southern California Transportation Program Manager, CCC
Karl Schwing, District Director, San Diego Coast District, CCC
Diana Lily, District Manager, San Diego Coast District, CCC
Deborah Lee, District Manager, San Diego Coast District, CCC
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COMMENT LETTER 11: CITY OF CORONADO



Comment Letter 11

CITY OF CORONADO
OFFICE OF THE CITY MANAGER
1825 STRAND WAY · CORONADO, CA 92118 · TEL (619) 522-7335 · FAX (619) 522-7846

October 6, 2021

Subject: Comments on the Draft EIR for the San Diego Forward: 2021 Regional Plan

Dear SANDAG staff:

11-1

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) for the San Diego Forward: 2021 Regional Plan (Regional Plan). While the City of Coronado (City) is generally supportive of the 2021 Regional Plan, there are several areas of concern, including the inclusion of a mobility hub in the Orange Avenue Business District / Village area, and the potential consequences of such designation including further increases in housing, and the assumption of new mixed use areas in the City. These main concerns were summarized in the City's July 21, 2021 letter (Attachment) and remain unresolved.

The Regional Plan introduces the concept of a Mobility Hub, which would call for facilities for "Flexible Fleets" and "Transit Leaps," such as ride hailing zones, electric vehicle charging stations, micro-mobility parking areas, parcel delivery lockers, and sidewalk delivery bots and the use of drone technology. These facilities, as well as mixed use or residential uses which are also anticipated in the Regional Plan, are currently not allowed uses within the Commercial zone of Coronado. Implementation of these would require significant time and resources to updates the City's General Plan, Zoning Ordinance, and Local Coastal Program.

Objective No. 1. of the Regional Plan, found on page ES.1 of the EIR, calls to "[f]ocus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas." This is of great concern for the City of Coronado as it has approximately 24,000 residents and a compact, fully developed village area covering about two square miles surrounded by the San Diego Bay and the Pacific Ocean. The City is highly constrained and has limited additional development capacity due to the multiple other jurisdictions that control land within Coronado, as well as the Naval Air Station North Island Airport Land Use Compatibility Plan (NASNI ALUCP) overlay. Designating a mobility hub in Coronado will undoubtedly lead to expectations of future growth in Coronado, contrary to the statement on page 4.14-16 that SANDAG has no control over the amount or exact location of growth in implementing the Regional Plan. By designating an area as a mobility hub, SANDAG is dictating where future growth would occur.

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RESPONSE TO COMMENT 11-1

Not all Mobility Hub areas are created equal. Coastal Mobility Hubs are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the Final EIR can be tailored to meet the needs of people traveling to and within Coronado. SANDAG staff will continue to coordinate with Coronado on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community.

Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11, *Land Use,* of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

Government Code Section 65080(b)(2)(B) provides that an SCS "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan. As the comment notes, the SCS land use pattern focuses growth and development in the Mobility Hub areas.

Coronado is a major destination due to the presence of one of the region's top military bases. Additionally, people commuting to hospitality, retail, and dining jobs is a daily occurrence, and the community serves as one of the region's top tourism destinations for visitors from both outside and within San Diego County. These trip-

inducing factors contribute to the area's high propensity for regional Mobility Hub designation.

The 6th Cycle RHNA Plan, adopted by the Board of Directors and approved by the California Department of Housing and Community Development, includes a methodology that allocates housing throughout the region near jobs and transit. Consistent with State law, the RHNA process occurs about every 8 years. During the next RHNA process, the Board of Directors will again consider a methodology for allocating housing throughout the region, which may be different from the 6th Cycle methodology. The SCS land use pattern assumes mixed-use development to accommodate future growth and development in the Mobility Hub areas. While this is a strategy to increase housing affordability and reduce VMT, land use authority is reserved for local jurisdictions, and implementation of the land use pattern is to be refined through coordinated planning with the jurisdiction(s).

With respect to Figures 2-35 and 2-14, each shows generalized Mobility Hub boundaries for planning purposes and is not intended to be binding or precise. Mobility hub boundaries are subject to refinement in close coordination/planning with the affected jurisdiction(s). While Naval Air Station North Island is not located within the Mobility Hub area identified in Figures 2-35 and 2-14, it is a major regional employer. As described above, this is one of many trip-inducing factors contributing to the area's high propensity for regional Mobility Hub designation.

The City of Coronado is concerned that a mobility hub within its jurisdiction would lead to a higher assigned Regional Housing Need Allocations (RHNA) from SANDAG in future Housing Element Update cycles. For the 6th Housing Element Update cycle, SANDAG based each jurisdiction's RHNA solely on the number of jobs and transit stops within the jurisdiction and included adjacent military jobs that had previously never been assigned to individual cities, resulting in a 1,800% increase in RHNA between the 5th and 6th Cycles. With the plan objective to focus on population and job growth within mobility hubs, the City believes the designation of a mobility hub in Coronado will lead to significant future impacts, including increases in the RHNA assigned to the City by SANDAG to which the City is vehemently opposed. Additionally, the City would oppose Alternative 3 outlined in the EIR, which would focus all growth within mobility hubs, for the same reasons. 11-1 cont.

When reviewing figures 2-35 and 2-14 that show proposed mobility hub locations as well as employment density for 2025 it does not appear that the significant employer/jobs are located within Coronado where the mobility hub is proposed, but rather on Naval Air Station North Island (NASNI). The Coronado village area is not a significant job center for the region, is constrained by existing development and the NASNI ALCUP, and has a general lack of vacant sites.

Additional intensified future growth could lead to many issues and create impacts within Coronado such as on the City's infrastructure, including sewer services, recreation facilities, and parks. Additionally, Coronado has just two access points into and out of the city: the San Diego-Coronado Bay Bridge and SR-75 Silver Strand, which is a Designated Scenic Highway as well as a STRAHNET Connector that is part of the National Strategic Highway Corridor Network for defense purposes. It is not prudent to place additional future growth on a constrained community that lacks adequate roadways that do not have feasible expansion opportunities and are designated as a strategic highway for defense purposes. Coronado requests that SANDAG conduct further analysis on potential impacts to the San Diego – Coronado Bay Bridge as well as the Silver Strand State Highway as a result of the Regional Plan. 11-2

The City also has the following comments:

- Page 4.18-2, related to water supply, includes a discussion on the various ways that water is provided to the region and states that "Coronado and Imperial Beach are not within SDCWA's service area" which is true. However, the EIR fails to analyze the water supply and demand for both Coronado and Imperial Beach, both of which are served by California American Water, and the potential impacts the Regional Plan would have on this water source. 11-3
- Table 4.8-5, found on page 4.8-18 of the Regional Plan, includes the status of each jurisdiction's efforts related to Climate Action Plans (CAP). The City of Coronado asks that a footnote be added to the table for Coronado, similar to footnote 2 for the City of Vista, noting that the City of Coronado published a public draft of a CAP update in 2021 that has not yet been adopted. On September 7, 2021, the City Council authorized the release of a public review draft CAP. 11-4
- Figure 2-27 on page 2-46 shows the 2025 regional bike network but omits a portion of the existing Bayshore Bikeway along Glorietta Boulevard. The Bayshore 11-5

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RESPONSE TO COMMENT 11-2

he degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR do not analyze project-specific impacts on City sewer services, recreation facilities, and parks. These would be analyzed at the development project level. This comment also inaccurately suggests that future growth necessitates roadway expansion to increase capacity. SB 743 directed OPR to identify appropriate criteria for the evaluation of transportation impacts in CEQA Guidelines amendments, and provided that once these amendments are adopted, automobile delay, as measured by "level of service" and other similar metrics, no longer constitutes a significant environmental effect under CEQA. OPR selected VMT as the preferred transportation impact metric and applied its discretion to require its use statewide for land use projects and to recommend its use for transportation projects. Transportation impacts for future development projects would be evaluated at the project level consistent with SB 743 and the CEQA Guidelines.

In the proposed Plan, Transit Leap includes a new Rapid bus service from Coronado to Downtown San Diego (Rapid 910) via the San Diego-Coronado Bay Bridge and San Diego-Coronado-Military ferry service that will provide alternatives to driving alone.

RESPONSE TO COMMENT 11-3

Coronado and Imperial Beach are not within the SDCWA service area. They are served by California American Water. However, as is detailed in California American Water's Typical Water Quality Summary (https://www.amwater.com/caaw/water-quality/water-quality-reports/coronado), "The Coronado water system is served entirely by treated surface water purchased from the City of San Diego. The City of San Diego obtains its raw surface water supplies from local reservoirs and the San Diego County Water Authority. The San Diego County Water Authority obtains its supply from the Metropolitan Water District of Southern California (MWD) and transfers from other water agencies." The regional water supply discussed in the EIR includes all water obtained from MWD or other sources and imported into the County by the SDCWA. It also includes any surface water captured in reservoirs owned by the City of San Diego. The water supplies purchased by the cities of Coronado and Imperial Beach, therefore, are included in the

regional supplies discussed in the EIR. The conclusions regarding the adequacy of regional supplies would apply to the water supplies of these two cities. Wording in the EIR has been changed to clarify that, while the two cities are not within the SDCWA service area, their water supply, obtained via the City of San Diego, is part of the regional supply included in the analysis.

RESPONSE TO COMMENT 11-4

This comment notes that the City Council authorized the release of a public draft CAP on September 7, 2021, and requests that this information be included in Table 4-8.5 of the Draft EIR (page 4.8-18).

The Draft EIR was published for public review on August 27, 2021, before the City's public draft CAP was authorized for release. In response to this request, SANDAG has revised Table 4.8-5 in the Final EIR to include a footnote explaining that the City has published a public draft CAP and does not have an adopted CAP.

Table 4.8-5

Summary of Local Plans to Reduce GHG Emissions (as of November~~June~~ 2021)

Jurisdiction	Document Title	Adopted (year)	New Plan or Update In Progress?	CEQA Qualified Plan?[1]
Carlsbad	Climate Action Plan	2020	No	Yes
Chula Vista	Climate Action Plan	2017	No	No
Coronado	Climate Action Plan	n/a	Yes[2]	n/a
Del Mar	Climate Action Plan	2016	No	No
El Cajon	El Cajon Sustainability Initiative: Policies to Reduce Greenhouse Gas Emissions	2020	No	No
Encinitas	Climate Action Plan	2020	No	Yes
Escondido	Climate Action Plan	2021	No	Yes
Imperial Beach	Resilient Imperial Beach: Climate Action Plan	2019	No	No
La Mesa	Climate Action Plan	2018	No	Yes

Lemon Grove	Climate Action Plan	2020	No	No
National City	Climate Action Plan	2011	No	Yes
Oceanside	Climate Action Plan	2019	No	No
Poway	None	n/a	No	n/a
San Diego (City)	Climate Action Plan	2015	Yes	Yes
San Diego (County)	Climate Action Plan	n/a	Yes	n/a
San Diego (Port)	Climate Action Plan	2013	No	Yes
San Diego County Regional Airport Authority	Sustainability Management Program	2020	No	No
San Marcos	Climate Action Plan	2020	No	Yes
Santee	Sustainable Santee Plan	2019	No	Yes
Solana Beach	Climate Action Plan	2017	No	No
Vista	Climate Action Plan	2012	Yes[3~~2~~]	Yes

Sources: City of Carlsbad 2020, City of Chula Vista 2017, City of Coronado 2021, City of Del Mar 2016, City of El Cajon 2020, City of Encinitas 2020, City of Escondido 2021, City of Imperial Beach 2019, City of La Mesa 2018, City of Lemon Grove 2020, National City 2011, City of Oceanside 2019, City of Poway 2009, City of San Diego 2015, Port of San Diego 2013, San Diego County Regional Airport Authority 2020, City of San Marcos 2020, City of Santee 2019, City of Solana Beach 2017, and City of Vista 2021.

[1] CEQA Qualified Plan = a plan for the reduction of GHG emissions that includes the elements listed in CEQA Guidelines Section 15183.5(b)(1) (as determined by the agency adopting the plan).

[2] The City of Coronado authorized the release of a public draft Climate Action Plan (CAP) on September 7, 2021.

[3~~2~~] The City of Vista published a public draft of a CAP update in 2021 that has not been adopted as of August 6, 2021.

RESPONSE TO COMMENT 11-5

For a more detailed response related to this comment, please refer to response L83 in Appendix P.2.

11-5 cont. Bikeway within Coronado is accurately depicted in the figure for the 2035 and 2050 regional bike networks. Coronado asks that Figure 2-27 be updated to reflect the current Bayshore Bikeway.

11-6 • Figure 4.11-1 on page 4.11-2 shows the 2016 Land Use Map for the region. When looking at residential designations in Coronado it appears as mostly single family residential, but lacks much of the existing multi-family residential zoned properties generally between Fourth and Tenth Streets and should be updated to reflect these conditions.

11-7 As stated earlier, Coronado appreciates SANDAG's ambitious plan to improve the San Diego region's mobility options, reduce greenhouse gas emissions, address traffic congestion, advance technology related to transportation services, and improve regional transportation infrastructure. Coronado, however, is concerned with the potential growth intensification the Regional Plan would have on this small, compact community with constrained and burdened transportation corridors and infrastructure. Coronado requests that the Regional Plan remove the mobility hub identified in Coronado and address the other comments in this letter.

Once again, thank you for the opportunity to comment on the 2021 Regional Plan. We look forward to seeing an amended plan in the future.

Respectfully submitted,

Tina Friend
City Manager

Cc: City Councilmembers for the City of Coronado

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RESPONSE TO COMMENT 11-6

The 2016 land use map was used by SANDAG as detailed in Appendix F of the proposed Plan, and considered local general plans. For consistency purposes with the rest of the County, no change has been made. However, it should be noted that ultimate land use authority is reserved for local jurisdictions, including the City of Coronado. The cities and the county are best positioned to effectively implement the objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. As such, it is within the City of Coronado's authority to determine whether zoning in this area is single-family or multi-family.

RESPONSE TO COMMENT 11-7

This comment addresses the proposed Plan and does not relate to the adequacy of the Draft EIR.

Coronado is a major destination due to the presence of one of the region's top military bases. Additionally, people commuting to hospitality, retail, and dining jobs is a daily occurrence, and the community serves as one of the region's top tourism destinations for visitors from both outside and within San Diego County. These trip-inducing factors contribute to the area's high propensity for regional Mobility Hub designation.

Not all Mobility Hub areas are created equal. Coastal Mobility Hubs are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the proposed Final EIR can be tailored to meet the needs of people traveling to and within Coronado. SANDAG staff will continue to coordinate with Coronado on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community. Mobility hub boundaries are also subject to refinement in close coordination/planning with the affected jurisdiction(s).

COMMENT LETTER 12: COUNTY OF SAN DIEGO



Comment Letter 12

County of San Diego

KATHLEEN A. FLANNERY
ACTING DIRECTOR

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VINCE NICOLETTI
ACTING ASSISTANT DIRECTOR

October 11, 2021

Kirsten Uchitel
Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: RegionalPlanEIR@sandag.org

RE: REQUEST FOR COMMENTS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN FOR SANDAG

Dear Ms. Uchitel,

12-1 The County of San Diego (County) staff reviewed SANDAG's Draft Programmatic Environmental Impact Report (Draft PEIR) for "San Diego Forward: The 2021 Regional Plan," dated August 2021. County staff provided detailed comments regarding the 2021 Regional Plan (Proposed Plan) in a letter previously submitted to SANDAG. The letter, dated August 6, 2021 (Attachment A), outlined opportunities within the Proposed Plan for which County staff requested further clarification, exploration, and consideration. County staff would like to continue discussions with SANDAG on how these opportunities align with the objectives of the proposed plan and the Draft PEIR.

To ensure that potential opportunities within the unincorporated area are not precluded in the future, County staff requests that SANDAG consider the comments below on the Draft PEIR and that any necessary refinements be reflected in Chapter 2, Project Description, and analyzed in the appropriate sections of the Final PEIR. County staff appreciates the opportunity to review the Draft PEIR for the Proposed Plan and offers the following comments for your consideration:

GENERAL

12-2 1. The Draft PEIR (Table 2-5) notes that 56% (1,855,597 out of 3,309,510 total people) of San Diego County residents are currently located outside of a Mobility Hub Network, including 512,597 people in the unincorporated area. With the significant investment described in the Proposed Plan, County staff would like to ensure that it is fairly and equitably distributed for the benefit of all County residents, including rural residents living in unincorporated communities.

RESPONSE TO COMMENT 12-1

SANDAG appreciates the County of San Diego's feedback on the proposed Plan and your participation in the environmental review process. Please refer to subsequent responses to your comments below for detailed responses. Refinements have been made to the Final EIR as applicable.

Responses to comments on the County's comments on the proposed Plan can be found under ID 968 in Appendix P.2. Please note that comments 12-1 through 12-7 apply to the proposed Plan, not to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 12-2

While certain types of Flexible Fleets are envisioned to converge in more dense communities (e.g., micromobility, last-mile delivery), there are also planned Flexible Fleet services that operate outside of Mobility Hubs including in unincorporated communities. These services may include on-demand rideshare, ridehail, carshare, and microtransit services. As an implementation action of the proposed Plan, SANDAG is conducting a Flexible Fleets Implementation Strategic Plan to determine the appropriate use cases and geographic locations that are best appropriate for Flexible Fleet services, including in unincorporated communities of the County. In addition, the proposed Plan includes investments in broadband connectivity that will facilitate improved access to online services and on-demand mobility services.

12-3 2. Staff recommends the inclusion of potential investments in roads identified in the County's Mobility Element and in the Regional Arterial System that would further connect the unincorporated area to proposed mobility hubs, with consideration of those roads that also serve as evacuation routes.

12-4 3. Staff would also request consideration of how transit can be aligned with recreation access points to increase access to these important regional amenities.

12-5 4. The Proposed Plan focuses on mobility and land use changes that would serve three primary user groups: pedestrians, bicyclists, and vehicles. Please consider updating the analysis to consider mobility needs for wildlife (wildlife corridors) and for equestrians where appropriate.

12-6 5. From a social equity standpoint, please consider if allowing single occupancy vehicles should be permitted in managed lanes. Allowing single occupants that can afford to travel in managed lanes will create some inequities in the community.

AIRPORTS

12-7 1. The San Diego County Regional Airport Authority adopted Airport Land Use Compatibility Plans for the eight airports, which included land use compatibility policies related to airspace, noise, safety, and overflight. Those policies have been adopted by the County of San Diego through its General Plan and Zoning Code. After evaluating the forecasted increases in housing and jobs around the Mobility Hubs, there are several land use assumptions made in the Proposed Plan related to safety and noise around Fallbrook Airpark, Jacumba Airport, Gillespie Field, and McClellan--Palomar Airport that County staff would like to better understand. For example, there are forecasted incompatible housing increases within the Runway Protection Zones at Gillespie Field. These inconsistencies could result in making the assumed intensities and density increases included in the Proposed Plan unachievable.

AESTHETICS AND VISUAL RESOURCES

12-8 1. Page 4.1-10 of the Draft PEIR mentions the County of San Diego Dark Sky Ordinance and associated regulation of outdoor light fixtures within 15 miles of local observatories. This ordinance also includes the minimization of light pollution to reduce impacts to wildlife. Please consider expanding the analysis to address direct and indirect impacts due to light and glare on open space lands and wildlife corridors/linkages.

12-9 2. It is not clear what type of trees and vegetation will be used to replace impacted vegetation in cases where vegetation disruption causes potential aesthetic impacts (Mitigation Measures AES-2a, 2b, AES-3a). Mitigation Measure BIO-1e specifies that certain invasive species shall not be used to replace impacted vegetation. Please consider adding that same requirement to the Aesthetic/Visual Resources mitigation measures in the Draft PEIR.

RESPONSE TO COMMENT 12-3

The proposed Plan includes improvements for arterial roadways so that they can benefit from management approaches and technology enhancements to increase efficiency and reduce delays (see proposed Plan Appendix A, A-41, Table A.13).

While these regional Mobility Hub coverage areas have been used to model the impact Transit Leap and Flexible Fleet trips to/from these hubs have on reducing VMT, they do not restrict Flexible Fleets from serving neighborhoods that may be between or beyond hubs. Some Flexible Fleet services operating within regional hubs will also need to reach outlying destinations, such as the set of beach and shopping communities cited in this comment. There will be many opportunities for Flexible Fleets to connect to Transit Leap stops located along routes in between hubs. The same applies to improvements on Complete Corridor arterials connecting to and from hubs.

Appendix Q of the proposed Plan describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses.

SANDAG also encourages the County to work with staff on any proposals to include additional RAS routes during the next Regional Plan cycle. Eligibility criteria is outlined in Appendix T of the proposed Plan.

RESPONSE TO COMMENT 12-4

The proposed Plan aims to improve access to a quality public transportation system for all San Diego residents, especially for seniors, historically underserved communities, and other under-represented populations. SANDAG's social equity analysis projects significant improvements for senior access to high-quality transit service, parks, and recreational facilities. In every metric senior access to transit, retail, medical facilities, and parks improves through 2025 and 2050. More data and analysis is available in Appendix H of the proposed Plan.

In general, the Draft EIR found that the main drivers of demand for recreational facilities is population growth, not transportation network improvements (see, inter alia, EIR page 4.15-40). However, "[t]he transportation network improvements and programs, in particular rail improvements and active transportation facilities, could redistribute a portion of existing travel and attract transit users to recreation facilities

in the vicinity of transit stops and stations leading to minor increases in usage….In addition, active transportation improvements would expand recreation opportunities, such as bicycle facilities" (EIR page 4.15-43).

RESPONSE TO COMMENT 12-5

e proposed Plan suggests a Nature-Based Climate Solutions Program that will promote natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure, Comprehensive Multimodal Corridor Plans (CMCPs), and consistent regional planning and implementation of the Sustainable Communities Strategy actions, emphasizing both nature-based and technological climate solutions. There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities.

The development CMCPs by SANDAG and Caltrans will consider all relevant and related plans and projects, in collaboration with city and County staff, to ensure there is cohesion and consistency between the CMCP and the communities within and adjacent to them, including active and multi-modal transportation considerations. These are focused efforts to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the corridors.

This comment asks that the proposed Plan consider mobility needs for wildlife and equestrians in addition to pedestrians, bicyclists, and vehicles. This comment is therefore aimed at the proposed Plan, not the EIR. The EIR analyzes the proposed Plan's impact on wildlife corridors in Section 4.4, *Biological Resources*. Mitigation measure BIO-3 includes specific measures to facilitate wildlife movements.

RESPONSE TO COMMENT 12-6

The intent of the Managed Lanes is to create a flexible system that can be managed in real time. This is similar to how the I-15 corridor is currently managed in North County. Solo drivers will have options to use the lanes but at a price, and transit services can travel congestion free. The result is better optimization of the system that encourages higher occupancy travel but with real alternatives that are competitive with driving.

SANDAG will launch a study in the next year to further examine the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

RESPONSE TO COMMENT 12-7

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The land use pattern proposed in the proposed Plan focuses growth and development in the mobility hub areas. The allocation of housing units to subregional areas represents general areas projected for future growth and not precise locations for future housing development or housing unit type. The exercise of land use authority is reserved for local jurisdictions, and projected intensity and density of development under the proposed Plan would be achieved through a variety of strategies without placing housing areas in incompatible areas defined by an Airport Land Use Compatibility Plan (ALUCP).

RESPONSE TO COMMENT 12-8

In response to this comment, text has been added to the Dark Sky Ordinance summary on page 4.1-10 of the EIR to indicate that this ordinance also includes the minimization of light pollution to reduce impacts on wildlife. Mitigation measure BIO-2a in Section 4.4 provides measures to reduce impacts from increased temporary and permanent sources of lighting during construction and operation of future development occurring under the proposed Plan.

RESPONSE TO COMMENT 12-9

The types of trees and vegetation that would be used to replace impacted vegetation would vary, depending on a number of factors; however, in response to this comment mitigation measures AES-2a, AES-2b, and AES-3a have been modified to include language prohibiting planting of invasive plant species, as designated on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.

BIOLOGICAL RESOURCES

12-10 1. Please clarify the significant reduction in acreages impacted between the 2015 EIR and the 2021 Draft EIR, especially as they relate to Wetlands and Riparian Habitat, Upland Habitat, Agricultural Land, and Transportation. The differences do not appear to correlate with the changes or updates made between the 2015 and 2021 Regional Plan.

12-11 2. On January 13, 2017, County staff submitted comments to SANDAG on the Notice of Preparation (NOP) of the Regional Plan Draft PEIR (Attachment B). In that letter, the County requested that SANDAG coordinate with County staff and evaluate in the Draft PEIR potential direct and indirect impacts on the Multiple Species Conservation Plan (MSCP). The comments related to the MSCP still stand (Attachment B). As such, it is not clear how the Proposed Plan would impact the MSCP, or if there is specific mitigation proposed to reduce these impacts. Please consider updating the analysis to clarify these potential impacts and associated mitigation.

12-12 3. Please ensure that maps are using the latest GIS data available from SanGIS, which is regularly updated. For example, the maps showing Open Space Parks and Recreation land (Figures 4.15-1 and 4.15-2) seem to be missing some of the County's Department of Parks and Recreation properties. Please ensure all references to County Department of Parks and Recreation properties are updated throughout the 2021 Draft PEIR.

12-13 4. Please consider including County parks and preserves and associated proposed project impacts to each specific park and preserve within the Draft PEIR; data on County parks and preserves can be found on SanGIS. For example, on Page 4.4-107, it states that the largest area of encroachment and associated impacts would occur on the Otay Ranch Preserve. However, the level and extent of that potential impact is not clear. Please coordinate in advance with the County Department of Parks and Recreation prior to implementation of projects that may have impacts to County parks and preserves.

12-14 5. The figures within the Draft PEIR do not show property ownership overlayed with the proposed project. To better understand and analyze potential impacts of the project, please consider the inclusion of a figure that shows County parks and preserves.

12-15 6. Please consider revising "Hardline Preserve" to "MSCP Preserve" throughout the Draft PEIR, as MSCP Preserve is the term most commonly used.

12-16 7. In Table 4.2-2 and Table 4.4-6, Otay Ranch and the associated General Development Plan/Subregional Plan are categorized as falling under the jurisdiction of the City of Chula Vista. While the text clarifies that Otay Ranch is jointly owned and managed by the City of Chula Vista and the County, the categorization in the tables is unclear. Please consider revising the tables to show the joint ownership and management of this area.

12-17 8. Figure 4.4-16, San Diego Conservation Planning Areas and Conserved Lands, does not appear to be consistent with the Subarea Plans under Adopted MSCP/MHCP Subregional Plans listed in Table 4.4-5. Please consider revising these to show all Subarea Plan Areas.

12-18 9. On page 4.4-107, Section BIO-4 Analysis Methodology, please consider updating the methodology to take into consideration requirements of the Public Park Preservation Act of

RESPONSE TO COMMENT 12-10

The significant reduction in impact acreages is due to a significantly smaller development footprint in non-urban areas and, thus, a significantly smaller impact on biological resources in general.

RESPONSE TO COMMENT 12-11

Thank you for submitting the County of San Diego's comments on the NOP for this EIR. The EIR preparers received your comments and considered them in the preparation of the EIR. Direct and indirect impacts from the proposed Plan land use change and transportation network on the County's adopted MSCP are programmatically addressed under Impact BIO-4 of the EIR. Indirect impacts are assessed qualitatively. Tables 4.4-16 through 4.4-19 quantitatively assess impacts on the County's MSCP Preserve. Consistent with the County's adopted MSCP, the County would be consulted prior to any design of projects that could potentially have an effect on the County's MSCP Preserve. Furthermore, consistent with the EIR, any such projects would be required to be consistent with the County's MSCP, and no impacts on hardline preserve are expected. Should impacts on the MSCP be unavoidable, boundary line adjustments would be required as mitigation for such impacts, pursuant to the County's guidelines and in consultation with the County of San Diego. In addition, please see response to comment USFWS 38-4.

RESPONSE TO COMMENT 12-12

Figure 4.4-16 has been revised to include any County of San Diego conserved open space parks that were/are not included in the Conserved Lands database in the Final EIR.

RESPONSE TO COMMENT 12-13

The impacts on the Otay Ranch Preserve are a factor of the programmatic nature of the proposed Plan footprint. Specific impact avoidance, minimization, and mitigation measures will be developed during subsequent project-specific CEQA-level review and will require consistency with any adopted HCP. Project-level analysis will include consultation with the County Department of Parks and Recreation.

RESPONSE TO COMMENT 12-14

Please see response to comment County of SD 12-12.

RESPONSE TO COMMENT 12-15

The text has been revised throughout the document and "hardline preserves" has been replaced with "NCCP Preserves" to identify not just MSCP but also MHCP preserve designations.

RESPONSE TO COMMENT 12-16

Table 4.4-6 has been revised to reflect this comment in the Final EIR.

RESPONSE TO COMMENT 12-17

Figure 4.4-16 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 12-18

The text on page 4.4-109 in Section 4.4 has been revised as suggested. The following language has been added:

> The Public Park Preservation Act of 1971 (Public Resources Code Sections 5400-5409) requires that any "take" of public parkland may require compensation that is sufficient to acquire substantially equivalent substitute parkland or provide substitute parkland of comparable characteristics.

12-18 1971 (Public Resources Code Sections 5400-5409). In the event the Proposed Plan results in "take" of any County MSCP Preserve Lands, this would be considered "take" of designated park land and may require land or other compensation for loss of park land.

12-19 10. In Figures 4.4-3 through 4.4-8, one of the data sources for these figures is stated as the County of San Diego's SanBios data from 2017. Please consider using the County of San Diego's SanBios data through 2020, as this contains updated data.

12-20 11. Table 4.4-5 states that the County is pursuing an amendment to the South County Subarea Plan to include the Quino checkerspot butterfly (QCB). Please remove reference to QCB as the County has expanded the project to the Regional Butterflies Habitat Conservation Plan (RBHCP) to include a comprehensive approach that would cover QCB, Harbison's dun skipper, Hermes copper, and the Laguna Mountains skipper.

a. Additionally, the RBHCP in currently being developed and has not yet been adopted. Therefore, reference to the RBHCP may not need to be included in Table 4.4-5 related to adopted regional conservation plans. Please consider removing the reference.

12-21 12. Given the significance and regional importance of wildlife corridors and wildlife linkages, please consider updating the analysis to consider areas where linkages and corridors could be impacted by the Proposed Plan and any mitigation measures that could be implemented to improve wildlife linkages.

12-22 13. Spread of invasive plants is a significant regional issue that many land managers face throughout the San Diego region. County staff supports Mitigation Measure BIO-1e, which would require a prohibition on planting or seeding of invasive species that appear on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory. Please consider inclusion of an integrated invasive plant control plan with enforceable protocols for maintenance, construction, and emergency activities to follow when working within and moving between important habitat areas.

12-23 14. Section 4.4 has a description of the TransNet Environmental Mitigation Program (EMP) and states that the EMP provides funding for the acquisition, restoration, and management costs for the implementation of local Natural Community Conservation Plans (NCCPs). The EMP or other funding from TransNet may not provide a long-term regional funding source for conservation, including funding for the acquisition or ongoing management and monitoring. Please consider updating the PEIR to clarify that an adequate regional funding source has not yet been identified or put in place, which leaves local jurisdictions responsible for securing ongoing funding to implement local NCCPs.

CULTURAL RESOURCES

12-24 1. Please consider associated potential impacts on County parks and preserves related to cultural and historical resources. Staff understand that this is a PEIR, so please include the maximum possible area of impacts. Please coordinate in advance with the County Department of Parks and Recreation prior to implementation of projects that may have impacts to County parks and preserves and associated cultural and historical resources.

RESPONSE TO COMMENT 12-19

The 2017 reference was an error. The figures and text have been revised to show that the analysis used SanBios 2020 data in the Final EIR.

RESPONSE TO COMMENT 12-20

Revisions to Table 4.4-5 and the associated text have been made to remove reference to the Quino checkerspot amendment and the RBHCP in the Final EIR.

RESPONSE TO COMMENT 12-21

Thank you for your comment. Figure 4.4-15 has been revised to include the transportation network footprint in the Final EIR. Please also see response to comment CBD 8-7.

RESPONSE TO COMMENT 12-22

The text for mitigation measure BIO-1e has been revised to add the following:

> Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory, including the development of an integrated invasive plant control plan describing protocols and enforcement schedules for maintenance, construction, and emergency activities working within and moving between important habitat areas in the Final EIR.

RESPONSE TO COMMENT 12-23

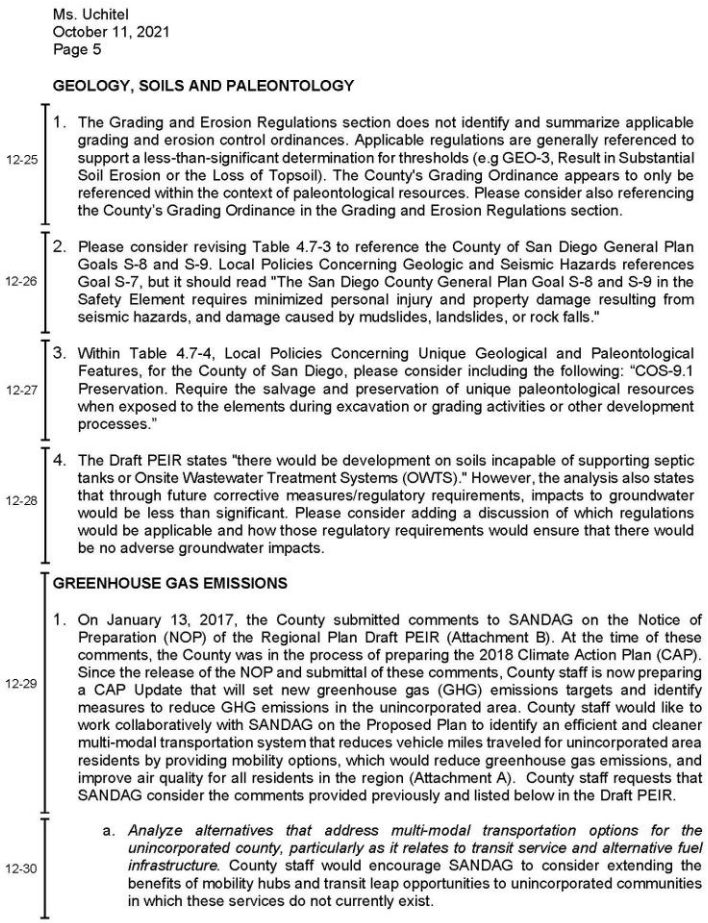
SANDAG notes the County's concern that the EMP or other TransNet funding may not provide a long-term regional funding source for conservation and may leave local jurisdictions responsible for securing ongoing funding to implement local NCCPs. Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund.

RESPONSE TO COMMENT 12-24

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including those that would impact County parks and preserves would be subject to project-specific

environmental review. As a rough estimate the proposed Plan would impact approximately 59 acres of open space parks and 20 acres of recreational lands.

Also, note that County parks and preserves are in general not CEQA-defined cultural resources, i.e., archeological resources or built-environment resources.



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October 11, 2021
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GEOLOGY, SOILS AND PALEONTOLOGY

12-25 1. The Grading and Erosion Regulations section does not identify and summarize applicable grading and erosion control ordinances. Applicable regulations are generally referenced to support a less-than-significant determination for thresholds (e.g GEO-3, Result in Substantial Soil Erosion or the Loss of Topsoil). The County's Grading Ordinance appears to only be referenced within the context of paleontological resources. Please consider also referencing the County's Grading Ordinance in the Grading and Erosion Regulations section.

12-26 2. Please consider revising Table 4.7-3 to reference the County of San Diego General Plan Goals S-8 and S-9. Local Policies Concerning Geologic and Seismic Hazards references Goal S-7, but it should read "The San Diego County General Plan Goal S-8 and S-9 in the Safety Element requires minimized personal injury and property damage resulting from seismic hazards, and damage caused by mudslides, landslides, or rock falls."

12-27 3. Within Table 4.7-4, Local Policies Concerning Unique Geological and Paleontological Features, for the County of San Diego, please consider including the following: "COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes."

12-28 4. The Draft PEIR states "there would be development on soils incapable of supporting septic tanks or Onsite Wastewater Treatment Systems (OWTS)." However, the analysis also states that through future corrective measures/regulatory requirements, impacts to groundwater would be less than significant. Please consider adding a discussion of which regulations would be applicable and how those regulatory requirements would ensure that there would be no adverse groundwater impacts.

GREENHOUSE GAS EMISSIONS

12-29 1. On January 13, 2017, the County submitted comments to SANDAG on the Notice of Preparation (NOP) of the Regional Plan Draft PEIR (Attachment B). At the time of these comments, the County was in the process of preparing the 2018 Climate Action Plan (CAP). Since the release of the NOP and submittal of these comments, County staff is now preparing a CAP Update that will set new greenhouse gas (GHG) emissions targets and identify measures to reduce GHG emissions in the unincorporated area. County staff would like to work collaboratively with SANDAG on the Proposed Plan to identify an efficient and cleaner multi-modal transportation system that reduces vehicle miles traveled for unincorporated area residents by providing mobility options, which would reduce greenhouse gas emissions, and improve air quality for all residents in the region (Attachment A). County staff requests that SANDAG consider the comments provided previously and listed below in the Draft PEIR.

12-30 a. *Analyze alternatives that address multi-modal transportation options for the unincorporated county, particularly as it relates to transit service and alternative fuel infrastructure.* County staff would encourage SANDAG to consider extending the benefits of mobility hubs and transit leap opportunities to unincorporated communities in which these services do not currently exist.

RESPONSE TO COMMENT 12-25

Under the County of San Diego's Grading Ordinance it is unlawful for any person to perform any grading or clearing within the County jurisdiction without proper approvals through County officials. While the Grading and Erosion Regulations discussion in Section 4.7, *Geology, Soils and Paleontology*, does not reference the specific grading and erosion control regulations of any of the local jurisdictions that fall within the region, the EIR discusses local jurisdictional requirements and the need to obtain appropriate permits in order to control erosion and sedimentation caused by construction activities. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 12-26

Revisions were incorporated into Table 4.7-3 as suggested by the comment.

RESPONSE TO COMMENT 12-27

Revisions were incorporated into Table 4.7-4 as suggested by the comment..

RESPONSE TO COMMENT 12-28

Additional text was added to page 4.7-52 of the EIR regarding which regulations are applicable to an Onsite Wastewater Treatment System. However, as stated in Section 4.7, "all site designs would be reviewed and approved by the appropriate agencies." Approval from reviewing agencies will ensure that the proposed project is in compliance with all regulatory requirements, some of which may differ and vary depending on the jurisdiction within which the development will take place. As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable

laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 12-29

SANDAG looks forward to collaborating with the County to identify an efficient and cleaner multi-modal transportation system that reduces VMT for unincorporated area residents by providing mobility options, which would reduce GHG emissions and improve air quality for all residents in the region.

RESPONSE TO COMMENT 12-30

Please see response to comment County of SD 12-2.

12-31

b. *Analyze whether the developed/urban communities within the unincorporated county meet the Urban Area Transit Strategy.* The Urban Area Transit Strategy, considered in the previous 2050 Regional Transportation Plan, is not considered in this Proposed Plan and is replaced with broad concepts of Mobility Hubs. County staff is supportive of these efforts to centralize mobility investments for all users in urbanized areas. However, staff would encourage SANDAG to consider in the project description and analysis the potential for mobility hubs concepts that can be applied to unincorporated area communities that are not currently identified as being within and benefiting from mobility hubs and associated investments (Attachment A).

12-32

c. *Analyze an environmentally sustainable transportation system that can reduce vehicle miles traveled, gasoline consumption, and GHG emissions, while providing alternative modes of transportation for all economic sectors of our population.* County staff continues to encourage SANDAG to consider and identify sustainable transportation systems and strategies that can reduce vehicle miles traveled and GHG emissions from residents in unincorporated communities. For example, extending existing transit routes and reducing headways to increase transit service to unincorporated communities will encourage increased ridership, reduce vehicle trips, and will assist in decreasing GHG emissions.

12-33

d. *The County requests that SANDAG staff coordinate with County staff to ensure that the most recent planning assumptions are incorporated in the transportation models and growth forecasts.* It is not clear what projects or plans were considered and incorporated into the Proposed Plan modeling. However, there are some areas in which inconsistencies appear between approved development projects in the unincorporated area and projected growth identified in the Proposed Plan modeling. County staff relies on SANDAG population, housing, and job growth forecasts for planning efforts. As recently as July 2021, long-range planning efforts, such as the County's Housing Element Update, have relied on forecasts that project future housing growth in the unincorporated area of 50,184 new units between 2018 and 2050. These prior projections are significantly greater than the forecasted growth of 7,419 units during a similar time period in the Proposed Plan. Further, historic data shows that from 2010 to 2020, 7,330 new homes were built in the unincorporated area. If that trend continued, an additional 22,000 new homes would be built in the unincorporated area by 2050. County staff would appreciate continued coordination with SANDAG staff to ensure the most recent planning assumptions and projects are considered.

12-34

2. Based upon a review of the Draft PEIR, County staff encourages continued collaboration with SANDAG to ensure the most recent planning and land use assumptions (including approved development projects or those that are under construction) are reflected in regional modeling and growth forecasting. Through continued collaboration, the County can support the vision of the Proposed Plan by developing the CAP Update and related efforts based on similar assumptions and goals.

HAZARDS AND HAZARDOUS MATERIALS

12-35

1. Within Table 4.9-1 Major EnviroStor Hazardous Waste and Substances Sites in the San Diego Region, the list of sites does not appear to match the current Cortese list on the Department of Toxic Substances Control's (DTSC) website. Please consider adding a figure

RESPONSE TO COMMENT 12-31

The coverage area of each regional Mobility Hub is based on a data-informed propensity analysis carried out in parallel with Transit Leap routing assessment. The analysis leveraged Census Block Group geographies, including ones in unincorporated areas, to assess which areas were most conducive to hubs based on factors such as current and forecasted population and jobs, proximity to major destinations, community of concern coverage, and levels of short trip-making.

RESPONSE TO COMMENT 12-32

The proposed Plan includes an SCS, as required by SB 375 (Steinberg, 2008), for the San Diego region. When combined with the transportation network, the SCS exceeds the state's target for reducing per capita GHG emissions set by CARB. Further clarification on planned improvements to the bus network, including frequency and span-of-service improvements are reflected in Appendix A, Attachment 1 of the proposed Plan. Beyond fixed-route transit service, the proposed Plan envisions unincorporated communities to be served by Flexible Fleet services, offering mobility options that can reduce VMT and GHG emissions through increased carpools, vanpools, ridesharing, and microtransit.

RESPONSE TO COMMENT 12-33

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Government Code Section 65080(b)(2)(B) provides that an SCS must "use most recent planning assumptions considering local general plans and other factors." It also requires that the SCS "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' general plans. The latest projection for the San Diego region reflects a reduction in expected population growth

compared to prior forecasts. The SCS land use pattern aligns with the RHNA allocation for the County of San Diego, which is 6,700 units in unincorporated areas by 2029. Historic home building data was not a factor considered in development of the forecast. The proposed Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 12-34

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG looks forward to continued collaboration with the County.

RESPONSE TO COMMENT 12-35

Figure 4.9-3 has been added per the County's request in the Final EIR.

12-35 cont. to show where these sites are in relation to proposed land use changes and transportation improvements.

12-36 2. Threshold HAZ-1 seems to apply specifically for potential release of hazardous materials during pre-construction, demolition, or construction activities. However, the analysis in this section also discusses the potential for releases during operational activities. Please consider updating the mitigation measure to reduce the risk of hazardous materials releases during project operation.

HYDROLOGY AND WATER QUALITY

12-37 1. Please consider augmenting the analysis to consider potential water quality impacts that could affect sensitive wildlife species and their associated habitats.

LAND USE

12-38 1. The County's *Community Trails Master Plan* identifies multiple regional trails that are regional resources, as they would benefit residents and visitors throughout the region. Please consider how the potential transportation and land use changes could impact the connectivity of these regional trails. The County also requests that SANDAG consider further coordination with the County Department of Parks and Recreation during implementation of the Proposed Plan when potential regional and community trail impacts are anticipated. Additionally, please consider working with County staff to look for further opportunities to provide trail connections during implementation of transportation infrastructure projects where feasible.

PUBLIC SERVICES AND UTILITIES (RECREATIONAL FACILITIES)

12-39 1. Within the Section "County and City General Plans," please consider adding the County's Parkland Dedication Ordinance, Community Trails Master Plan, and County of San Diego Parks Master Plan to the Draft PEIR, as these are all resource documents that discuss regional trail and recreation facilities.

2. Page 4.15-42 and Page 4.15-45, Section REC-1:

   a. 2025

      i. The Regional Growth and Land Use Change section states that "*As noted under Threshold PS-1, approximately 78.8 percent of the 2025 population growth would occur within the City of San Diego, City of Chula Vista, and City of Escondido.*" Of the remaining 21.2 percent, it is unclear what portion is anticipated within the unincorporated County area. Please consider revising the PEIR to further clarify this. 12-40

      ii. Transportation Network Improvements and Programs section: Please consider adding a table showing areas of impacts to recreational facilities belonging to or within the County's jurisdiction. The PEIR does not appear to specify which County of San Diego Recreational Facilities are impacted by the proposed project.

RESPONSE TO COMMENT 12-36

In addition to the potential release of hazardous materials during preconstruction, demolition, or construction activities, the analysis under Impact HAZ-1 notes that most land uses are likely to involve activities in which some form of hazardous materials would be routinely used, stored, handled, or transported. Additional operation impacts are discussed under Impacts HAZ-2 through HAZ-4. Furthermore, Impact HAZ-1 would result in a less-than-significant impact, and mitigation measures would not be required. As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific mitigation measures would be identified during that process.

RESPONSE TO COMMENT 12-37

The analysis under Impact BIO-2 in Section 4.4 discusses the potential water quality impacts that could affect sensitive wildlife species and their associated habitats. The section specifically discusses the impacts on water-dependent species if changes in hydrology occur from the proposed Plan.

RESPONSE TO COMMENT 12-38

Regional trails are discussed in the *Recreational Facilities* subsection of Section 4.15, *Public Services and Utilities*. Section 4.15 has been updated to address County-specific trails, including regional trails. The following text was added to page 4.15-43:

> In addition, the future transportation network improvements could have impacts on the following County parks and recreation facilities through the year 2050: Eastview County Park and Sweetwater Regional Park (i.e., SR 125 Complete Corridor improvements from SR 905 to SR 54), Lakeside Sports Park (San Diego River Trail from Mast Park to Lakeside baseball park), Los Peñasquitos Canyon Preserve (Commuter Rail), Otay Valley Regional Park (Heritage Road Bridge), San Elijo Lagoon and Ecological Reserve (North Coast Bike Trail), San Luis Rey River Park (San Luis Rey River Trail), and Waterfront Park

(Commuter Rail). None of the County trails would be impacted by transportation network improvements.

No revisions to Section 4.11, *Land Use,* of the EIR have been made as a result of this comment. SANDAG looks forward to working with the County to identify opportunities for increased trail connections during implementation of the proposed Plan.

RESPONSE TO COMMENT 12-39

In response to this comment, SANDAG has added a reference to the Parkland Dedication Ordinance, Community Trails Master Plan, and Parks Master Plan on page 4.15-35 of the Final EIR due to their relevance to addressing population growth impacts on park and recreation resources.

RESPONSE TO COMMENT 12-40

Table 2-2 in Chapter 2 of the EIR outlines where population growth would occur throughout all jurisdictions in the County. The sentence under the REC-1 discussion simply summarizes the geographic population trends presented in the table and is not intended to be all-inclusive. As shown in Table 2-2, 1 percent of the forecasted population growth would occur in the unincorporated County lands between 2016 and 2050.

To provide further clarification, the following text has been added to page 4.15-43 of the Final EIR:

In addition, the future transportation network improvements could have impacts on the following County parks and recreation facilities through the year 2050: Eastview County Park and Sweetwater Regional Park (i.e., SR 125 Complete Corridor improvements from SR 905 to SR 54), Lakeside Sports Park (San Diego River Trail from Mast Park to Lakeside baseball park), Los Peñasquitos Canyon Preserve (Commuter Rail), Otay Valley Regional Park (Heritage Road Bridge), San Elijo Lagoon and Ecological Reserve (North Coast Bike Trail), San Luis Rey River Park (San Luis Rey River Trail), and Waterfront Park (Commuter Rail). None of the County trails would be impacted by transportation network improvements

b. 2035

i. As with the comment above under "2025," please consider revising the Regional Growth and Land Use Change section to show the percentage breakdown within the unincorporated area of the county.

12-41 ii. This section also states, "*Between 2026 and 2035, the majority of the open space conversions would occur as a result of growth and land use change in the Warner Springs area shown in Figure 4.15-2, which would convert 275 acres of open space parks to spaced rural residential* use." However, the analysis does not appear to explain the potential impact associated with this proposed loss of open space/park land. It should also be noted that this project is not yet approved and therefore may not result in open space conversion for additional growth and land use change(s). Please consider updating the analysis to take this into consideration and to further clarify and explain potential impacts.

12-42 3. Page 4.15-47, under REC-1 Implement Mitigation Measures Parks and other Recreational Facilities, please specify and/or provide information on the impacted facilities within the unincorporated areas of the county. Are there impacts to existing parks, campgrounds, trails, etc.? Please also consider including details of impacted County of San Diego facilities within the environmental document.

12-43 4. In the Pedestrian Facilities section of the Draft PEIR it states, "It should be noted that trail facilities are also considered part of the pedestrian network. The trail facilities within the San Diego region are further described and analyzed in Section 4.15, Public Services and Utilities, of this PEIR, along with other recreational facilities." Section 4.15 Public Services and Utilities further explains the trail facilities. However, the information is limited in that it only references the California Coastal Trail. Trails are an important aspect of the regional transportation network. Please consider updating the analysis to include existing trails and pathways and include this information as part of the pedestrian facilities assessment. The County's existing *Community Trails Master Plan* may be used as a reference document regarding regional trails.

TRANSPORTATION

12-44 1. If the boundaries of the proposed mobility hubs are not intended to be static, please include narratives and/or graphics to further clarify that the boundaries are not absolute.

12-45 2. County staff recommends that any 5 Big Moves pilot program or case study include and/or consider the unincorporated area (i.e. Flexible Fleet Strategic Plan).

12-46 3. Please coordinate with County staff in advance of transportation plans that go through or near County properties and facilities.

12-47 4. Regarding page 4.16-34, 4.16.3 SIGNIFICANCE CRITERIA, TRA-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including -transit, roadway, bicycle, and pedestrian facilities:

RESPONSE TO COMMENT 12-41

The requested information regarding population growth in the unincorporated County is provided in Table 2-2, as noted in response to comment County of SD 12-40.

With regard to the loss of open space parks in the 2035 scenario, the impact analysis applies the recreation significance threshold and concludes that population and growth may result in a physical deterioration of park and recreation facilities. Deterioration caused by overuse can lead to a number of physical environmental impacts including degradation of the quality of biological habitats or increases in erosion near trailheads or along trails, as described in Sections 4.4 of the EIR. Minor edits have been made under the 2025, 2035, and 2050 scenarios to clarify the link between population growth and impacts on recreation facilities. Page 4.15-42 of the EIR acknowledges that local jurisdictions have the means to acquire, develop, and maintain parkland and recreation facilities in the future through funding mechanisms described in Section 4.15.2. However, there are no assurances that future park and recreation facilities would be capable of adequately serving forecasted populations contained in the proposed Plan. For this reason, the EIR concludes that impacts may be significant, should the Plan be approved.

RESPONSE TO COMMENT 12-42

The County of San Diego park and recreation facilities that could be impacted by proposed transportation network improvements are listed in response to comment County of SD 12-40. Potential impacts on those facilities have been addressed programmatically in the appropriate sections of the EIR and are illustrated in Figure 4.15-2.

RESPONSE TO COMMENT 12-43

SANDAG acknowledges there any many existing and future trails in the region that facilitate pedestrian movements. The trail information specificity requested in this comment is beyond the scope of the EIR; however, as noted in response to comment 12-40, none of the County trails would be impacted by the proposed Plan. A reference to the County's Community Trails Master Plan has been added to the EIR in response to comment 12-39.

RESPONSE TO COMMENT 12-44

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The following language has been added to Mobility Hub maps (Figures 2-35 and 2-36) in the Final EIR:

> These maps show generalized regional Mobility Hub boundaries for planning purposes and are not intended to be binding or precise. Mobility Hub boundaries are subject to refinement in close coordination with the affected jurisdiction(s).

RESPONSE TO COMMENT 12-45

SANDAG looks forward to coordinating with the County on many areas of implementation for the proposed Plan, including the Flexible Fleet Implementation Strategic Plan, Active Transportation Plan, Comprehensive Multimodal Corridor Plans, and advanced transit planning. All of these efforts provide opportunities for refinement of the proposed Plan concepts at a local level.

RESPONSE TO COMMENT 12-46

SANDAG looks forward to coordinating with County staff prior developing transportation plans that go through or near County properties and facilities.

RESPONSE TO COMMENT 12-47

The County is currently developing an Active Transportation Plan (ATP) for the unincorporated communities of the county. The ATP will integrate and update several existing plans and documents into a single plan. The ATP will serve as a master plan and policy document to guide the development and maintenance of active transportation infrastructure including sidewalks, pathways, multi-use trails, and bikeways; the ATP will include the Safe Routes to School programs for the unincorporated County. Additionally, the ATP is expected to be one of the implementation measures for the County's Climate Action Plan.

Ms. Uchitel
October 11, 2021
Page 9

12-47 cont.

a. 2025: Transportation Network Improvements and Programs, under Pedestrian (page 4.16-34). Table 4.16-8 shows a Pedestrian Analysis table showing average daily walking trips, walking mode share, and average length of walking trip. It is unclear as to whether these include an assessment of trail system(s) and trail facilities. Please consider including trails as a part of this analysis.

b. 2035: Transportation Network Improvements and Programs, Same comment as 2025 above.

c. 2050: Transportation Network Improvements and Programs, Same comment as 2025 above.

12-48 Thank you again for the opportunity to comment on the Draft PEIR. County staff looks forward to continued discussions with SANDAG on how we can work together to better ensure that consideration is given to future investments and incentives that would result in expanded options for transit, active transportation, and shorter and fewer automobile trips. If you have any questions regarding these comments, please contact Luis Duran, Land Use/Environmental Planner, at (619) 214-4698, or via e-mail at luis.duran@sdcounty.ca.gov.

Sincerely,

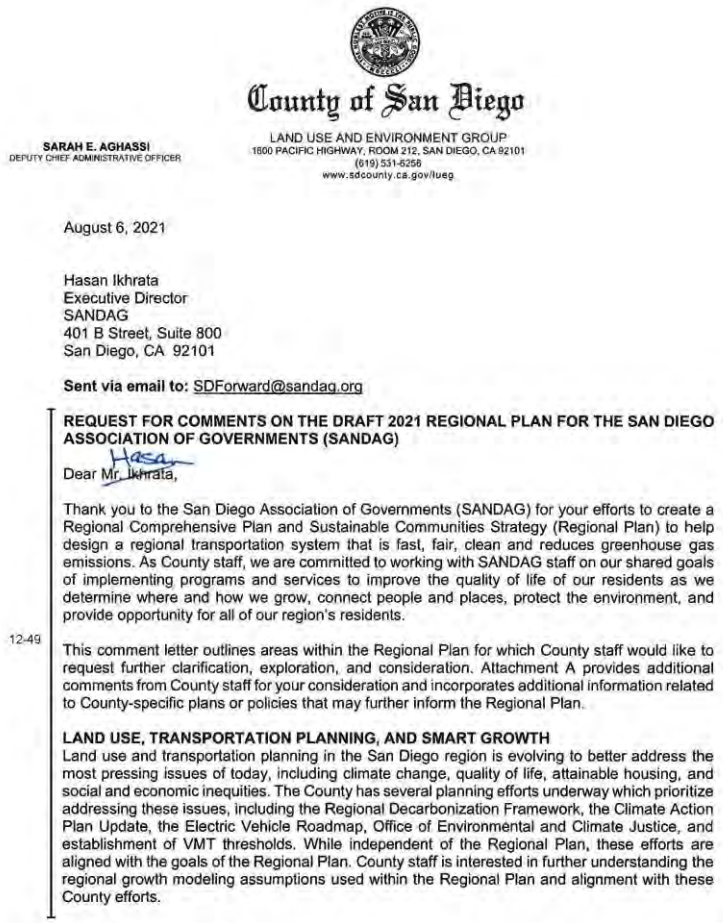
Lynnette Tessitore

Lynnette Tessitore
Chief, Long Range Planning Division
Planning & Development Services

cc: Rosa Olascoaga, Policy Advisor, Board of Supervisors, District 1
Gregory Kazmer, Land Use Director, Board of Supervisors, District 2
Cody Petterson, Policy Advisor, Board of Supervisors, District 3
Emily Wier, Policy Advisor, Board of Supervisors, District 4
Benjamin Mills, Policy Advisor, Board of Supervisors, District 5
Luis Pallera, CAO Staff Officer, LUEG
Luis Duran, Land Use/Environmental Planner, PDS
Sue Waters, Land Use/Environmental Planner, DPW
Crystal Benham, Group Program Manager, DPR
Emmet Aquino, Park Project Manager, DPR

RESPONSE TO COMMENT 12-48

Thank you for your comments. SANDAG looks forward to future coordination with the County of San Diego.



County of San Diego

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August 6, 2021

Hasan Ikhrata
Executive Director
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: SDForward@sandag.org

REQUEST FOR COMMENTS ON THE DRAFT 2021 REGIONAL PLAN FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

Dear Mr. Ikhrata,

Thank you to the San Diego Association of Governments (SANDAG) for your efforts to create a Regional Comprehensive Plan and Sustainable Communities Strategy (Regional Plan) to help design a regional transportation system that is fast, fair, clean and reduces greenhouse gas emissions. As County staff, we are committed to working with SANDAG staff on our shared goals of implementing programs and services to improve the quality of life of our residents as we determine where and how we grow, connect people and places, protect the environment, and provide opportunity for all of our region's residents.

12-49

This comment letter outlines areas within the Regional Plan for which County staff would like to request further clarification, exploration, and consideration. Attachment A provides additional comments from County staff for your consideration and incorporates additional information related to County-specific plans or policies that may further inform the Regional Plan.

LAND USE, TRANSPORTATION PLANNING, AND SMART GROWTH

Land use and transportation planning in the San Diego region is evolving to better address the most pressing issues of today, including climate change, quality of life, attainable housing, and social and economic inequities. The County has several planning efforts underway which prioritize addressing these issues, including the Regional Decarbonization Framework, the Climate Action Plan Update, the Electric Vehicle Roadmap, Office of Environmental and Climate Justice, and establishment of VMT thresholds. While independent of the Regional Plan, these efforts are aligned with the goals of the Regional Plan. County staff is interested in further understanding the regional growth modeling assumptions used within the Regional Plan and alignment with these County efforts.

RESPONSE TO COMMENT 12-49

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan responses L165 through L174 in Attachment P.2.

PLANNING FOR THE UNINCORPORATED AREAS

The County represents more than 500,000 residents who live within 34 unincorporated communities throughout the region. County staff would like to better understand how the Regional Plan will address transportation options outside of proposed mobility hubs for those communities. The unincorporated community of Ramona, for example, has a population of 36,000 residents, which is a larger population than the incorporated communities of Imperial Beach, Lemon Grove, Coronado, Solana Beach, and Del Mar.

Less than 1% of the unincorporated area is within the proposed mobility hubs, which is where transit and on-demand travel infrastructure investment will be focused. The unincorporated north and east county communities represent a significant population with higher-than-average VMT in the region. Investment in public transit and other transportation options will make it easier for people to drive less, which results in decreased GHG emissions. However, investment outside of mobility hubs appears to be limited, which would make it difficult for unincorporated residents to use new transit service.

To promote greater equity, County staff see opportunities to expand the proposed mobility hubs to include adjacent unincorporated communities. When we overlay the proposed mobility hubs with the County's VMT efficient areas (using both the unincorporated and regional averages), North County Metro, Lakeside, and Spring Valley (Attachment B) are adjacent to what appear to be proposed mobility hubs. These unincorporated communities would benefit from additional access and investment associated with inclusion in adjacent mobility hubs, as these communities have few existing alternative options to driving.

12-49 cont.

County staff is also interested in understanding how Regional Housing Needs Assessment (RHNA) allocations would be assigned. For the current 6th RHNA cycle, which covers 2021 – 2029, SANDAG allocated 6,700 units for the unincorporated area, with a total housing forecast in the Regional Plan of 7,419 units through 2050 for the unincorporated area. This forecast projects the County's RHNA allocation of 6,700 units being met by 2029, with an additional growth of 719 units by 2035, and projects no further growth in the unincorporated area through 2050. Based on this forecast, it appears that beyond 2035, all future housing needs in the region from RHNA cycles would be allocated to and met by growth in incorporated cities.

In order to fulfill the goals of the Regional Plan in providing access to affordable, reliable, and safe mobility options for everyone in the region, County staff would like to work with SANDAG to ensure consideration is given to future investments and incentives within the unincorporated area that would result in expanded options for transit and active transportation, and to encourage shorter and fewer automobile trips, including locations of mobility hubs, transit leap, flexible fleets, and complete corridors.

COMMUTER PATTERNS AND MOBILITY IN THE UNINCORPORATED AREA

The Regional Plan focuses on five key investment opportunities: Next Operating System (OS), Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Fleets. Many of the Regional Plan investments would be contained within proposed mobility hubs and along identified complete corridors. The majority of infrastructure improvements appear to support a shift to new rail and trolley line infrastructure, largely along the coastal areas. However, Ramona, Lakeside, Spring Valley, and other unincorporated east and north county communities represent a significant population that would benefit from similar consideration for infrastructure improvements as that proposed for the coastal communities with less population. According to SANDAG's "Commuting Patterns in the San Diego Region" study, a majority of the unincorporated east and north county residents who are employed commute outside the boundaries of their County Supervisorial

district, with 84% of District 2 residents working outside the district and 82% of District 5 residents working outside the district. Vehicle miles traveled could be reduced through greater mobility options for the unincorporated area (i.e., expansion of mobility hubs, increased transit options such as bus rapid transit, and improvements to transit frequency and service areas).

The County worked closely with SANDAG as part of the 2015 Regional Plan to identify roads in the unincorporated areas to include in the Regional Arterial System (RAS). Many of these roads serve as evacuation routes during emergencies, provide access to unincorporated communities from Caltrans roads, and create a link to the larger San Diego region.

County staff would like to continue coordinating with SANDAG to further identify Regional Plan investments in infrastructure, technology, and communication improvements for roads identified in both the County's Mobility Element and unincorporated roads included in the RAS and how these investments will further connect the unincorporated area to proposed mobility hubs, flexible fleets, or transit leaps. In addition to providing efficient movement of people and goods, these investments would increase the efficiency of evacuation routes, relay important information on evacuation conditions to first responders, and assist in getting residents safely away from hazardous conditions, all important components of resiliency planning.

FUNDING AND FINANCING

12-49 cont.

County staff appreciates the difficulty in forecasting funding and revenue sources for a regional transportation network. The Regional Plan identifies use of TransNet funds as part of the implementation, but it is not clear whether projects that have previously been planned, programmed, or awarded as part of the previous plan using TransNet would retain that funding allocation, or if there would be a reallocation of these funds as part of the Regional Plan. It is also unclear if there would be any changes to the current allocation or use of funds that local agencies receive directly for local road system improvements. The unincorporated area relies on TransNet funding to build, improve, and maintain transportation facilities that enhance roadway safety and support smart growth development, including road infrastructure to support increased transit options. Loss or reallocation of this funding could affect these projects and limit the County's ability to provide transportation services in support of our goal of reducing greenhouse gas emissions.

The Regional Plan indicates that user fees would help build a transportation system that provides travelers with alternatives to driving. County staff would like to further discuss how the proposed road user charges would be developed, implemented, and applied to ensure that this funding strategy will not disproportionately burden unincorporated communities, which often have longer commutes and less access to alternative transportation options due to lack of regional planning for transit services to these communities. Revenues generated should also be allocated to support additional transportation and mobility options in unincorporated communities, while vehicle use by those with access to alternate modes of transportation should be disincentivized since their communities are receiving significant investments in public transit.

County staff looks forward to learning more about how future funding and investment would be applied to ensure that both the benefits and the costs of the Regional Plan are equitably distributed across the region.

RESOURCE DISTRIBUTION

The Regional Plan provides SANDAG with an opportunity to guide future investments in a way that meets smart growth objectives and reduces GHG emissions, but also guides future allocation of resources to achieve equitable outcomes. Several of the unincorporated communities, such as Lakeside, Spring Valley, and Ramona, have larger populations than some of the incorporated

cities that are prioritized in the Regional Plan. In review of the proposed plan expenditures, a majority of the capital investments (55% of RTP funding) appear to go toward mobility hubs, complete corridors, and Next OS investments that are primarily outside of unincorporated communities. It is unclear what proportion of investment would go toward addressing mobility challenges within unincorporated communities and infrastructure investment that would provide linkages between the unincorporated areas and the proposed mobility hubs, transit leap, flexible fleets, and complete corridors. County staff is committed to working with SANDAG to further identify opportunities to equitably distribute the mobility benefits of the 5 Big Moves and further reduce GHG emissions regionwide.

12-49 cont.

The County appreciates the opportunity to comment on the Draft Regional Plan, and staff looks forward to future discussions regarding these comments. If you have questions regarding this letter, please contact Rami Talleh, Deputy Director with the Department of Planning and Development Services at 858-495-5475 or Rami.Talleh@sdcounty.ca.gov.

Sincerely,

SARAH E. AGHASSI
Deputy Chief Administrative Officer

cc: Chair Nathan Fletcher: Board of Supervisors, District 4
Vice Chair Nora Vargas: Board of Supervisors, District 1
Supervisor Joel Anderson: Board of Supervisors, District 2
Supervisor Terra Lawson-Remer: Board of Supervisors, District 3
Supervisor Jim Desmond: Board of Supervisors, District 5
Kathleen Flannery, Acting Director, Planning and Development Services
Jeff C. Moneda, Director, Department of Public Works
Brian Albright, Director, Department of Parks and Recreation

Attachments:
Attachment A: Comments from County Departments and Divisions
Attachment B: Expansion Potential of Mobility Hubs (North County Metro, Lakeside, and Spring Valley)

County of San Diego

SARAH E. AGHASSI
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ATTACHMENT A
2021 REGIONAL PLAN COMMENTS FROM COUNTY OF SAN DIEGO DEPARTMENTS AND DIVISIONS

County of San Diego (County) staff in Planning & Development Services, the Department of Public Works, and the Department of Parks and Recreation reviewed the San Diego Association of Governments' (SANDAG) Draft 2021 Regional Plan (Regional Plan), for applicability to their respective work programs and County initiatives that are planned or currently underway. The County offers the following comments for your consideration.

TRANSPORTATION

1. County staff would be interested to better understand and discuss further with SANDAG the potential for Regional Plan strategies to be used as part of a potential regional mitigation strategy related to Vehicle Miles Traveled (VMT).

2. When would funding be expected to be implemented related to Transit Leap/Flexible Fleet Connections to Mobility Hub areas, as this is a potential opportunity to reduce VMT for residents living in the unincorporated area?

12-50 3. The County has developed an Electric Vehicle (EV) Roadmap and is committed to assisting with the deployment of regionwide EV infrastructure to reduce GHG emissions in the transportation sector. Could SANDAG provide additional details on the future development, application, and implementation of the proposed Road User Fees and other proposed road usage revenues? Will consideration be given to exemptions for use of clean mobility strategies?

4. County staff would like to discuss with SANDAG staff the Regional Plan strategies, including funding for Major Transit (for purposes of CEQA, defined as a rail transit station, ferry terminal *served by bus or rail, and a bus stop with two or more lines that provide transit service at 15 minute intervals or better during peak commute periods)* in areas of the unincorporated area that are identified as "VMT efficient" in the SANDAG VMT Map.

5. There is significant investment in development and infrastructure in the Otay Mesa area, and Otay Mesa is identified as a "Mobility Hub" area in the RTP. County staff would like to better understand what funding has been identified for this "Mobility Hub" area.

6. County staff would like to discuss with SANDAG the potential for "Major Transit" services along the I-15 corridor, such as the potential for buses on shoulders.

RESPONSE TO COMMENT 12-50

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan responses L418 through L437 in Attachment P.2.

ROADS/TRAFFIC/FIELD ENGINEERING

7. Complete Corridors, such as the SR-67 and I-15 Corridors, are envisioned to act as the backbone of the regional transportation system. In addition to providing for safe and comfortable spaces to get around for all modes of transportation, road improvements such as intersection widening are important for the safe and reliable movement of all road users. County staff would like to discuss further identification and investment within complete corridors that provide linkages to the unincorporated area. These improvements could assist in providing routes for the County's eastern and northern rural regions that could be essential in the event of accidents or fire evacuation. For example, County staff would like to discuss with SANDAG the option of including safety improvements along the SR-67 Corridor on Wildcat Canyon Road, as this road is a relief route to SR-67. Additionally, road improvements on Old Hwy 395 and Pala Temecula Road in the north county may merit further conversation, as both of these roads serve as alternate routes to I-15 during peak traffic hours.

8. County staff would like to further discuss improvements of low flow crossings that are necessary to limit area flooding as well as the safe passage of motorists.

12-50 cont.

9. County staff would like to work with SANDAG to identify evacuation routes at a regional level, and the possibility of creating a separate section within the Regional Plan that would identify improvements of these routes and potential funding that could be part of the 2021 Regional Plan.

10. County staff would like to discuss with SANDAG how Smart Infrastructure and Connected Vehicles will address the legal and financial challenges with sharing traffic signal data with private entities and the liability of the potential misuse of signal timing data.

11. County staff would like to better understand the impact of Electric Vehicle Infrastructure on County of San Diego public right of way.

WATERSHED

12. Stormwater Management & Regional Needs Assessment; suggested edits in Appendix R, page R-2:
    a. "The County of San Diego has initiated an update of the 2010 Needs Assessment's 40-year water quality cost estimate using more recent water quality planning documents and strategies for achieving regulatory compliance and water quality objectives throughout the region. Since 2010, the Copermittees have worked to formulate Water Quality Improvement Plans (WQIPs) for the region's watersheds, including strategies, planned projects, and schedules to address their respective water quality objectives and compliance needs. The update to the Needs Assessment is intended to assist the County in planning and decision making and will draw upon the most recent WQIPs, with a focus on unincorporated areas to develop updated cost information."

BIOLOGY

13. Figure AA.1 shows the conserved habitat lands in the San Diego region (light green) and displays the areas included in the four subregional habitat conservation plans (subfigure).
    a. The Pre-Approved Mitigation Area (PAMA) of the South County Multiple Species Conservation Program (MSCP) and draft PAMA of the draft North County MSCP are labeled as "Proposed Conserved Habitat Lands" (dark green). This label may be misinterpreted by readers. While the MSCP Preserves will be assembled within the PAMA, not all PAMA designated lands will be conserved or are being actively pursued for conservation at this time.
    b. The draft Focused Conservation Area (FCA) of the draft East County MSCP was not included in the "Proposed Conserved Habitat Lands" (dark green). This area is equivalent to the draft North County MSCP's draft PAMA and should be included in this figure.
    c. The Rancho Guejito property located north of San Pasqual Valley Road will not be included in future iterations of the draft North County MSCP Permit Area. The portions of this property identified within the draft North County MSCP should be changed from dark green to white to reflect this change.
    d. In the subfigure, both the draft North County MSCP and Multiple Habitat Conservation Plan (MHCP) are identified by the number "4." The MHCP area should be identified by the number "1" to correspond with the provided key.

12-50 cont.

14. Although the draft 2021 Regional Plan mentions the importance of protecting habitat corridors and wildlife linkages through land acquisition, it does not appear to include the construction of safe passageways to connect wildlife to preserved lands bisected by existing and future regional transit corridors. It is recommended that SANDAG work with the San Diego Monitoring and Management Program (SDMMP) and community partners to identify the areas along regional transit corridors that would benefit from wildlife crossings and that these improvements be included in future regional projects.

PARKS AND RECREATION

15. For proposed projects that occur adjacent to Department of Parks and Recreation (DPR) County-managed lands, DPR staff would like to coordinate with SANDAG staff to ensure wildlife connectivity is maintained from adjacent lands to preserved County lands, including wildlife-only crossings.

16. For proposed projects that occur adjacent to or near existing or potential future trail connections, DPR staff would like to coordinate with SANDAG staff on trail connectivity throughout the County and incorporate safe multi-use crossings such as bridges or overpasses for recreational use.

17. DPR staff request SANDAG staff coordinate in developing SANDAG's 5 Comprehensive Multimodal Corridor Plans as mentioned in Appendix B: Implementation near DPR facilities:
    a. Central Mobility Hub and Connections, Coast, Canyons, and Trails – State Route 52, North County – SPRINTER/Palomar Airport Road/State Route 78/State Route 76, San Vicente – State Route 67, South Bay to Sorrento – Purple Line/Interstate 805/Blue Line/Interstate 5 South.

b. Study additional seven corridors to inform the next Regional Continuing Actions.
c. Pursue funding opportunities for projects, programs, and services identified in completed CMCPs.

18. County Staff would like to discuss with SANDAG the possibility of including trails and trail systems within the unincorporated area as part of the 2021 Regional Plan and to consider California Coastal Trail connections to DPR facilities.

AIRPORTS

19. As the owner and operator for eight airports in the region, County Airports continues efforts to safely operate its facilities, ensure future land uses are compatible with aircraft operations, and protect the health and safety of people and property within the vicinity of an airport. The County's airports serve as transportation hubs, emergency service facilities and economic engines in their communities. McClellan-Palomar Airport is the only commercial airport in North County and has over 145,000 annual aircraft operations. It is also a Customs and Border Protection Port of Entry. In East County, Gillespie Field is the 44th busiest airport in the nation with 240,000 annual operations. Both of these airports support thousands of jobs and generate hundreds of millions of dollars in economic activity. The County looks forward to the integration of these airports into the regional transportation system.

12-50 cont.

20. The San Diego County Regional Airport Authority adopted Airport Land Use Compatibility Plans for the eight airports, which included land use compatibility policies related to airspace, noise, safety and overflight. Those policies have been adopted by the County of San Diego through its General Plan and Zoning Code. After evaluating the forecasted increases in housing and jobs around the Mobility Hubs, there are several land use assumptions related to safety and noise around Fallbrook Airpark, Jacumba Airport, Gillespie Field and McClellan-Palomar Airport that County staff would like to better understand. For example, there are forecasted incompatible housing increases within the Runway Protection Zones at Gillespie Field. These inconsistencies could result in the assumed intensities and densities increases being unachievable.

County of San Diego

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ATTACHMENT B
2021 REGIONAL PLAN PROPOSED MOBILITY HUB EXPANSION AREAS

The Regional Plan will focus future investment, development, and growth in centralized areas referred to as "mobility hubs." There are locations in the unincorporated area that the County has forecasted for future growth, which included already designated Regional Housing Needs Assessment (RHNA) sites, and are located within close proximity to a proposed mobility hub. The County would like to work with SANDAG to consider the expansion of proposed mobility hubs to include additional unincorporated north and east county communities. As indicated in Figure 1, these proposed expansions include areas in North County Metro, Lakeside, and Spring Valley. Additional details for these three mobility hub expansions are provided below.

12-51 The North County Metro community is located between the proposed Vista and San Marcos mobility hubs. Expansion of the San Marcos mobility hub could include the Buena Creek Sprinter Station and additional housing units, including multiple RHNA sites.

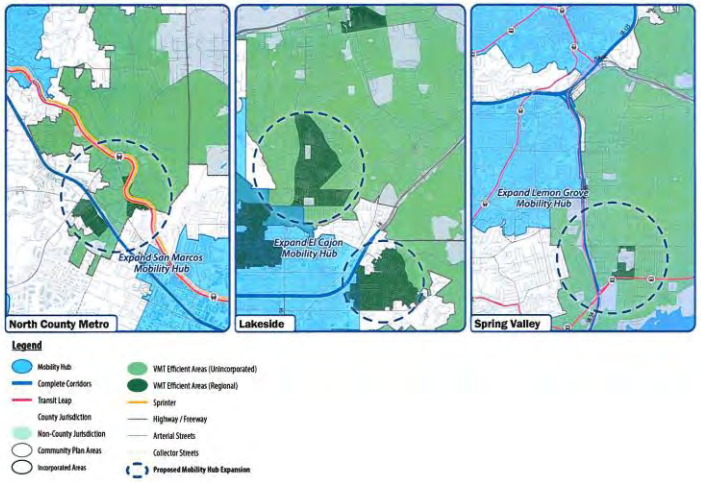
Lakeside has multiple areas that are identified as efficient areas compared to the regional vehicle miles traveled (VMT) average. These areas are located immediately adjacent to the proposed El Cajon mobility hub. Expansion of the El Cajon mobility hub could include these VMT efficient areas as well as potentially including additional growth areas in Lakeside along the I-8 corridor.

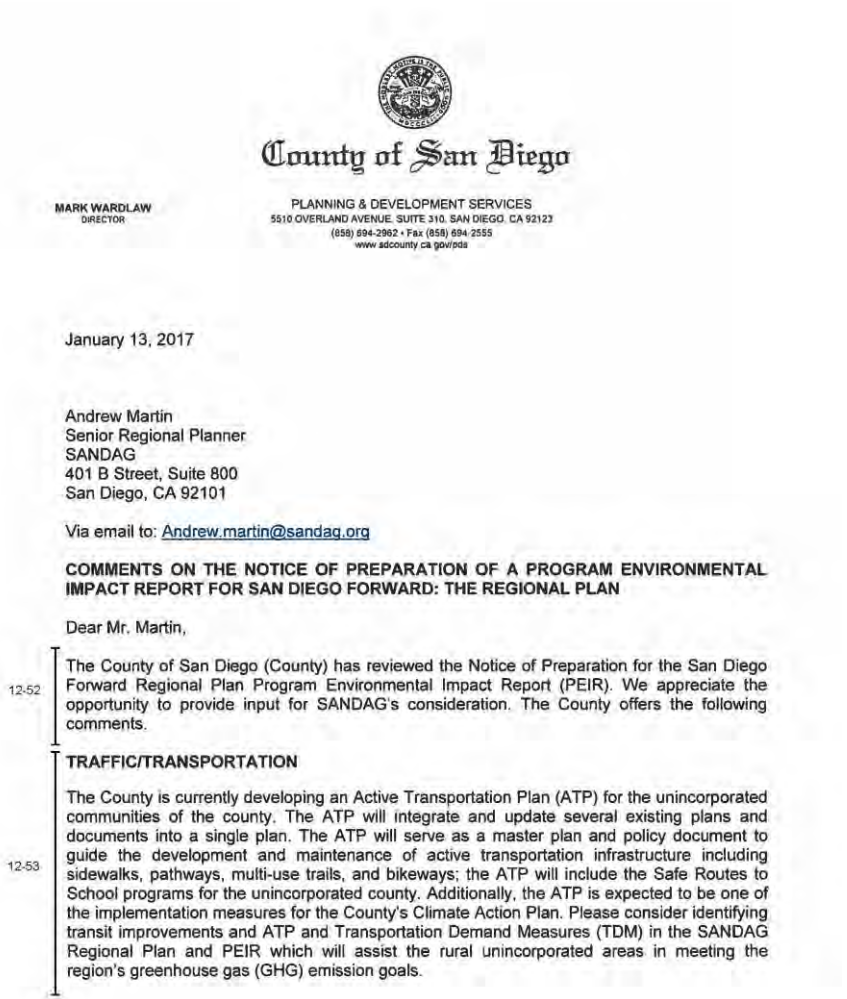
Spring Valley is located east of the proposed Lemon Grove mobility hub and south of the proposed La Mesa mobility hub. This community has existing transit access along Jamacha Boulevard and is in close proximity to the MTS Trolley stations in Lemon Grove. Expansion of this mobility hub could include the Spring Valley areas near SR-125 and along Jamacha Boulevard.

RESPONSE TO COMMENT 12-51

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan response L438 in Attachment P.2.

Figure 1 Proposed Mobility Hub Expansions in North and East County





County of San Diego

MARK WARDLAW
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January 13, 2017

Andrew Martin
Senior Regional Planner
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Via email to: Andrew.martin@sandag.org

COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGO FORWARD: THE REGIONAL PLAN

Dear Mr. Martin,

12-52 The County of San Diego (County) has reviewed the Notice of Preparation for the San Diego Forward Regional Plan Program Environmental Impact Report (PEIR). We appreciate the opportunity to provide input for SANDAG's consideration. The County offers the following comments.

TRAFFIC/TRANSPORTATION

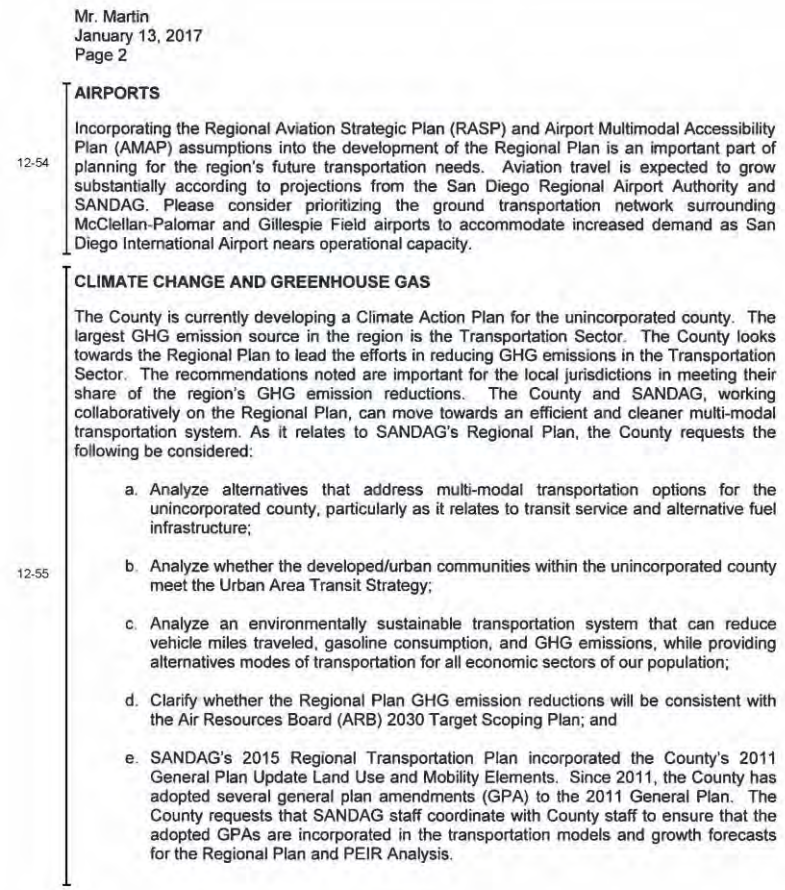
12-53 The County is currently developing an Active Transportation Plan (ATP) for the unincorporated communities of the county. The ATP will integrate and update several existing plans and documents into a single plan. The ATP will serve as a master plan and policy document to guide the development and maintenance of active transportation infrastructure including sidewalks, pathways, multi-use trails, and bikeways; the ATP will include the Safe Routes to School programs for the unincorporated county. Additionally, the ATP is expected to be one of the implementation measures for the County's Climate Action Plan. Please consider identifying transit improvements and ATP and Transportation Demand Measures (TDM) in the SANDAG Regional Plan and PEIR which will assist the rural unincorporated areas in meeting the region's greenhouse gas (GHG) emission goals.

RESPONSE TO COMMENT 12-52

This comment was submitted during the NOP scoping period for the EIR and is not a comment on the adequacy of the EIR. No additional response is required.

RESPONSE TO COMMENT 12-53

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.



Mr. Martin
January 13, 2017
Page 2

AIRPORTS

12-54 Incorporating the Regional Aviation Strategic Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP) assumptions into the development of the Regional Plan is an important part of planning for the region's future transportation needs. Aviation travel is expected to grow substantially according to projections from the San Diego Regional Airport Authority and SANDAG. Please consider prioritizing the ground transportation network surrounding McClellan-Palomar and Gillespie Field airports to accommodate increased demand as San Diego International Airport nears operational capacity.

CLIMATE CHANGE AND GREENHOUSE GAS

The County is currently developing a Climate Action Plan for the unincorporated county. The largest GHG emission source in the region is the Transportation Sector. The County looks towards the Regional Plan to lead the efforts in reducing GHG emissions in the Transportation Sector. The recommendations noted are important for the local jurisdictions in meeting their share of the region's GHG emission reductions. The County and SANDAG, working collaboratively on the Regional Plan, can move towards an efficient and cleaner multi-modal transportation system. As it relates to SANDAG's Regional Plan, the County requests the following be considered:

a. Analyze alternatives that address multi-modal transportation options for the unincorporated county, particularly as it relates to transit service and alternative fuel infrastructure;

12-55 b. Analyze whether the developed/urban communities within the unincorporated county meet the Urban Area Transit Strategy;

c. Analyze an environmentally sustainable transportation system that can reduce vehicle miles traveled, gasoline consumption, and GHG emissions, while providing alternatives modes of transportation for all economic sectors of our population;

d. Clarify whether the Regional Plan GHG emission reductions will be consistent with the Air Resources Board (ARB) 2030 Target Scoping Plan; and

e. SANDAG's 2015 Regional Transportation Plan incorporated the County's 2011 General Plan Update Land Use and Mobility Elements. Since 2011, the County has adopted several general plan amendments (GPA) to the 2011 General Plan. The County requests that SANDAG staff coordinate with County staff to ensure that the adopted GPAs are incorporated in the transportation models and growth forecasts for the Regional Plan and PEIR Analysis.

RESPONSE TO COMMENT 12-54

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG has incorporated the Regional Aviation Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP), and these can be found in Appendix BB of the proposed Plan. SANDAG will assess the ground transportation network throughout the region and prioritize transportation projects from the RASP and AMAP where appropriate and most needed.

RESPONSE TO COMMENT 12-55

This comment consists of County comments on the NOP, which appear to be similar to comments included in the County's letter on the Draft EIR, and which have been responded to in prior responses. Also note that the comment does not raise any issues about the adequacy of the Draft EIR and no response is required. However, the following clarifications are provided:

(a) The proposed Plan includes a transportation system that includes multi-modal options for the unincorporated county, such as investments in transit service, flexible fleets, active transportation, and electric vehicle programs.

(b) The Urban Area Transit Strategy was not updated for the proposed Plan. The proposed Plan identifies 31 Mobility Hub areas as focus areas for facilitating access to transit, deploying flexible fleet services, implementing complete streets, and focusing future growth and development. Chapter 2 of the proposed Plan also acknowledges the importance of transit priority areas as areas of focus for future planning efforts between SANDAG and local jurisdictions in support of sustainable communities. As shown in Figure 2.6 of the proposed Plan, there are unincorporated communities contained in Mobility Hub areas and/or transit priority areas.

(c) Performance results of the proposed Plan (see Appendix T of the Plan) demonstrate a reduction in per capita vehicle miles traveled and per capita GHG emissions. The Social Equity Analysis of the proposed Plan (see Appendix H of the Plan) demonstrates an increase in access to alternative modes of transportation to low income, minority, and senior populations.

(d) The comment asks SANDAG to clarify whether GHG emissions reductions under the proposed Plan would be consistent with the "Air Resources Board (ARB) 2030 Target Scoping Plan." SANDAG assumes

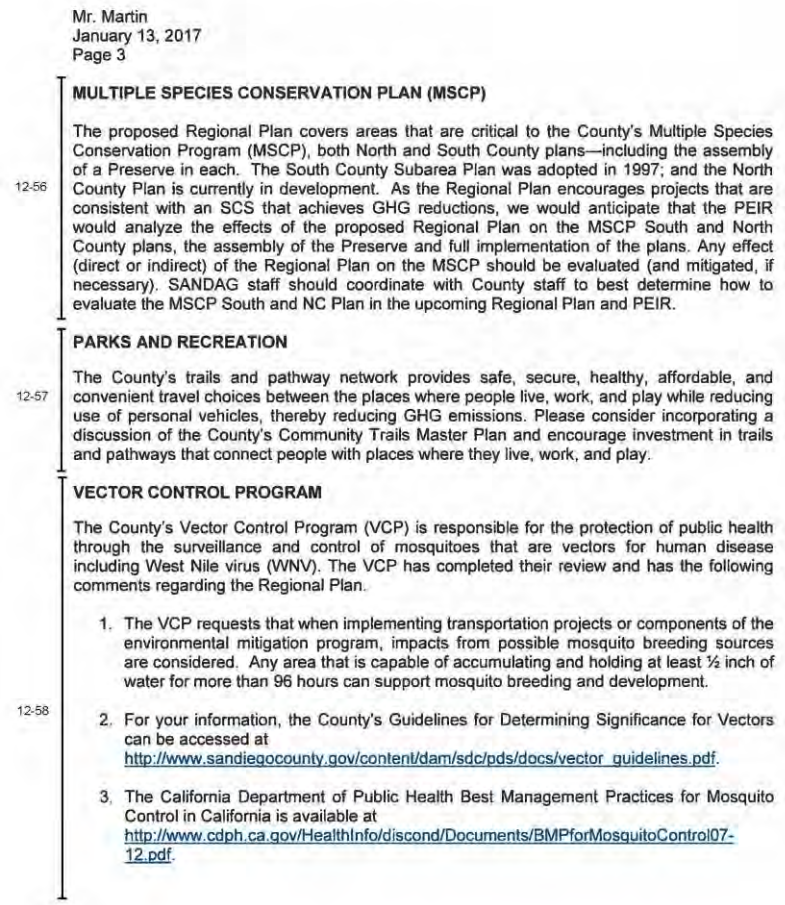
this is a reference to California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), which identifies measures for how California can achieve the GHG reduction target of SB 32, which set forth in State law a requirement that statewide GHG emissions levels be reduced to 40 percent below 1990 levels by 2030.

The Draft EIR analyzes whether the proposed Plan would be inconsistent with the State's ability to achieve the 2030 reduction target of SB 32 in Impact GHG-5 (Draft EIR pages 4.8-31 to 4.8-33). The proposed Plan would assist in meeting the statewide 2030 GHG target by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375. Nevertheless, the Draft EIR concludes in Impact GHG-5 that the proposed Plan's 2030 GHG emissions would be inconsistent with the State's ability to achieve the goals of SB 32 because total emissions in the San Diego region of 20.4 $MMTCO_2e$ in 2030 would exceed the regional 2030 GHG reference point of 15.6 $MMTCO_2e$ (which is based on SB 32 targets for 2030). The 2017 Scoping Plan indicates that to achieve the statewide 2030 target, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California's natural and working lands, and sustainable solid waste management are among many actions the State must take. Many of the needed actions, including generation of renewable electric power, decarbonizing buildings, vehicle mandates, and sustainable solid waste management, are outside the jurisdictional authority of SANDAG and the scope of the proposed Plan. CARB notes that to reach the State's long-term GHG reduction goals, local, regional, and State agencies must engage with each other and local stakeholders to coordinate climate change solutions and programs to reduce local GHG emissions.

The Draft EIR identifies Impact GHG-5 as a significant impact in the year 2030. The Draft EIR identifies several mitigation measures to reduce this significant impact by achieving additional GHG emissions reductions above and beyond the reductions shown in the analysis for GHG-5 (mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, and GHG-5f). However, even with additional GHG emissions reductions from these mitigation measures, total regional GHG emissions would remain inconsistent with the State's ability to achieve the 2030 target. Achieving the necessary

level of reductions from all GHG emissions sectors will required a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. The Draft EIR concludes that Impact GHG-5 would be significant and unavoidable.

(e) In 2016–2018, local jurisdictions, including the County of San Diego, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development.



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MULTIPLE SPECIES CONSERVATION PLAN (MSCP)

12-56 The proposed Regional Plan covers areas that are critical to the County's Multiple Species Conservation Program (MSCP), both North and South County plans—including the assembly of a Preserve in each. The South County Subarea Plan was adopted in 1997; and the North County Plan is currently in development. As the Regional Plan encourages projects that are consistent with an SCS that achieves GHG reductions, we would anticipate that the PEIR would analyze the effects of the proposed Regional Plan on the MSCP South and North County plans, the assembly of the Preserve and full implementation of the plans. Any effect (direct or indirect) of the Regional Plan on the MSCP should be evaluated (and mitigated, if necessary). SANDAG staff should coordinate with County staff to best determine how to evaluate the MSCP South and NC Plan in the upcoming Regional Plan and PEIR.

PARKS AND RECREATION

12-57 The County's trails and pathway network provides safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play while reducing use of personal vehicles, thereby reducing GHG emissions. Please consider incorporating a discussion of the County's Community Trails Master Plan and encourage investment in trails and pathways that connect people with places where they live, work, and play.

VECTOR CONTROL PROGRAM

The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed their review and has the following comments regarding the Regional Plan.

1. The VCP requests that when implementing transportation projects or components of the environmental mitigation program, impacts from possible mosquito breeding sources are considered. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.

12-58

2. For your information, the County's Guidelines for Determining Significance for Vectors can be accessed at http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf.

3. The California Department of Public Health Best Management Practices for Mosquito Control in California is available at http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf.

RESPONSE TO COMMENT 12-56

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see response to comment County of SD 12-11.

RESPONSE TO COMMENT 12-57

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. At the regional and local level, SANDAG is supportive of planning efforts for locally sponsored trails and pathway networks as alternative transportation options and that foster improved neighborhoods and community connections. Please see discussions provided in Impact LU-1 in Section 4.11 and Section 4.15.

RESPONSE TO COMMENT 12-58

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG understands the need for vector control and appreciates the information provided by the County and will take these measures into consideration when implementing transportation projects or components of the environmental mitigation programs.

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12-59 The County looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Danny Serrano, Land Use / Environmental Planner at (858) 694-3680, or via email at daniel.serrano@sdcounty.ca.gov.

Sincerely,



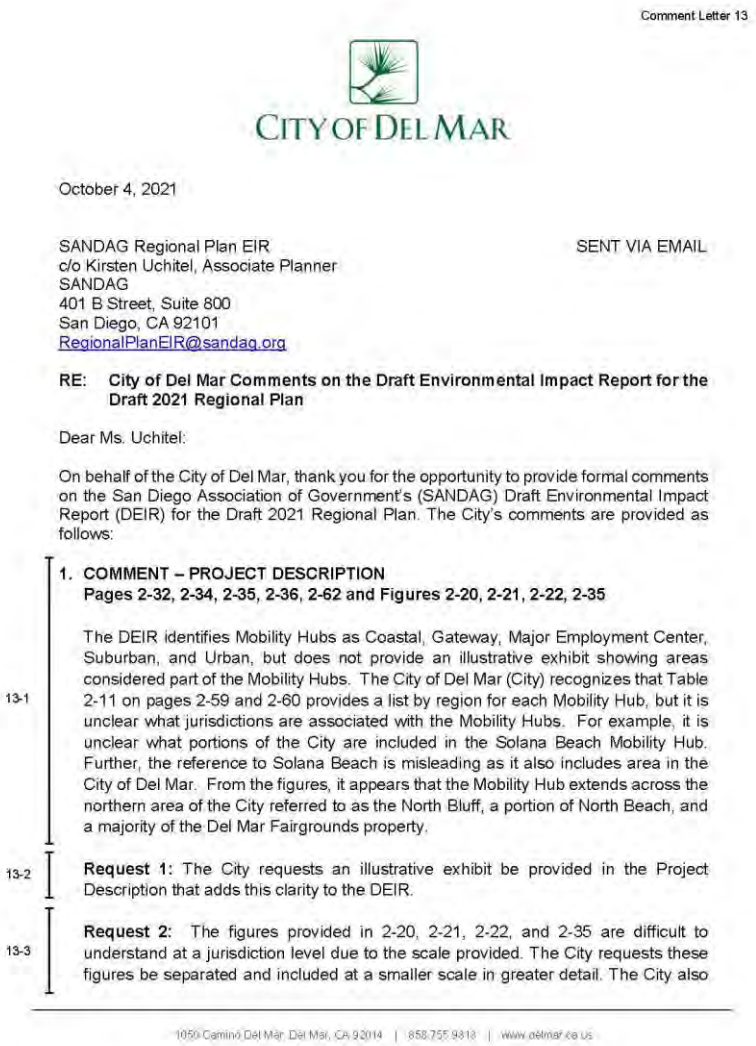
MARY KOBASKIE, Chief
Advance Planning Division
Planning & Development Services

Email cc: Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Dustin Steiner, Chief of Staff, Board of Supervisors, District 3
Adrian Granda, Policy Advisor, Board of Supervisors, District 4
Melanie Wilson, Policy Advisor, Board of Supervisors, District 5
Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Everett Hauser, Transportation Specialist, PDS
Bulmaro Canseco, Planner, PDS
Jeff Kashak, Planner, DPW
Richard Chin, Associate Transportation Specialist, DPW
Eric Lardy, Chief, Community Health Division, DEH

RESPONSE TO COMMENT 12-59

The County's comments on the NOP were considered during preparation of the Draft EIR.

COMMENT LETTER 13: CITY OF DEL MAR



Comment Letter 13

CITY OF DEL MAR

October 4, 2021

SANDAG Regional Plan EIR
c/o Kirsten Uchitel, Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
RegionalPlanEIR@sandag.org

SENT VIA EMAIL

RE: City of Del Mar Comments on the Draft Environmental Impact Report for the Draft 2021 Regional Plan

Dear Ms. Uchitel:

On behalf of the City of Del Mar, thank you for the opportunity to provide formal comments on the San Diego Association of Government's (SANDAG) Draft Environmental Impact Report (DEIR) for the Draft 2021 Regional Plan. The City's comments are provided as follows:

1. **COMMENT – PROJECT DESCRIPTION**
Pages 2-32, 2-34, 2-35, 2-36, 2-62 and Figures 2-20, 2-21, 2-22, 2-35

13-1 The DEIR identifies Mobility Hubs as Coastal, Gateway, Major Employment Center, Suburban, and Urban, but does not provide an illustrative exhibit showing areas considered part of the Mobility Hubs. The City of Del Mar (City) recognizes that Table 2-11 on pages 2-59 and 2-60 provides a list by region for each Mobility Hub, but it is unclear what jurisdictions are associated with the Mobility Hubs. For example, it is unclear what portions of the City are included in the Solana Beach Mobility Hub. Further, the reference to Solana Beach is misleading as it also includes area in the City of Del Mar. From the figures, it appears that the Mobility Hub extends across the northern area of the City referred to as the North Bluff, a portion of North Beach, and a majority of the Del Mar Fairgrounds property.

13-2 **Request 1:** The City requests an illustrative exhibit be provided in the Project Description that adds this clarity to the DEIR.

13-3 **Request 2:** The figures provided in 2-20, 2-21, 2-22, and 2-35 are difficult to understand at a jurisdiction level due to the scale provided. The City requests these figures be separated and included at a smaller scale in greater detail. The City also

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RESPONSE TO COMMENT 13-1

A map depicting the five different mobility hub types has been added to Chapter 2, *Project Description*, of the Final EIR as Figure 2-37. Figures 2-2.1 through 2-2.11 have also been added to the Project Description of the Final EIR to provide greater granularity on the Mobility Hub areas and projects in the proposed Plan at a corridor level. A portion of the City of Del Mar is included in the Solana Beach mobility hub, as reflected in Figures 2-2.5 and 2-2.8 in the Project Description of the Final EIR.

RESPONSE TO COMMENT 13-2

Please see response to comment Del Mar 13-1.

RESPONSE TO COMMENT 13-3

Figures 2-20, 2-21, 2-22, and 2-35 are intended to illustrate housing and employment density on a regional scale to demonstrate the process for identifying the areas targeted for development of Mobility Hub Networks. These maps are not intended to demonstrate exact locations of future Mobility Hubs. SANDAG did not include jurisdictional boundaries on these maps because the addition of this layer would have made the maps much harder to read given the amount of information already included. Major regional transportation corridors (i.e., interstates and state routes) are included to provide locational context.

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13-3 cont. requests City jurisdiction lines be included as a matter of transparency. Otherwise, it is unclear where the City's boundary lines are located.

13-4 **Request 3:** Since the Del Mar Fairgrounds appears to be included in the Solana Beach Mobility Hub, the City requests an additional area southwest of the boundary be studied as part of the Mobility Hub. The City recognizes the DEIR is studying the areas included in the Draft 2021 Regional Plan, so this comment is requesting additional analysis be included so that the southeast boundary can be extended east to meet Jimmy Durante Boulevard (at minimum) or even further east to meet I-5. This is requested because these undesignated areas are immediately adjacent and outside the boundary of the Mobility Hub, as proposed, yet include key access points to major roads, the freeway, and major employment centers.

2. COMMENT – PROJECT DESCRIPTION
Pages 2-55, 2-56, 2-57 and Figures 2-32, 2-33, 2-34

13-5 The DEIR illustrates the region's transit networks in 2025, 2035, and 2050 via a mix of Commuter Rail, Light Rail, Next Gen Rapid Bus, Local Bus, and Ferry. In 2025, Commuter Rail and Local Bus are designated in the City; however, in 2035, Next Gen Rapid Bus is introduced east-west on Del Mar Heights Road and north-south on Camino del Mar. Rail relocation inland from the Del Mar Bluffs is of critical importance to the City. The proposed 2025, 2035, and 2050 transit network maps do not reflect a realignment of the rail network in this fragile coastal region. The following requests are intended to ensure transparency and clarification to the public, and that sufficient analysis is provided within this Program-level DEIR.

13-6 **Request 1:** The City requests a callout be added to Figures 2-32, 2-33, and 2-34 indicating that the Commuter Network in said area is pending additional study for future inland realignment. The City further requests this be clarified on the figures via a dashed line through the Del Mar rail corridor and noted in the key legend.

13-7 **Request 2:** The City requests narrative be added to this section of the DEIR describing the planned realignment of the Commuter Rail network through the Del Mar rail corridor. The City further requests a clarification be made regarding the horizon years for: 1) the Del Mar Tunnel, which appears to be 2035; 2) the rail realignment inland from the Del Mar Bluffs, which is not specifically noted, however, Table E-6-3 in Appendix E-6 indicates this may be planned for 2050, not 2035, due to identified marsh and riparian scrub habitat impacts associated with "Commuter Rail 398" projects (although the identified amounts are relatively small at 0.2 acre of marsh and 0.4 acre of riparian scrub so it is unclear if this is intended to account for the inland rail

RESPONSE TO COMMENT 13-4

As SANDAG collaborates with cities on proposed Plan project and policy implementation in the years to come, conceptual Mobility Hub boundaries will be refined while taking into consideration city corridor and land use planning goals and policies, similar to what has already begun as part of the Comprehensive Multimodal Corridor Plans (CMCP) planning and design process. The City's request will be considered as part of this process. More detailed network-level analysis will be needed within each Mobility Hub to finalize detailed Transit Leap routing, Complete Corridor cross-sections, Flexible Fleet pilots, and supporting technologies.

RESPONSE TO COMMENT 13-5

Resilience of transportation infrastructure to climate impacts is a priority of the proposed Plan. As such, the relocation of the rails off of the Del Mar bluffs is a priority project recognized in the Appendix A of the proposed Plan as part of the 2035 Commuter Rail 398 project (Project ID TL06), with planning already underway.

RESPONSE TO COMMENT 13-6

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects. Callouts showing future second-tier projects on the referenced figure would not be feasible and are not within the scope of this Program EIR's project description.

RESPONSE TO COMMENT 13-7

The Del Mar tunnel is a top priority for SANDAG. Planning work is underway with preliminary engineering, and the environmental phase is expected to begin as soon as 2022 if funding is secured. The Del Mar Tunnel project is in the 2035 phase in the proposed Plan and the inland rail realignment is assumed as part of the tunnel project. Timing for bluffs restoration will be determined as the tunnel and inland rail realignment projects progress.

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13-7 relocation component); and 3) and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures. It is unclear if the rail relocation and bluffs restoration is planned for 2035 or 2050.

13-8 **Request 3:** The City requests a notation on the figures and narrative be included to clarify that the COASTER route through Del Mar is referred to as "Commuter Route 398" in the DEIR.

13-9 **Request 4:** Due to the thick purple line delineation of the Commuter Rail alignment though Del Mar, it is difficult to view the light blue delineation noting the addition of Next Gen Rapid Bus in Figures 2-33 (2035) and 2-34 (2050). The City requests these figures be refined so that the planned Next Gen Rapid Bus along Del Mar Heights Rd (east-west) and Camino del Mar (north-south) are clearly shown and viewable to the public.

3. COMMENT – PROJECT DESCRIPTION
Page 2-58

13-10 The DEIR notes that between 2026 to 2035, "major transportation improvements and programs would include continued double tracking at certain locations on the LOSSAN rail corridor, increases in COASTER frequencies, Del Mar Tunnel, new stations at Central Mobility Hub and at Camp Pendleton…" However, this section does not specifically include reference to a relocation of the rail corridor inland from the Del Mar Bluffs (though implied by the Del Mar Tunnel reference) or restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures. See above comment related to the 2035 or 2050 timeframe for the inland rail relocation. Further, this section does not list the proposed station (seasonal platform) at the Del Mar Fairgrounds. Note that the DEIR lists other planned rail stations in the region.

13-11 **Request:** The City requests that the inland rail relocation from the Del Mar Bluffs and seasonal platform at the Del Mar Fairgrounds be added to the project description and included in the DEIR analysis where appropriate, including inclusion into the 2035 or 2050 timeframe. Without the inclusion of these two key items, the extent of the DEIR project description is confusing to the public and inadequate.

RESPONSE TO COMMENT 13-8

These figures do not depict the transit leap network at the level of granularity required to complete the request. Route 398 is identified in Table A.5: Interstate North Coast Corridor, in Appendix A of the proposed Plan, as projects TL05, TL06, and TL07.

RESPONSE TO COMMENT 13-9

Specific corridor maps have been added to Appendix A of the proposed Plan so that the reader can see the difference between the proposed Plan projects within each corridor. These will be included as maps A.1 through A.12 in the proposed Plan.

RESPONSE TO COMMENT 13-10

While not specifically referenced in the 2025 Commuter Rail 398 (COASTER) project, the Bluff Stabilization Project (among others) is included in that phase, and those cost are represented in the $1.2 billion cost assumptions. Also, the Del Mar Tunnel project is included in the 2035 phase. Specific alignments will be chosen once the project goes through the project-level environmental analysis phase. Relocation away from the bluffs is assumed as part of the tunnel project in the 2035 phase. The Del Mar platform is part of the San Dieguito Double Track Project, which is included in the 2025 Commuter Rail 398 project grouping.

RESPONSE TO COMMENT 13-11

The Del Mar platform is part of the San Dieguito Double Track Project, which is included in the 2025 Commuter Rail 398 project grouping. Relocation away from the Bluffs is assumed as part of the tunnel project in the 2035 phase.

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4. COMMENT – AESTHETICS
Page 4.1-11, Table 4.13

13-12 Under "Visual Plan or Regulation," the DEIR includes reference to the City's Trees, Scenic Views, and Sunlight Protection Ordinance. Under "Local Scenic Resources," the DEIR notes the City's Local Coastal Program (LCP) with a date of 1993. These sections do not reflect additional provisions in the City's codes related to scenic resources.

13-13 **Request 1:** The City requests the correct code reference be made to the Trees, Scenic Views, and Sunlight Ordinance. This is City of Del Mar Municipal Code, Chapter 23.51 (not 30.52).

13-14 **Request 2:** The City requests that "Visual Plan or Regulation" be updated to include reference to the City's Bluffs, Slopes, and Canyon Overlay Zone (BSC-OZ) which is part of the City's certified LCP (City of Del Mar Municipal Code, Chapter 30.52). As stated in the chapter, the "BSC Overlay Zone is designed to … preserve the scenic sandstone bluffs and related canyons and steep slopes which characterize the area within the zone…The unique landforms within the zone provide visual relief and diversity within the City, and they define and separate neighborhoods, enhance the overall quality of Del Mar's local coastal environment, and preserve the economic integrity of our visitor-oriented community."

13-15 **Request 3:** The City requests that "Local Scenic Resources" be updated to reflect the correct certification years for its LCP – should read "Local Coastal Program Land Use Plan (1993) and Implementing Ordinances (2001)" and the list should also include references to "canyons and steep slopes."

5. COMMENT – AESTHETICS
Page 4.1-7

13-16 The DEIR states that "some of the other local jurisdictions within the San Diego region have adopted scenic highway general plan elements or programs." The City's Community (General) Plan lists five principal roadways within the City as scenic corridors. These include: 1) Camino del Mar; 2) Crest Road; 3) Carmel Valley Road; 4) Coast Boulevard; and 5) Del Mar Heights Road (Community Plan, Transportation Element, pages 43-47). These roads have been determined by the City to allow for special views of scenic natural resources and to afford greater protection in order to maintain those views. Camino del Mar, Coast Boulevard, and Del Mar Heights Road offer scenic views of the Pacific Ocean. Crest Road offers views of the San Dieguito

RESPONSE TO COMMENT 13-12

The text on page 4.1-11 of the EIR, in Table 4.1-3, has been updated as described in response to comments Del Mar 13-13 through Del Mar 13-15, in regards to additional provisions in the City's codes related to scenic resources.

RESPONSE TO COMMENT 13-13

The City of Del Mar Municipal Code reference in Table 4.1-3 has been updated to reference the correct section of the Municipal Code (Chapter 23.51).

RESPONSE TO COMMENT 13-14

The "Visual Plan or Regulation" column on Table 4.1-3 has been updated to include a brief discussion of Municipal Code Chapter 30.52, *Bluff, Slope, and Canyon Overlay Zone*.

RESPONSE TO COMMENT 13-15

The "Local Scenic Resources" column on Table 4.1-3 has been updated to include the references to the Implementing Ordinances (2001) and to list "canyons and steep slopes" as resources identified in the listed documents.

RESPONSE TO COMMENT 13-16

The Draft EIR correctly states that "some of the other local jurisdictions within the San Diego region have adopted scenic highway general plan elements or programs." Identifying all local scenic roadways or corridors within each jurisdiction is not necessary for programmatic impact analysis in the EIR. The project-specific evaluation of potential aesthetics impacts resulting from planned 2035 development in/adjacent to the City of Del Mar including the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, will occur during the project-specific environmental review process for these improvements.

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13-16 River Valley as well as Crest Canyon and the North Bluffs adjacent to North Beach. Del Mar Heights Road and Carmel Valley Road serve as the City's southerly roadway connections to I-5. Views of Los Peñasquitos Lagoon are visible from Carmel Valley Road.

13-17 **Request:** The City requests its five principal roadways as noted above be included in the framework section of the Aesthetics chapter (similar to how other chapters in the DEIR describe relevant General Plan policies by local jurisdiction – see e.g., page 4.4-54, Table 4.4-6 in Biological Resources). This is important for the evaluation of potential aesthetics impacts resulting from planned 2035 development in/adjacent to the City of Del Mar including the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures.

6. COMMENT - AESTHETICS
Pages 4.1-18, 4.1-20

13-18 The DEIR states for horizon year 2025 that, "Development in the Coastal Zone would need to adhere to the California Coastal Act and local coastal plans, while typical measures in local plans require development to be sited and designed to protect views to and along the ocean and other scenic coastal areas." A conclusion is noted that "these measures would reduce adverse effects on scenic vistas." A similar conclusion is noted for horizon year 2035 on page 4.1-20 regarding adherence to the Coastal Act. Further, page 4.1-20 states that implementation of the Big 5 Moves would include construction of "Complete Corridor improvements consisting of continued double-tracking at certain locations on the LOSSAN rail corridor, increase in COASTER frequencies, and grade separation at Leucadia Blvd." However, this impact analysis does not include the cited 2035 Del Mar Tunnel on page 2-58 (though it lists all other 2035 components), nor does it include reference to the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal rail platform at the Del Mar Fairgrounds.

13-19 **Request:** The City requests the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, and planned seasonal rail platform at the Del Mar Fairgrounds be included in the Aesthetics section and analyzed accordingly. Without inclusion of these components, including the cited Del Mar Tunnel on page 2-58, and sufficient analysis of these components in this impact section, the City is

RESPONSE TO COMMENT 13-17

Page 4.1-17 of the EIR, provides a general characterization of the coastal scenic resources, including scenic vistas in the North County area that would be affected by new development, and includes the long-range views of the coastal mountain ranges and habitat preserves, unobstructed views of the Pacific Ocean from the Pendleton-De Luz area, and views of highly scenic lagoons and waterways such as Batiquitos, Agua Hedionda, Buena Vista, San Elijo, and Los Peñasquitos Lagoons, and the San Dieguito and San Luis Rey Rivers along the I-5 corridor. As stated in the EIR, the locations of some transportation network improvements and certain design features (e.g., above-grade facilities, retaining walls, sound attenuation walls, cut-and-fill activities) cannot avoid physical changes that have substantial adverse effects on scenic vistas, including blocking panoramic views or views of major landscape features or landforms. The EIR concludes that implementation of regional growth and land use change and transportation network improvements would result in new development and infrastructure affecting scenic resources, including trees, rocks, outcroppings, and historic structures within a state scenic highway and local scenic routes and protected public viewsheds. The impact in the year 2035 is significant. Also, see response to comment Del Mar 13-16 regarding program-level vs. project level CEQA analysis of aesthetics impacts.

RESPONSE TO COMMENT 13-18

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects would be subject to project-specific environmental review. With a programmatic level of analysis, the EIR provides a general assessment of potential impacts in the coastal regions, as discussed above. The evaluation of potential aesthetics impacts resulting from second-tier projects, including planned 2035 development in/adjacent to the City of Del Mar such as the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, will occur as part of the project-specific environmental review process for these improvements.

RESPONSE TO COMMENT 13-19

See response to comment Del Mar 13-18 above.

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13-19 cont. unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

7. COMMENT– AESTHETICS
Pages 4.1-28, 4.1-29, Table 4.1-5

13-20 The DEIR impact analysis does not include the cited 2035 Del Mar Tunnel on page 2-58 (though it lists all other 2035 components), nor include reference to the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal rail platform at the Del Mar Fairgrounds. This includes no reference to these items in Del Mar under Table 4.1-5 on page 4.1-29.

13-21 **Request:** The City requests the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, and planned seasonal platform at the Del Mar Fairgrounds be included in the Aesthetics section and analyzed accordingly. Without inclusion of these components, including the cited Del Mar Tunnel on page 2-58, and sufficient analysis of these components in this section, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

8. COMMENT – AESTHETICS
Page 4.1-23

13-21 The DEIR makes the reference, "The SPRINTER rail lines would be extended from Escondido to the North County Fair" as part of the 2050 Transportation Network Improvements and Programs. As a matter of clarification, this is presumed to be the "Westfield North County Shopping Center" and not the "Del Mar Fairgrounds" located in the City of Del Mar.

13-23 **Request:** The City requests any reference to "North County Fair" be amended to "Westfield North County Shopping Center" in order to avoid confusion with the intended location of the SPRINTER extension.

9. COMMENT – AESTHETICS
Pages 4.1-42, 4.1-43

13-24 The DEIR describes components of the horizon year 2035 Transportation Network Improvements and Programs related to transit service as "increases in service for the COASTER…" but does not include reference to the Del Mar Tunnel, which would

RESPONSE TO COMMENT 13-20

See response to comment Del Mar 13-18 above.

RESPONSE TO COMMENT 13-21

See response to comment Del Mar 13-18 above.

RESPONSE TO COMMENT 13-22

Reference to the "North County Fair" has been amended to "Westfield North County Shopping Center" on pages 4.1-23, 4.1-30, and 4.1-39 of the EIR.

RESPONSE TO COMMENT 13-23

See response to comment Del Mar 13-22 above.

RESPONSE TO COMMENT 13-24

Page 4.1-43 of the EIR states that "due to the highly urbanized nature of the area surrounding these improvements (increases in service for the COASTER), substantial sources of additional lighting and glare would not occur." The text has been amended to include increases in Amtrack and Freight Service. The EIR does not dismiss aesthetic impacts but acknowledges that impacts would occur on a local level and would be evaluated at a local level on a project-by-project basis. Therefore, the detailed analysis relative to the proposed Del Mar Tunnel including security and/or maintenance lighting will be evaluated at the project-specific level, at which time the level of impacts will be determined and appropriate mitigation measures will be identified.

13-24 cont. include an inland rail relocation from the Del Mar Bluffs. Potential inland realignments will alter the location of rail service, including the referenced increase in COASTER service as well as AMTRAK and freight rail service through the City of Del Mar. During evening hours, it is anticipated that rail lighting including train headlights will result in new lighting and/or glare effects on public nighttime views not currently experienced under Existing Conditions. Further, it is not known if any other lighting would be associated with the Del Mar Tunnel including security and/or maintenance lighting.

13-25 **Request:** The City requests this impact section be updated to include the Del Mar Tunnel and inland rail realignment from the Del Mar Bluffs, with associated analysis provided related to the new lighting and/or glare effects from train lights, increased train frequency, and any associated lighting for the Del Mar Tunnel including but not limited to security and/or maintenance lighting.

10. COMMENT – AIR QUALITY
Pages 4.3-35, 4.3-36

13-26 The DEIR describes components of the 2035 Transportation Network Improvements and Programs as including "expanded commuter rail services (Commuter Rail 582) improvements between Sorrento Mesa and National City," Trolley line improvements, and a People Mover at the San Diego Airport. This section does not include references to increased service for the COASTER (e.g., as cited on pg. 4.1-42), or other rail network service improvements including AMTRAK or freight rail movement, all of which utilize diesel engines. Further, this section does not discuss the Del Mar Tunnel and potential concentrations (could be referred to as "hot spots") of train emissions produced from tunnel exhaust systems in focused areas and their associated effects on residential areas with sensitive (65+) populations and/or two public elementary schools west of I-5 adjacent to the City's east boundary (Del Mar Hills Academy and Del Mar Heights). Pursuant to the City's recently adopted 6th Cycle Housing Element, in 2017 nearly 26% of City residents were 65 years or older, and 12% under 18 years based on the American Community Survey, 2017 (www.delmar.ca.us/DocumentCenter/View/7542). Page 4.3-7 of the DEIR states that "CARB has identified the following people as the most likely to be affected by air pollution: children younger than 14, the elderly older than 65…these groups are classified as sensitive receptors."

13-27 **Request:** The City requests this impact section be updated to include the proposed increase in rail service by horizon year 2035 for pedestrian and freight trains, and the Del Mar Tunnel. Further the City requests the associated air quality impacts resulting from increased diesel emissions, both by increased frequency of use and

RESPONSE TO COMMENT 13-25

As stated above, detailed analysis related to the new lighting and/or glare effects from train lights, increased train frequency, and any associated lighting for the Del Mar Tunnel and inland rail realignment from the Del Mar Bluffs, will be evaluated at the project-specific level, at which time the level of impact will be determined and appropriate mitigation measures will be identified.

RESPONSE TO COMMENT 13-26

These are general comments about the Draft EIR analysis and CARB definitions. The DEIR is in agreement with these comments and no changes have been made. The air quality analysis does not need to be updated to reflect increased service associated with COASTER, AMTRAK, and freight, as well as the Del Mar Tunnel, because the increase in service due to transportation improvements is already accounted for in emissions estimates and modeling. Moreover, the design of the Del Mar Tunnel is not yet known; therefore, it is not possible to analyze detailed construction and operation effects. Regardless, mitigation measures in the EIR would apply to future construction of future tunnels. For example, mitigation measure AQ-5b ensures railway tunnels or other underground features are designed to help reduce localized toxic air contaminant concentrations at sensitive receptors and are located as far away as feasibly possible from nearby sensitive receptors. No changes to the analysis are required.

RESPONSE TO COMMENT 13-27

See response to comment Del Mar 13-26. Additionally, mitigation measure AQ-2b ensures that all new train purchases shall be zero emission after 2035. No changes to the analysis are required.

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13-27 cont.

concentrated exhaust points emitted from the Del Mar Tunnel be analyzed in the impact section. Without inclusion of these components, including the cited Del Mar Tunnel on page 2-58 and increased rail service referenced on page 4.1-42), and sufficient analysis of these components being included in this impact section, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

11. COMMENT – AIR QUALITY
Pages 4.3-40, 4.3-41, 4.3-42

13-28

The DEIR addresses the increase in rail activity between 2016 and 2025, and refers to rail operators such as the COASTER and AMTRAK are replacing existing older locomotives with modern, Tier 4 engines by 2025. As a result, the DEIR concludes that contrary to the increase in rail activity, emissions are reduced due to the Tier 4 engines. Further, the DEIR addresses the increase in rail activity between 2016 and 2035 (page 4.3-42) and draws the same conclusion. However, the 2035 conclusion states, "Moreover, while passenger rail activity increases, all passenger rail lines (both current and new) are assumed to be operating completely with modern, Tier 4 engines by 2035." The conclusions made for horizon years 2025 and 2035 appear to be based on an assumption per the Regulatory framework and replacements made at-will by rail operators. It does not appear that Tier 4 replacements would be required as mitigation.

13-29

Request 1: As the impact section is based on an assumption that all train engines will be Tier 4, the City requests the impact section discuss the air quality impacts under an alternate scenario where passenger and freight rail would not be replaced with Tier 4 engines by horizon years 2025 and 2035, or only replaced in part. The City further requests clarification be included to understand at what point the increase in rail activity coupled with older engines (or a mix of older and Tier 4) could result in a significant impact to Air Quality. If it is found that a significant impact would occur if all train engines were not replaced with Tier 4 (or a percentage mix), the City requests a mitigation measure be added for horizon years 2025 and 2035 requiring the threshold percentages of all trains being Tier 4.

13-30

Request 2: The City requests this impact section be updated to include the Del Mar Tunnel and associated air quality impacts resulting from increased frequency of use and concentrated exhaust points emitted from the Del Mar Tunnel be analyzed in the impact section.

RESPONSE TO COMMENT 13-28

This is a general comment that references the fact that use of Tier 4 despite increases in rail service would decrease emissions. The commenter notes that new Tier 4 engines are not a mitigation measure. No specific comment requiring a response is provided.

RESPONSE TO COMMENT 13-29

The air quality analysis assumes that all passenger lines will be operating with Tier IV or better engines by 2025. However, both the Coaster and Amtrak Pacific Surfliner lines are operating their full fleet with Tier IV locomotives today, which is ahead of the schedule assumed in the Draft EIR. Both Coaster and Amtrak have retired the older diesel locomotives that were assumed under the EIR's baseline conditions. Moreover, any new locomotive purchases will be Tier IV or better, in compliance with federal locomotive standards (40 CFR 1033). The suggested additional analysis and mitigation measure are not required.

RESPONSE TO COMMENT 13-30

Please see responses to comments Del Mar 13-27 and Del Mar 13-29 above.

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13-31 **12. COMMENT – AIR QUALITY**
Pages 4.3-56, 4.3-57

Request: Same comment made above for Air Quality on Pgs. 4.3-35, 4.3-36

13. COMMENT – BIOLOGICAL RESOURCS
Page 4.4-12, Figure 4.4-2

13-32 Several key lagoons are noted in the figure including Batiquitos and San Elijo to the north of the City. However, two key lagoons that flank the City's northern and southern boundaries are not noted on the figure. These are the San Dieguito (north) and Los Peñasquitos (south) Lagoons.

13-33 **Request:** The City requests that both the San Dieguito and Los Peñasquitos Lagoons are referenced on the figure as these lagoons are of critical importance to the community and region, and anticipated to be affected by the proposed 2035 Del Mar Tunnel and inland rail relocation from the Del Mar Bluffs.

14. COMMENT – BIOLOGICAL RESOURCES
Page 4.4-56, Table 4.4-6

13-34 The table references the City's Lagoon Overlay Zone (Del Mar Municipal Code Chapter 30.53), Tree Protection Ordinance (Del Mar Municipal Code Chapter 23.50), and General Plan. However, the table does not include the following: 1) the City's Bluff, Slope, and Canyon Overlay Zone (Del Mar Municipal Code Chapter 30.52) and purpose, in part: Protects downstream resources from the adverse impacts of erosion and sedimentation; and 2) the City's Land Conservation Ordinance (Del Mar Municipal Code Chapter 23.33) and purpose: Regulates soil disturbances of existing or natural terrain and vegetation and does not create soil erosion, silting of lower slopes, slide damage, flooding problems, or severe cutting or scarring.

13-35 **Request:** The City requests the table also include the Bluff, Slope, and Canyon Overlay Zone and Land Conservation Ordinance.

15. COMMENT – BIOLOGICAL RESOURCES
Page 4.4-69

13-36 The DEIR states that "estimated direct impacts on vegetation communities and regulated aquatic resources for the 2035 horizon year are provided in Table 4.4-8. Tables E-6-1 through E-6-3 in Appendix E-6 summarize the project-by-project impacts

RESPONSE TO COMMENT 13-31

Please see responses to comments Del Mar 13-27 and Del Mar 13-29 above.

RESPONSE TO COMMENT 13-32

A call-out has been added to Figure 4.4-2 identifying the San Dieguito and Los Penasquitos lagoons in the Final EIR.

RESPONSE TO COMMENT 13-33

A call-out has been added to Figure 4.4-2 identifying the San Dieguito and Los Penasquitos lagoons in the Final EIR.

RESPONSE TO COMMENT 13-34

The cited ordinances in this comment were added to Table 4.4-6 in the Final EIR.

RESPONSE TO COMMENT 13-35

The cited ordinances in this comment were added to Table 4.4-6 in the Final EIR.

RESPONSE TO COMMENT 13-36

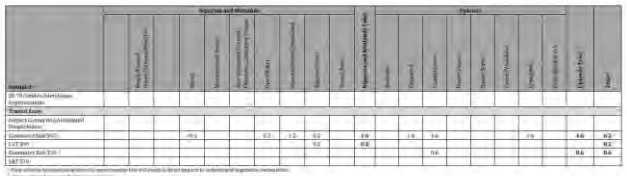
The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. Specific projects under the proposed plan, including the Del Mar Tunnel, Inland Rail alignment from the Del Mar Bluffs, Commuter Rail 398, and restoration of the Del Mar Bluffs, would be subject to project-specific environmental review, and the alignment, alternatives, and biological resources analysis will be included in the project-specific environmental review.

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13-36 on vegetation communities for each horizon year." The City provided an earlier comment under Chapter 2, Project Description where it requested a narrative be added describing the planned realignment of the Commuter Rail network through the Del Mar rail corridor. In this comment, the City requested clarification be made regarding the horizon years for: 1) the Del Mar Tunnel, which appears to be 2035 based on the DEIR Project Description; 2) the inland rail realignment from the Del Mar Bluffs, which is not specifically noted in the DEIR, but implied due to a Del Mar Tunnel being included; and 3) the associated restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures.

13-37 Related to planned Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs (Commuter Rail 398), and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, the DEIR does not sufficiently describe the potential impacts to vegetation communities for each horizon year in Appendix E-6, Tables E-6-2 and E-6-3. As shown below, Table E-6-2 is for the 2035 horizon year and indicates Commuter Rail 398 would result in impacts to 0.6 acres of Coastal Scrub habitat. If the Del Mar Tunnel is proposed for horizon year 2035, regardless of the final alternative alignment selected, it is anticipated that a greater area of habitat impacts would result from both temporary/construction and permanent impacts associated with the construction of a Del Mar Tunnel. This is because the City is bordered by two lagoons, Los Peñasquitos to the south (which Commuter Rail 398 currently is located within) and San Dieguito to the north. Further, the City is bordered by the Torrey Pines State Natural Reserve Extension on the City's south slope and Crest Canyon on its north slope – areas that include a diversified mix of native plants and trees. It is reasonable that greater upland impacts would result from tunneling through or adjacent to a hillside.

Appendix E-6, Table E-6-2 (2035)



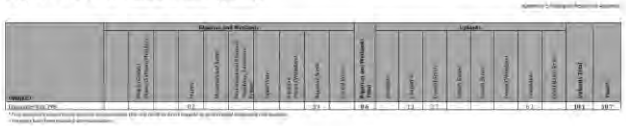
RESPONSE TO COMMENT 13-37

Please see response to comment Del Mar 13-36.

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13-38 Similarly, Table E-6-3 for the 2050 horizon year indicates Commuter Rail 398 would result in impacts to 0.2 acres of Marsh habitat and 0.4 acres of Riparian Scrub habitat. As noted in the City's Project Description comment, it is unclear if the inland rail realignment and/or restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures is planned for horizon year 2035 or 2050 as this information is not provided in the DEIR (DEIR only references the Del Mar Tunnel). Based on the identified impacts in Table E-6-3, wetland and riparian impacts are noted for Commuter Rail 398. It is unclear if these impacts are associated with the inland rail realignment. If the inland rail realignment is proposed for horizon year 2050, regardless of the final alternative alignment selected, it is anticipated that a greater area of habitat impacts would result from both temporary/construction and permanent impacts associated with the construction of a Del Mar Tunnel. This is because the City is bordered by two lagoons, Los Peñasquitos to the south (which Commuter Rail 398 currently is located within) and San Dieguito to the north. It is reasonable that greater impacts to wetland and/or riparian habitat would result from any of the inland rail realignment alternatives due to existing conditions in the Del Mar area. Further, the Table does not include reference to and analysis of the planned seasonal platform at the Del Mar Fairgrounds for either 2035 or 2050 which is also in vicinity to the San Dieguito Lagoon.

Appendix E-6, Table E-6-3 (2050)



13-39 **Request:** In addition to clarifying the horizon years for inland rail relocation from the Del Mar Bluffs and planned seasonal platform at the Del Mar Fairgrounds, the City requests a sufficient level of analysis be provided in the impact section and Appendix E-6 related to planned improvements to Commuter Rail 398 through and adjacent to the City of Del Mar – and in particular the Los Peñasquitos and San Dieguito Lagoons, Torrey Pines State Natural Reserve Extension, and Crest Canyon.

Until this clarification is made and sufficient analysis is included in this impact section, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

RESPONSE TO COMMENT 13-38

Please see response to comment Del Mar 13-36.

RESPONSE TO COMMENT 13-39

Please see response to comment Del Mar 13-36.

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16. COMMENT – CULTURAL RESOURCES
Page 4.5-23

13-40 The DEIR describes the Del Mar Tunnel and continued double-tracking at certain locations on the LOSSAN rail corridor by horizon year 2035, but does not list the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds. Further, it is unclear which horizon years these components are planned for.

13-41 **Request:** The City requests inclusion of the inland rail relocation from the Del Mar Bluffs and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable.

17. COMMENT – GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES
Page 4.7-27, Table 4.7-3 and Page 4.7-29, Table 4.7-4

13-42 The table references the City's Community (General) Plan but does not reference the City's Local Coastal Program.

13-43 **Request 1:** The City requests inclusion of the following Local Coastal Program sections in Table 4.7-3: 1) Bluff, Slope, Canyon Overlay Zone (Del Mar Municipal Code Chapter 30.52) which is designed to protect the health, safety, and general welfare, and to protect downstream resources from the adverse impacts of erosion and sedimentation; 2) Coastal Bluff Overlay Zone (Del Mar Municipal Code Chapter 30.55) which is intended to protect Del Mar's fragile coastal bluffs as a visual resource and avoid the risks to life and property associated with bluff failure and shoreline erosion; 3) the Floodplain Overlay Zone (Del Mar Municipal Code Chapter 30.56). which is intended to avoid hazards to those who will occupy the development; to avoid damage or hazards to the surrounding area; and ensure that development will not obstruct flood flow; will be designed to reduce the need for construction of flood control facilities that would be required if unregulated development were to occur; and to minimize the cost of flood insurance to Del Mar residents; and 4) the City's Land Conservation Ordinance (Del Mar Municipal Code Chapter 23.33) which regulates soil disturbances of existing or natural terrain and vegetation and does not create soil erosion, silting of lower slopes, slide damage, flooding problems, or severe cutting or scarring.

13-44 **Request 2:** The City requests inclusion and reference to its adopted Sea Level Rise Adaptation Plan, which is part of its Community Plan Safety Element (adopted March

RESPONSE TO COMMENT 13-40

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel project, which is a second-tier project, falls within the 2035 horizon year in the proposed Plan, and the inland rail realignment and bluffs restoration project are assumed as part of the tunnel project.

RESPONSE TO COMMENT 13-41

Please see response to comment Del Mar 13-40.

RESPONSE TO COMMENT 13-42

See responses to comments Del Mar 13-43 through Del Mar 13-45 for specific requests.

RESPONSE TO COMMENT 13-43

Suggested components of the City of Del Mar's LCP have been incorporated into Table 4.7-3 in Section 4.7, *Geology, Soils, and Paleontological Resources*.

RESPONSE TO COMMENT 13-44

Suggested reference to the City of Del Mar's Sea Level Rise Adaptation Plan has been incorporated into Table 4.7-3 in Section 4.7.

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2019). The Adaptation Plan is intended to guide policy decisions related to future development in areas that are identified as vulnerable to projected sea-level rise, flooding, and erosion. The Adaptation Plan identifies a range of adaptation options and prioritizes specific measures to address projected sea-level rise, flooding from the Pacific Ocean and San Dieguito River, and associated coastal bluff and beach erosion. The Adaptation Plan identifies beach nourishment and sand retention as high priority short-to-medium term adaptation measures that would reduce the risk of wave run-up and erosion of the bluff toe. Maintaining a wide public beach will help minimize flood risk to the adjacent public infrastructure, beach access, and private homes and businesses. The City's Sediment Management Plan (October 2018) is a technical document that supports the adopted approach for beach nourishment and maintenance dredging of the San Dieguito river inlet, as set forth in the Adaptation Plan. Currently, the City is seeking local, state, and federal approvals for a Sand Compatibility Opportunistic Use Program (SCOUP) to facilitate beach nourishment adaptation in accordance with the Adaptation Plan and Sediment Management Plan.

13-44 cont.

Request 3: The City requests inclusion of the following in Table 4.7-4: 1) Bluff, Slope, Canyon Overlay Zone (Del Mar Municipal Code Chapter 30.52) which is designed to protect the health, safety, and general welfare, and to control the development of properties within the designated zone in order to preserve the scenic sandstone bluffs and related canyons and steep slopes which characterize the area within the zone.; and 2) Open Space Overlay Zone (Del Mar Municipal Code Chapter 30.60) which is intended, in part, to preserve scenic vistas and particularly unique natural features in specific neighborhoods.

13-45

18. COMMENT – GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES
Page 4.7-34

The DEIR describes continued double-tracking at certain locations on the LOSSAN rail corridor by horizon year 2035, but does not list the Del Mar Tunnel, the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds. Further, it is unclear which horizon years the inland rail relocation and seasonal platform are planned for.

13-46

Request: The City requests inclusion of the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable. Provided that all three components would generally be sited within wetland areas with high liquefaction potential and/or hillside with potential seismic-related ground failure and/or landslides, until these components

13-47

RESPONSE TO COMMENT 13-45

Suggested references to the City of Del Mar's Municipal Code have been incorporated into Table 4.7-4 in Section 4.7.

RESPONSE TO COMMENT 13-46

See response to comment Del Mar 13-47.

RESPONSE TO COMMENT 13-47

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects.

13-47 cont. are included and sufficient analysis provided, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

19. COMMENT – GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES
Page 4.7-41

The DEIR generally makes reference to "…transportation network improvements [that] would occur in areas susceptible to slope failure, unstable soils, and expansive soils – particularly improvements in hilly or coastal areas such as the managed lanes along the freeways…" Further, the DEIR generally states that "specific transportation facilities located in areas prone to slope failure, or where the development of these facilities would be likely to cause slope failure, include services through coastal areas or canyons. These improvements may be at a greater risk for effects of slope failure or cause greater risks to people or structures in proximity to these improvements."

13-48 There are three specific rail improvement components that are either within or adjacent to the City and would be sited in "hilly or coastal areas" and/or "through coastal areas or canyons." However, the DEIR does not list these components but refers to them generally. These include the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, and the planned seasonal platform at the Del Mar Fairgrounds. As written, general references to "transportation network improvements" that are "susceptible to slope failure, unstable soils, expansive soils" and could cause "greater risk to people or structures in proximity" can be confusing to the public. Further, general references with the stated conclusions are not a sufficient level of programmatic analysis for the planned LOSSAN rail corridor improvements in/adjacent to the City.

Request: The City requests inclusion of the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable. This is because all three components are within the DEIR's general statements related to "hilly or
13-49 coastal areas" and/or "through coastal areas or canyons" as well as general references to "transportation network improvements" that are "susceptible to slope failure, unstable soils, expansive soils" and could cause "greater risk to people or structures in proximity." Until these components are included and sufficient analysis is provided, the City is unable to provide further comment on the impacts, conclusion of less than significant, and/or mitigation measures at this time.

RESPONSE TO COMMENT 13-48

As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects, and because the specifications of second-tier projects such as the timing, location, and size, associated with implementation of the proposed Plan, are not known at this time, conclusions regarding the specific geologic risks related to the above-referenced second-tier projects would be speculative.

RESPONSE TO COMMENT 13-49

As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects, and because the specifications of second-tier projects such as the timing, location, and size, associated with implementation of the Plan, are not known at this time, conclusions regarding the specific geologic risks related to the above-referenced second-tier projects would be speculative.

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20. COMMENT – GREENHOUSE GAS EMISSIONS
Page 4.8-24

13-50 The DEIR describes the Del Mar Tunnel and continued double-tracking at certain locations on the LOSSAN rail corridor by horizon year 2035, but does not list the inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds. Further, it is unclear which horizon years these components are planned for.

13-51 **Request:** The City requests inclusion of the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable.

21. COMMENT – LAND USE
Page 4.11-30, 4.11-31

13-52 The DEIR states that "the planned transportation network improvements for 2035 are described above" which is a reference to a general list of horizon year 2035 projects on page 4.11-30. However, there is no reference made in the impact section to the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, or restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures. As previously noted in earlier comments, the horizon year for the Del Mar Tunnel is 2035 but a reference to an inland rail relocation and its associated horizon year (2035 or 2050) or the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, is not described in the DEIR. It can be assumed that if the horizon year for the Del Mar Tunnel is 2035, then the inland rail realignment and bluffs restoration including removal of temporary measures would also be 2035. However, as previously noted in the City's Biological Resources comments, the 2035 impacts for Commuter Rail 398 only affect a small portion of Coastal Scrub habitat, whereas the 2050 impacts for Commuter Rail 398 only affects a small portion of Marsh and Riparian Scrub habitat.

The DEIR provides three horizon years – 2025, 2035, and 2050. It is clear that a Del Mar Tunnel is planned for horizon year 2035, which is also described in Appendix A of the Draft 2021 Regional Plan, Table A.5 as Project ID TL06 ("Oceanside to downtown San Diego (Build Del Mar tunnel, add stations at Central Mobility Hub and Camp Pendleton, and Grade"). However, as previously commented, it is not clear if

RESPONSE TO COMMENT 13-50

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. Reference to future projects such as the inland rail realignment and bluff restoration projects in the impact analyses were provided as examples of the types of projects that could occur by those horizon years and were not intended to be an exhaustive list of all second-tier projects that would occur by that horizon year.

RESPONSE TO COMMENT 13-51

See response to comment Del Mar 13-50.

RESPONSE TO COMMENT 13-52

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. References to future projects such as the inland rail realignment and bluff restoration projects in the impact analyses were provided as examples of the types of projects that could occur by those horizon years and were not intended to be an exhaustive list of all second-tier projects that would occur by that horizon year. Given the programmatic nature of the EIR, project-specific analysis of the Del Mar Bluffs improvement project is not necessary at this time.

13-52 cont. and when the associated inland rail realignment or bluff restoration including removal of the temporary stabilization measures are proposed.

Assuming it is 2035, the Land Use impact section does not sufficiently describe the indirect effects associated with deferring these critical components of the Transportation Network Improvements and Program to a horizon year post-2025. By not evaluating these critical components in the first horizon year of 2025, use of the LOSSAN rail corridor/Commuter Rail 398 by COASTER, AMTRAK, and fright rail will remain in its Existing Condition on the Del Mar Bluff. This includes associated bluff stabilization projects that have been completed prior to the baseline year of 2016 and post-2016 via a series of comprehensive bluff stabilization projects planned as part of Del Mar Bluffs Stabilization Projects 5 (DMB5), and subsequent Project 6 under consideration.

13-53 Completed projects pre-2016 include: 1) a soil cement buttress and new beach outfall constructed near Mile Post 244.45 (1996); 2) an emergency repair project constructed near the terminus of 8th Street after a failure of the bluff (late 2001); 3) construction of Del Mar Bluffs Stabilization Project 1, which included the addition of surface and subsurface drainage improvements and repair of upper bluff walls; 4) construction of Del Mar Bluffs Stabilization Project 2, which included the installation of Cast-In-Drilled-Holes (CIDH) soldier piles along 1,326 feet of the bluffs in the top priority areas (2007); and 5) construction of Del Mar Bluffs Stabilization Project 3, which included installation of soldier piles at seven additional priority areas along the bluffs that were not completed in previous phases (2012).

Completed/in-construction projects post-2016 include: 1) construction of Del Mar Bluffs Stabilization Project 4 which included urgent repairs to existing drainage systems and lower bluff wood retaining walls and additional upper bluff stabilization measures below 7th Street and lower bluff stabilization measures below Sea Orbit Lane due to bluff failures (2017-2020); 2) emergency bluff repairs below 13th Street and 15th Street (2019); and 3) emergency repairs for a bluff and seawall collapse that occurred in February 2021, under construction.

The next foreseeable project includes Del Mar Bluffs Stabilization Project 5 (DMB5) that is currently in design. As described in the DMB5 Analysis Report (July 2021) (available at www.delmar.ca/rail), the project is described as a "maintenance of way project, to maintain the existing track and protect it from erosion and seismic events" through various components such as "adding bluff toe protection measures and surface stabilization" (Report page 8). The Report lists consistency with key regional and corridor plans, including the "San Diego Forward: The Regional Plan (SANDAG

RESPONSE TO COMMENT 13-53

See response to comment Del Mar 13-52. The project components listed in the comment constitute second-tier projects, and this programmatic EIR does not analyze project-specific land use conflicts. The Draft EIR also does not provide a specific schedule for completion of the second-tier projects. SANDAG will continue coordinating with the City of Del Mar, as well as other local jurisdictions, to determine the prioritization and specific timelines of these second-tier projects, including the bluff stabilization project.

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13-53 cont.

2015), the 2016 San Diego regional Transportation Improvement Plan (SANDAG 2016), LOSSAN Corridor wide Strategic Implementation Plan (LOSSAN Corridor Rail Agency 2012), the LOSSAN Program Environmental Impact Report/Environmental Impact Statement (Caltrans and the Federal Railroad Administration 2009), the Infrastructure Development Plan for the LOSSAN Rail Corridor in San Diego County (SANDAG 2013), and the North Coast Corridor Public Works Plan/Transportation and Resources Enhancement Program (NCC PWP/TREP; Caltrans and SANDAG 2016)" (Report page 8). Further, the Report states that "the Proposed Action considers the anticipated bluff retreat for the next 30 to 50 years" (Report page 12).

13-54

As a result of deferring these components post horizon year 2025, the proposed 2021 Regional Plan results in indirect effects that conflict with the City's adopted and certified Local Coastal Program and in particular the Beach Overlay Zone (B-OZ, Del Mar Municipal Code Chapter 30.50) and the Coastal Bluff Overlay Zone (CB-OZ, Del Mar Municipal Code Chapter 30.55). Both overlays are Implementing Ordinances in the City's certified LCP (2001). The B-OZ chapter of the LCP includes a Shoreline Protection Area (SPA) line that begins at the approximate center-line of the railway tracks and covers the area west as specified in B-OZ Exhibit B. Components of the bluff stabilization projects in conflict with the LCP include exposed vertical retaining structures, soil nail reinforced areas with shotcrete facing, and grading within 40 feet of the top edge of a coastal bluff. Further, DMB5 proposes the excavation and removal of an existing coastal bluff berm located west of the track bed and generally below the area of 11th Street and 9th Street.

Under the certified Del Mar LCP (CB-OZ, Del Mar Municipal Code Section 30.55.080), development on coastal bluffs is regulated under the following provisions (in part):

> A. Unless otherwise specified herein, **all new or redeveloped principal or accessory structures, including new supporting foundations or supports for existing structures, shall be set back a minimum of 40 feet from the top edge of the coastal bluff** as defined in this Chapter. **[emphasis added]**
>
> **C. No grading shall be allowed within 40 feet of the top edge of a coastal bluff. [emphasis added]**
>
> D. **No grading or construction activities shall be allowed on the face of a coastal bluff unless approved as part of a Shoreline Protection Permit or Setback Seawall Permit** issued in accordance with the provisions of this Title and when the

RESPONSE TO COMMENT 13-54

See responses to comments Del Mar 13-52 and Del Mar 13-53.

> Planning Commission or City Council, as the authorized review body for the project, **makes a finding that the proposed grading has been minimized to the extent feasible to implement the authorized shoreline protection. [emphasis added]**

Under the certified Del Mar LCP (B-OZ, DM Section 30.50.060), the construction of a protective structure may be authorized in the SPA area if it meets a list of findings, that include (in part):

> C. Will assure stability and structural integrity and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area, **nor in any way substantially alter natural landforms along bluffs and cliffs. [emphasis added]**

13-54 cont.

> G. Will, if there is a vertical wall element in the proposed protective structure, have the seaward face of the vertical wall located within the Shoreline Protective Area only if there is no other feasible location for effectively protecting a principle structure; there is no feasible, less environmentally damaging alternative; **and feasible mitigation measures have been provided to minimize adverse environmental effects; but in no event have the seaward face of the vertical wall more than five feet westward of the Shoreline Protection Area line. [emphasis added]**
>
> H. Will, **if other than a vertical wall,** meet all the conditions of Subsection G above. **[emphasis added]**

The constructed and planned stabilization components, including exposed vertical retaining structures, soil nail reinforced areas with shotcrete facing, and grading within 40 feet of the top edge of a coastal bluff (including terraced slopes and the excavation and removal of coastal bluff berms west of the track bed) are not consistent with City's LCP and in particular the bolded sections above.

13-55 Further, there is a conflict between the timing included in the DMB5 Alternatives Analysis Report of 30-50 years (i.e., 2051 to 2071 from the date of Report preparation) and the DEIR timeframe associated with the Del Mar Tunnel and assumed inland rail realignment from the Del Mar Bluffs (i.e., horizon year 2035) and assumed restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures. The DEIR does not include reference to the DMB5 Alternatives Analysis Report or any other completed or planned Del Mar Bluffs Stabilization Projects, including reports or plans.

RESPONSE TO COMMENT 13-55

See responses to comments Del Mar 13-52 and Del Mar 13-53. The proposed Plan identifies funding to kick start the environmental, design, and right-of-way phases of the Del Mar Tunnel project by 2025 with construction funding in the 2035 phase, and the inland rail realignment is assumed as part of the tunnel project. Timing for bluffs restoration will be determined as the tunnel and inland rail realignment projects progress. During project-specific analysis of second-tier projects, specific conflicts with reports such as the DMB5 Alternative Analysis Report will be considered.

13-55 cont. This is important because even though SANDAG considers projects, such as DMB5, to be a maintenance of way project, pertinent DMB5 documents such as the July 2021 Alternatives Analysis Report describes the maintenance project's consistency with key regional and corridor plans, including the "San Diego Forward: The Regional Plan (SANDAG 2015), the 2016 San Diego regional Transportation Improvement Plan (SANDAG 2016), LOSSAN Corridor wide Strategic Implementation Plan (LOSSAN Corridor Rail Agency 2012), the LOSSAN Program Environmental Impact Report/Environmental Impact Statement (Caltrans and the Federal Railroad Administration 2009), the Infrastructure Development Plan for the LOSSAN Rail Corridor in San Diego County (SANDAG 2013), and the North Coast Corridor Public Works Plan/Transportation and Resources Enhancement Program (NCC PWP/TREP; Caltrans and SANDAG 2016)" (Report page 8).

13-56 The impact section for 2035 concludes that "…transportation network improvements would conflict with land use plans, policies, and regulations, including general plans, specific plans, and community plans, adopted for the purpose of avoiding or mitigating an environmental effect, impacts are already evaluated in other sections of this EIR, so these conflicts would not cause new significant impacts. Therefore, this impact (LU-2) in the year 2035 is less than significant."

For the reasons described above, the DEIR does not sufficiently describe the impacts associate with Commuter Rail 398 improvements in/adjacent to the City of Del Mar in other sections of the DEIR.

13-57 **Request:** Based on the concerns expressed above, the City requests that an analysis be provided in the impact section discussing the indirect and direct effects resulting from a deferred Del Mar Tunnel to 2035, inland rail relocation to horizon year 2035 (or 2050), and bluffs restoration including removal of the temporary stabilization measures to horizon year 2035 (or 2050). This includes an analysis of completed and planned bluffs stabilization projects, associated documents therewith, and their inconsistency with the City's certified LCP provisions in the CB-OZ and B-OZ. The City further requests the impact section's conclusion of less than significant be re-evaluated (page 4.11-31).

22. COMMENT – LAND USE
Page 4.11-31

13-58 The DEIR states that "it cannot be guaranteed that all planned rail extensions would have alignments and design features that would avoid land use conflicts with adopted plans. Individual transportation network improvements would undergo separate environmental review under CEQA and NEPA, where applicable." The impact section

RESPONSE TO COMMENT 13-56

See responses to comments Del Mar 13-52 and Del Mar 13-53.

RESPONSE TO COMMENT 13-57

See responses to comments Del Mar 13-52 and Del Mar 13-53. The EIR's conclusion of less than significant for Impact LU-2 need not be re-evaluated because it is based on a programmatic vs. project-specific analysis of land use conflicts.

RESPONSE TO COMMENT 13-58

See response to comment Del Mar 13-52.

13-58 cont. does not provide specific reference to the Del Mar Tunnel, the inland rail relocation from the Del Mar Bluffs, or the planned seasonal platform at the Del Mar Fairgrounds.

13-59 **Request:** In reference to the statement that "individual transportation network improvements would undergo separate environmental review under CEQA and NEPA, where applicable," the City requests that the sentence be amended to include specific references to the Del Mar Tunnel, the inland rail relocation from the Del Mar Bluffs, bluffs restoration including removal of the temporary stabilization measures, and the planned seasonal platform at the Del Mar Fairgrounds.

23. COMMENT – NOISE
Page 4.13-12, Table 4.13-4

13-60 The table lists various construction equipment types including auger drill rig, blasting, dozer, dump truck, excavator, front end loader, impact pile driver, jackhammer, mounted impact hammer, rock drill, and vibratory pile driver. It is unclear if all types of equipment associated with the construction of a train tunnel are provided in the list.

13-61 **Request:** The City requests the table be amended, as applicable, to include any other equipment typical of rail tunnel construction (taking into account the size of trains used by COASTER, AMTRAK, and freight rail, including structural improvements, drainage, and emission exhaust) and update the associated analysis within the impact section accordingly.

24. COMMENT – NOISE
Pages 4.13-39, 4.13-40

13-62 The DEIR describes continued double-tracking at certain locations on the LOSSAN rail corridor along with increases in COASTER frequencies and the Del Mar Tunnel, but does not reference the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds.

13-63 **Request:** In addition to the City's prior Noise comment on tunnel construction equipment, the City requests inclusion of the inland rail relocation from the Del Mar Bluffs and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable. Provided that these components would occur near residential areas, until these components are included and sufficient analysis provided, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

RESPONSE TO COMMENT 13-59

Requested text has been added to page 4.11-31 in the EIR. In addition, see response to comment Del Mar 13-52.

RESPONSE TO COMMENT 13-60

Table 4-13-4 includes the typical construction equipment mix that could be used in projects that would occur under the proposed Plan. The table is not meant for project-level analysis and does not include an exhaustive list of construction equipment, as the EIS is a program-level document. The exact mix of construction equipment for the commenter-referenced project would be included in project-level environmental documents.

RESPONSE TO COMMENT 13-61

See response to comment Del Mar 13-60. As discussed, the table is not meant to be exhaustive, and it is unknown at this time what type of tunneling equipment will be utilized for the project. Specific analysis will be conducted during project-level analysis.

RESPONSE TO COMMENT 13-62

As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. Noise increases associated with projects that would occur under the proposed Plan are discussed under Impact NOI-1 in Section 4.13, *Noise and Vibration*. The discussion is programmatic and outlines some of the projects that would occur during the time horizons referenced in the document. References to future projects in the impact analyses were provided as examples of the types of projects that could occur by those horizon years, and were not intended to be an exhaustive list of all second-tier projects that would occur by that horizon year.

RESPONSE TO COMMENT 13-63

See response to comment Del Mar 13-62.

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25. COMMENT – NOISE
Page 4.13-47

13-64 The DEIR describes continued double-tracking at certain locations on the LOSSAN rail corridor along with increases in COASTER frequencies and the Del Mar Tunnel, but does not reference the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds.

13-65 **Request:** In addition to the City's prior Noise comment on tunnel construction equipment, the City requests inclusion of the inland rail relocation from the Del Mar Bluffs and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable. Provided that these components would occur near residential areas, until these components are included and sufficient analysis provided, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

26. COMMENT – POPULATION AND HOUSING
Page 4.14-8

13-66 The Regulatory Setting section describes four State laws, regulations, plans, and policies including State Housing Element Law (generally), California Relocation Assistance Act, Assembly Bill 1730 of 2019, and the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). The DEIR does not provide a summary of applicable State housing laws where additional density and streamlined processing is available for development projects within a Transit Priority Area and/or within a distance (e.g., one-half mile) of points such as a "Major Transit Stop" or a "High Quality Transit Corridor."

13-67 **Request:** The City requests relevant statutes be provided with summaries that relate to development within areas such as a Transit Priority Area, Major Transit Stop, High Quality Transit Corridor, etc. and update the associated impact sections as applicable. This will help cities, such as the City of Del Mar, that currently only has Local Bus service understand the potential impacts associated with development and density once Next Gen Rapid bus service is introduced at the 2035 horizon year.

RESPONSE TO COMMENT 13-64

See response to comment Del Mar 13-62.

RESPONSE TO COMMENT 13-65

See response to comment Del Mar 13-62.

RESPONSE TO COMMENT 13-66

Additional recently adopted housing legislation related to streamlining approval for high density housing or housing within Transit Priority Areas has been incorporated into the Regulatory Setting in Section 4.14, *Population and Housing*.

RESPONSE TO COMMENT 13-67

See response to comment Del Mar 13-67. In addition, as noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Next Gen Rapid bus service would be a second-tier project, and analysis of direct and indirect impacts associated with these second-tier projects would occur during project-specific environmental review.

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27. COMMENT – POPULATION AND HOUSING
Page 4.14-14

13-68 The DEIR in Chapter 2 Project Description (pages 2-55, 2-56, 2-57 – Figures 2-32, 2-33, 2-34) indicates that in 2025 (similar to the baseline year of 2016), Commuter Rail and Local Bus are designated in the City. However, in horizon year 2035, Next Gen Rapid Bus is introduced east-west on Del Mar Heights Road and north-south on Camino del Mar. The impact section for 2035 does not reference the addition of Next Gen Rapid Bus service in the City or the associated direct effects (e.g., Next Gen Rapid Bus results in new types of transit stops and corridors in the City, resulting in changes to development and density, and CEQA streamlining per State statute) or indirect effects (e.g., the extension of bus service types and commuter frequencies).

13-69 **Request:** The City requests the introduction of Next Gen Rapid Bus service in 2035 be discussed and potential impacts on population growth and housing per State statute related to development in areas such as Transit Priority Areas, Major Transit Stops, High Quality Transit Corridors, etc. As the 2021 Regional Plan had not been adopted prior to the State's 6th Housing Cycle deadline of April 5, 2021, the City's 6th Cycle Housing Element and associated 6th Cycle Housing Element EIR did not consider the addition of Next Gen Rapid bus service through the City, nor accounted for the potential land use and development/density changes, and CEQA streamlining that could result due to the addition of this type of service in the City. Until this is included and sufficiently analyzed, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.

28. COMMENT – WILDFIRE
Page 4.19-10, Table 4.19-2

13-70 The table does not include reference to the City's amended Community (General) Plan in 2019 to its Safety Element. In particular, wildfire is referenced in the current version of the Community (General) Plan (reference the online version at https://library.municode.com/ca/del_mar/codes/community_plan?nodeId=THCOPLDEMACA_THE_PLAN_ENVIRONMENTAL_MANAGEMENT_SPECIFIC_RECOMMENDATIONSORPANO34--42). The amended Community (General) Plan now reads, in part, "The safety element is intended to protect the public health and safety, minimize the risk of hazards, and address local needs for climate change adaptation and resilience. Potential hazards in Del Mar include the threat of coastal storms, flooding, bluff erosion, beach erosion, sea level rise, dam failure, earthquake, landslide, tsunami, wildfire, structure fire, and drought."

RESPONSE TO COMMENT 13-68

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Next Gen Rapid Bus service is considered a second-tier project, and the specifications of these projects such as the timing, location, and size would be defined and specific impacts related to project characteristics would be identified during project-level analysis.

RESPONSE TO COMMENT 13-69

See response to comment Del Mar 13-68.

RESPONSE TO COMMENT 13-70

Language has been added to Table 4.19-2 to clarify that the City of Del Mar Safety Element was updated in 2019. Wildfire is now listed as a "potential hazard" in Table 4.19-2.

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13-71 **Request:** The City requests the table be updated to reflect the 2019 Safety Element amendment date and remove the statement that "Wildfire is not mentioned in the Safety Element."

29. COMMENT – ALTERNATIVES
Page 6-2

13-72 This is related to the City's prior comment made in Land Use (pages 4.11-30, 4.11-31).

13-73 **Request 1:** The City requests that an Alternative be included in the DEIR that analyzes the indirect and direct impacts associated with a 2025 horizon year for the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and bluffs restoration including removal of the temporary stabilization.

13-74 **Request 2:** The City requests that an Alternative be included in the DEIR (or joined with the Alternative request above) that analyzes the direct and indirect impacts associated with a even further inland realigned rail corridor for passenger and freight rail following the planned southerly alignments for High Speed Rail generally near SR-52 or SR-163 and I-15, and then connects with freight rail corridor near SR-78 (shown in red outlines below).

RESPONSE TO COMMENT 13-71

The statement that "Wildfire is not mentioned in the Safety Element" was removed from Table 4.19-2.

RESPONSE TO COMMENT 13-72

This is an introductory comment for the following comments. No response is required.

RESPONSE TO COMMENT 13-73

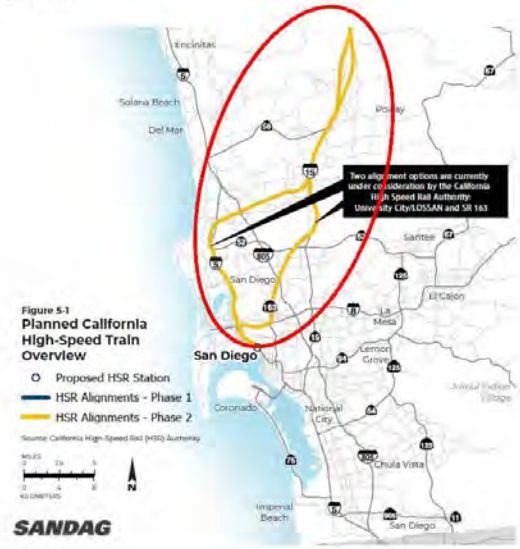
See Master Response 1 regarding the range of alternatives analyzed in the EIR. In addition, the comment requests analysis of an alternative to a specific project, not an alternative to the proposed Plan. Such a project would be a second-tier project and would have project-specific alternatives analysis as part of its environmental review. The proposed project-specific alternative is therefore not an appropriate alternative for this first-tier Program EIR.

RESPONSE TO COMMENT 13-74

See Master Response 1 regarding the range of alternatives analyzed in the EIR, and response to comment Del Mar 13-73.

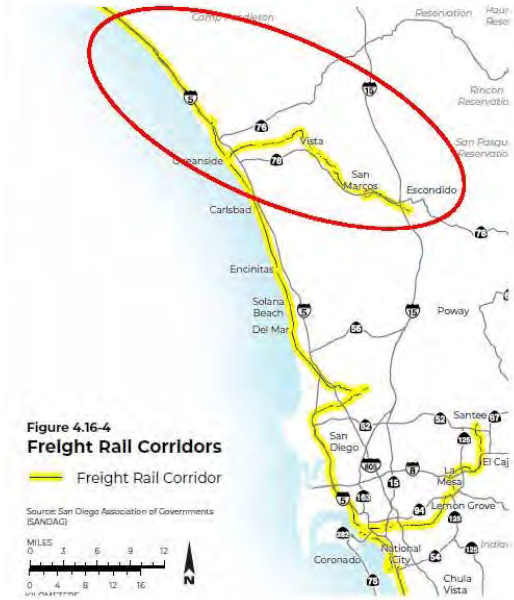
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13-74



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30. COMMENT – ALTERNATIVES
Page 6-12

In a 2019 Notice of Preparation (NOP) Scoping letter, the Coastal Commission requested an alternative be provided referred to as the "Coastal Protection Alternative" to consider the effects of sea level rise and minimize the need for shoreline armoring with the relocation of the rail corridor along the Del Mar bluffs. The letter also requests that the expected life of the rail corridor along the Del Mar bluffs and other existing infrastructure be analyzed given sea level rise and other environmental impacts. This alternative was rejected on the basis that is an individual project included in the proposed Plan rather than an alternative for the proposed Plan as a whole, and that the lead agency need not discuss alternatives to each particular component of a project.

13-75

Request: Based on the City's prior comment made in Land Use (page 4.11-30, 4.11-31), the City requests SANDAG reconsider a "Coastal Protection Alternative" on page 6-12 and not reject it from further consideration. As part of the reconsideration, the City's two requests noted above should be included as part of an updated Coastal Protection Alternative. While the City recognizes the reasons stated on page 6-12 as to why a Coastal Protection Alternative was rejected, the planned improvements to Commuter Rail 398 are programmatic components of the draft 2021 Regional Plan and discussed as part of the Transit Leap components in Chapter 2, Project Description (page 2-53) and Phased Transit Leap Network Improvements in Chapter 2, Project Description (page 2-58). The City recognizes that future implementation of the Commuter Rail 398 improvements at a project-level will require further environmental analysis per CEQA and NEPA at the project-level. However, the City disagrees with the reasons for rejecting the Coastal Protection Alternative on the basis that it is an individual project included in the proposed Plan rather than an alternative for the proposed Plan as a whole.

13-76

As noted throughout the City's comments, sufficient analysis at a programmatic level of the planned Commuter Rail 398 improvements may find that impacts to the coastal region may be reduced via an alternative alignment outside of the coastal corridor. However, unless this analysis is completed at a programmatic level, the proposed Plan's alignment in horizon years 2025, 2035, and 2050 for Commuter Rail 398 (including associated freight rail) will continue to be along the coastal corridor. The lead agency can include this alternative for further study in the DEIR and should include it given the extent of feedback and public interest on this critical programmatic component of SANDAG's Draft 2021 Regional Plan.

13-77

RESPONSE TO COMMENT 13-75

See Master Response 1 regarding the range of alternatives analyzed in the EIR. As noted in the comment, the Coastal Protection Alternative was rejected from further consideration because it is a "second-tier" project-specific alternative. An EIR is not required to consider alternatives to a project component, and instead focuses on alternatives to the project (in this case the proposed Plan) as a whole. *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal. App. 4th 957,993.

RESPONSE TO COMMENT 13-76

See response to comment Del Mar 13-75.

RESPONSE TO COMMENT 13-77

See response to comment Del Mar 13-75.

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13-78 The City looks forward to ongoing coordination in SANDAG's development of its draft 2021 Regional Plan and requests Responses to Comments be provided via email to the City staff emails noted. Should you have any questions, please contact the City at (858) 755-9313.

Sincerely,

Terry Gaasterland
Mayor

cc: Del Mar City Council
Ashley Jones, Interim City Manager (ajones@delmar.ca.us)
Kristen Crane, Assistant City Manager (kcrane@delmar.ca.us)
Joseph Smith, Planning & Community Development Director (jsmith@delmar.ca.us)
Amanda Lee, Principal Planner (alee@delmar.ca.us)

RESPONSE TO COMMENT 13-78

SANDAG would like to thank the City of Del Mar again for the comments on the DEIR. We look forward to continued coordination, and a copy of this response to comments will be provided via email to City staff as requested. Please continue to follow along in this process by visiting SDForward.com.

COMMENT LETTER 14: DESCANSO COMMUNITY PLANNING GROUP

Comment Letter 14

From: Descanso Planning Group <descansocpg@gmail.com>
Sent: Tuesday, October 5, 2021 11:06:07 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Subject: Request for Comments on the DEIR Regional Plan

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

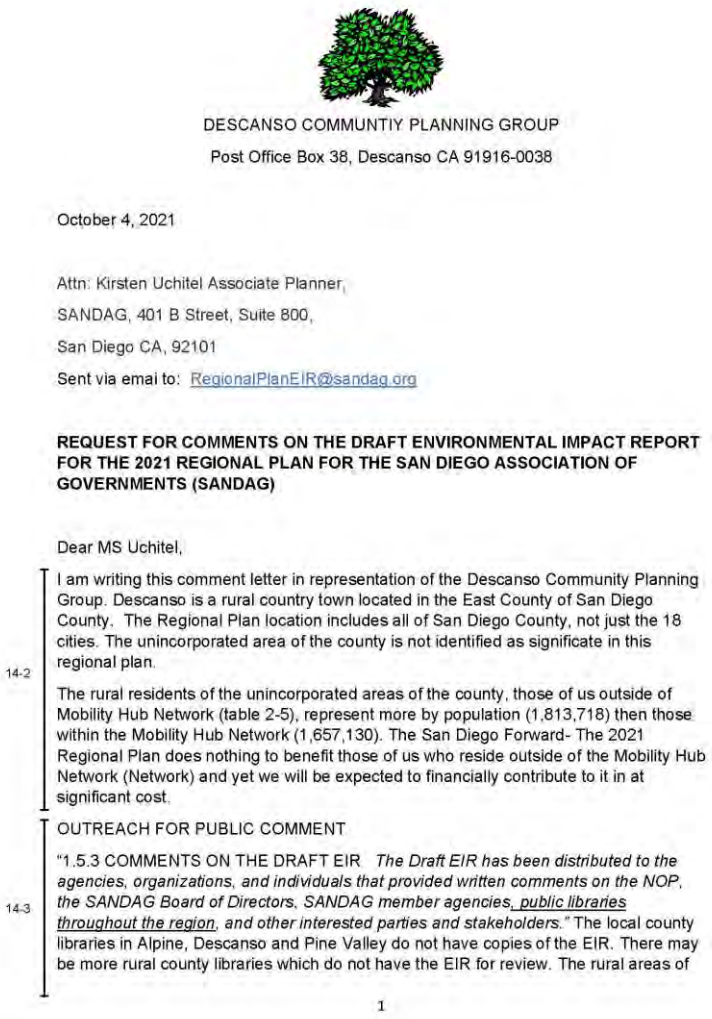
Kirsten Uchitel,

14-1 I am sending you the Descanso Community Planning Group comments on the Draft EIR for SANDAG 2021 Regional Plan, attached.
I am also sending you a copy USPS.
As residents of the unincorporated community of Descanso, we feel we have not received any public outreach on this process, nor has any community in the East County Rural areas.
The comment letter will outline our community's concerns of inequity, lack of representation, lack of services and being "taxed" without representation.
I look forward to more inclusion of the unincorporated areas of the County in the next iteration of the DEIR and revision of the Regional Plan.
Kerry Forrest,
Chair Descanso Community Planning Group

1

RESPONSE TO COMMENT 14-1

SANDAG appreciates the Descanso Community Planning Group's (DCPG) feedback on the proposed Plan and your participation in the environmental review process. Please refer to subsequent responses to your comments below for detailed responses regarding your concerns.



DESCANSO COMMUNTIY PLANNING GROUP

Post Office Box 38, Descanso CA 91916-0038

October 4, 2021

Attn: Kirsten Uchitel Associate Planner,

SANDAG, 401 B Street, Suite 800,

San Diego CA, 92101

Sent via emai to: RegionalPlanEIR@sandag.org

REQUEST FOR COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2021 REGIONAL PLAN FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

Dear MS Uchitel,

I am writing this comment letter in representation of the Descanso Community Planning Group. Descanso is a rural country town located in the East County of San Diego County. The Regional Plan location includes all of San Diego County, not just the 18 cities. The unincorporated area of the county is not identified as significate in this regional plan.

14-2

The rural residents of the unincorporated areas of the county, those of us outside of Mobility Hub Network (table 2-5), represent more by population (1,813,718) then those within the Mobility Hub Network (1,657,130). The San Diego Forward- The 2021 Regional Plan does nothing to benefit those of us who reside outside of the Mobility Hub Network (Network) and yet we will be expected to financially contribute to it in at significant cost.

OUTREACH FOR PUBLIC COMMENT

"1.5.3 COMMENTS ON THE DRAFT EIR *The Draft EIR has been distributed to the agencies, organizations, and individuals that provided written comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, public libraries throughout the region, and other interested parties and stakeholders."* The local county libraries in Alpine, Descanso and Pine Valley do not have copies of the EIR. There may be more rural county libraries which do not have the EIR for review. The rural areas of

14-3

1

RESPONSE TO COMMENT 14-2

The comment raises concerns about the proposed Plan not benefiting those who reside outside of the Mobility Hub Network. The comment does not raise any concerns about the adequacy of the EIR. No further response is required.

RESPONSE TO COMMENT 14-3

ANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR was to be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG's office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-

income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability (NOA) for the Draft EIR in local newspapers on August 27, 2021, and mailed the NOA to an extensive distribution list. SANDAG also filed a Notice of Completion (NOC) with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021.

The Draft EIR and all appendices were available for review online at www.sdforward.com; at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR.

14-3 cont. the county are stakeholders but have not been contacted in the SANDAG outreach much less had the opportunity to review the draft EIR on the Regional Plan. Due to the lack of broad band internet and the lack of outreach by SANDAG to their communities many of those impacted by this action are being deprived of their right to participate in this process that may impact them significantly**. This review process should be delayed until the rest of the County residents have been included in the review and comment on the DEIR Regional Plan.**

PLANNING FOR THE UNINCORPORATED AREAS

14-4 *"Public Services and Utilities San Diego Forward: The 2021 Regional Plan Page 4.15-19 Program Environmental Impact Report Broadband refers to a high-speed internet connection that can transport multiple signals and traffic types. According to the Federal Communications Commission (FCC) (2017), 100 percent of residents in the San Diego region currently have access to broadband via at least one provider*." There is an opportunity here to develop investment strategies for working from home if broad band internet at a reasonable cost was made available to rural communities. Despite what has been reported Broad Band internet is NOT accessible to many of us in the county. Satellite and Cellular options can be very costly and unreliable, not efficient enough for home school study or work needs. This has not been identified as a strategy to reduce Vehicle Miles Traveled (VMT) for residents living outside the "Network" and should be considered and implemented within the Regional Plan.

14-5 How will the Regional Plan provide transportation options for those residents outside of the "Network"? The unincorporated East and North County communities represent a significant population with higher -than- average VMT within the County. Social Justice/Equity concerns regarding the Indian Reservations in the east County should be considered. Will the VMT fees be applied to tribal nations and the tribal members who may travel off tribal lands? Sequan, Viejas, Barona, Campo, La Posta, Jamul and Ewiiaapaayp nations are in the rural areas of East County.

14-6 Many rural residents are of lower income and of Hispanic decent, how will this plan invest equitably in public transportation? Walking, riding a bike or using flexible fleets will not work in these areas. A possibility is frequent bus rapid transit using pickup points at the park- and -ride lots located on the Interstates such as I-8 and the State Highway 94 to the nearest mobility hub for further transport options. A rural transit line such as a train or bus service traveling from the ends of the county to the Mobility Hubs should be part of the plan.

ROADS/TRAFFIC

14-7 SANDAG should do more to identify and invest in routes for the County's eastern and northern rural regions that could be essential in the event of a natural disaster, earthquake, flood, or wildfire. Road improvements such as curve straightening and widening would benefit the drivers as well as recreational bike riders on roads like Highway 79 and Highway 94. Evacuation routes for disasters should be identified, developed, and marked in a manner like the Tsunami routes recently put into place

2

RESPONSE TO COMMENT 14-4

The Plan includes an investment in the backbone fiber infrastructure needed to support the transportation network; however, SANDAG is also developing a Regional Digital Equity Strategy & Action Plan to support the expansion of broadband county-wide. The Strategy & Action Plan will define strategies for expanding broadband and internet connectivity in the San Diego region to support quality of life, transportation, and equity.

RESPONSE TO COMMENT 14-5

The proposed Plan includes Mobility Hubs for East County which can facilitate creating additional economic opportunities within that hub. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. They offer on-demand travel options and supporting infrastructure to enhance connections to high-quality Transit Leap services while helping people make short trips around the community on Flexible Fleets. Mobility Hubs will be implemented in close coordination with local jurisdictions to align with the unique needs of each community.

SANDAG is also developing a Flexible Fleet Implementation Strategic Plan to identify near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

The Intraregional Tribal Transportation Strategy was used to inform many of the improvements identified for the rural corridors. These examples have been added to the description of rural corridor improvements in Appendix A of the proposed Plan in the section titled *Rural Corridors* and Table A.12: Rural Corridors.

RESPONSE TO COMMENT 14-6

The Plan includes investments in Flexible Fleets, expansion of broadband, investment in zero emission vehicles, and improvements on rural corridors. These benefit rural communities with improved access to mobility options via technology, increased safety on hazardous roads particularly during emergency situations, and advanced deployment of zero emission vehicles.

RESPONSE TO COMMENT 14-7

The Comprehensive Multimodal Corridor Plans identify ways to improve roadway safety, enhance the urban-rural transportation interface (with special consideration given to limiting impacts on

surrounding environmental habitats and wildlife), engage with tribal nations, and create greater trip reliability and efficiency throughout the study area while supporting climate action initiatives. The suite of solutions will include active transportation, clean transportation, transit, resilience and environment, right-of-way and utilities, equity, and evacuation considerations.

14-7 cont. within the county. The intersections of Highways to feeder roads should be evaluated for improvements and safety. There are more and more visitors to the rural areas of the county, and this has adversely impacted the safety of these intersections.

FUNDING AND FINANCING

14-8 The Regional Plan indicates that user fees would help build a transportation system that provides residents an alternative to driving in their vehicle. This plan must address how the proposed road use charges will be developed, implemented, and applied to ensure that this funding strategy will not disproportionately burden unincorporated communities, which have longer a commute, less access to alternative transportation options, don't use electric cars because SDGE cuts power off during potential high wind and wildfire events and have not yet had a voice in expressing their comments to this process (see outreach).

14-9 County VMT fees on top of State VMT fees on top of Federal VMT fees on top of existing gasoline taxes would unfairly penalize the driver of a gas- powered vehicle. Owners of gas-powered vehicles are frequently the low-income residents who live in the rural areas of the county where housing costs are less. This is not equitable for 50% or more residents living in the County (table 2-5). Those that have the least are being asked to sacrifice the most. You are creating a class of people who live in the rural areas of the county without alternative transportation options, a voice or opportunity but will be penalized by the VMT fees.

It is unclear what proportion of investment would go toward addressing mobility between unincorporated communities and infrastructure investment that would provide linkages between rural communities and the "Network".

14-10 SANDAG must address the equitable distribution of mobility benefits of the 2021 Regional Plan and the costs associated with it. The residents of the unincorporated areas of the county should not have to pay more than the benefits they may receive.

14-11 I look forward to the development of a more equitable draft Regional Plan which recognizes and includes the needs of residents in the unincorporated areas of San Diego County. The County does not end at El Cajon, as shown on your maps in the DEIR, there is much more of it you are not considering in your draft **Regional** Plan.

Kerry Forrest

Chair, Descanso Community Planning Group

cc: Supervisor Joel Anderson: Board of Supervisors, District 2

Senator Brian Jones, 38th Senate District, CA

3

RESPONSE TO COMMENT 14-8

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as rural residents, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system. For example, drivers of fuel-powered vehicles in the state of Oregon receive a credit for fuel tax and remote emissions testing through their road usage charge program called OReGO.

RESPONSE TO COMMENT 14-9

The proposed Plan includes a variety of projects and programs to improve the transportation system for all modes of transportation in the San Diego region over 30 years. This includes investments to improve roads and freeways as well as public transit and active transportation. Gas tax revenues have been declining as vehicles become more fuel efficient and more electric vehicles are on the roads. A road usage charge would be a new funding mechanism to replace the gas tax. Road usage charges are being considered by transportation agencies across the country.

RESPONSE TO COMMENT 14-10

Investments in the proposed Plan for unincorporated communities include improvements to local bus service (increased frequencies and span of service) and Flexible Fleet services. Attachment 1 to Appendix A of the proposed Plan provides the frequencies and spans of service

proposed for Transit Leap, including local bus routes. In addition, the investments in the mobility hubs also serve residents of the unincorporated area as many residents live near a mobility hub and will be able to access the transit system within a reasonable amount of time on a Flexible Fleet service, then be able to make use of the Rapid bus, light rail, or commuter rail systems.

SANDAG looks forward to coordinating with the County on many areas of implementation for the proposed Plan including the Flexible Fleet Implementation Strategic Plan, Active Transportation Plan, Comprehensive Multimodal Corridor Plans, and advanced transit planning. All of these efforts provide opportunities for refinement of the proposed Plan concepts at a local level.

The proposed Plan puts in place a regional framework for a reimagined transportation system. The plans and studies identified as implementation actions in Appendix B of the proposed Plan will provide opportunities for SANDAG to work closely with the County to apply the 5 Big Moves concepts to the unincorporated areas and improve mobility options and safety.

RESPONSE TO COMMENT 14-11

The proposed Plan considers the current and future needs of the whole region, including unincorporated communities. The reimagined transportation system offers benefits that extend through the region as residents and visitors travel outside their communities for work, recreation, school, entertainment, and accessing basic needs. The investments in Next OS, Flexible Fleets, Mobility Hubs, and other programs are presented as regional investments, and SANDAG intends to work collaboratively with each jurisdiction to implement the proposed Plan and customize mobility solutions for the unique needs of each community.

COMMENT LETTER 15: ENDANGERED HABITATS LEAGUE

Comment Letter 15

From: Dan Silver <dsilverla@me.com>
Sent: Monday, October 11, 2021 1:48 PM
To: Kirsten Uchitel
Cc: Michael Beck
Subject: Draft EIR for San Diego Forward: The 2021 Regional Plan (RTP/SCS)

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

October 11, 2021

Kirsten Uchitel, Associate Planner
San Diego Association of Governments
401 B Street
San Diego, CA 92101

RE: Draft EIR for San Diego Forward: The 2021 Regional Plan (RTP/SCS)

Dear Ms Uchitel:

15-1 Endangered Habitats League (EHL) is supportive of the 2021 RTP/SCS and its forward-looking transportation initiatives and housing allocations. We wish to comment on biological impacts. For your reference, EHL is a Southern California conservation group dedicated ecosystem protection and sustainable land use.

The EIR acknowledges significant and unavoidable impacts to biological resources, including to wetlands, sensitive species, and movement corridors/wildlife
connectivity. There will also be significant impacts to greenhouse gas emissions and climate change, albeit less than a trend scenario.

15-2 For biological impacts, all feasible mitigation should be undertaken, and should take the form of *advanced, programmatic mitigation*. Such mitigation is comprehensive rather than project-by-project. A good model is the Orange County Transportation Authority's Measure M2 program for its Freeway Projects, in which a fraction of revenues were set aside to fund the mitigation. Because the San Diego region has existing and planned multiple species habitat plans (MSCP, MHCP, North County MSCP, etc.) establishment of a regional funding source for their acquisition and management – as called for in the MSCP – is a logical direction for the advanced, programmatic mitigation.

Please let me know of questions.

Yours truly,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592 Los
Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
https://ehleague.org

RESPONSE TO COMMENT 15-1

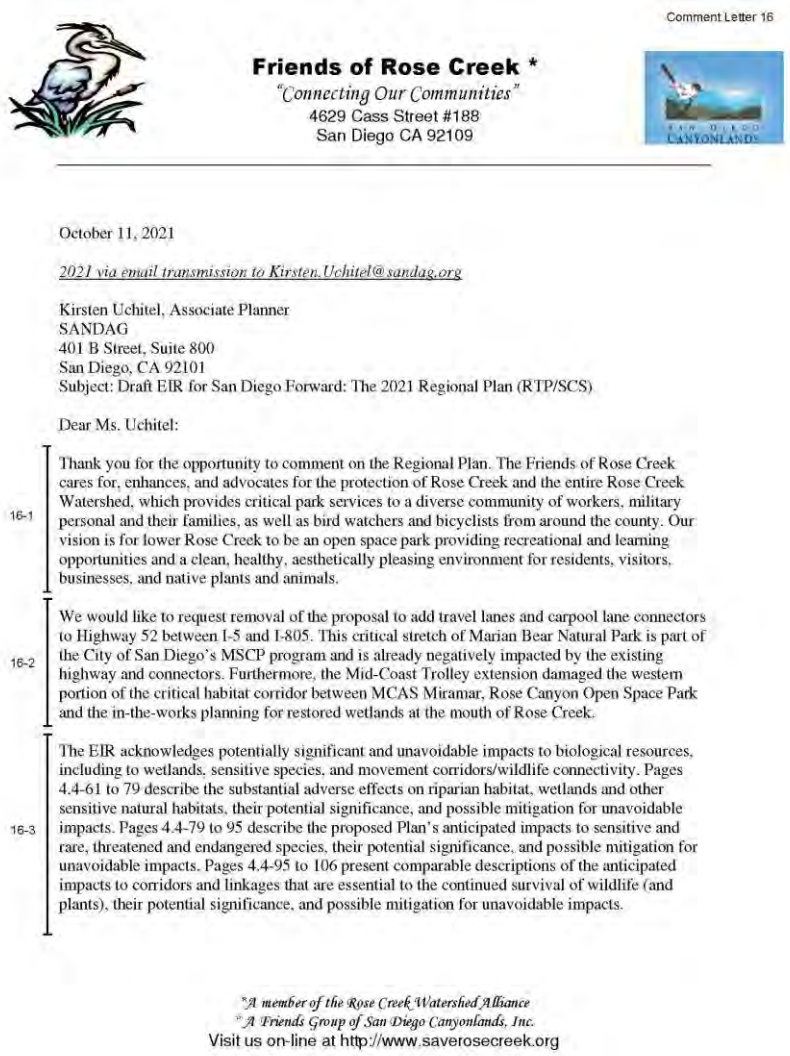
Thank you for the Endangered Habitat League's participation in the environmental review process. Further elaboration regarding your organization's comments is addressed below.

RESPONSE TO COMMENT 15-2

This comment states that the Draft EIR should include "advanced, programmatic mitigation" of biological impacts, specifically, that funds should be set aside for the acquisition and management of habitat plans. As an initial matter, the EIR found that the proposed Plan has no significant impacts relating to conflicts with the provisions of adopted HCPs, NCCPs, or other conservation plans, or any local policies or ordinances protecting biological resources.

To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As identified in Appendix B of the proposed Plan, SANDAG will continue to monitor the implementation of the Plan on a four-year cycle and make the data accessible to the public. Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.

COMMENT LETTER 16: FRIENDS OF ROSE CREEK



Comment Letter 16

Friends of Rose Creek *
"Connecting Our Communities"
4629 Cass Street #188
San Diego CA 92109

October 11, 2021

2021 via email transmission to Kirsten.Uchitel@sandag.org

Kirsten Uchitel, Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Subject: Draft EIR for San Diego Forward: The 2021 Regional Plan (RTP/SCS)

Dear Ms. Uchitel:

16-1 Thank you for the opportunity to comment on the Regional Plan. The Friends of Rose Creek cares for, enhances, and advocates for the protection of Rose Creek and the entire Rose Creek Watershed, which provides critical park services to a diverse community of workers, military personal and their families, as well as bird watchers and bicyclists from around the county. Our vision is for lower Rose Creek to be an open space park providing recreational and learning opportunities and a clean, healthy, aesthetically pleasing environment for residents, visitors, businesses, and native plants and animals.

16-2 We would like to request removal of the proposal to add travel lanes and carpool lane connectors to Highway 52 between I-5 and I-805. This critical stretch of Marian Bear Natural Park is part of the City of San Diego's MSCP program and is already negatively impacted by the existing highway and connectors. Furthermore, the Mid-Coast Trolley extension damaged the western portion of the critical habitat corridor between MCAS Miramar, Rose Canyon Open Space Park and the in-the-works planning for restored wetlands at the mouth of Rose Creek.

16-3 The EIR acknowledges potentially significant and unavoidable impacts to biological resources, including to wetlands, sensitive species, and movement corridors/wildlife connectivity. Pages 4.4-61 to 79 describe the substantial adverse effects on riparian habitat, wetlands and other sensitive natural habitats, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-79 to 95 describe the proposed Plan's anticipated impacts to sensitive and rare, threatened and endangered species, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-95 to 106 present comparable descriptions of the anticipated impacts to corridors and linkages that are essential to the continued survival of wildlife (and plants), their potential significance, and possible mitigation for unavoidable impacts.

**A member of the Rose Creek Watershed Alliance*
**A Friends Group of San Diego Canyonlands, Inc.*
Visit us on-line at http://www.saverosecreek.org

RESPONSE TO COMMENT 16-1

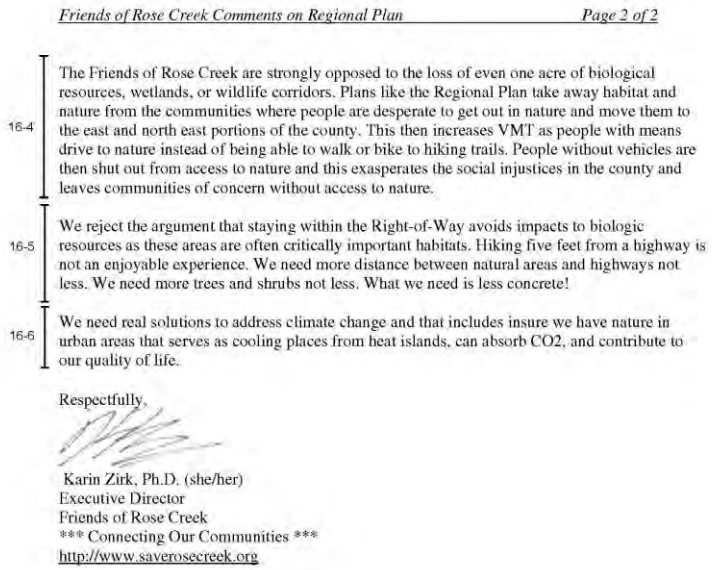
Thank you for the Friends of Rose Creek's participation in the environmental review process; further elaboration regarding your organization's comments will be addressed in subsequent responses below.

RESPONSE TO COMMENT 16-2

This comment relates to the proposed Plan, and not the analysis in the Draft EIR. Many of the complete corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

RESPONSE TO COMMENT 16-3

This comment accurately recites content of the Draft EIR. As identified in Section 4.4 of the EIR, implementation of mitigation measures would reduce impacts related to biological resources. However, there is no assurance that mitigation measures would be implemented for all projects or be equally effective due to the wide variety of circumstances, complexity of some sites, complexity of impacts on those sites, lack of available mitigation sites, shortage of acreage at mitigation banks, mitigation complexity and cost, lack of long-term management and monitoring, and lack of enforcement. Instances may occur in which impacts are not reduced to less-than-significant levels. Therefore, these impacts have been identified as significant and unavoidable.



Friends of Rose Creek Comments on Regional Plan *Page 2 of 2*

16-4 The Friends of Rose Creek are strongly opposed to the loss of even one acre of biological resources, wetlands, or wildlife corridors. Plans like the Regional Plan take away habitat and nature from the communities where people are desperate to get out in nature and move them to the east and north east portions of the county. This then increases VMT as people with means drive to nature instead of being able to walk or bike to hiking trails. People without vehicles are then shut out from access to nature and this exasperates the social injustices in the county and leaves communities of concern without access to nature.

16-5 We reject the argument that staying within the Right-of-Way avoids impacts to biologic resources as these areas are often critically important habitats. Hiking five feet from a highway is not an enjoyable experience. We need more distance between natural areas and highways not less. We need more trees and shrubs not less. What we need is less concrete!

16-6 We need real solutions to address climate change and that includes insure we have nature in urban areas that serves as cooling places from heat islands, can absorb CO2, and contribute to our quality of life.

Respectfully,

Karin Zirk, Ph.D. (she/her)
Executive Director
Friends of Rose Creek
*** Connecting Our Communities ***
http://www.saverosecreek.org

RESPONSE TO COMMENT 16-4

This comment relates to the proposed Plan, and not the analysis in the Draft EIR.

See response to comment FORC 16-3.

In addition, many of the complete corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

The conservation of native species and their habitat is a key component of SANDAG's SCS. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and fewer impacts on native habitat and species. Appendix AA, *Regional Habitat Conservation Vision of the Regional Plan,* describes the region's efforts to develop and implement a system of open space for conservation of San Diego's unique biodiversity.

RESPONSE TO COMMENT 16-5

The Draft EIR does not find that transportation projects within existing rights-of-way categorically avoid impacts on biological or recreational resources. Both Sections 4.4 and 4.15 analyze impacts of the proposed Plan's transportation projects, projects within *and* outside existing rights-of-way.

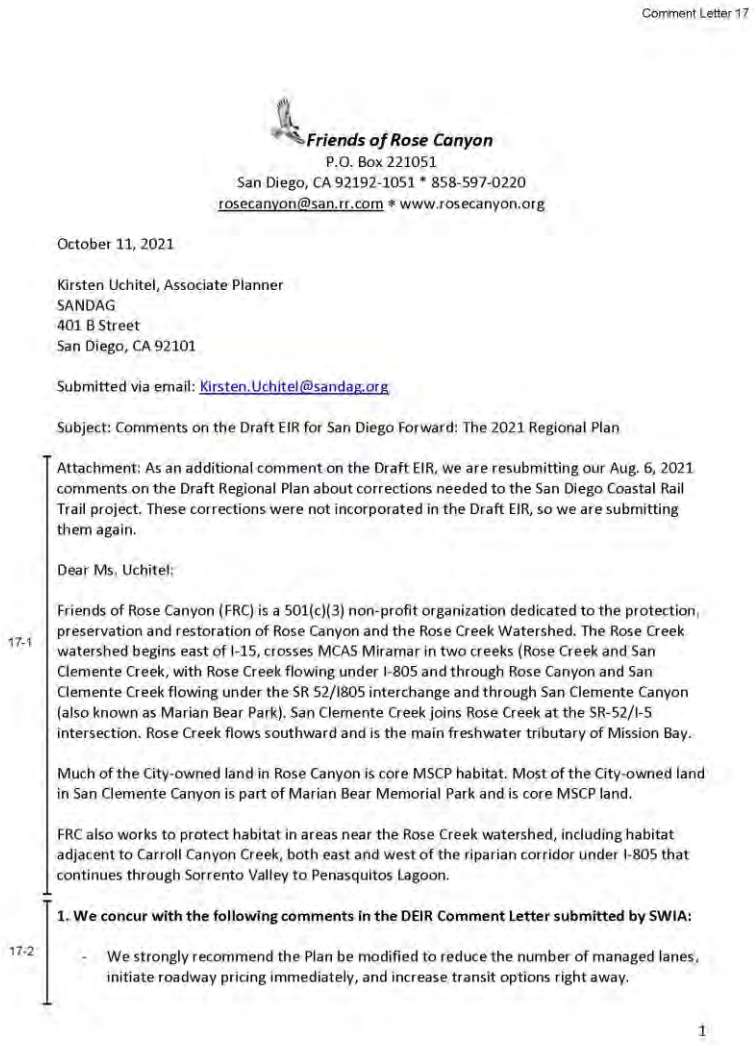
As discussed in prior responses, where impacts on biological resources cannot be avoided, mitigation has been identified to avoid and reduce these impacts for the future construction of transportation and land use projects. Through the implementation of the proposed Plan, SANDAG will continue to support habitat conservation with the proposed establishment of the $565 million Nature-Based Climate Solutions Program.

RESPONSE TO COMMENT 16-6

SANDAG acknowledges that more work needs to be done in this area and that various climate action plans developed for the region, along with federal and State agency initiatives, are being incorporated as

SANDAG's comprehensive strategies for addressing climate change in this and future regional plans.

COMMENT LETTER 17: FRIENDS OF ROSE CANYON



Comment Letter 17

Friends of Rose Canyon
P.O. Box 221051
San Diego, CA 92192-1051 * 858-597-0220
rosecanyon@san.rr.com * www.rosecanyon.org

October 11, 2021

Kirsten Uchitel, Associate Planner
SANDAG
401 B Street
San Diego, CA 92101

Submitted via email: Kirsten.Uchitel@sandag.org

Subject: Comments on the Draft EIR for San Diego Forward: The 2021 Regional Plan

Attachment: As an additional comment on the Draft EIR, we are resubmitting our Aug. 6, 2021 comments on the Draft Regional Plan about corrections needed to the San Diego Coastal Rail Trail project. These corrections were not incorporated in the Draft EIR, so we are submitting them again.

Dear Ms. Uchitel:

17-1 Friends of Rose Canyon (FRC) is a 501(c)(3) non-profit organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek Watershed. The Rose Creek watershed begins east of I-15, crosses MCAS Miramar in two creeks (Rose Creek and San Clemente Creek, with Rose Creek flowing under I-805 and through Rose Canyon and San Clemente Creek flowing under the SR 52/I805 interchange and through San Clemente Canyon (also known as Marian Bear Park). San Clemente Creek joins Rose Creek at the SR-52/I-5 intersection. Rose Creek flows southward and is the main freshwater tributary of Mission Bay.

Much of the City-owned land in Rose Canyon is core MSCP habitat. Most of the City-owned land in San Clemente Canyon is part of Marian Bear Memorial Park and is core MSCP land.

FRC also works to protect habitat in areas near the Rose Creek watershed, including habitat adjacent to Carroll Canyon Creek, both east and west of the riparian corridor under I-805 that continues through Sorrento Valley to Penasquitos Lagoon.

1. We concur with the following comments in the DEIR Comment Letter submitted by SWIA:

17-2
- We strongly recommend the Plan be modified to reduce the number of managed lanes, initiate roadway pricing immediately, and increase transit options right away.

1

RESPONSE TO COMMENT 17-1

Thank you for your participation in the environmental review process and for the detailed comments for SANDAG's consideration. For comments related to the San Diego Coastal Rail Trail Project, please refer to Appendix P.2 under Comment ID #1126. For other comments included in this letter, please refer to detailed responses below.

RESPONSE TO COMMENT 17-2

This comment is related the proposed Plan, not the analysis within the Draft EIR.

The proposed Plan is focused on creating more mobility options for all people in the San Diego region through a fast, reliable, and fair public transportation system and micromobility options including e-bikes and scooters, rideshare, and microtransit shuttles. The proposed Plan also proposes a network of Managed Lanes using existing infrastructure that provide priority access to people using transit, carpooling, or vanpooling. The Managed Lane network supports transit services, making transit a compelling alternative to driving.

The final draft of the proposed Plan has been updated to reflect 2030 as the start of implementation for the road usage charge to better align with the timing that the State and other regions are expecting for transitioning to a road usage charge.

The planned transit frequency improvements and spans of services for all routes, including existing local service and future regional services, will be added to Appendix A of the proposed Plan and can be currently viewed as part of the Social Equity Working Group agenda from August 5, 2021.

Regarding an alternative that prioritizes transit over the construction of new highway capacity, please see Master Response 1.

17-2 cont.

- Adoption of an alternative that prioritizes transit over the construction of new highway capacity. That could include converting existing lanes to Managed Lanes.

2. For road and rail projects in urban areas, the Plan should mitigate all environmental impacts in the area the impacts occur.

17-3

Our MSCP lands, wetlands, and wildlife corridors areas are the last remaining ones we have in our urbanized areas. They should be highly protected from further environmental impacts. Yet the DEIR indicates that multiple proposed road and (presumably) rail projects in the 2021 RTP would have highly negative direct and indirect impacts on these MSCP lands and wildlife movement corridors. We strongly disagree with the assumption in the DEIR that these impacts are acceptable. The approach is the usual mantra of impacting the urban habitat and mitigating far away. Historically in the Rose Creek watershed SANDAG has not mitigated impacts to urban habitat in the area those impacts occurred. SANDAG has instead mitigated the impacts at distant mitigation banks. Over time, this approach has led to a cumulative and ever-increasing degradation of our urban habitat areas, including urban MSCP lands, wetlands, riparian corridors and wildlife movement corridors. For example, SANDAG's $30 million Rose Creek Bikeway project, completed last year, impacted the Rose Creek riparian corridor with construction of a major concrete structure for the bikeway. The creek in that location is a highly degraded urban waterbody, thick with invasive plant species and full of trash. It would have been a prime location for SANDAG to do wetland mitigation. Instead, SANDAG exported the

17-4

mitigation to a distant mitigation bank, leaving Rose Creek as bad or worse than before. Bicyclists using this $30 million bikeway cycle along the edge of this still highly degraded creek. Similarly, SANDAG's recent MidCoast Trolley Project and Elvira to Morena Double Tracking Project impacted Rose Creek riparian areas with multiple new concrete structures. Yet SANDAG carried out mitigation for those impacts in distant mitigation banks

17-5

The DEIR proposes to continue this practice. It dismisses the impacts to our urban MSCP lands and watersheds by proposing to do mitigation elsewhere. The DEIR should instead acknowledge that in reality when impacts to urban area habitat are mitigated elsewhere, the environmental impacts in the urban area are permanent and cumulative.

17-6

The Plan promotes concentrating growth in high density urban areas in order to promote environmental benefits related to climate change and air quality. The Plan should therefore take a new approach to the environmental impacts of the projects it proposes to build in those urban areas: it should strongly consider not building road and other projects that impact urban MSCP lands, riparian areas, wildlife corridors and parks and mitigate impacts that do occur due to projects in urban areas in the area they occur,

17-7

3. The Plan fails to identify the existence of Marian Bear Memorial Park. It is one of the City of San Diego's oldest Open Space Parks, and it provides recreational and nature enjoyment opportunities in an area that is increasingly urbanized (thanks in part to SANDAG's projects). The area is also core MSCP and provides key wildlife corridor linkages to Rose Canyon in the west and MCAS Miramar in the east. Nevertheless, the Plan proposes a massive highway

2

RESPONSE TO COMMENT 17-3

Please see response to comment Del Mar 13-36 regarding the programmatic nature of the EIR. The EIR addresses mitigation on a programmatic level. On a project-specific level, and as often required by the regulatory agencies and local ordinances, onsite mitigation and mitigation within the same watershed is preferred, but if mitigation lands are not available, mitigation may need to occur elsewhere. The Draft EIR does not make a finding that impacts are "acceptable" or "unacceptable.".

RESPONSE TO COMMENT 17-4

This comment provides a concern with the mitigation of a previous SANDAG project and does not provide a comment regarding the adequacy of this EIR. Therefore, no further response is required. However, the comment will be provided to the SANDAG Board of Directors for their consideration.

RESPONSE TO COMMENT 17-5

Please see response to comment FRC 17-3. The EIR provides programmatic mitigation measures to address impacts of the overall proposed Plan. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document. The Draft EIR discloses that offsite mitigation and mitigation banks are part of the programmatic mitigation measures (see BIO-1b, BIO-1c, BIO-2b, BIO-2c). The Draft EIR also discloses that despite implementation of these mitigation measures, impacts would remain significant and unavoidable.

RESPONSE TO COMMENT 17-6

This comment relates to the content of the proposed Plan, not the Draft EIR. Please see response to comments FRC 17-3 and FRC 17-5.

RESPONSE TO COMMENT 17-7

SANDAG's proposed Plan includes freeway improvements along I-5 and implementation of the Coastal Rail Trail in this area for the 2035 horizon, as well as the SR 52 bikeway from I-5 to Santo Road that would impact Marian Bear Memorial Park. Although SANDAG appreciates the concerns expressed in this comment, the improvements are required to

accommodate planned population growth and related transportation improvements identified in the proposed Plan.

The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document, including the implementation of mitigation measures identified in Section 4.4, *Biological Resources*, of the EIR.

17-7 cont. project on SR-52 immediately adjacent to the park and MSCP, and likely cutting into it.

The following projects should removed from the Plan:
For SR 52 between I-5 and I-805:

- **Remove the proposed three additional lanes (4 F to 4F + 3 ML)**
- **Remove the Managed Lane Connectors going in all directions between SR-52 and I-5**
- **Remove the Managed lane connectors between SR 52 EB and I-805 SB**

17-8

Marian Bear I Park is immediately adjacent to this entire stretch of SR 52. Marian Bear Memorial Park, one of the City of San Diego's oldest open space parks. The Plan fails to identify its existence. The Park's trails provide beloved recreational opportunities for residents who live in the increasingly dense surrounding areas, a density increase that is promoted by the Plan as one of its core goals. The Plan is working at cross purposes if it simultaneously promotes major density increases in this area while simultaneously building a huge noisy intrusive highway project immediately adjacent to the very park that makes life move livable in those increasingly dense areas.

17-9 Marian Bear Park is core MSCP habitat. It provides wildlife corridor connectivity via the ever more constrained wildlife linkages to Rose Canyon in the west, to MCAS Miramar in the east, and to the south via the Rose Creek riparian corridor to Mission Bay. SANDAG's projects have increasingly constrained these corridors in recent years: with the Midcoast Trolley and the Elvira to Morena Doubletracking projects at the west end, and with the previous construction of the SR-52/I-805 intersection which left only a hugely constrained undercrossing for wildlife between Marian Bear Park and MCAS Miramar.

17-10 **4.Adding road capacity produces induced demand: the Plan should significantly reduce the number of lane miles of roadway it proposes to build.**
As the DEIR states, the Regional Plan adds a large amount of capacity to our roadways:
It would add 799 lane miles of roadway by 2050 (Figure 4.16-74).

- 412 miles of additional freeway miles
- 32 miles of additional State Highway miles
- 392 miles of additional arterial miles
- 7 miles of Tollway (the plan removes 38 miles of Tollway)

17-11 a. The DEIR needs to explain its assumptions and conclusions around induced demand. It is now well accepted that adding road capacity induces demand. Induced demand occurs with HOV lanes as well as general purpose lanes. A potential way to address the issue of induced demand is with an aggressive pricing structure. But the issues around the pricing of Managed Lanes/HOV Lanes and whether and how much pricing impacts induced demand and VMT are debated. Moreover, while the construction of the 799 lane miles of new road capacity is built into the plan, no specific pricing structure is guaranteed. The DEIR should explain what its models show the pricing would need to be to counter the issue of induced demand and reduce VMT. Would it apply to general purpose lanes as well as managed lanes? What decisions would need to be made, and by whom, to implement the pricing

3

RESPONSE TO COMMENT 17-8

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR. Many of the complete corridor projects in the Draft Plan utilize existing right-of-way, and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

RESPONSE TO COMMENT 17-9

Please see response to comment FRC 17-7. In addition, as discussed in Section 4.4, the transportation network improvements projected in the proposed Plan would impact wildlife movement. As noted under regional growth and land use change, adherence to the existing federal, State, and local laws, regulations, and programs discussed in Section 4.4.2 would reduce impacts on wildlife movement; however, it cannot be concluded that adherence would result in less-than-significant impacts for all projects. Considering both direct and indirect impacts, transportation network improvements under the proposed Plan would interfere substantially with fish and wildlife movement, wildlife corridors, and nursery sites. This would be a significant impact.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects that would be subject to project-specific environmental review. Specific projects that would impact on Marian Bear Park would be considered second-tier projects and would be subject to project-specific environmental review.

RESPONSE TO COMMENT 17-10

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with

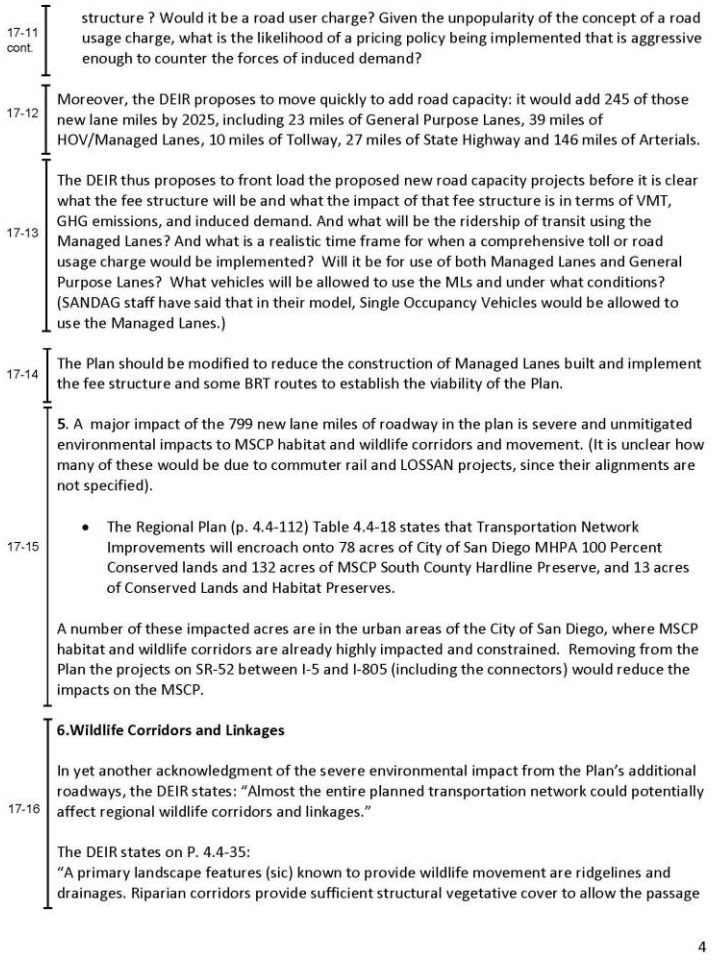
appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

Improvements to arterials are primarily part of SANDAG's Complete Corridor Regional Arterials. Complete Corridors are designed to provide priority access for transit and flexible fleet shared ride services on our regional arterials, and provide safe and comfortable transportation options to get people to their destinations safely and efficiently.

RESPONSE TO COMMENT 17-11

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D. Where possible, the Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources. This study will also give SANDAG a better idea of the interaction between included demand and usage-based fees.



17-11 cont. structure ? Would it be a road user charge? Given the unpopularity of the concept of a road usage charge, what is the likelihood of a pricing policy being implemented that is aggressive enough to counter the forces of induced demand?

17-12 Moreover, the DEIR proposes to move quickly to add road capacity: it would add 245 of those new lane miles by 2025, including 23 miles of General Purpose Lanes, 39 miles of HOV/Managed Lanes, 10 miles of Tollway, 27 miles of State Highway and 146 miles of Arterials.

17-13 The DEIR thus proposes to front load the proposed new road capacity projects before it is clear what the fee structure will be and what the impact of that fee structure is in terms of VMT, GHG emissions, and induced demand. And what will be the ridership of transit using the Managed Lanes? And what is a realistic time frame for when a comprehensive toll or road usage charge would be implemented? Will it be for use of both Managed Lanes and General Purpose Lanes? What vehicles will be allowed to use the MLs and under what conditions? (SANDAG staff have said that in their model, Single Occupancy Vehicles would be allowed to use the Managed Lanes.)

17-14 The Plan should be modified to reduce the construction of Managed Lanes built and implement the fee structure and some BRT routes to establish the viability of the Plan.

5. A major impact of the 799 new lane miles of roadway in the plan is severe and unmitigated environmental impacts to MSCP habitat and wildlife corridors and movement. (It is unclear how many of these would be due to commuter rail and LOSSAN projects, since their alignments are not specified).

17-15
- The Regional Plan (p. 4.4-112) Table 4.4-18 states that Transportation Network Improvements will encroach onto 78 acres of City of San Diego MHPA 100 Percent Conserved lands and 132 acres of MSCP South County Hardline Preserve, and 13 acres of Conserved Lands and Habitat Preserves.

A number of these impacted acres are in the urban areas of the City of San Diego, where MSCP habitat and wildlife corridors are already highly impacted and constrained. Removing from the Plan the projects on SR-52 between I-5 and I-805 (including the connectors) would reduce the impacts on the MSCP.

6.Wildlife Corridors and Linkages

17-16 In yet another acknowledgment of the severe environmental impact from the Plan's additional roadways, the DEIR states: "Almost the entire planned transportation network could potentially affect regional wildlife corridors and linkages."

The DEIR states on P. 4.4-35:
"A primary landscape features (sic) known to provide wildlife movement are ridgelines and drainages. Riparian corridors provide sufficient structural vegetative cover to allow the passage

4

RESPONSE TO COMMENT 17-12

Although this comment uses the term "DEIR," the substance of the comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

The comment summarizes information provided in Table 4.16-6, *Roadway Network Analysis – Year 2025*, from Section 4.16, *Transportation*, of the Draft EIR regarding the number of lane miles of roadway that would be added under the proposed Plan. Generally, this summary provides introductory information for the following comments. However, the proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

RESPONSE TO COMMENT 17-13

Although this comment uses the term "DEIR," the substance of the comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

As discussed in Appendix V of the proposed Plan, the Managed Lanes Feasibility Tool was used to forecast Managed Lane performance. The Managed Lanes Feasibility Tool is an interactive dashboard model developed by SANDAG's consultant, HNTB, that can be used to forecast Managed Lane performance and revenues. It has been used by agencies around the country to inform implementation of Managed Lane projects, phasing, and the development of associated operational policies. When outputs from the tool are compared to data from Managed Lanes once they are built, it has been found to be very accurate. The methodology uses revealed preference data from existing operating Managed Lanes across the country that were specifically selected to be representative based on conditions found to be similar to facilities in the San Diego region. The model analyzes existing traffic and

proposed lane configuration for the San Diego facilities that are included in the Managed Lane network to assign traffic volumes. It assumes a baseline volume must be reached before drivers will be willing to pay for the Managed Lanes. Usage of the Managed Lanes is predicted based on the overall level of demand above the baseline volume, available capacity in the Managed Lane, and remaining capacity in the general purpose lanes. It includes assumptions around HOV and clean air vehicle policies and discounts, traffic levels, growth rates, cost assumptions, lane capacity, toll rates, and inflation.

SANDAG will also launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The road usage charge provides an alternative to replace an old tax system that is no longer relevant.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. The mechanism to collect a future road usage charge has not yet been determined, but as the State of California transitions from the gas tax towards a road usage charge, SANDAG is anticipating leveraging the mechanism selected by the State. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving gas fueled vehicles, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.

RESPONSE TO COMMENT 17-14

The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting

connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

RESPONSE TO COMMENT 17-15

The project-specific impacts of commuter lane rail and LOSSAN projects will be addressed at the project-specific CEQA level and avoidance, minimization and mitigation measures will be identified pursuant to the Analysis Methodology Section in Chapter 4 of the EIR, and consistent with CEQA, local ordinance and guidelines, and the requirements by the Wildlife Agencies. As noted above, the Draft EIR discloses that the proposed Plan will have significant, unavoidable impacts on biological resources.

RESPONSE TO COMMENT 17-16

This comment correctly quotes from the Draft EIR.

17-16 cont. of many different types of wildlife. …In many parts of Southern California, the linear habitat provided by riparian corridors is the only habitat left providing connectivity to core areas or unfragmented habitat patches. The Regional Plan, through land use and regional growth and climate adaptation and resiliency policies, intends to include wildlife movement corridors in the planned transportation network by conserving existing known corridors, identifying local corridors, and facilitating wildlife movement through project design."

17-17 The Plan should do exactly as it proposes to do by conserving the existing corridors in Marian Bear Park and deleting from the Plan the proposed three additional lanes and the huge connectors proposed to be on the SR 52 between I-5 and I-805. The corridor at SR 52 and I-805 is particularly constrained. If any of the proposed connectors at this location are built, it could be the final blow for that wildlife corridor.

17-18 Another reason to remove from the Plan the MLs on the 52 between I-5 and I-805 and the ML connectors to I-5 and I-805 is that both the I-5 and I-805 intersections already include a multi-level spaghetti pile of concrete roadways. Adding yet more would likely be extremely expensive and require rebuilding the existing portions of the spaghetti pile.

17-19 Figure 4.4-15: Regional Wildlife Movement Corridors. This shows the constrained wildlife movement corridors between Rose Canyon and MCAS Miramar and Marian Bear Park and MCAS Miramar, and in turn connectivity from MCAS Miramar to areas east of I-15, including Mission Trails and MCAS Miramar lands.

17-20 **Direct impacts to wildlife movement by 2050**
The Plan identifies Transportation Network Improvement impacts on the following acres of MSCP Core and linkages and SDSU Climate Resilient Wildlife Movement Corridors:
35 acres by 2025
554 acres between 2026 and 2035
440 acres between 2036 and 205

Again, reducing the number of additional lane miles of roadway would reduce this impact.

17-21 **7. I-805/Nobel**

The DEIR states (P. 4.4-71) that between 2026 and 2035, many of the Plan's projects are not expected to result in greater than a 5-acre loss of sensitive vegetation communities. However, two that are include:
I-805 from SR 52 to Carroll Canyon Road
I-5 widening along Rose Canyon

17-22 **The DEIR should delete from the plan Project ID CC114 (Complete Corridor: Transit Operational Improvement at I-805/Nobel Drive). This may be the project that would cause a greater than 5 acre loss of sensitive vegetation communities (referred to on Page 4.4-71) Assuming it does, there is no need for a project at Nobel/805.** Presumably, this project is to

5

RESPONSE TO COMMENT 17-17

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR. The proposed Plan includes the Managed Lanes and connectors for SR 52; however, it also specifies that improvements to SR 52 will not expand beyond the current improved width. As projects move into advanced planning and design stages, more details will be defined to reduce impacts and develop mitigation strategies where necessary.

RESPONSE TO COMMENT 17-18

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

In terms of the Managed Lanes proposed on SR 52 between I-5 and I-805 plus Managed Lane Connectors at I-5 and SR 52 and at I-805 and SR 52, the improvements for this segment are envisioned to be within the existing corridor footprint where the Managed Lanes would be designed through repurposing the existing shoulders and landscaped median.

Decisions on where to construct proposed Managed Lane connectors, including defining and designing site-specific elevation profiles and or structural/physical footprint construction components, will be examined through more detailed operational and technical studies. These efforts are generally undertaken during the project development and environmental clearance phase, which is generally carried out with public input and following the CEQA Guidelines to evaluate proposed project impacts and identify necessary mitigation measures.

RESPONSE TO COMMENT 17-19

Thank you for your comment. SANDAG appreciates the summary of Figure 4.4-15.

RESPONSE TO COMMENT 17-20

SANDAG appreciates the summary of impacts on the region's preserve system. The EIR addresses impacts on a programmatic level. Specific impact avoidance, minimization, and mitigation will be developed at the project-specific CEQA level. Please also see response to comment FRC 17-15.

RESPONSE TO COMMENT 17-21

SANDAG appreciates your comment regarding the potential impacts on sensitive vegetation communities from the I-805 from SR 52 to Carrol Canyon Road project, and I-5 widening along Rose Canyon. The comment does not identify any specific comments on the EIR adequacy. No further response is required.

RESPONSE TO COMMENT 17-22

The Direct Access Ramp at Nobel/I-805 has been removed from the proposed Plan. There are a number of constraints that limit the ability of the Rapid bus to access La Jolla Village Drive via the Managed Lanes. The current plan is to use existing ramps or operational improvements that would give the bus some level of priority to enter the existing ramps. More planning will need to occur as this project moves forward.

17-22 cont.

get BRT buses on and off at Nobel. However, this is concept is a holdover from an ill-conceived project many years ago and should be eliminated. There is no reason to get BRT buses on the 805 and off at Nobel Drive. It is far from the jobs/housing density that the BRT route is designed to serve. The DEIR should delete any proposed changes to the Nobel/805 location. The habitat at the Southwest corner is critical habitat for spreading Navarettia and has multiple special status species. It should not be impacted. Any BRT route on the I-805 should get on and off at La Jolla Village Drive or Mira Mesa Blvd or Sorrento Valley Road. There are existing high density jobs all along LJ Village Drive to Genesee Avenue and UTC, with lots more density planned for the coming years. There is also high density housing, with lots more likely to come. Coming SB on the I-805 from Sorrento Valley, the BRT buses can simply get on the I-805, stay in the auxiliary lane, and exit at LJ Village Drive, a distance of about a mile. For BRT buses entering I-805 NB at LJ Village Drive, they can stay in the on ramp and then almost immediately enter the off ramp for Sorrento Valley Road

17-23

8. Intended Uses of the EIR (2.6, p. 2-72)

The DEIR should clarify that Project level EIRs will likely be required for a high percentage of the road and rail projects. It is worrisome that the DEIR states: "Subsequent activities implementing the proposed Plan will be examined in light of this EIR to determine whether additional environmental documentation, if any, such as a Negative Declaration, Supplemental or Subsequent EIR, or Addendum, must be prepared. We have seen CALTRANS prepare an MND for a huge, highly environmentally impactful highway project. Future avoidance of appropriate project level environmental review should not be suggested or implied.

Sincerely,

Deborah Knight
Executive Director

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RESPONSE TO COMMENT 17-23

The referenced statement is not intended to suggest or imply that this document will be used as a means to avoid following proper environmental review procedures for future projects. The statement is only stating that proper project-level environmental documentation will be conducted at the proper time, while following all applicable federal, State, and local environmental review requirements and procedures.

Friends of Rose Canyon

PO Box 221051, San Diego, CA 92192-1051

858-597-0220 ∗ rosecanyon@san.rr.com

www.rosecanyon.org

August 6, 2021

Submitted via email: SDForward@sandag.org
Comments on the Draft 2021 Regional Plan

Active Transportation Projects:

The City of San Diego's chosen alignment for the Coastal Rail chosen between Gilman/La Jolla Colony Drive and Sorrento Valley Coaster Station should be added to the RTP and the old alignment should be deleted (Rose Canyon, "UTC" (along Judicial Drive), Roselle Canyon and Roselle St to the Sorrento Valley Coaster station). This old alignment was thoroughly studied and rejected due to multiple major problems.

17-24 The Draft RTP contains inconsistent and out-of-date labeling of a portion of the City of San Diego's Coastal Rail Trail. The City is the Lead Agency for the Coastal Rail Trail in the City, and it has selected the alignment and completed final design of the alignment along Gilman Drive to UCSD.

The City has deleted from its Bike Master Plan the old Rose Canyon, "UTC", and Roselle Canyon alignment. The City studied that route for years and rejected it for multiple reasons.

The RTP therefore needs to:

- cut three planned CRT segments and trim one CRT segment
- relabel the CRT route in the RTP to coincide with the approved Gilman Drive CRT segment, adding the UC San Diego CRT segment plus the I-5 Bicycle Corridor.
- Amend Appendix A and Appendix L in the SANDAG RTP to be consistent with this change.

The RTP should make the following changes summarized in the following tables:

1

RESPONSE TO COMMENT 17-24

A full response to this letter is included beginning from ID L189 in Appendix P.2.

17-24 cont.

CRT route as presented in the SANDAG RTP

SANDAG Project ID	Name/Description	SANDAG 2020 Cost	The RTP should make the following change	RTP Page reference
AT032	CRT - Carmel Valley to Sorrento to Roselle Canyon	$20M	Change Carmel Valley to Roselle via Sorrento by removing Sorrento to Roselle. Carmel Valley to Sorrento remains.	Appendix A Table 1 p. A-6
AT036	CRT - Roselle Canyon	$12M	Cut	Appendix A Table 1 p. A-6
AT037	CRT - UTC to Rose Canyon	$11M	Cut	Appendix A Table 1 p. A-6
AT023	CRT - Rose Canyon	$31M	Cut	Appendix A Table 1 p. A-8

The RTP needs to add the CRT route the City of San Diego has chosen for the segment from Sorrento Valley Coaster Station to the Gilman Drive/La Jolla Colony intersection

Segment	Start	End	Notes
CRT – I-5 Bicycle Corridor	Sorrento Valley	Voigt and Gilman	Already completed by Caltrans
CRT - UC San Diego	Voigt and Gilman Dr.	Gilman and La Jolla Village Dr.	UC San Diego is adding major bike infrastructure improvements through the campus on this route
CRT - Gilman	Gilman Dr. and La Jolla Village Dr.	Gilman Dr. and I-5 / Rose Creek Bike Path and La Jolla Colony Dr.	Protected bike lanes fully designed by City. Partial construction funding in SD City 2022 CIP budget.

2

17-24 cont.

Reallocation of funds and equity

The savings for the three old, out-of-date segments to be cut is $53 million (Rose Canyon, UTC (Judicial Drive) and Roselle Canyon, plus any savings from trimming the route AT032 by cutting Sorrento to Roselle, a segment made unnecessary by the I-5 bike path from the Sorrento Valley Coaster Station to UCSD. Two of the three segments in the City's chosen CRT route are either complete or funded, so it can be anticipated that almost all of the $53 million in the RTP can be freed up for active transportation projects that address equity, for example, in Chollas Creek, South Bay, or the Midway Corridor.

Community and City of San Diego support and action for the CRT alignment up Gilman:

The CRT route has City and Community support:

- The SANDAG RTP routes do not exist in the City of San Diego Bike Master Plan. They were explicitly deleted by the San Diego City Council in December 2013.
- The approved CRT Project route in San Diego has been selected, with the final Gilman Dr. link ready for construction and on the CIP list for 2020-2021.
- The approved CRT route was developed and selected by a City of San Diego Public Working Group in 2013-2014.
- The approved CRT route is supported by the Community Planning Groups: the UCPG in 2013 and 2021, and the La Jolla Planning Association in 2021.
- The approved CRT route has been supported by the City of San Diego in 2013, 2016 and budgeted in 2021.

The City's approved CRT route enhances important existing connections:

- With the Rose Creek bikeway open, it is a connecting link to UC San Diego from the south.
- With the existing I-5 Bicycle Corridor, it is a connecting link to UC San Diego from Sorrento and the Coaster.
- The completed UC San Diego Gilman Bridge over I-5 provides comfortable and safe bicycle links to the east UC San Diego Campus, industry along Eastgate Mail, and the commercial center at UTC.

3

COMMENT LETTER 18: DAVID GRUBB (QUALITY OF LIFE COALITION)

Comment Letter 18

October 11, 2021

Via E-mail (RegionalPlanEIR@sandag.org)
Kirsten Uchitel
Associate Planner, SANDAG
401 B Street, Suite 800
San Diego CA, 92101

Dear Ms. Uchitel,

Please accept the following comments regarding the Draft 2021 SANDAG Regional Plan ("Regional Plan" or "Plan") and Draft Environmental Impact Report ("DEIR").

18-1 Please note that these comments have also been included in the combined comments document from the Quality of Life Coalition.

I am suggesting changes to Alternative 3 to avoid some of the significant impacts identified in the DEIR. While the DEIR states that impacts to GHG Emissions and Air Quality are "unavoidable", that is not correct. Some of these impacts can be avoided or mitigated by changes to the Plan, as described below.

I. Eliminate all addition of freeway lanes.

18-2 The Regional Plan proposes to add lanes to a number of freeway segments in order to provide "managed" lanes. These additional lanes will increase capacity, inducing additional driving and increasing regional VMT and GHG Emissions, as well as PM-10 pollution from tire, brake, and road wear. Conversely, eliminating them will avoid some of these "Unavoidable" impacts and also reduce the GHG emissions attributable to the construction of new lanes.

II. Replace "Managed" lanes with "Transit-only" lanes.

18-3 Define "Transit" to include carpools of 3 or more, vanpools, shuttles, and other unconventional multi-passenger vehicles in addition to conventional transit vehicles. Restrict some freeway lanes to use only by transit, with no provision for paid access by non-transit vehicles. This will reduce the relative advantage of solo driving and make transit more attractive, further reducing the VMT, GHG, and PM-10 impacts. The Transit-only lanes should be taken from existing general-purpose or managed lanes, never from new construction.

RESPONSE TO COMMENT 18-1

Thank you again for the Quality of Life Coalition's participation in the environmental review process and for the detailed comments for SANDAG's consideration. Please see subsequent responses to specific comments for additional details regarding the Quality of Life Coalition's concerns, including avoidance of certain significant impacts.

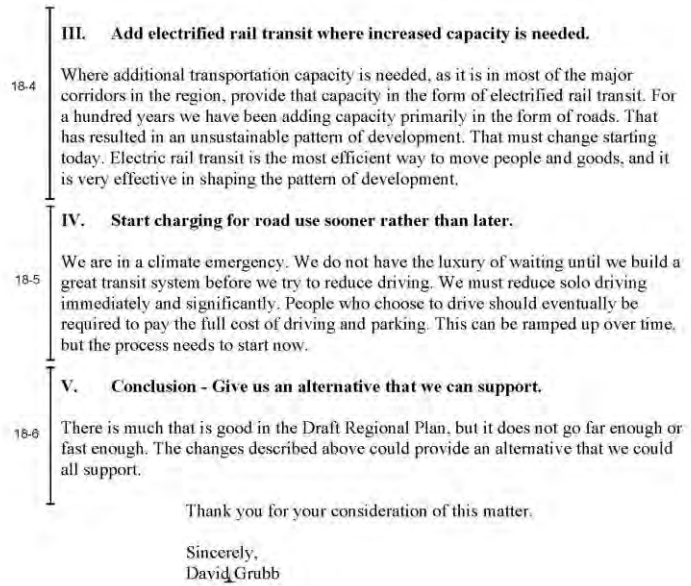
RESPONSE TO COMMENT 18-2

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D. Where possible, the proposed Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network

Please also refer to SANDAG's response to a similar proposed alternative to eliminate all additional freeway lanes in letter 35 (response to comment SOFAR 35-3), and to Master Response 1 regarding alternatives.

RESPONSE TO COMMENT 18-3

Improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel. Please also refer to SANDAG's response to a similar proposed alternative in letter 35 (response to comment SOFAR 35-3), specifically, making all managed lanes transit only.



III. Add electrified rail transit where increased capacity is needed.

18-4 Where additional transportation capacity is needed, as it is in most of the major corridors in the region, provide that capacity in the form of electrified rail transit. For a hundred years we have been adding capacity primarily in the form of roads. That has resulted in an unsustainable pattern of development. That must change starting today. Electric rail transit is the most efficient way to move people and goods, and it is very effective in shaping the pattern of development.

IV. Start charging for road use sooner rather than later.

18-5 We are in a climate emergency. We do not have the luxury of waiting until we build a great transit system before we try to reduce driving. We must reduce solo driving immediately and significantly. People who choose to drive should eventually be required to pay the full cost of driving and parking. This can be ramped up over time, but the process needs to start now.

V. Conclusion - Give us an alternative that we can support.

18-6 There is much that is good in the Draft Regional Plan, but it does not go far enough or fast enough. The changes described above could provide an alternative that we could all support.

Thank you for your consideration of this matter.

Sincerely,
David Grubb

RESPONSE TO COMMENT 18-4

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Fast and frequent mass transit is the most efficient and sustainable way to move large amounts of people, particularly in our urban corridors that are carrying the largest number of trips the longest distances. These corridors experience the greatest congestion, which is why they have been slated for commuter rail that is much faster and more frequent than the rail service provided in the region today. The type of vehicles and propulsion will be determined during the advanced planning phase of each project.

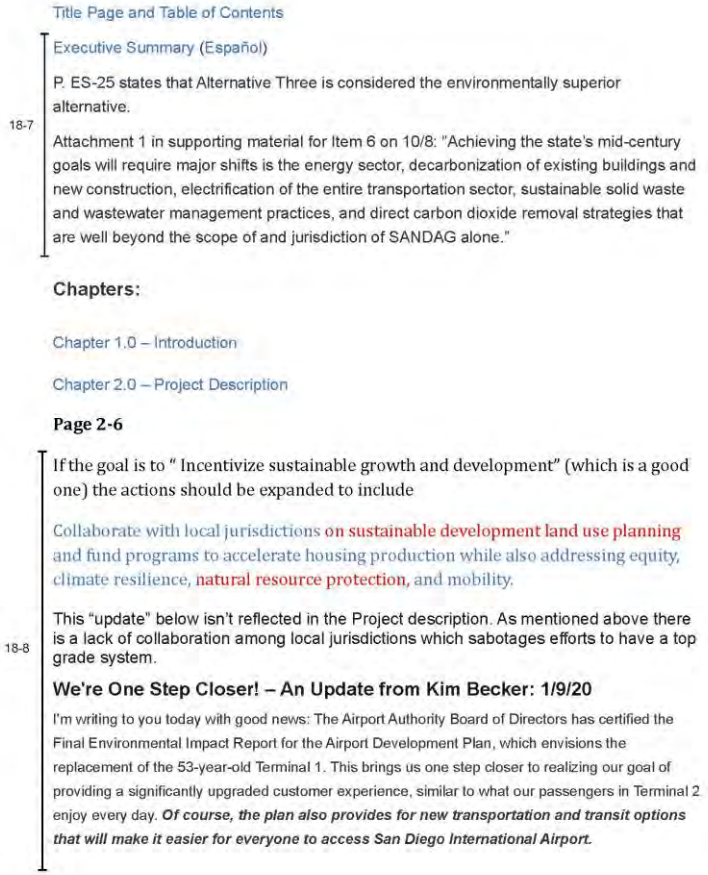
Please see response to comment Chatten-Brown 34-2 for more information regarding changes to mitigation measure GHG-5b, "Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure," that will further reduce GHG emissions with, in part, electrified public transit.

RESPONSE TO COMMENT 18-5

The proposed Plan has been updated to reflect 2030 as the start of implementation for the road usage charge to better align with the timing that the State and other regions are expecting to transition to a road usage charge.

RESPONSE TO COMMENT 18-6

SANDAG appreciates the Quality of Life Coalition's feedback, and we hope the responses above provided some clarification. Please continue to follow along in the environmental process by visiting www.SDForward.com.



Title Page and Table of Contents

Executive Summary (Español)

P. ES-25 states that Alternative Three is considered the environmentally superior alternative.

18-7

Attachment 1 in supporting material for Item 6 on 10/8: "Achieving the state's mid-century goals will require major shifts is the energy sector, decarbonization of existing buildings and new construction, electrification of the entire transportation sector, sustainable solid waste and wastewater management practices, and direct carbon dioxide removal strategies that are well beyond the scope of and jurisdiction of SANDAG alone."

Chapters:

Chapter 1.0 – Introduction

Chapter 2.0 – Project Description

Page 2-6

If the goal is to " Incentivize sustainable growth and development" (which is a good one) the actions should be expanded to include

Collaborate with local jurisdictions on sustainable development land use planning and fund programs to accelerate housing production while also addressing equity, climate resilience, natural resource protection, and mobility.

18-8

This "update" below isn't reflected in the Project description. As mentioned above there is a lack of collaboration among local jurisdictions which sabotages efforts to have a top grade system.

We're One Step Closer! – An Update from Kim Becker: 1/9/20

I'm writing to you today with good news: The Airport Authority Board of Directors has certified the Final Environmental Impact Report for the Airport Development Plan, which envisions the replacement of the 53-year-old Terminal 1. This brings us one step closer to realizing our goal of providing a significantly upgraded customer experience, similar to what our passengers in Terminal 2 enjoy every day. ***Of course, the plan also provides for new transportation and transit options that will make it easier for everyone to access San Diego International Airport.***

RESPONSE TO COMMENT 18-7

SANDAG looks forward to collaborating with local jurisdictions to implement the proposed Plan and support implementation of the local Climate Action Plans.

RESPONSE TO COMMENT 18-8

Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement the objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed Plan. SANDAG's Housing Incentive Program will include development of a regional anti-displacement strategy, considering climate change and resilience, consistency with the transportation improvements included in the proposed Plan, and alignment with SANDAG grant programs. No revisions to the Project Description are necessary.

Figure 2-2 Corridor Geographies

Parts of this map should be amended or clarified. In the 'corridor geography' of North County, most of the area between the I-15 and the San Vincente green area has 1,000s of acres with no (or very few) people living there. Although people do travel along the 78 to the east, the designation of this area is over-large. It should be refined to show just along the actual 78…not 1,000s of acres to the north. IN fact, if you look at later Figure 2-9 thru 2-12, no more houses or population is projected in this areas and more is projected south of the east 78.

Proposed revision to Figure 2-2

18-9



Reading later in the document (2-32, even more concern arises when the text suggests….

RESPONSE TO COMMENT 18-9

This comment is noted. Figure 2-2, *Corridor Geographies*, has been updated.

18-10

GENERAL INTENSIFICATION OF LAND USES The SCS land use pattern represents a continuing trend in the San Diego region to provide more housing and job opportunities in the existing urbanized areas of the region. In 2012, SANDAG projected 17 percent of future housing growth would occur in the unincorporated area of the county under local general plans at the time. Today, SANDAG expects 12 percent of growth to occur in the unincorporated areas, much of that focused in the Lakeside, Spring Valley, and North County Metro. Tables 2-2 through 2-4 above show the forecasted growth in population, jobs, and housing units for each jurisdiction from the SCS land use pattern.

Actually, other than the corridor geography 2-2, there is little to no intensification of housing, jobs shown in this area in the follow on figures. Again, figure 2-2 should be refined significantly in this area.

Figures 2-17 to 2019

18-11

What does a '*Vacant*' designation mean? No land is vacant. It is unclear where these lands are, but they should be called something else. Vacant implies not-developed. If there isn't any development, then there is probably some natural or artificial habitat present there.

Page 2-70

The text reads:

18-12

CLIMATE ACTION PLANNING To help reach regional and State GHG emissions–reduction targets, the proposed Plan focuses heavily on the conversion to clean transportation and a shift from personal vehicle dependency through the 5 Big Moves. To help local jurisdictions make this transition and achieve broader reductions in GHG emissions, SANDAG will provide technical assistance, guidance resources, templates, and grant funding to incorporate the 5 Big Moves and SCS actions into their Climate Action Plans (CAPs) and plan for more well-connected, sustainable, healthy communities that are accessible to all.

However, success in this area will require more aggressive actions on the part of SANDAG to assist in the reduction/elimination of sprawl development proposals that will undermine the success of the GHG reductions. Development speculators have now shifted to an 'annexation' approach and are expected to continue. The

RESPONSE TO COMMENT 18-10

This comment is noted. Figure 2-2 has been updated.

RESPONSE TO COMMENT 18-11

This comment is noted. "Vacant" denotes land without dwelling units or other structures or land usage type. The land use types and descriptions relevant to the GIS analyses in the proposed Plan and EIR can be found at: https://www.sandag.org/resources/maps_and_gis/gis_downloads/downloads/codes/Land_Use_Definitions.html.

RESPONSE TO COMMENT 18-12

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and greater reductions in GHG emissions. SANDAG has limited authority to "punish" local governments.

18-12 cont. Plan should propose additional consequences to local governments who attempt to subvert these important transportation and climate actions in favor of sprawl.

Chapter 3.0 – Environmental Setting

Chapter 4.0 – Environmental Impact Analysis Approach

Chapter 4.1 – Aesthetics and Visual Resources

Chapter 4.2 – Agricultural and Forestry Resources

Chapter 4.3 – Air Quality

Chapter 4.4 – Biological Resources

Page 4.4-76

18-13 As we experience over and over, too often issues of science get politicized. This is true of wildlife and habitat management and mitigation. The Natural Resources Agencies often get undercut in their ability to oversee important habitat management issues. Therefore, we recommend the following addition in red

*... Consistent with the resource agencies' **approval** and applicable adopted plans, ordinances, and policies, provide compensatory mitigation for sensitive upland vegetation communities through the following: ... ..*

Page 4.4-77

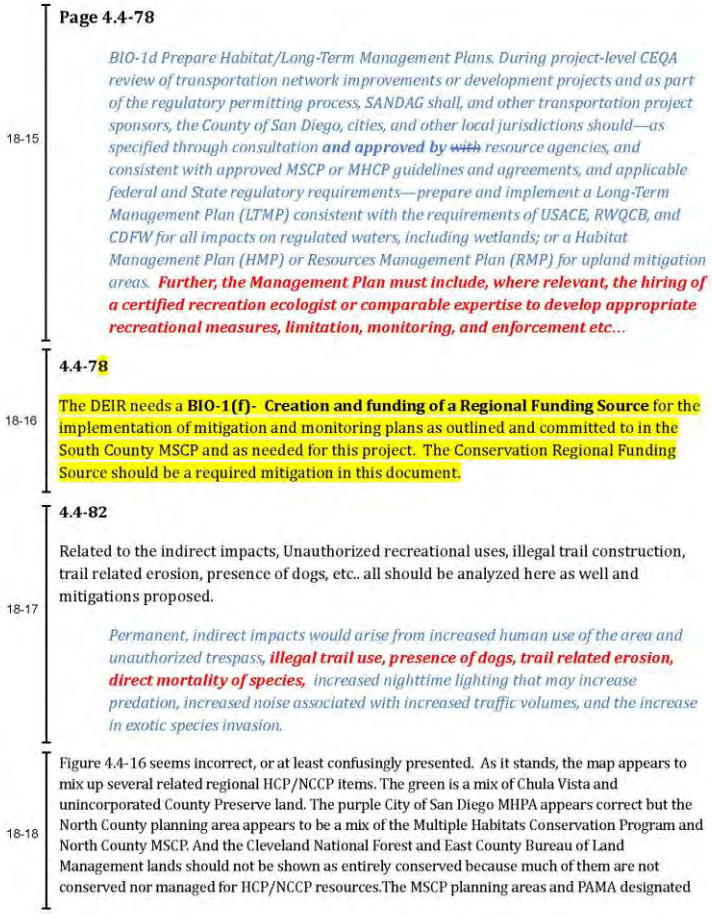
18-14 *BIO-1c Prepare a Habitat Restoration Plan. During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation **and approval by** ~~with~~ resource agencies, and consistent with approved MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a Habitat Mitigation and Monitoring Plan (HMMP) consistent with the requirements of and **approved by** USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands. ..*

RESPONSE TO COMMENT 18-13

The text has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 18-14

The text has been revised as suggested in the Final EIR.



Page 4.4-78

18-15 *BIO-1d Prepare Habitat/Long-Term Management Plans. During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation* ***and approved by*** ~~*with*~~ *resource agencies, and consistent with approved MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a Long-Term Management Plan (LTMP) consistent with the requirements of USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands; or a Habitat Management Plan (HMP) or Resources Management Plan (RMP) for upland mitigation areas.* ***Further, the Management Plan must include, where relevant, the hiring of a certified recreation ecologist or comparable expertise to develop appropriate recreational measures, limitation, monitoring, and enforcement etc…***

4.4-78

18-16 The DEIR needs a **BIO-1(f)- Creation and funding of a Regional Funding Source** for the implementation of mitigation and monitoring plans as outlined and committed to in the South County MSCP and as needed for this project. The Conservation Regional Funding Source should be a required mitigation in this document.

4.4-82

18-17 Related to the indirect impacts, Unauthorized recreational uses, illegal trail construction, trail related erosion, presence of dogs, etc.. all should be analyzed here as well and mitigations proposed.

Permanent, indirect impacts would arise from increased human use of the area and unauthorized trespass, ***illegal trail use, presence of dogs, trail related erosion, direct mortality of species,*** *increased nighttime lighting that may increase predation, increased noise associated with increased traffic volumes, and the increase in exotic species invasion.*

18-18 Figure 4.4-16 seems incorrect, or at least confusingly presented. As it stands, the map appears to mix up several related regional HCP/NCCP items. The green is a mix of Chula Vista and unincorporated County Preserve land. The purple City of San Diego MHPA appears correct but the North County planning area appears to be a mix of the Multiple Habitats Conservation Program and North County MSCP. And the Cleveland National Forest and East County Bureau of Land Management lands should not be shown as entirely conserved because much of them are not conserved nor managed for HCP/NCCP resources.The MSCP planning areas and PAMA designated

RESPONSE TO COMMENT 18-15

The text has been revised as suggested in the Final EIR; the following text revisions have been made on page 4.4-79:

> The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures. ~~The management plans should outline~~describe management in perpetuity of the mitigation and conservation areas, ~~identify~~ illustrate adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives.

RESPONSE TO COMMENT 18-16

To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As identified in Appendix B of the proposed Plan, SANDAG will continue to monitor the implementation of the Regional Plan on a four-year cycle and make the data accessible to the public. Monitoring would occur two years after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for the Sustainable Communities Strategy on a two-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019).

Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.

RESPONSE TO COMMENT 18-17

The text has been revised as suggested. The following text revisions have been made on page 4.4-84:

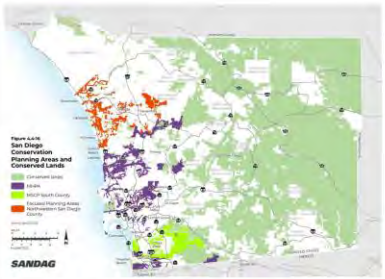
> Permanent, indirect impacts would arise from increased human use of the area and unauthorized trespass, unauthorized trail use, presence

of dogs and feral cats, trail-related erosion, direct mortality of species, increased nighttime lighting that may increase predation, increased noise associated with increased traffic volumes, and the increase in exotic species invasion.

RESPONSE TO COMMENT 18-18

Figure 4.4-16 has been revised and the nomenclature in the legend has been corrected.

area is much larger than shown here. Further, the areas of the NC MSCP do not appear to be shown and the red seems like the MHCP of which only Carlsbad has completed its plan. This should be re-done to be clearer in what is actually conserved, PAMA, and in planning areas.



18-18 cont.

In fact, here is the County map for South County MSCP From https://www.sandiegocounty.gov/content/sdc/sustainability/cap/SouthMSCP.html These boundaries should be reflected in the DEIR.



Page 4.4-58

18-19 Please add the following General Plan policy in the Escondido category
Escondido General Plan page 11-13, states that the focus of the Escondido General "*Plan's smart growth principles represent a shift in focus from 'how to develop vacant land' to 'how to reinvest in existing neighborhoods.*"

Chapter 4.5 – Cultural Resources

Chapter 4.6 – Energy

Chapter 4.7 – Geology, Soils, and Paleontological Resources

Chapter 4.8 – Greenhouse Gas Emissions

Failure to Reduce GHG Emissions

The most significant concern is that the plan fails to reduce greenhouse gas emissions. It shows a reduction in per capita VMT, but that reduction is overwhelmed by the projected population increase, leading to an overall increase in VMT and the resulting emissions. That may satisfy the letter of the legal requirements, but it cannot be regarded as success. Climate disruption is the existential issue of our time. Failure to do our part to reduce the emissions that are disrupting the climate is clearly a failure of the plan.

The main reason for this failure of the plan is that it continues to promote and subsidize inefficient ways to move people and goods around the region.

18-20 The science tells us that we have a very short time to significantly reduce emissions. The realities of the market tell us that the only way to do that is to reduce driving starting immediately.

Increasing highway capacity does the opposite. It will induce additional driving, and make driving an even more attractive alternative to other modes. Instead of a positive mode shift away from driving, it will create a negative mode shift away from walking, biking, transit and telecommuting.

Adding managed lanes does not cure this problem. Increased capacity is increased capacity and it will induce more driving. Shifting some vehicles to managed lanes increases the capacity of the general purpose lanes.

Some specific questions for discussion.

Added Freeway Lanes

RESPONSE TO COMMENT 18-19

This has been added per the comment.

RESPONSE TO COMMENT 18-20

The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels, as mandated by SB 375. Reducing GHG emissions and achieving State goals related to carbon neutrality requires actions at all levels of government. SANDAG looks to support and encourage local jurisdictions, State agencies, and other partners to reduce emissions beyond what is included in the proposed Plan.

SANDAG acknowledges that more work needs to be done in this area and that various climate action plans developed for the region, along with federal and State agency initiatives, are being incorporated as SANDAG's comprehensive strategies for addressing climate change in this and future regional plans. SANDAG continues to partner with local jurisdictions and other agencies to support the implementation of their specific climate action plans.

18-21 1. Table 4.16-14 shows an increase of 374 lane-miles of freeway by 2050, about a 15% increase over current conditions. That increased capacity will induce additional VMT. How is that handled in the modeling? How much VMT is projected to be added as a result of the added lane-miles? What mitigation is proposed to reduce that impact?

18-22 2. How do the added freeway lanes relate to the 450 acres of habitat impacts shown in Tables 4.4-7, 4.4-8, and 4.4-9?

18-23 3. Can SANDAG provide a map showing where lanes will be added, including any HOV-to-HOV transitions?

18-24 4. What would be the VMT and mode shift impacts of removing the added lanes from Alternative 3? In other words, what is the balance between VMT reductions due to BRT and the VMT increase due to induced driving?

18-25 5. Would it be possible to advance any transit projects to reduce the need to add lanes?

Tolling and Road Use Charges

18-26 Allowing single-occupancy vehicles with internal combustion engines to use HOV lanes for a fee defeats the purpose of having HOV lanes to reduce GHG emissions. It is also inherently inequitable. Making the fee somehow means-tested would further reduce the effectiveness as a GHG reduction measure. Tolling only some lanes and not others is not a good way to reduce VMT.

A road use charge is a much better option, but will be politically difficult. The discussion of Alternative 3 says there will be a road use charge of 3 cents a mile. That is not enough to motivate mode shift. Please provide more information on how a Road Use Charge will be implemented.

Chapter 4.9 – Hazards and Hazardous Materials

Chapter 4.10 – Hydrology and Water Quality

Chapter 4.11 – Land Use

Chapter 4.12 – Mineral Resources

Chapter 4.13 – Noise and Vibration

Chapter 4.14 – Population and Housing

RESPONSE TO COMMENT 18-21

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

RESPONSE TO COMMENT 18-22

Roughly 75 percent of the transportation network improvements impacts listed in Tables 4.4-7 through 4.4-9 are associated with Complete Corridor projects. However, as discussed in prior responses, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan will be further evaluated and project design and alignments will be refined to minimize impacts on biological resources to the extent practicable. As such, impact values presented in this EIR are subject to change.

RESPONSE TO COMMENT 18-23

The Data Viewer accessible on SDForward.com includes maps of the improvements included in the proposed Plan.

RESPONSE TO COMMENT 18-24

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the Plan. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

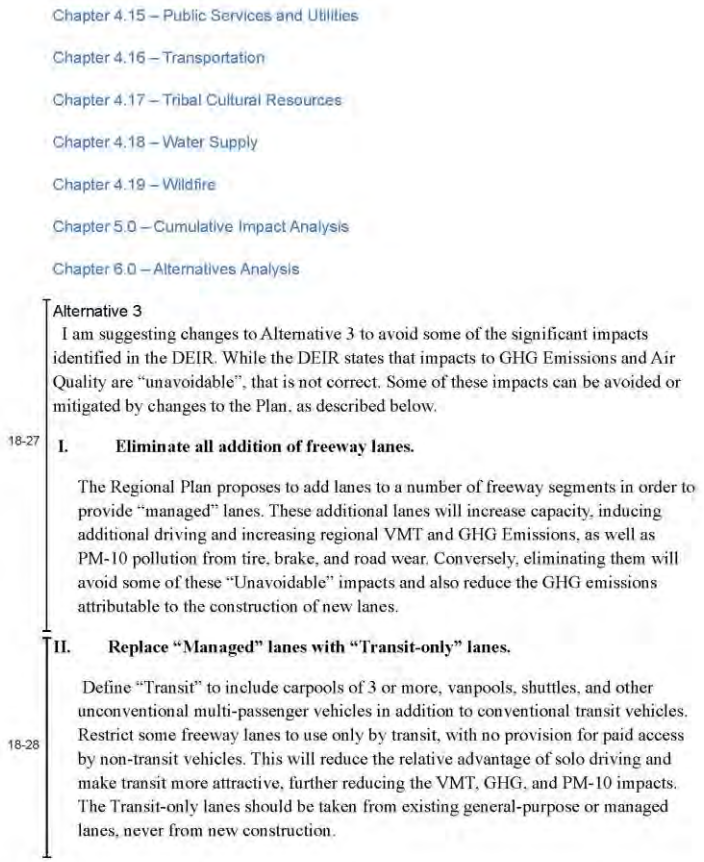
RESPONSE TO COMMENT 18-25

Additional lanes included in the proposed Plan directly support Transit Leap; the facilities and enhanced transit service function together as a system. These facilities improve transit operations, including transit priority functions that make transit a compelling alternative to driving.

RESPONSE TO COMMENT 18-26

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers.

The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources. The study will assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will consult with its Board of Directors, stakeholders, and community members to develop implementation strategies for a road usage charge. This includes policies such as who will pay what and how much, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no group, such as those driving fuel-powered vehicles, low-income individuals, rural residents, or those with long commutes, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.



Chapter 4.15 – Public Services and Utilities

Chapter 4.16 – Transportation

Chapter 4.17 – Tribal Cultural Resources

Chapter 4.18 – Water Supply

Chapter 4.19 – Wildfire

Chapter 5.0 – Cumulative Impact Analysis

Chapter 6.0 – Alternatives Analysis

Alternative 3

I am suggesting changes to Alternative 3 to avoid some of the significant impacts identified in the DEIR. While the DEIR states that impacts to GHG Emissions and Air Quality are "unavoidable", that is not correct. Some of these impacts can be avoided or mitigated by changes to the Plan, as described below.

18-27 **I. Eliminate all addition of freeway lanes.**

The Regional Plan proposes to add lanes to a number of freeway segments in order to provide "managed" lanes. These additional lanes will increase capacity, inducing additional driving and increasing regional VMT and GHG Emissions, as well as PM-10 pollution from tire, brake, and road wear. Conversely, eliminating them will avoid some of these "Unavoidable" impacts and also reduce the GHG emissions attributable to the construction of new lanes.

II. Replace "Managed" lanes with "Transit-only" lanes.

Define "Transit" to include carpools of 3 or more, vanpools, shuttles, and other unconventional multi-passenger vehicles in addition to conventional transit vehicles. Restrict some freeway lanes to use only by transit, with no provision for paid access by non-transit vehicles. This will reduce the relative advantage of solo driving and make transit more attractive, further reducing the VMT, GHG, and PM-10 impacts. The Transit-only lanes should be taken from existing general-purpose or managed lanes, never from new construction.

18-28

RESPONSE TO COMMENT 18-27

Please refer to responses to comments Grubb 18-1 and 18-2.

RESPONSE TO COMMENT 18-28

Please refer to the response to comment Grubb 18-3.

III. **Add electrified rail transit where increased capacity is needed.**

18-29 Where additional transportation capacity is needed, as it is in most of the major corridors in the region, provide that capacity in the form of electrified rail transit. For a hundred years we have been adding capacity primarily in the form of roads. That has resulted in an unsustainable pattern of development. That must change starting today. Electric rail transit is the most efficient way to move people and goods, and it is very effective in shaping the pattern of development.

IV. **Start charging for road use sooner rather than later.**

18-30 We are in a climate emergency. We do not have the luxury of waiting until we build a great transit system before we try to reduce driving. We must reduce solo driving immediately and significantly. People who choose to drive should eventually be required to pay the full cost of driving and parking. This can be ramped up over time. but the process needs to start now.

V. **Conclusion - Give us an alternative that we can support.**

18-31 There is much that is good in the Draft Regional Plan, but it does not go far enough or fast enough. The changes described above could provide an alternative that we could all support.

Chapter 7.0 – Other Considerations Required by CEQA

Chapter 8.0 – References

Chapter 9.0 – Preparers of the Environmental Document

Appendices:

Appendix A – Notice of Preparation

Appendix B – Transportation Projects and Phasing Tables (Español)

Appendix C – Climate Change Projections, Impacts, and Adaptation

Appendix D – Air Quality Technical Report

RESPONSE TO COMMENT 18-29

Please refer to the response to comment Grubb 18-4.

RESPONSE TO COMMENT 18-30

Please refer to the response to comment Grubb 18-5.

RESPONSE TO COMMENT 18-31

Please refer to the response to comment Grubb 18-6.

Appendix E – Biological Resources Appendix

Appendix F – Energy Appendix

Appendix G – GWP Summaries Using AR4 and AR5 Values

Appendix H – Appendix X of the Proposed Plan; 2016 GHG Emissions Inventory and Projections for the San Diego Region

Appendix I – Appendix F of the Proposed Pan; Regional Growth Forecasts and Sustainable Communities Strategy Land Use Pattern

Appendix J – Analysis of Potential for Conflicts Between the 2021 Regional Plan and Adopted Local Plans to Reduce Greenhouse Gas Emissions

Appendix K – Appendix B of the Proposed Plan; Implementation Actions

Appendix L – Subregional Plan Consistency Analysis

Appendix M – Mineral Resources Appendix

Appendix N – Noise Contour Maps

Appendix O – Alternatives Data

COMMENT LETTER 19: TOSHI ISHIHARA

Comment Letter 19

From: Toshi Ishihara <toshiishihara58@gmail.com>
Sent: Friday, September 17, 2021 11:27 AM
To: Keith Greer <Keith.Greer@sandag.org>
Subject: Your EIR presentation during the trans com meeting today

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

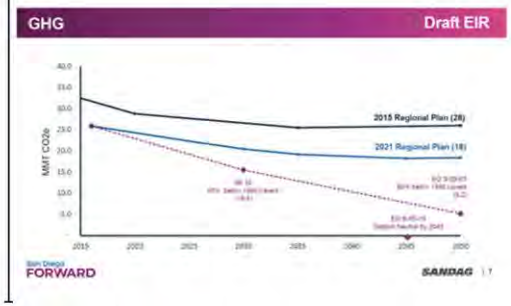
Hi Mr Greer

I watched your presentation on EIR today. The EIR document on GHG does not have any plots, it has only tables, but your presentation helped me understand the impacts of the RP on our region's GHG emissions.

I have one question about the GHG plot below.

Question: The 2021 RP will not reduce GHG emissions much after 2035 according to the plot. As you know, California has a 2035 100% EV mandate for passenger cars. How did the SANDAG's GHG emission model include that mandate ?

19-1



Toshi Ishihara, PhD
Climate Change and Transportation Justice Advocate
Board Member, SanDiego350
Member, San Diego Transportation Equity Working Group

RESPONSE TO COMMENT 19-1

The comment asserts that "California has a 2035 100% EV mandate for passenger cars" and asks how this "mandate" was included in the GHG emissions projections for the San Diego region reported in the EIR.

In Impacts GHG-1 and GHG-5, the Draft EIR analysis is based on GHG emissions projections from 15 emissions categories, including the on-road transportation and off-road transportation sectors (Draft EIR pages 4.8-19 to 4.8-26; pages 4.8-31 to 4.8-35). The analysis in Impacts GHG-1 and GHG-5 is based on the *2016 GHG Inventory and Projections for the San Diego Region* report (Draft EIR Appendix H). This report provides an estimate of 2016 GHG emissions for the San Diego region and GHG projections for the years 2025, 2030, 2035, 2045, and 2050.

The 2016 inventory and projections report take into account existing laws, regulations, programs, and policies in effect as of May 2021 to project future GHG emissions out to 2050. The report does not attempt to predict the types of legal, regulatory, policy, economic, technological, and social changes that governments, the private sector, and individuals might make to reduce GHG emissions by 2050. This is because there is substantial uncertainty in projecting future emissions, especially for 2050; in general, the level of uncertainty regarding future emissions increases as the projections get closer to 2050. The 2016 inventory and projections report does not and cannot account for several factors that are unknown at this time but will affect future GHG emissions in the San Diego region, including: future changes in local, State, and federal laws, regulations, and public policy; local, State, national, and global economic conditions; multinational or global agreements; investments and decision-making by private sector actors, including local, national, and global businesses; and personal and group behavior. The Draft EIR analysis is therefore considered conservative and may overstate actual GHG emission trends in future years.

As described in Draft EIR Appendix H, the GHG emissions projections from the on-road transportation sector are based on the CARB Emissions FACtor model (EMFAC2017), which includes the effect of all

key federal and State laws, regulations, and legislative actions that were adopted as of December 2017.

Executive Order N-79-20, which was published on September 23, 2020, establishes, among other things, goals for the State to achieve: 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. It also directs that CARB, to the extent consistent with State and federal law, shall develop and propose regulations to achieve these goals for passenger cars and trucks and medium- and heavy-duty vehicles, including drayage trucks, and develop strategies to achieve these goals for off-road vehicles and equipment operations in coordination with other State agencies, the U.S. Environmental Protection Agency, and local air districts. When developing these regulations and strategies, CARB is directed to "act consistently with technological feasibility and cost-effectiveness." It is important to recognize that EO N-79-20, while establishing a goal for 100 percent of in-state *sales* of new passenger cars and trucks to be zero emissions by 2035, does not mean 100 percent of all cars and trucks operating on the road will be zero emissions.

Regulations to implement this EO have not been adopted, nor have they been developed or proposed. At this time it is not known if such regulations will be adopted, or if they are adopted, how they will be designed and how they will affect the composition of the on-road transportation and off-road transportation vehicle and equipment fleets (i.e., the proportion of zero-emission versus non-zero-emission vehicles) in the San Diego region over time after they go into effect. As a result, their effect on future regional GHG emissions from the on-road transportation sector is not known at this time and is therefore not included in the GHG impact analysis of the Draft EIR.

The comment does not raise any issues with the adequacy of the Draft EIR, and no further response is required.

COMMENT LETTER 20: JACUMBA COMMUNITY SPONSOR GROUP

Comment Letter 20

Jacumba Community Sponsor Group (JCSG)

To: Kristen Uchitel, Associate Planner at SANDAG (via RegionalPlanEIR@sandag.org)

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN DEVELOPED BY THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

October 11, 2021

Dear Ms. Uchitel,

20-1 Page 1-4 of the DEIR, states "on August 27, 2021, a Notice of Availability (NOA) was published in local newspapers and a Notice of Completion (NOC) was filed with the State Clearinghouse and that copies of the document were placed in public libraries throughout the region." While a NOA may have been published in newspapers, it is highly doubtful that many San Diegans were reached through that medium. Also, library branches in the rural parts of the county were not provided copies of the document. In fact, it was not until September 7, 2021, that rural community planning/sponsor groups, charged with advising the County about the impacts of projects such as this regional transportation plan (RTP) on their respective communities, received written notification of the public comment period. By then, the 45-day public comment window had been reduced to just 36 days, an inadequate review period for this detailed 1300+ page document. Unlike many other project DEIRs which are often of interest to a specific community, the RTP will impact residents in all areas of the county. Contrary to what is stated on page 2-1, there was no extensive engagement with the public on the development of the DEIR and the general public had no real input into this document. **As a minimum, SANDAG should aggressively recirculate the DEIR and extend the public comment period for an additional 45 days, so that county residents have a genuine opportunity to submit their comments.**

20-2 The San Diego county region which encompasses 4,200 square miles, is geographically diverse, with rural landscapes comprising about two-thirds of the total land area. So, it was disappointing to learn that the draft 2021 RTP only proposes meaningful transportation improvements to the metropolitan areas of the county where Mobility Hubs, including expanded mass transit opportunities will provide a variety of affordable programs and services for urban residents. In fact, the RTP maps do not even identify individual communities east of El Cajon that will be disproportionately impacted by its urban focus. This freedom-restricting plan, in conjunction with other GHG regulatory programs currently under development like the Climate Action Plan and the Regional Decarbonization Framework, will make it costlier to live in the San Diego Region. Taken together, these plans will impact the personal choices of the county's low-income residents who will no longer be able to afford to raise their families in rural communities or even drive and park a personal vehicle. Burdensome regulations may also cause residents to relocate to less regulated and expensive counties or states.

After its review of the DEIR, the JCSG provides the following specific comments and questions:

20-3 --Page 2-2, Figure 2-1, the regional setting map does not show the communities in the entire region: it is missing Spring Valley, Otay Mesa (which the plan describes elsewhere as an area of major growth), Ramona, and, of course, all the smaller communities located in the southeastern

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RESPONSE TO COMMENT 20-1

SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR was to be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG's office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a PIP to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability for the

Draft EIR in local newspapers on August 27, 2021, and mailed the Notice to an extensive distribution list. SANDAG also filed a Notice of Completion with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the Notice of Preparation, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021. SANDAG's mail distribution list is open to any subscriber and has been maintained and utilized for e-mail notifications throughout the planning process for the proposed Plan as well as the Draft EIR. SANDAG is unaware of the means through which JCSG received written notification of the public comment period on September 7, 2021. SANDAG's August 27, 2021 notification of the start of the public comment period was consistent with the requirements of CEQA and does not warrant recirculation.

The Draft EIR and all appendices were available for review online at www.sdforward.com; at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment Period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR.

RESPONSE TO COMMENT 20-2

The comment addresses the content of the proposed Plan, not EIR adequacy.

The proposed Plan was developed through a data driven planning process. The forecasted development pattern for the proposed Plan SCS is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity. The SCS land use pattern uses

areas in the region known as Mobility Hubs to concentrate future development. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. The SCS land use pattern represents a continuing trend in the San Diego region to provide more housing and job opportunities in the existing urbanized areas of the region.

Rural corridors, mostly located along state routes traversing the eastern two-thirds of the region, provide people access to rural towns and lands (including Jacumba), as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region's many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects including shoulder widening and curve straightening. Our rural and tribal communities also need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors; it will enable residents to work remotely, learn online, and conduct other business over the internet.

Technology enhancements such as ATDM, as well as SIS are also aimed at improving safety. These improvements provide people with a variety of benefits, including expediting the movement of goods to rural communities during disaster recovery efforts. Projects related to ATDM will provide motorists with real time roadway conditions, including speeds, roadway visibility conditions, and other tactical information. Smart sensors, closed circuit television cameras, changeable message signs, and traffic detection equipment will all help provide people with a safer environment to walk and bike, while also adding the capability to prioritize the movement of freight or emergency vehicles along a rural corridor.

RESPONSE TO COMMENT 20-3

In response to this comment, Figure 2-1 has been revised to include tribal lands in the San Diego region.

20-3 cont. portion of the county. It is also missing several Indian reservations/tribes such as the Campo, Manzanita, etc. Same comment about missing Indian reservations applies to the maps through Figure 2-16. **Provide inclusive maps throughout the EIR which identify rural communities as well as Indian reservations.**

20-4 --Page 4-3 states, "Not all of the proposed plan impacts can meaningfully be analyzed quantitatively through the year 2050." **If SB 375 only sets GHG reductions for the years 2020 and 2035, then why does the RTP attempt to regulate transportation methodology which can be expected to drastically change well before the 2050-time horizon?**

20-5 --Page 2-8 states, "...that by the 2030s, growth will slow to about 0.4 percent per year and decrease after 2040 to 0.3 percent per year, or less than 10,000 persons entering the region yearly." This statement appears to be in conflict with the population forecasts provided in Table 2-1 on page 2-11. **Review RTP for consistency.**

20-6 --Page 2-32, Table 2-5 makes predictions/assumptions that the areas around Mobility Hubs will see the greatest increases in future population growth. Unfortunately, these are the areas where the cost of living is very high, which means that low income residents will be unable to afford to buy a home. It is the lack of affordability and personal safety that drives residents away from urban neighborhoods into the suburbs and rural communities. Based on modeling, this table shows an unsubstantiated decline in the population located outside to the mobility hubs from the baseline year of 2016 and 2050.

20-7 --Page 2-37, Table 2-8 shows the RTP's GHG reductions for cars and light trucks at 17 percent in 2020. **Since we have 2020 in our rear-view mirrors, why doesn't this RTP use 2020 GHG figures instead of 2016 GHG figures as a baseline?**

20-8 --Page 2-38 describes "Complete Corridors" that claim to provide everything to everyone. "Managed Lanes" (MLs) appear to be the RTP's preferred solution for reducing travel times on our freeways instead of building additional traffic lanes. **Where is data that shows existing MLs on I-15 significantly reduce gridlock during the morning or afternoon commutes?**

20-9 --Page 2-42 has a map that shows Completed corridors by 2050. **Why doesn't I-8, which is a major east-west corridor and an evacuation route, show any road improvements east of El Cajon? Is this yet another instance where the RTP overlooks the impacts to rural residents who do not have other viable transportation options for getting to work?**

20-10 --Page 2-49 states that over 2 million trucks pass through the Port of Entry (POE) at Tecate and Otay Mesa. These vehicles are not required to have the same strict emission standards as U.S. registered vehicles. **How will the RTP regulate/mitigate for the higher amounts of GHG emitted from Mexican trucks and passenger vehicles idling at POEs?** California could require that Mexican transport companies comply with the state's emission requirements and that Mexican truckers could be charged a per vehicle fee when crossing into the United States. (U.S. truckers should not be penalized over foreign truckers.)

20-11 --Page 2-50, Figure 2-30 is a map which identifies rural corridors. Missing from that map is Highway 80 and SR-1. Both of these roads should be considered to be an integral part of the rural corridor system as they provide alternative routes for rural residents when I-8 or Highway 79 are

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RESPONSE TO COMMENT 20-4

In addition to complying with SB 375, SANDAG's regional transportation planning efforts must also comply with CFR Section 450.324(a), which requires that "The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20–year planning horizon as of the effective date. In formulating the transportation plan, the MPO shall consider factors described in § 450.306 as the factors relate to a minimum 20–year forecast period. In nonattainment and maintenance areas, the effective date of the transportation plan shall be the date of a conformity determination issued by the FHWA and the FTA. In attainment areas, the effective date of the transportation plan shall be its date of adoption by the MPO." SANDAG has projected out to 2050 in its 2011, 2015, and 2021 regional transportation planning efforts. The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 20-5

The population numbers have been reviewed for consistency and have been confirmed to be accurate. Expected growth of 0.4 or 0.3 percent per year as stated on page 2-8 does not conflict with the population forecasts presented in Table 2-1.

RESPONSE TO COMMENT 20-6

SANDAG is currently developing a housing incentive program. This program will fund local plan updates and increasing affordable housing in transit-rich areas with infrastructure, services, and jobs. Please see Appendix B: Implementation Actions of the proposed Plan for more details.

RESPONSE TO COMMENT 20-7

Table 2-8 in Chapter 2, *Project Description,* of the Draft EIR, is not establishing baseline conditions, but rather GHG reduction targets established by SB 375. As stated on page. 2-38, "In accordance with SB 375, the proposed Plan must include an SCS that demonstrates that the San Diego region will reduce GHG emissions (GHG emissions for SB 375 compliance are calculated using carbon dioxide [CO_2] emissions) from automobiles and light-duty trucks to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by CARB. Targets are expressed as percent change in per capita GHG emissions relative to

2005. Consistent with the targets established by CARB, the targets for the San Diego region are a 15 percent per capita reduction in passenger vehicle GHG emissions by 2020 and a 19 percent per capita reduction by 2035. The proposed Plan would exceed the GHG emission reduction targets for 2020 and 2035 established by CARB, as shown in Table 2-8."

Regarding the use of 2016 as the baseline, the proposed Final Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is two years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 were used as the baseline for the impact analysis of the proposed Final EIR, corresponding with the release of the NOP on November 14, 2016 and the start of EIR preparation. This is the case for the GHG emissions baseline data used for analysis in the proposed Final EIR.

RESPONSE TO COMMENT 20-8

The proposed Plan maximizes our existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes. This model is very similar to how the I-15 Express Lanes operate today.

The Managed Lanes concept is envisioned in the proposed Plan, providing a system that gives the opportunity to dynamically manage the lanes based on real time conditions, time of day, and vehicle occupancy, to make all lanes more efficient and provide benefits to the system as a whole.

It is also important to recognize that State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). These bold changes are necessary to address unprecedented challenges facing our region, and state. SANDAG understands the near-term need for congestion relief and is

working to find near-term ways to implement flexible fleet pilot projects and expand service and frequency of public transportation.

RESPONSE TO COMMENT 20-9

The proposed Plan includes managed lanes on Interstate 8 between I-5 and Greenfield Drive east of El Cajon and, as indicated in Figure 2-25 and Figure 2-30, the proposed Plan includes rural corridor technology and operational improvements from Greenfield Drive to the Imperial County line. The rural corridor improvements would include curve realignments or straightenings, shoulder widenings, intersection improvements, and other safety improvements.

RESPONSE TO COMMENT 20-10

In terms of the air regulations in California, regardless of their registration and plate, any truck operating in the state is subject to California in-use regulations (e.g., truck and bus rule, smoke opacity requirements, and CARB's drayage truck rule). For example, each vehicle operating in California, including those in transit from Mexico, Canada, or any other state, must have a label, called an Emission Control Label, showing that the engine met the required federal emission standards applicable for the model year of the engine (see regulation at https://ww2.arb.ca.gov/resources/documents/heavy-duty-diesel-emission-control-label-ecl-inspection-program-regulation). Even if these trucks are exchanging cargo near California-Mexico border with another truck, they are still subject to CARB's regulations, including the Drayage Truck Rule.

Relevant federal and State regulations are discussed in Appendix Y of the proposed Plan.

Additionally, the Plan includes numerous projects to improve mobility at the border by reducing truck queuing, reducing congestion, and thereby reducing idling emissions.

No changes to the analysis are required.

RESPONSE TO COMMENT 20-11

Figure 2-30 is not intended to be a comprehensive map of all rural roadways, but rather Rural Corridors. Rural Corridors provide rural towns and lands access and connectivity to the interstate system. Highway 80 and SR 1, as "alternate routes," are not Rural Corridors.

20-11 cont. closed to major accidents or fires. **Add Highway 80 and SR-1 to the rural corridor maps with an appropriate level of improvements.**

20-12 --Table 2-10 on page 2-53 states, "Commuter rail lends itself to longer travel distances and operates with speeds up to 110 MPH." Figure 2-34 on page 2-57 shows an expansion of several commuter rail lines which seem to parallel the existing light rail (trolley) lines. **Where is the mass transit usage data for those routes that would justify the need (and the expense) of duplicative rail services?**

20-13 --Table 2-11 on pages 2-59 to 2-61 provides a list of the proposed mobility hubs in the RTP. **Why aren't the communities of Lakeside and Spring Valley included as future mobility hubs?**

20-14 --Table 2-12 on page 2-64 lists a variety of "Flexible Fleet Services." The RTP states that San Diego population is becoming older and that an estimated 60 percent will be seniors who are 75 years or older. **How will seniors safely use the flexible fleet services included in the RTP such as e-scooters, bikes, and ride-hailing? Does the RTP really intend for seniors to pick up their packages at "smart lockers" at mobility hubs instead of receiving package delivery at their doors?**

20-15 --Table 2-13 on page 2-68 to 2-69 is an expensive "wish list" of programs that are part of the RTP. Not only are the costs for these programs listed in 2020 millions of dollars, the table does not indicate funding sources. Even with all the RTP's proposed increases in road user fees, VMT, ridesharing costs, etc., in 2050, the RTP has a stated funding shortfall of $73 billion in 2020 dollars. **Update Table 2-13 to include funding sources.**

20-16 --On page 2-72 is a list of prioritized RTP implementation actions where the number one priority is to "apply the Social Equity Planning Framework" and the number ten priority is to "Advance a data science program to better understand travel behavior and issues in the region…" **These implementation priorities must be reversed.** Included on the implementation actions list should be a requirement to identify funding sources before the RTP is approved. If funding cannot be identified, then reduce the scope of the plan.

20-17 --Table 4.3-4 on page 4.3-12 provides criteria pollutant emissions inventory for 2016 in the San Diego Air Basin. **Why does the RTP use "old" 2016 data for its modeling? Update the EIR to include a similar inventory for the year 2020, so that a trend in air quality can be determined.**

20-18 --Page 4-3-13 identifies wood burning and natural gas consumption as two emission sources. Both of these energy sources are commonly used by low-income rural residents to heat their homes. Future plans that would curtail or eliminate these energy sources must avoided in the interests of social equity. Especially when mismanagement of forest resources continues to result in enormous wildfires that burn large swaths of the State.

20-19 --Page 4.3-20 addresses Executive Order N-79-20 which requires that 100 percent of new car sales in California are to be zero emission by 2035. With the shift to electric vehicles, the draw on our electrical grid must surely increase. Just last week, Elon Musk who knows a little bit about electric cars, stated that the State's electrical generation capacity will have to at least double to support the planned shift to electric vehicles. Yet, the regional energy predictions found in Appendix F, and in Table 4.6.1 (page 4.6-17) show an overall decrease in the region's electrical

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RESPONSE TO COMMENT 20-12

The comment only addresses the data used to prepare the proposed Plan, not the EIR.

SANDAG developed the proposed Plan and the proposed transportation network based on a data driven process— analyzing where people live and work, how they get around, what transportation infrastructure exists, what is needed to serve future growth, and more. This data included census data and cellphone based data. SANDAG did not rely on data alone; the proposed Plan reflects the views of real residents from around the region, the professional judgments of a number of planning professionals at the agency, and extensive knowledge of diverse communities across our region. Appendix T of the proposed Plan includes the detailed methodology for network development and performance of the Plan related to improved access to basic needs (retail, parks, and medical), employment centers, and higher education.

RESPONSE TO COMMENT 20-13

The coverage area of each regional Mobility Hub represents a general area defined through a propensity analysis (detailed in Appendix T of the proposed Plan). The Mobility Hubs depict a framework that will be used to guide future collaborative planning efforts between SANDAG and local jurisdictions. In reviewing the County of San Diego's suggestions received through the proposed Plan comment period, SANDAG agrees that the areas identified, including Lakeside and Spring Valley, are appropriate to consider in future Mobility Hub planning. The areas identified also align with Transit Priority Areas. In the proposed Plan, Mobility Hub maps also reflect Transit Priority Areas to be more inclusive of these areas.

RESPONSE TO COMMENT 20-14

The comment only addresses the content of the proposed Plan, not the EIR.

The proposed Plan aims to improve access to a quality public transportation system for all San Diego residents, especially for seniors and other disadvantaged populations. These improvements include transit fare subsidies and on-demand Flexible Fleet services that are accessible to seniors. The proposed Plan projects a growth in senior access to parks and recreational facilities via walking, biking, and transit (see Appendix H of the proposed Plan for more information). In

every metric, senior access to transit, retail, medical facilities, and parks improves through 2025 and 2050.

SANDAG has a long history of working closely with senior community members, social service providers, non-profits, and community-based organizations to develop and fund specialized transportation services geared specifically towards the needs of seniors. The proposed Plan network includes a variety of modes that work together seamlessly to provide all San Diego residents, regardless of age or ability, access to multiple travel choices. Flexible Fleets are an example of an option that is particularly well suited for the senior population. Flexible Fleets options like ridehail, rideshare, and microtransit offer a range of mobility options and vehicles that can accommodate many types of trips and meet the needs of various users. They can make it easy for seniors to access medical appointments and other basic needs without relying on a car. Flexible Fleet vehicles and services are adaptable in nature and can offer personalized accommodations, such as wheelchair lifts, door-to-door services, and other options for people with physical limitations. SANDAG has conducted outreach and will continue to engage with seniors to ensure their mobility needs are met. In addition, SANDAG is developing a Flexible Fleets Implementation Strategic Plan that will address potential barriers to accessing Flexible Fleets, ensuring options for people without smartphones or internet, providing education about how to access Flexible Fleets, and more.

RESPONSE TO COMMENT 20-15

Table 2-13 includes costs for proposed programs of the proposed Plan. Specific funding sources have not been identified for each program; however, proposed Plan Appendix V, *Funding and Revenues* includes Table V.1 that shows eligible uses (including programs) for the various funding sources.

The comment incorrectly identifies a funding shortfall of $73 billion. The proposed Plan is revenue constrained, as required by 23 CFR 450.324 (f) and the California Transportation Commission Regional Transportation Plan Guidelines for Metropolitan Planning Organizations (2017). In the proposed Plan, revenues total $172 billion and costs total $163 billion in 2020 dollars.

RESPONSE TO COMMENT 20-16

The implementation actions identified on page 2-72 of the Draft EIR are not listed in order of priority. Funding sources for the proposed Plan are detailed in proposed Final Plan Appendix V.

RESPONSE TO COMMENT 20-17

As discussed in Chapter 4, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of the EIR. The 2016 base year for the air quality analysis is the same as the 2016 year used in other technical sections, such as *Greenhouse Gas Emissions* (Section 4.6) and *Transportation* (Section 4.16). As shown in Table 4.3-3, ambient air quality in recent years is generally similar to 2016 data. Moreover, as discussed in Section 4.16.1, differences in traffic conditions between 2016 and current conditions (2021) are minor, and the change does not affect findings in the transportation analysis. Similarly, for air quality, changes between 2016 and current conditions are minor, and changing the baseline would not affect the overall findings of the air quality analysis.

No changes to the analysis are required..

RESPONSE TO COMMENT 20-18

There are no measures in the proposed Plan that would curtail or eliminate residential wood burning and natural gas combustion. SDAPCD regulates stationary and area source emissions as part of its air quality responsibility, and develops rules and regulations to ensure federal and State air quality standards are met. SDAPCD periodically revisits and amends its rulebook as part of the State Implementation Plan (SIP) process. Regardless, no mitigation like this is proposed in the EIR, and no changes to analysis are required.

RESPONSE TO COMMENT 20-19

The energy consumption shown in Table 4.6-1 is based on the energy consumption projections used in the GHG inventory (Appendix X of the proposed Plan), which are based on the CEC Energy Demand 2020–2030 Revised Forecast. The CEC forecasts discussed in Section 4.6, *Energy*, and Chapter 5, *Cumulative Impact Analysis*, indicate an increase in energy demand between 2020 and 2030. Appendix O of the EIR provides information to support the alternatives analysis, but does not include information related to electricity or energy demand.

No changes to the EIR analysis are required.

20-19 cont. consumption from 2016 to 2050. The decrease in electrical consumption will also occur while the region's population is increasing. The CEC California Energy Demand 2018-2030 revised forecast shows the continued increase in the demand for energy supplies over the next ten years (page 5-30). **Verify electrical energy usage figures in Appendix O and cite sources for these figures.**

20-20 --Page 4.3-33 states the entire MTS fleet of busses will be transitioned to zero-emission vehicles by 2040. **How will the longer time it takes to charge bus batteries be accommodated?** MTS should really consider a transition to smaller busses as the current passenger usage does not appear to require the seating capacity provided by full-sized, 60-feet long buses. **Will school buses be required to transition to electric buses?** This may be impractical and unworkable in rural parts of the county where Santa Ana winds cause frequent and extended power outages, and bus replacement may cause a financial hardship for small school districts.

20-21 --Page 4.3-43 states VMT is expected to increase by 6.7 percent in 2050. One of the RTP's stated goals is to reduce VMT and the associated GHG emissions.

20-22 --Page 4.3-51 states the use of propane and natural gas generators is authorized for construction purposes when the power is not available from the electrical grid. Residents in the rural part of the county frequently rely on propane generators when their normal source of electrical power has been shut off. Therefore, the future use of propane generators and/or heaters must be allowed.

20-23 --Many RTP figures such as Figures 4.4-2 to 4.4-14 are missing page numbers which make them easier to reference. **Add page numbers to all RTP figues.**

20-24 --Figure 4.4-7 should indicate that tricolored blackbirds and golden eagles are in the Jacumba area. **Update.**

20-25 --Page 4.4-20 should show that Golden eagle habitat includes Jacumba. Page 4.4-21 should show the Tricolored blackbird and Pacific Pocket mouse habitat includes Jacumba. **Add Jacumba in habitat comments.**

20-26 --Page 4.8-5, Table 4.8.4 should show emission breakdowns for the year 2020 and not 2016. **Update.**

20-27 --Page 4.8-34, Table 4.8-12 shows 2050 GHG emission reference point is 80 percent below 2016 levels. Elsewhere in the RTP, the 2050 reference point is described as 80 percent below 1990 emission levels. **Review DEIR for GHG consistency.**

20-28 --Page 4.8-50 describes the need for building "low stress bicycle networks." **What are low stress bicycle networks and how do they difer from bicycle corridors?** It also recommends implementing a school bus program in areas not currently served by school buses**. Identify the areas where additional school bus service is needed based on a geographical need and not a social equity "want."** In urban areas where schools are located close to residences, children should walk to school. San Diego County has recently allocated funds to pay for programs that would reduce childhood obesity and walking a short distance to school would provide a health benefit for children.

20-29 --Figure 4.9-2 emergency evacuations routes do not include rural communities. **Add Alpine, Jamul, Campo, Jacumba, etc.**

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RESPONSE TO COMMENT 20-20

he proposed Plan supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the Plan include SANDAG's proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website here: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/ict-rollout-plans. As discussed in the Rollout Plans, appropriate charging infrastructure will be installed on site to accommodate and support bus capacity. MTS and NCTD will consider forecasted passenger usage, among other factors, when making decisions regarding bus sizes prior to purchase of vehicles.

The MTS transition to zero-emissions vehicles is detailed in its transition plan. The transition plan takes into account daily mileage requirements and charging needs. See the transition plan here: https://www.sdmts.com/sites/default/files/attachments/mts_fleet_transition_study_final_092220_reduced.pdf. School buses are not part of MTS transition plan, but CARB has budgeted for 1,000 zero-emission school buses in its 2021–2022 budget.

No changes to the Draft EIR analysis are required.

RESPONSE TO COMMENT 20-21

This comment does not pertain to EIR adequacy. As shown in Tables 4.6-17 through 4.6-19, while overall VMT is expected to increase relative to 2016 conditions, VMT on a per capita basis is reduced 14.1 percent by 2050, consistent with the objectives of the EIR.

RESPONSE TO COMMENT 20-22

Mitigation measure AQ-3b allows for the use of propane or natural gas generators when grid power is not available, which includes the rural areas. No changes to the EIR analysis are required.

RESPONSE TO COMMENT 20-23

For ease of reference, electronic documents have been updated to link all figure references to the appropriate figure upon selecting the associated reference.

RESPONSE TO COMMENT 20-24

Figure 4.4-7 has been updated as requested to include the tricolored blackbird and golden eagle in the Final EIR.

RESPONSE TO COMMENT 20-25

The EIR relies on available data sources. All sensitive species from the data sources referenced in the EIR are included in Figure 4.4-7, and tricolored blackbird and golden eagle points were added to the figure in the Final EIR.

RESPONSE TO COMMENT 20-26

As stated in Chapter 4 of the EIR, SANDAG is required to update the Regional Plan every 4 years, in collaboration with the 18 cities and County of San Diego, along with regional, State, and federal partners. The proposed Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the RTP/SCS for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of this EIR, corresponding with the release of the NOP on November 14, 2016, and the start of EIR preparation. As such, no changes have been made to Table 4.8-4.

RESPONSE TO COMMENT 20-27

The comment asserts that the reference in Draft EIR Table 4.8-12 referring to the 2050 reference point as 80 percent below 2016 levels is inconsistent with other, unspecified references to the 2050 reference point as 80 percent below 1990 emissions levels.

Under Impact GHG-5 the Draft EIR evaluates whether the proposed Plan is inconsistent with the State's ability to achieve the EO S-3-05 goal of reducing California's GHG emissions to 80 percent below 1990 levels by 2050. To perform this analysis, the Draft EIR estimated an emissions reduction reference point for the region for 2050, based on EO S-3-05. Because there is not an available 1990 emissions inventory for the San Diego region that is comparable to the regional inventory and projections prepared for the proposed Plan, a reference point was developed for this analysis to show the level of GHG reductions needed between 2016 (the baseline year of the inventory and proposed Plan)

and 2050 that would be equivalent to the level of reductions needed when measured against 1990.

In 2016, total statewide emissions equaled 429 $MMTCO_2e$, which was 2 $MMTCO_2e$ (less than 1 percent) lower than the statewide 1990 emissions level of 431 $MMTCO_2e$ (CARB 2018d). Because total statewide emissions in 2016 were essentially equal to the statewide 1990 level, for purposes of this analysis, total regional emissions in 2016 are assumed to be representative of total regional emissions in 1990. Therefore, to identify the reference point for 2050, an 80 percent reduction was applied to the total regional emissions in 2016.

This comment does not relate to the adequacy of the Draft EIR and no further response is required.

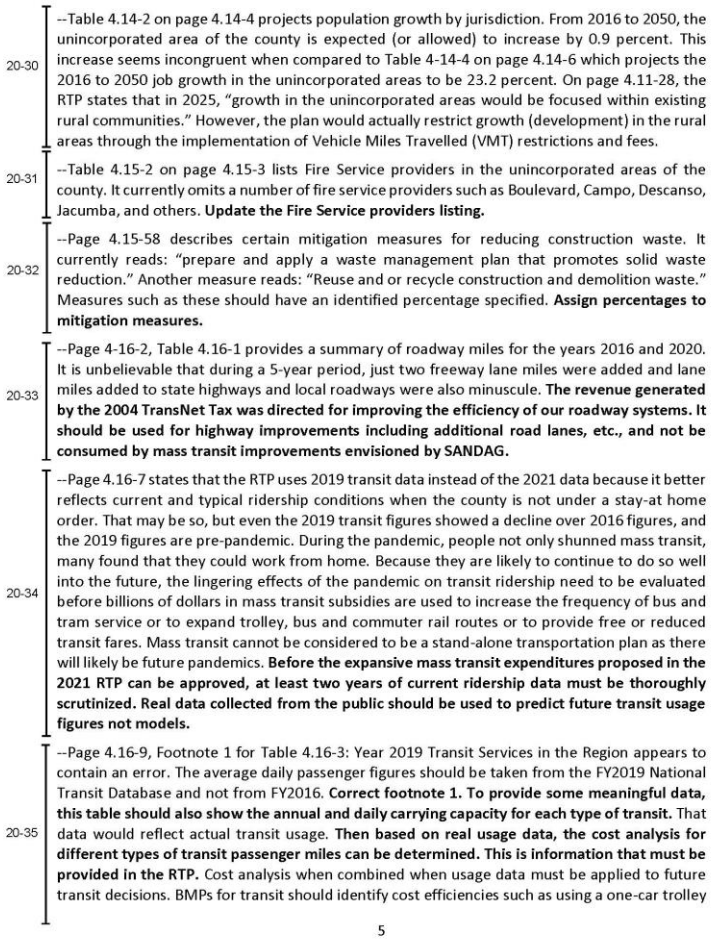
RESPONSE TO COMMENT 20-28

This comment addresses two of the measures included in Draft EIR mitigation measure GHG-5f that the County of San Diego and cities can and should implement to reduce VMT from development projects. Specifically, the comment asks for clarification on the difference between low stress bicycle networks and bicycle corridors; regarding the measure to implement school bus programs in areas not served by school buses, the comment requests that SANDAG identify areas where school bus programs are "needed based on geographical need and not a social equity 'want'."

Low stress bicycle networks refer to bicycle facilities like trails, paths, or lanes in which the user experiences a low amount of stress due to factors such as low vehicle speed, low vehicle volumes, and physical separation from vehicle traffic. Implementing a school bus program in areas not served by school bus service is included in mitigation measure GHG-5f because school bus service can reduce VMT and associated GHG emissions when students travel to and from school in a bus instead of in passenger cars and trucks. The request for SANDAG to identify areas with a geographic need for school bus service is noted but not required by CEQA. However, this comment is noted for the record and will be forwarded to the SANDAG Board of Directors for its consideration prior to making a decision on adoption of the proposed Plan.

RESPONSE TO COMMENT 20-29

Edits have been made to Figure 4.9-2 to include rural communities.



20-30 --Table 4.14-2 on page 4.14-4 projects population growth by jurisdiction. From 2016 to 2050, the unincorporated area of the county is expected (or allowed) to increase by 0.9 percent. This increase seems incongruent when compared to Table 4-14-4 on page 4.14-6 which projects the 2016 to 2050 job growth in the unincorporated areas to be 23.2 percent. On page 4.11-28, the RTP states that in 2025, "growth in the unincorporated areas would be focused within existing rural communities." However, the plan would actually restrict growth (development) in the rural areas through the implementation of Vehicle Miles Travelled (VMT) restrictions and fees.

20-31 --Table 4.15-2 on page 4.15-3 lists Fire Service providers in the unincorporated areas of the county. It currently omits a number of fire service providers such as Boulevard, Campo, Descanso, Jacumba, and others. **Update the Fire Service providers listing.**

20-32 --Page 4.15-58 describes certain mitigation measures for reducing construction waste. It currently reads: "prepare and apply a waste management plan that promotes solid waste reduction." Another measure reads: "Reuse and or recycle construction and demolition waste." Measures such as these should have an identified percentage specified. **Assign percentages to mitigation measures.**

20-33 --Page 4-16-2, Table 4.16-1 provides a summary of roadway miles for the years 2016 and 2020. It is unbelievable that during a 5-year period, just two freeway lane miles were added and lane miles added to state highways and local roadways were also minuscule. **The revenue generated by the 2004 TransNet Tax was directed for improving the efficiency of our roadway systems. It should be used for highway improvements including additional road lanes, etc., and not be consumed by mass transit improvements envisioned by SANDAG.**

20-34 --Page 4.16-7 states that the RTP uses 2019 transit data instead of the 2021 data because it better reflects current and typical ridership conditions when the county is not under a stay-at home order. That may be so, but even the 2019 transit figures showed a decline over 2016 figures, and the 2019 figures are pre-pandemic. During the pandemic, people not only shunned mass transit, many found that they could work from home. Because they are likely to continue to do so well into the future, the lingering effects of the pandemic on transit ridership need to be evaluated before billions of dollars in mass transit subsidies are used to increase the frequency of bus and tram service or to expand trolley, bus and commuter rail routes or to provide free or reduced transit fares. Mass transit cannot be considered to be a stand-alone transportation plan as there will likely be future pandemics. **Before the expansive mass transit expenditures proposed in the 2021 RTP can be approved, at least two years of current ridership data must be thoroughly scrutinized. Real data collected from the public should be used to predict future transit usage figures not models.**

20-35 --Page 4.16-9, Footnote 1 for Table 4.16-3: Year 2019 Transit Services in the Region appears to contain an error. The average daily passenger figures should be taken from the FY2019 National Transit Database and not from FY2016. **Correct footnote 1. To provide some meaningful data, this table should also show the annual and daily carrying capacity for each type of transit.** That data would reflect actual transit usage. **Then based on real usage data, the cost analysis for different types of transit passenger miles can be determined. This is information that must be provided in the RTP.** Cost analysis when combined when usage data must be applied to future transit decisions. BMPs for transit should identify cost efficiencies such as using a one-car trolley

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RESPONSE TO COMMENT 20-30

For the San Diego region, population is expected to grow by nearly 437,000 people from 2016 to 2050. Prior forecasts projected more people in the San Diego region. The Series 14 Regional Growth Forecast includes assumptions of housing unit production that results in a subregional forecast that includes population decline or lower population growth in certain areas in the region. These housing assumptions, described in proposed Plan Appendix F, include an increase in the region's vacancy rate to 4% by 2040, an accounting of vacation rentals and second homes as "unoccupiable," and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036.

Forecasted job growth in the region is a result of the size and age/race/ethnicity/sex composition of the projected population as well as higher projected labor force participation rates in the future. The region is expected to grow by 440,000 jobs by 2050. Future jobs are allocated to existing employment centers and scheduled commercial development. To clarify, the quoted statement is intended to indicate that for the growth that would occur within the unincorporated areas (0.9 percent), that growth would be focused within existing rural communities, rather than in unincorporated areas that are not part of rural communities. It is acknowledged that VMT restrictions and fees encourage growth in urban areas and discourages growth in unincorporated areas.

RESPONSE TO COMMENT 20-31

Table 4.15-2 in the Final EIR has been updated in response to this comment to include additional County fire service providers, specifically, Campo Reservation Fire Protection District and Boulevard. The other two fire stations referenced are CAL FIRE stations and were already accounted for.

RESPONSE TO COMMENT 20-32

The percentage of waste reduction associated with the measures outlined in mitigation measure U-2b would be based on State legislation and local regulations. A specific percentage cannot be applied to each measure due to waste reduction policy variations across the various jurisdictions in the county and potential future regulatory updates at

the State level; however, a reference to State and local requirements has been added to the measure to ensure the goals established are achieved.

RESPONSE TO COMMENT 20-33

Experience and research have demonstrated that expanding roadways ultimately leads to more traffic and GHG emissions. For example, in the Houston area, a 26-lane, $2.8 billion mega-freeway project was built to alleviate traffic congestion. Within a few years after construction was completed, congestion worsened and travel times increased 30 percent during the morning commute and 55 percent during the evening commute. The proposed Plan maximizes our existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes.

The TransNet measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. The remaining projects in the TransNet measure may not be constructed due to changes in regional needs, changes in State law, and technology advancements that would suggest a different transportation solution. The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development of the proposed Plan.

RESPONSE TO COMMENT 20-34

Due to data/survey availability, ABM2+ largely relies on pre-pandemic survey (2016/17 household behavior, 2019 SB1 TNC, and 2015 transit onboard surveys); therefore, the pandemic impacts on behaviors such as transit/carpool usage and auto ownership are not reflected in ABM2+. Based on information from the National Household Travel Survey, California Household Travel Survey, 2016/17 Household Behavior Survey, and the ACS, SANDAG developed a telework trend to project future telework rates. Researchers from the Institute of Transportation Studies at UC Irvine reviewed and confirmed the telework assumptions used in proposed Plan.

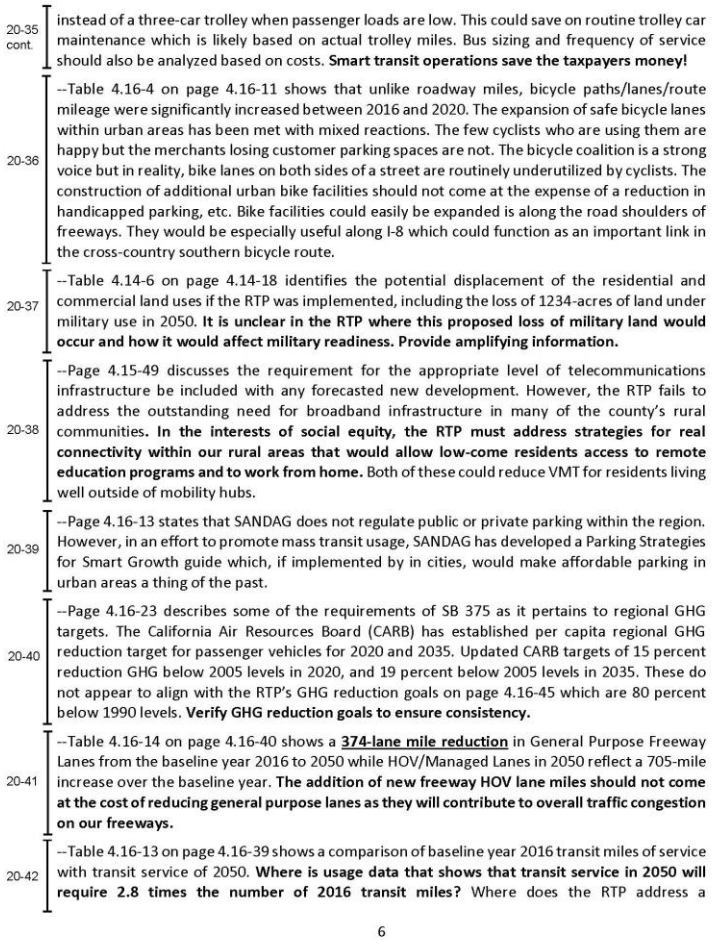
SANDAG has a plan to update ABM2+ to ABM3 to reflect the “new normal” travel behaviors, once surveys conducted in a new normal year become available. The new normal condition is important for

creating a long-range planning model. It is unclear at this moment, when and if the new normal has arrived.

RESPONSE TO COMMENT 20-35

Please see response to comment JCSG 20-26 for rationale regarding the use of a 2016 baseline.

The performance of the proposed Plan is based on the best available data at this time. It will be important to continue to monitor trends and impacts on travel behavior as the Regional Plan is implemented and updated in the future. Priority Implementation Action 10 is to advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.



20-35 cont. instead of a three-car trolley when passenger loads are low. This could save on routine trolley car maintenance which is likely based on actual trolley miles. Bus sizing and frequency of service should also be analyzed based on costs. **Smart transit operations save the taxpayers money!**

20-36 --Table 4.16-4 on page 4.16-11 shows that unlike roadway miles, bicycle paths/lanes/route mileage were significantly increased between 2016 and 2020. The expansion of safe bicycle lanes within urban areas has been met with mixed reactions. The few cyclists who are using them are happy but the merchants losing customer parking spaces are not. The bicycle coalition is a strong voice but in reality, bike lanes on both sides of a street are routinely underutilized by cyclists. The construction of additional urban bike facilities should not come at the expense of a reduction in handicapped parking, etc. Bike facilities could easily be expanded is along the road shoulders of freeways. They would be especially useful along I-8 which could function as an important link in the cross-country southern bicycle route.

20-37 --Table 4.14-6 on page 4.14-18 identifies the potential displacement of the residential and commercial land uses if the RTP was implemented, including the loss of 1234-acres of land under military use in 2050. **It is unclear in the RTP where this proposed loss of military land would occur and how it would affect military readiness. Provide amplifying information.**

20-38 --Page 4.15-49 discusses the requirement for the appropriate level of telecommunications infrastructure be included with any forecasted new development. However, the RTP fails to address the outstanding need for broadband infrastructure in many of the county's rural communities**. In the interests of social equity, the RTP must address strategies for real connectivity within our rural areas that would allow low-come residents access to remote education programs and to work from home.** Both of these could reduce VMT for residents living well outside of mobility hubs.

20-39 --Page 4.16-13 states that SANDAG does not regulate public or private parking within the region. However, in an effort to promote mass transit usage, SANDAG has developed a Parking Strategies for Smart Growth guide which, if implemented by in cities, would make affordable parking in urban areas a thing of the past.

20-40 --Page 4.16-23 describes some of the requirements of SB 375 as it pertains to regional GHG targets. The California Air Resources Board (CARB) has established per capita regional GHG reduction target for passenger vehicles for 2020 and 2035. Updated CARB targets of 15 percent reduction GHG below 2005 levels in 2020, and 19 percent below 2005 levels in 2035. These do not appear to align with the RTP's GHG reduction goals on page 4.16-45 which are 80 percent below 1990 levels. **Verify GHG reduction goals to ensure consistency.**

20-41 --Table 4.16-14 on page 4.16-40 shows a **374-lane mile reduction** in General Purpose Freeway Lanes from the baseline year 2016 to 2050 while HOV/Managed Lanes in 2050 reflect a 705-mile increase over the baseline year. **The addition of new freeway HOV lane miles should not come at the cost of reducing general purpose lanes as they will contribute to overall traffic congestion on our freeways.**

20-42 --Table 4.16-13 on page 4.16-39 shows a comparison of baseline year 2016 transit miles of service with transit service of 2050. **Where is usage data that shows that transit service in 2050 will require 2.8 times the number of 2016 transit miles?** Where does the RTP address a

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RESPONSE TO COMMENT 20-36

Build out of the Regional Bike Network along with investments in Complete Streets and Vision Zero programs are components of the proposed Plan that advance goals related to reducing GHG emissions, improving safety for all users, and advancing public health. SANDAG is unaware of any study indicating that it is either safe or effective to add bicycle lanes to freeway shoulders.

RESPONSE TO COMMENT 20-37

Figure 4.11-3 in the Land Use section of the EIR identifies the military installations in the San Diego region. Table 4.14-6 identifies the potential loss of land uses with implementation of the proposed Plan (including a 500-foot buffer to provide a conservative estimate of impact). The potential impact on military lands that may occur with permanent ROW acquisitions from the proposed transportation projects would be addressed at the project-specific level of environmental analysis. As discussed in Appendix B of the proposed Plan, SANDAG is collaborating directly with Military Community Planning Liaison Officers to identify challenges, opportunities, and priority projects that support mission readiness and the region's transportation priorities.

RESPONSE TO COMMENT 20-38

As discussed in detail in mitigation measure GHG-5d in Section 4.8, SANDAG will adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). SANDAG will also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs.

RESPONSE TO COMMENT 20-39

Please note that the Parking Strategies for Smart Growth guide is referenced on page 4.16-13 of the Draft EIR.

SANDAG developed a *Parking Strategies for Smart Growth* guide as part of their *Planning Tools for the San Diego Region* (SANDAG 2010a). This guide provides a benchmark and compares the various parking regulations within the region, as well as how those regulations compare to national standards. Additionally, the guide provides example policies

on how jurisdictions can implement smart growth parking policies and programs. SANDAG also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals.

RESPONSE TO COMMENT 20-40

This comment asserts that the per capita regional GHG reduction targets for passenger vehicles for 2020 and 2035 established for SANDAG by CARB "do not appear to align with the RTP's GHG reduction goals," which the commenter refers to as "80 percent below 1990 levels" by referencing Draft EIR page 4.16-45.

To clarify, Draft EIR page 4.16-45 is referring to the statewide goal established in EO S-3-05 for reducing GHG emissions from all emissions sectors in California to 80 percent below 1990 levels by 2050. The proposed Plan does not establish a reduction goal of reducing total regional emissions in the San Diego region to 80 percent below 1990 levels by 2050. The Draft EIR does provide an analysis of whether the proposed Plan would be inconsistent with the State's ability to achieve the EO S-3-05 target of reducing emissions to 80 percent below 1990 levels by 2050 (Impact GHG-5, pages 4.8-31 to 4.8-35).

The proposed Plan is required by State law to include an SCS that will achieve the 2035 per capita regional GHG reduction targets for passenger vehicles, if it is feasible to do so. GHG reductions under SB 375 apply only to certain classes of passenger vehicles, are measured against a 2005 baseline, and are measured on a per capita basis. For these reasons GHG reductions required under SB 375 are not directly comparable to the statewide GHG reductions goals set forth in EO S-3-05.

RESPONSE TO COMMENT 20-41

Managed Lane investments are focused on making carpooling, vanpooling, and transit more time competitive with driving by ensuring these driving alternatives can use Managed Lanes to bypass congestion in general purpose lanes. Solo drivers who pay a fee will also have the opportunity to bypass traffic congestion. Conversion of general purpose lanes to create additional Managed/HOV lanes would be governed by federal and State laws and regulations. Increasing non-drive alone

travel choices such as carpooling/vanpooling and bicycle facilities is also important to the overall goal of reducing GHG emissions and VMT.

RESPONSE TO COMMENT 20-42

The performance of the proposed Plan is based on the best available data at this time. It will be important to continue to monitor trends and impacts on travel behavior as the Regional Plan is implemented and updated in the future. The proposed Plan's Priority Implementation Action 10 is to advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.

20-42 cont. corresponding transportation benefit for rural residents who don't reside near mobility hubs who must use roadways as their primary method of travel?

20-43 --Page 4.16-45 describes total VMT, household-generated VMT and light-duty VMT. (Hey fellas, can we make this more complicated?) The RTP uses "modeled" forecasts to develop transportation metrics and predict transportation requirements using 2016 as the baseline year. Complicated VMT models make assumptions that are unlikely to approach reality especially when models are used to make per capita VMT predictions that are 34-years out (2050). **2019 should be used as a baseline year and any VMT analysis predictions past 2035 are educated guesses at best.**

20-44 --On page 5-65 in its description of the California-Baja California Boarder Master Plan, the RTP states that more than 30 million privately owned vehicles crossed the border from Mexico in 2015. This figure seems to be at odds with the figure of 2 million trucks crossing the border in 2019 that is found on page 2-49. **Clarify.**

20-45 The JCSG and the residents of Jacumba reject the RTP for the following reasons:

--It is essentially an urban transportation benefits plan which residents in the rural area will be required to fund via VMT programs and road user fees which come on top of the gasoline taxes already paid at the pump. Road user fees should be only be applied to electric vehicles because they do not pay gasoline taxes. The vehicle registration program could include a flat fee for electric vehicle road usage and that would eliminate the need to require black boxes in vehicles to record VMT. Unfortunately, future increases to road user fees can be expected, as state and federal governments look for an easy source of revenue that can be thrown at a variety of programs. After all, history has proved there are no governmental "lock boxes." Even with the addition of many new transpiration-related fees, the 2021 RTP acknowledges a funding shortfall of $70 billion (2020 dollars) and this is real money.

20-46 **--The RTP uses outdated 2016 data to model many of its transportation predictions 34-years into the future (2050). It should at least be using 2019 data.** SANDAG must do a better job of identifying the lasting impacts of the COVID-19 pandemic before shoveling billions of taxpayer dollars into an overly expensive plan that has been developed with faulty assumptions.

20-47 **--The RTP also seeks to institutionalize ever-increasing transportation fees and land use policies that would essentially raise the cost of renting, buying, or building a home in San Diego county. Additionally, the RTP would infringe upon the rights of residents to raise their families in the rural parts of the county.**

20-48 **--Finally, the 2021 RTP admits that even if all the restrictive transportation programs described in the plan were approved it does not guarantee that local temperature and the sea levels won't rise.** In fact, on page 4-8-35, the RTP states:

"Despite the transportation-related reductions under the proposed Plan implementation, total regional GHG emissions would exceed the reference points for 2050. Additional reductions would be needed in the transportation sector and in all other GHG sectors: energy; solid waste; water supply and wastewater; industrial processes; management of natural lands; etc. Achieving GHG

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RESPONSE TO COMMENT 20-43

The data presented in this table are modeled results from SANDAG's Activity Based Model (ABM). This model can take into account several factors such as travel distance, speed, and network availability. The ABM is updated regularly with the latest available data and best practices to represent regional travel; please see Appendix S, *Travel Demand Modeling Tools*, of the proposed Plan for more information.

Regarding the assertion that VMT predictions past 2035 are educated guesses, the ABM is a state-of-the-art tool for analyzing the transportation network, land use pattern, and other policies of the proposed Plan; however, it is based on the information we know today. There are many emerging technologies and future behavior changes that could impact mode shift in the future. SANDAG will continue to use best available data and research on mobility to inform future updates of the ABM and estimated performance of the proposed Plan.

Please see response to comment JCSG 20-7 regarding the use of 2016 for the baseline year.

RESPONSE TO COMMENT 20-44

Page 5-65 of the Draft EIR references the total number of privately owned vehicles, including trucks, crossing the border, while page 2-49 references just trucks. These numbers are not conflicting, and no change has been made.

RESPONSE TO COMMENT 20-45

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Rural corridors, mostly located along state routes traversing the eastern two-thirds of the region, provide people access to rural towns and lands (including Jacumba), as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region's many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects including shoulder widening and curve straightening. Rural and tribal communities also

need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors; it will enable residents to work remotely, learn online, and conduct other business over the internet.

Technology enhancements such as ATDM, as well as SIS, are also aimed at improving safety. These improvements provide people with a variety of benefits, including expediting the movement of goods to rural communities during disaster recovery efforts. Projects related to ATDM will provide motorists with real time roadway conditions, including speeds, roadway visibility conditions, and other tactical information. Smart sensors, closed circuit television cameras, changeable message signs, and traffic detection equipment will all help provide people with a safer environment to walk and bike, while also adding the capability to prioritize the movement of freight or emergency vehicles along a rural corridor.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources.
The study will assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will consult with its Board of Directors, stakeholders, and community members to develop implementation strategies for a road usage charge. This includes policies such as who will pay what and how much, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed

program that will ensure that no group, such as those driving fuel-powered vehicles, low-income individuals, rural residents, or those with long commutes, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.
The road usage charge, which is being studied by both the federal and State governments, is being considered to replace an old tax system that is no longer relevant. We know this is a challenge and we respect the concerns raised. We are committed to having authentic dialogues to work through the challenges and create a revenue system that is flexible, sustainable, equitable, and fair to all.

The proposed Plan is revenue constrained, as required by 23 CFR 450.324 (f) and the California Transportation Commission Regional Transportation Plan Guidelines for Metropolitan Planning Organizations (2017). Funding sources for the proposed Plan are detailed in Appendix V of the Plan.

RESPONSE TO COMMENT 20-46

This comment addresses the proposed Plan and is not related to EIR adequacy.

The proposed Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the RTP/SCS for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. The COVD-19 pandemic is very recent phenomenon that fell in the middle of the planning efforts related to the proposed Plan. The long-term effects of the pandemic on the region, specifically related to transportation, have yet to fully emerge. SANDAG is mandated by State law (AB 1730) to adopt the current iteration of its RTP/SCS by December 31, 2021. However, as noted under response to comment JCSG 20-43, the Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience. The longer-term effects of the pandemic will be taken into account during the subsequent iterations of the Regional Plan.

RESPONSE TO COMMENT 20-47

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 20-48

This comment accurately cites language in the Draft EIR stating that achieving GHG reductions "at the scale required would require major changes to government regulation, private sector activity, consumer behavior, and other facets of life. . ." However, it incorrectly implies that the proposed Plan outcome should guarantee that local temperatures and sea levels would not rise. The basic purposes of CEQA are to inform government decision makers and the public about potential significant environmental impacts of projects, identify ways the impacts can be reduced or avoided, prevent significant avoidable environmental damage through alternatives and mitigation, and disclose to the public the reason that decision makers approved a project that may result in unavoidable significant impacts. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the project approval. The Draft EIR accomplishes the basic purposes of CEQA, and the SANDAG Board of Directors will consider the information in making its decision on the Plan.

20-48 cont. reductions for these sectors at the scale required would require major changes to government regulation, private sector activity, consumer behavior, and other facets of life..."

20-49 **It is for the reasons stated above and others, that the JCSG recommends the "No Project" RTP alternative outlined in the DEIR. We reject the Draft 2021 Regional Transportation Plan as it is written**. Attachment A provides some of our previous comments on the draft 2021 RTP.

Sincerely,

Cherry Diefenbach
Chair, Jacumba Sponsor Group
csdiefenbach@sbcglobal.net
619-743-5224

cc:
County Board of Supervisors: Fletcher, Vargas, Anderson, Lawson-Remer, and Desmond
Kathleen Flannery, Acting Director, Planning and Development Services
Rami Talleh, Deputy Director, Planning and Development Services

Attachments:
Attachment A: JSCG letter of August 6, 2021

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RESPONSE TO COMMENT 20-49

JCSG's support for the No Project Alternative is acknowledged and will be considered during the final decision-making process.

ATTACHMENT A

Jacumba Community Sponsor Group

To: Rami Talleh (via rami.talleh@sdcounty.ca.gov)
San Diego County Department of Planning and Development Services (PDS)

Subject: Comments on the San Diego Association of Governments (SANDAG's) Draft 2021 Regional Plan

August 6, 2021

Dear Mr. Talleh,

20-50 On July 16, 2021, community planning/sponsor groups were asked to provide their comments on the draft May 2021 San Diego Forward-The 2021 Regional Plan and its thirty-one lengthy and detailed appendices. Although this was an exceptionally short review period, the Jacumba Sponsor Group has the following comments.

This draft plan identifies interdependent transformative strategies designed to address the greatest transportation and mobility challenges that the region faces: safety and traffic congestion; social inequities; and state and federal requirements to reduce greenhouse gas (GHG) emissions and air pollution—and they are noble goals. However, it makes many unsubstantiated assumptions based on inadequate data from which it then draws conclusions.

On page 10, the plan states that in 2019, greater than 90 percent of CA-MEX trade was moved by truck across the international border. A great fact to know, but where does your regional plan address and mitigate for the smoggy trucks registered in Mexico that are hauling those goods? Will the plan only regulate the emissions of vehicles registered in San Diego County (or California) while out-state and out-of-country (Mexican) vehicles get a "free pass?"

On page 12, the plan states: "from 2016 to 2050, nearly 60 percent of population growth will be among those who are 75 years and older." Will this aging population (60 percent who are projected to be people of color), feel physically safe while using public transit (buses, trams, trolleys) during evening/night time? Will they all have smart phones and be able to navigate a smart phone application that gives them a choice of transportation modality based on a variety factors including CO_2 emissions?

On page 15, the plan states that if the 2021 plan was implemented, "By 2050, this could result in 13 percent of commuters using transit (up from 3 percent today) and that there would be a substantial decline in commuters driving alone to work (from 80 percent today to 62 percent in 2050). Those figures do not reflect any significant behavioral changes regarding transportation choices given that this plan would greatly expand mass transit frequency and routes. In 2021, many city busses are carrying just two to three passengers while trolleys carry more passengers depending on their routes. How realistic are the 2021 plan's predicted increases? Were urban residents asked about factors that would actually make them leave their cars and use mass transit instead? Was the current trend of working remotely from home factored into these calculations? What if the public perceives that it is not in their best interests to share a bus or a trolley with a group of strangers who may or may not be healthy? What happens when the next pandemic

1

RESPONSE TO COMMENT 20-50

Thank you for including a copy of JCSG's comments on the proposed Plan. For detailed responses to these comments, please refer to responses beginning on L217 in Appendix P.2.

impacts our region and mass transit shuts down for public safety reasons? Clearly more studies on the current trends in mass transit usage must be analyzed before the predictions contained in this plan can be validated. Also, additional studies on post-COVID mass transit usage figures are critical. Analysists should avoid using the data from any month when all mass transit ridership fares have been waived, as they will skew the data. (This will happen in September 2021.)

On page 25, the 2021 plan calls for providing a variety of transit riders with reduced fares (seniors, low-income, students, youth and the disabled). This is fiscally untenable. What is the actual cost per passenger mile on a bus, trolley, or light rail? **Appendix A predicts that in 2020 dollars, transit fare subsides in 2035 will be $982 million dollars and in 2050, subsides will be $4 BILLION dollars which means that the answer to the previous question about the cost per passenger mile must be too high to print!!!** This plan cannot seriously contemplate spending $4 billion dollars to possibly achieve a 13 percent increase in mass transit ridership.

The 2021 plan which seeks to "reimagine" regional transportation strategies appears to be a huge and costly wish list of programs and government regulations directed primarily at changing residents' driving behavior at a tremendous loss of personal freedoms. It envisions spending millions of dollars to create an expanded bike network with corridors by 2050. Again, where is the data that shows that kind of expenditure will get more people out of their cars and onto bicycles? A recent case in point: the removal of 400 parking spaces along the business district on 30th Street in the North Park area so that bike lanes, that are rarely used to commuting to and from work, could be installed. Not only are the merchants upset about the loss of customer parking and business, but delivery trucks are now blocking bikes lanes to make their deliveries and handicapped parking has become confusing for those who need it. The 2021 plan will greatly expand on that unpopular and costly transportation strategy.

Under this plan, transportation in and around mobility hubs or areas of concentrated development (cities) would be highly regulated with curb management regulations/fees based on the time of day parking rates, and ride-hailing opportunities. Ride-hailing at mobility hubs is described as offering people on-demand vehicles for short and long-distance trips, possibly subscription-based services which would "allow people to reserve a vehicle that best serves the needs of their trip." So, it is okay to rent/drive a vehicle but just not to personally own a vehicle?

On page 32, the plan states: "In the San Diego region, almost half of all trips are three miles or less, and most everyday trips are made within neighborhoods using local streets." Where is the data to back up this statement? This page also states: "On average, one person is killed or seriously injured in traffic violence everyday in the region." Everyone understands the safety risks that they take when they drive a car and they believe those risks to be acceptable. Again, no driving statistics are referenced, and of course, the plan does not provide data on the numbers of people who are mugged walking down the region's streets or at trolley stations, etc.

Everyone agrees that climate change is real. On page 34, several climate strategies are listed. The blue pie chart at the top of the page lists "collecting rainwater" as one viable climate mitigation strategy. Why doesn't this 2021 plan identify more impactful strategies such as building new reservoirs/expanding exisiting ones or building additional desalinization plants? It should be noted, that even if the 2021 plan is implemented, it will not stop the sea levels from rising.

2

This plan would require employers and developers to provide transportation benefits and on-site amenities to encourage people to use sustainable transportation choices. Does the County want even more businesses to flee California for a friendlier business climate? Employers can figure out how to use flexible work schedules and tele-work options to attract and sustain their workforce without unnecessary government intervention/regulation.

Of course, of the 2021 plan's proposed transportation management "strategies" come at a huge cost ($163 billion dollars). The plan identifies $90 billion dollars that will come from local funding sources: sales taxes, impact fees, fuel taxes, roads tolls, increased passenger fares, general funds, housing revenue, ride-hailing fees, value pricing, and road user charges also called vehicle miles travelled (VMT). Road usage fees or VMT, which have yet to be implemented through legislation, are needed to offset the reduction in gasoline taxes as more electric vehicles (EV) use our roadways. Under this plan, VMT fees would come on top of the exisiting federal, state, and local gasoline taxes, and they would unfairly penalize the drivers of gas-powered vehicles, who frequently are low-income and minority residents who live in the rural areas of the County. (VMT would not be collected on out-of-state vehicles.) Under the 2021 plan, fees of all kinds would be raised, including variable road tolls based on the time of day (congestion), fees for solo drivers using carpool lanes, and fees for ride-sharing services like Uber. The fees and regulations imposed by this plan will disproportionately impact low-income residents, while the plan claims to promotes social equity. They are the ones who will not be able to afford to park/drive their own private vehicles while private transportation choices of more affluent residents will not be affected.

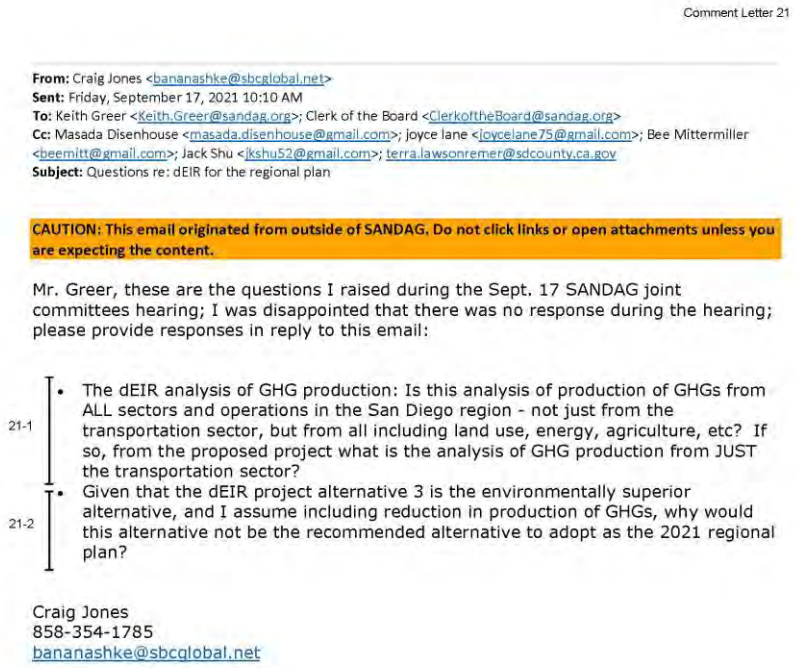
Figure 3.3 on page 50 shows the 2021 Regional Plan Expenditures with an estimated total of $163 billion in 2020 dollars. There needs to be a similar pie chart within the 2021 plan that shows how much money will be spent on each transportation category: Transit Leap (mass transit), mobility hubs, complete corridors, bicycle network, highway improvements etc. Although there may be appendices that list all the funding for a specific category, it is unlikely that most people will wade through all of them to find that important information.

On page 53 of the 2021 Regional plan is a list of a priority implementation actions. Number 1 on the list is "Apply the Social Equity Planning Framework". Number 10 on this list is: "Advance a data science program to better understand travel behavior in the region." These priorities should be reversed. **You can't apply a framework or develop a meaningful plan until there is solid and recent (post COVID) transportation data!**

This very expensive "Lamborghini" transportation plan with its "woke" statements about social equity and its claims to "strengthen a sense of place," is a direct assault on the personal transportation choices of San Diego County residents. County leaders must choose a less expensive "Toyota" plan that will not transform "America's Finest City" into a third-rate economy where only the wealthy residents can still afford to own and drive a car.

Cherry Diefenbach
Chair, Jacumba Community Sponsor Group
619-743-5224

COMMENT LETTER 21: CRAIG JONES



Comment Letter 21

From: Craig Jones <bananashke@sbcglobal.net>
Sent: Friday, September 17, 2021 10:10 AM
To: Keith Greer <Keith.Greer@sandag.org>; Clerk of the Board <ClerkoftheBoard@sandag.org>
Cc: Masada Disenhouse <masada.disenhouse@gmail.com>; joyce lane <joycelane75@gmail.com>; Bee Mittermiller <beemitt@gmail.com>; Jack Shu <jkshu52@gmail.com>; terra.lawsonremer@sdcounty.ca.gov
Subject: Questions re: dEIR for the regional plan

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Mr. Greer, these are the questions I raised during the Sept. 17 SANDAG joint committees hearing; I was disappointed that there was no response during the hearing; please provide responses in reply to this email:

21-1 • The dEIR analysis of GHG production: Is this analysis of production of GHGs from ALL sectors and operations in the San Diego region - not just from the transportation sector, but from all including land use, energy, agriculture, etc? If so, from the proposed project what is the analysis of GHG production from JUST the transportation sector?

21-2 • Given that the dEIR project alternative 3 is the environmentally superior alternative, and I assume including reduction in production of GHGs, why would this alternative not be the recommended alternative to adopt as the 2021 regional plan?

Craig Jones
858-354-1785
bananashke@sbcglobal.net

RESPONSE TO COMMENT 21-1

The comment asks whether the Draft EIR analysis of "GHG production" includes only the transportation sector or also includes other sectors and operations in the San Diego, and also asks for "the analysis of GHG production from JUST the transportation sector."

In Impacts GHG-1 and GHG-5, the Draft EIR analysis is based on GHG emissions projections from 15 emissions categories, including the on-road transportation and off-road transportation sectors (Draft EIR pages 4.8-19- to 4.8-26; pages 4.8-31 to 4.8-35). The analysis in Impacts GHG-1 and GHG-5 is based on the *2016 GHG Inventory and Projections for the San Diego Region* report (Draft EIR Appendix H). This report provides an estimate of 2016 GHG emissions for the San Diego region and GHG projections for the years 2025, 2030, 2035, 2045, and 2050.

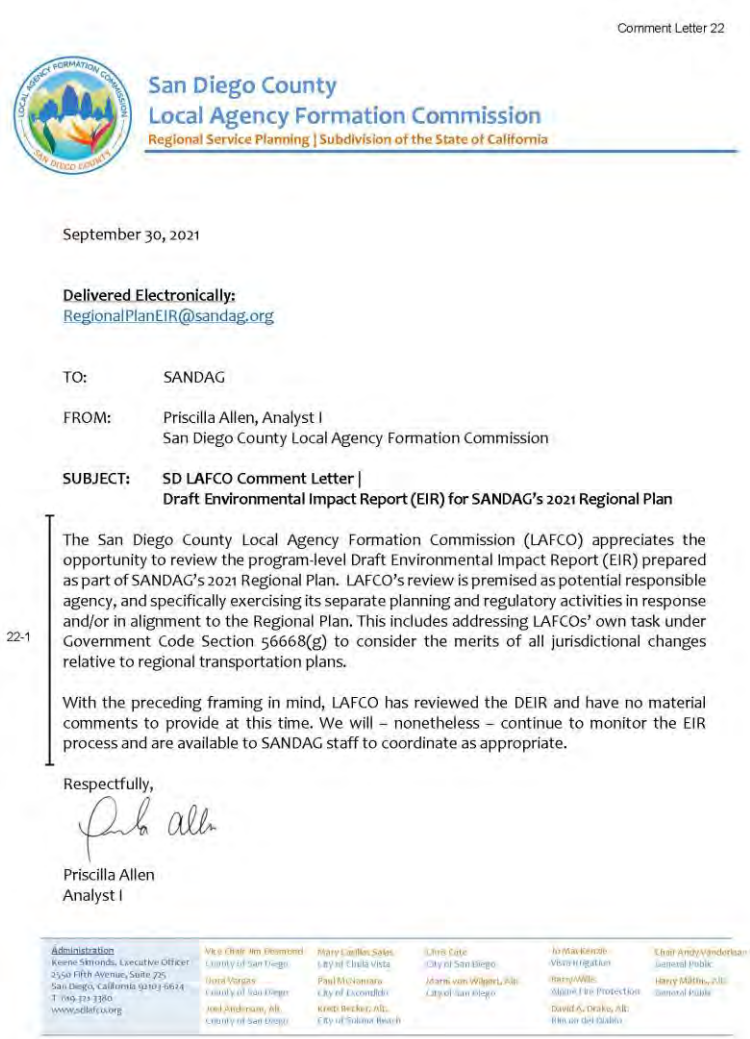
In Impact GHG-3, the Draft EIR analysis is based on GHG emissions projections from the entire on-road transportation sector (Draft EIR pages 4.8-28 to 4.8-29). The on-road transportation sector is defined in Impact GHG-3 as passenger cars and light-duty trucks and heavy-duty trucks and vehicles (Draft EIR page 4.8-28).

The comment does not raise any issues with the adequacy of the Draft EIR and no further response is required.

RESPONSE TO COMMENT 21-2

CEQA does not require that lead agencies adopt the environmentally superior alternative. At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See CEQA Guidelines Section 15091(a)(3).) Therefore, this comment will be provided to the Board of Directors and will be considered before it makes a decision on adopting a final Regional Plan.

COMMENT LETTER 22: SAN DIEGO COUNTY LOCAL AGENCY FORMATION COMMISSION



Comment Letter 22

San Diego County
Local Agency Formation Commission
Regional Service Planning | Subdivision of the State of California

September 30, 2021

Delivered Electronically:
RegionalPlanEIR@sandag.org

TO: SANDAG

FROM: Priscilla Allen, Analyst I
San Diego County Local Agency Formation Commission

SUBJECT: SD LAFCO Comment Letter |
Draft Environmental Impact Report (EIR) for SANDAG's 2021 Regional Plan

22-1 The San Diego County Local Agency Formation Commission (LAFCO) appreciates the opportunity to review the program-level Draft Environmental Impact Report (EIR) prepared as part of SANDAG's 2021 Regional Plan. LAFCO's review is premised as potential responsible agency, and specifically exercising its separate planning and regulatory activities in response and/or in alignment to the Regional Plan. This includes addressing LAFCOs' own task under Government Code Section 56668(g) to consider the merits of all jurisdictional changes relative to regional transportation plans.

With the preceding framing in mind, LAFCO has reviewed the DEIR and have no material comments to provide at this time. We will – nonetheless – continue to monitor the EIR process and are available to SANDAG staff to coordinate as appropriate.

Respectfully,

Priscilla Allen
Analyst I

Administration
Keene Simonds, Executive Officer
2550 Fifth Avenue, Suite 725
San Diego, California 92103-6624
T (619) 321-3380
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Vice Chair Jim Desmond, County of San Diego | Mary Casillas Salas, City of Chula Vista | Chris Cate, City of San Diego | Jo MacKenzie, Vista Irrigation | Chair Andy Vanderlaan, General Public
Dane Vargas, County of San Diego | Paul McNamara, City of Escondido | Marni von Wilpert, Alt., City of San Diego | Harry Mathis, Alt., General Public
Joel Anderson, Alt., County of San Diego | Kristi Becker, Alt., City of Solana Beach | Harry Mathis, Alternate Fire Protection | David A. Drake, Alt., Rincon del Diablo

RESPONSE TO COMMENT 22-1

Thank you for your review of the Draft EIR and participation in the environmental review process. Please continue to follow along in this process by visiting SDForward.com.

COMMENT LETTER 23: LIBBY LUCAS

Comment Letter 23

Libby Lucas
4532 Chinook Court
San Diego, CA 92117

October 11, 2021

San Diego Regional Plan EIR
C/O Kirsten Uchitel, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101
Only via email to RegionalPlanEIR@sandag.org

Re: Comments on the Draft Program EIR for San Diego Forward: The 2021 Regional Plan

Dear Ms. Uchitel:

23-1 The focus of the comments herein on the subject DEIR is one of the proposed Regional Plan's Major Travel Corridors - Coast, Canyons, and Trails, specifically trail-related impacts on wildlife. Here, "trail-related impacts on wildlife" refers to negative indirect impacts / effects on wildlife from the construction and/or use of trails and bikeways for recreation, commuting, or local trips. The wildlife species of concern are those living in, passing through, or somehow relying on lands conserved for the perpetuation of viable populations of sensitive species pursuant to the approved and draft NCCPs/HCPs in San Diego County, and otherwise conserved lands such as CDFW's ecological reserves and USFWS's national wildlife refuges.

The construction and human use of such trails / bikeways is an admittedly minor component of the proposed Plan; and, this focus is in no way intended to minimize the importance of any other aspects of the proposed Plan, but rather only to highlight DEIR's inadequacies on this matter.

23-2 The DEIR identifies several trail / trail segments and bikeways among the projects of the proposed Plan.[1] The following two CEQA significance criteria in the DEIR are the most pertinent to the construction and use of trails and bikeways.

BIO-2 Have a substantial adverse effect, either directly or indirectly, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or listed by CDFW or USFWS, including their federally designated critical habitat, or species that are considered sensitive in CEQA Guidelines section 15380.

BIO-3 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Please note the following four points.

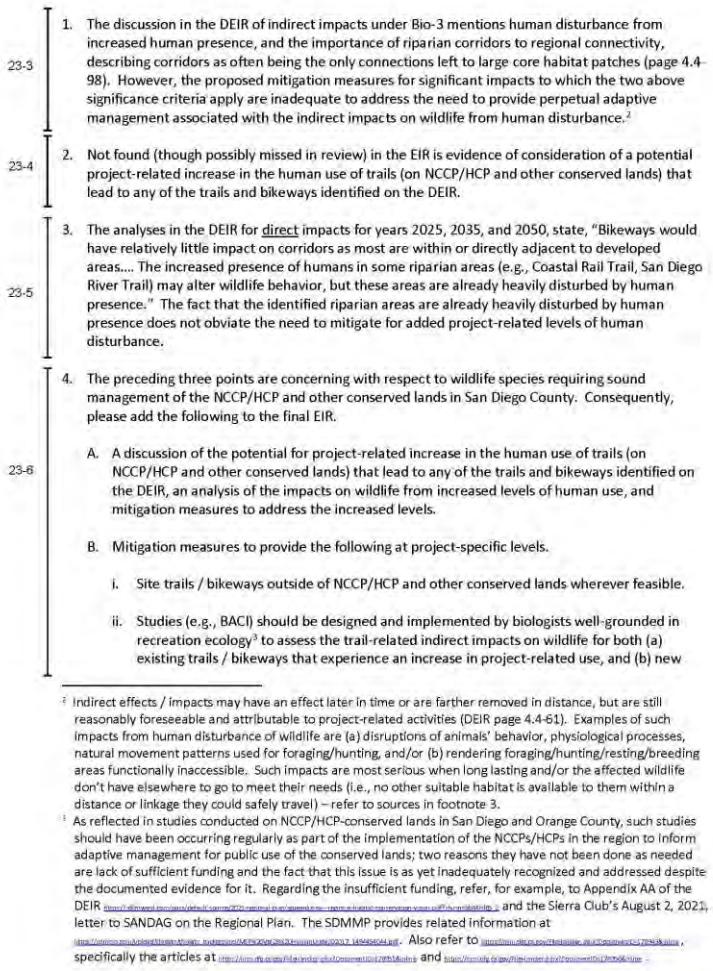
[1] The following are the trail / trail segments among the projects of the proposed Plan: California Coastal Trail, Coastal Rail Trail, San Diego River Trail - Carlton Oaks Segment, San Diego River Trail – Mast Park to Lakeside baseball park, San Luis Rey River Trail, and Inland Rail Trail: Oceanside (tables on pages E-63 to E-77 in the DEIR's Appendix E - Biological Resources - [illegible]).

RESPONSE TO COMMENT 23-1

Thank you for your participation in the environmental review process. Further responses to your comments are provided below. SANDAG appreciates and shares your concerns on the importance of wildlife protection from the effects of trails and bikeways.

RESPONSE TO COMMENT 23-2

SANDAG appreciates the summary of the EIR's biological mitigation measures that pertain to the construction and use of trails and bikeways.



23-3

1. The discussion in the DEIR of indirect impacts under Bio-3 mentions human disturbance from increased human presence, and the importance of riparian corridors to regional connectivity, describing corridors as often being the only connections left to large core habitat patches (page 4.4-98). However, the proposed mitigation measures for significant impacts to which the two above significance criteria apply are inadequate to address the need to provide perpetual adaptive management associated with the indirect impacts on wildlife from human disturbance.[2]

23-4

2. Not found (though possibly missed in review) in the EIR is evidence of consideration of a potential project-related increase in the human use of trails (on NCCP/HCP and other conserved lands) that lead to any of the trails and bikeways identified on the DEIR.

23-5

3. The analyses in the DEIR for direct impacts for years 2025, 2035, and 2050, state, "Bikeways would have relatively little impact on corridors as most are within or directly adjacent to developed areas.... The increased presence of humans in some riparian areas (e.g., Coastal Rail Trail, San Diego River Trail) may alter wildlife behavior, but these areas are already heavily disturbed by human presence." The fact that the identified riparian areas are already heavily disturbed by human presence does not obviate the need to mitigate for added project-related levels of human disturbance.

23-6

4. The preceding three points are concerning with respect to wildlife species requiring sound management of the NCCP/HCP and other conserved lands in San Diego County. Consequently, please add the following to the final EIR.

   A. A discussion of the potential for project-related increase in the human use of trails (on NCCP/HCP and other conserved lands) that lead to any of the trails and bikeways identified on the DEIR, an analysis of the impacts on wildlife from increased levels of human use, and mitigation measures to address the increased levels.

   B. Mitigation measures to provide the following at project-specific levels.

      i. Site trails / bikeways outside of NCCP/HCP and other conserved lands wherever feasible.

      ii. Studies (e.g., BACI) should be designed and implemented by biologists well-grounded in recreation ecology[3] to assess the trail-related indirect impacts on wildlife for both (a) existing trails / bikeways that experience an increase in project-related use, and (b) new

[2] Indirect effects / impacts may have an effect later in time or are farther removed in distance, but are still reasonably foreseeable and attributable to project-related activities (DEIR page 4.4-61). Examples of such impacts from human disturbance of wildlife are (a) disruptions of animals' behavior, physiological processes, natural movement patterns used for foraging/hunting, and/or (b) rendering foraging/hunting/resting/breeding areas functionally inaccessible. Such impacts are most serious when long lasting and/or the affected wildlife don't have elsewhere to go to meet their needs (i.e., no other suitable habitat is available to them within a distance or linkage they could safely travel) – refer to sources in footnote 3.

[3] As reflected in studies conducted on NCCP/HCP-conserved lands in San Diego and Orange County, such studies should have been occurring regularly as part of the implementation of the NCCPs/HCPs in the region to inform adaptive management for public use of the conserved lands; two reasons they have not been done as needed are lack of sufficient funding and the fact that this issue is as yet inadequately recognized and addressed despite the documented evidence for it. Regarding the insufficient funding, refer, for example, to Appendix AA of the DEIR and the Sierra Club's August 2, 2021, letter to SANDAG on the Regional Plan. The SDMMP provides related information at . Also refer to , specifically the articles at and .

RESPONSE TO COMMENT 23-3

Mitigation measure BIO-3, *Facilitate Wildlife Movement* (page 4.4-106), identifies measures for indirect impacts on wildlife movement corridors, including designing to avoid impacts on wildlife corridors and the preparation of wildlife movement studies where no data exist. In order to capture adaptive management and monitoring as suggested by the comment, the following text has been added to the first paragraph:

> Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking, identify corridor widths and wildlife crossing structures, and consider balancing conservation and recreation (Mitrovich et al. 2020) in project design. Include adaptive management and monitoring measures in the CEQA review, mitigation measures, and project design.

RESPONSE TO COMMENT 23-4

Page 4.4-83 (BIO-2) addresses potential impacts from human use on sensitive species resulting from land use changes and regional growth. Consistency with the HCPs is addressed in BIO-4, which assumes that the proposed Plan is consistent with all HCPs. Allowable uses, including recreational trails, are identified in the respective adopted NCCP Subarea Plans, and land use adjacency analyses conducted on the project-specific CEQA level would identify any conflicts with Subarea Plans and require mitigation.

RESPONSE TO COMMENT 23-5

DAG appreciates your comment. In order to mitigate for added project-related levels of human disturbance, the following revisions have been made to mitigation measure BIO-3:

- Allow corridor buffer zones and wide movement corridors to remain or incorporate periodic larger habitat patches along a corridor's length.
- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit night-time trail use and enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.

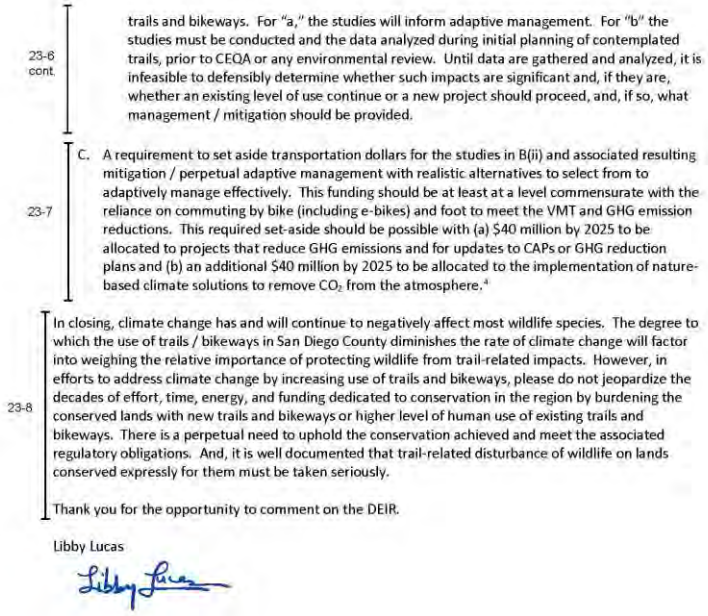
- As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.
- Use only native species for landscaping within at least 200 feet of identified wildlife corridors.
- Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
- Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e. rubberized asphalt), and traffic calming measures..

RESPONSE TO COMMENT 23-6

Thank you for identifying potential indirect impacts on wildlife species and corridors. As addressed in the response to the preceding comments, and as correctly stated, increase of human use would be addressed on the project-specific level; see also response to comments Lucas 23-3 and 23-4. Informed by studies on the recreational impacts on wildlife (i.e. M. Mitrovich, C. L. Larson, K. Barrows, M. Beck, and R. Unger. 2020. *Balancing Conservation and Recreation*. California Fish and Wildlife, Recreation Special Issue; 11–28), the following bullets were added to the BIO-3 mitigation paragraph:

- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit night-time trail use and enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.

With regards to funding and Appendix AA (see Footnote 3), please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund.



23-6 cont

trails and bikeways. For "a," the studies will inform adaptive management. For "b" the studies must be conducted and the data analyzed during initial planning of contemplated trails, prior to CEQA or any environmental review. Until data are gathered and analyzed, it is infeasible to defensibly determine whether such impacts are significant and, if they are, whether an existing level of use continue or a new project should proceed, and, if so, what management / mitigation should be provided.

23-7

C. A requirement to set aside transportation dollars for the studies in B(ii) and associated resulting mitigation / perpetual adaptive management with realistic alternatives to select from to adaptively manage effectively. This funding should be at least at a level commensurate with the reliance on commuting by bike (including e-bikes) and foot to meet the VMT and GHG emission reductions. This required set-aside should be possible with (a) $40 million by 2025 to be allocated to projects that reduce GHG emissions and for updates to CAPs or GHG reduction plans and (b) an additional $40 million by 2025 to be allocated to the implementation of nature-based climate solutions to remove CO_2 from the atmosphere.[4]

23-8

In closing, climate change has and will continue to negatively affect most wildlife species. The degree to which the use of trails / bikeways in San Diego County diminishes the rate of climate change will factor into weighing the relative importance of protecting wildlife from trail-related impacts. However, in efforts to address climate change by increasing use of trails and bikeways, please do not jeopardize the decades of effort, time, energy, and funding dedicated to conservation in the region by burdening the conserved lands with new trails and bikeways or higher level of human use of existing trails and bikeways. There is a perpetual need to uphold the conservation achieved and meet the associated regulatory obligations. And, it is well documented that trail-related disturbance of wildlife on lands conserved expressly for them must be taken seriously.

Thank you for the opportunity to comment on the DEIR.

Libby Lucas

[4] This assumes that the funding is realized and that, for example, carbon sequestration projects may occur within lands conserved for wildlife species and there will be existing or new trails in some of these areas.

RESPONSE TO COMMENT 23-7

To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

RESPONSE TO COMMENT 23-8

SANDAG appreciates the commenter's concerns. The proposed Plan includes a Climate Adaptation and Resilience Program that takes into consideration the potential effects of and solutions to climate change. Climate change has been a key topic throughout the Draft EIR and is discussed in detail in Appendix C, *Climate Change Projections, Impacts, and Adaptation*.

COMMENT LETTER 24: JAMES MARPLE

Comment Letter 24

From: JAMES MARPLE <jamesmarple66@yahoo.com>
Sent: Friday, September 3, 2021 8:15:38 AM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR
Subject: Regional Plan EIR

24-1 CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

RESPONSE TO COMMENT 24-1

Thank you for participating in the environmental review process. Please continue to follow along in this process by visiting SDForward.com.

(Note that since this comment was received blank, SANDAG subsequently followed up with the commenter and received a follow up comment letter on November 11, 2021.).

From: JAMES MARPLE <jamesmarple66@yahoo.com>
Sent: Thursday, November 11, 2021 11:11 PM
To: Kirsten Uchitel
Cc: Kelly McFlea; TomMarple@comcast.net; Mary Beth Sheets
Subject: Re: San Diego Forward Draft EIR Comment

Kirsten

24-2 Many thanks for your thoughtful reminder. Becoming ancient has brought on constant overload as my colleagues decline in number and/or acuity. Our favorite Editor is on leave so please bear with my stumbling verbiage, not meant to offend.

Citizens for Responsible Watershed Management comment to 2021 SANDAG Regional Plan

24-3 The focus of this plan on improving effectiveness of previous plans reveals limitations of information and/or education on the part of authors who did not factor in the publicly beneficial effects of compliance with the *1945 CA Water Code.*

What does this have to do with transit planning?

24-4 That Landmark State Law specifically and repeatedly

RESPONSE TO COMMENT 24-2

This comment is an explanation of the previously submitted blank email SANDAG received. SANDAG appreciates your feedback on the Draft EIR. Please see responses below for the comments provided in this letter.

RESPONSE TO COMMENT 24-3

Section 4.10.2 of the *Hydrology and Water Quality* section in the EIR, includes all of the applicable federal, State, and regional and local laws, regulations, plans, and policies applicable to the proposed Plan. Applicable sections of the California Water Code were included and analyzed to determine if implementation of the proposed Plan would result in a significant hydrology and water quality impact. The analysis in Section 4.10.4 of the EIR concluded that with compliance with regulatory requirements the proposed Plan's impacts on hydrology and water quality are less than significant.

RESPONSE TO COMMENT 24-4

Please see response to comment Marple 24-3.

24-4 cont. instructed all Southern CA agencies to; "guide all or any stormwaters into soils of the District".

24-5 We need no civil engineering expertise to recognize beneficial alternatives to 'traditional' transit planning that would become open to present planners if this simple instruction was complied with.
- If all San Diego landscapes are managed like the USEPA mode of Phoenix to retain rainfall so that it soaks into the soil, no runoff of water would occur.
- If there is no runoff then storm drains would not dump rainfall into canyons so these could become 'secondary transit' routes, as in Phoenix.

24-6 If planners find these concepts confusing then we may reasonably assume they've not 'done their homework' well enough to recognize public benefit from providing a convenient, safe, economical alternative to riding a bike in traffic or owning an automobile.

24-7 Public servants who manage transit systems should be aware of all costs/benefits of non-auto travel routes and produce a comprehensive study of these from National and Worldwide models. Only then will San Diego citizens be able to vote wisely for candidates who will demand multi-layered transit planning.

If residents have convenient paths-trails-travelways simple economics would reduce car ownership and thereby bring an overall improvement in traffic flow.

24-8 Has the scope of benefits from this reduction been identified? Have results of reduced auto traffic been

RESPONSE TO COMMENT 24-5

Please see response to comment Marple 24-3. As discussed in additional detail in Section 4.10, through the various regulatory requirements to incorporate hydromodification and low impact development (LID) measures, projects implementing the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff such that on- or offsite flooding would not occur.

RESPONSE TO COMMENT 24-6

For further information, refer to the proposed Plan, which discusses in additional detail the Plan's strategy for creating an integrated transportation system, including one with Complete Corridors that prioritize access to roadways for public transit, active transportation, and shared mobility services. The Active Transportation Network is a critical part of the proposed Plan that represents critical connections needed to get people around and is more than just bike facilities. As is the case with current SANDAG Active Transportation projects, each of these facilities also includes safety and connectivity enhancements for people walking, riding micromobility or transit, and driving. That said, this comment is not a comment about the content or analysis of the Draft EIR, and, as such, no further response is required.

RESPONSE TO COMMENT 24-7

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms.

RESPONSE TO COMMENT 24-8

The proposed Plan includes a number of investments in active transportation including the regional bike network, local bike projects through local streets and road funding as well as complete street investments in mobility hubs, mobility hub amenities (including secure bike parking and e-bike charging), an e-bike incentive program, and Vision Zero programs. In addition, Appendix B describes implementation actions for the proposed Plan, which includes a Regional Active Transportation Plan (including updated Regional Bike

Plan), Comprehensive Multimodal Corridor Plans, Regional Vision Zero Action Plan (including Regional Safety Policy), updating SANDAG grant programs, a quick build program for complete streets, and transportation demand management grants and incentives.

Also, as discussed in comment Marple 24-7, SANDAG will conduct a study that will focus on calculating the true cost of driving. Equity will be a very important component of that study. That said, this comment does not appear to provide a specific comment about the content or analysis of the Draft EIR and no further response is required.

evaluated and illustrated to the public?
It is obvious that the less wealthy population would benefit most from a dense network of non-auto trails, but so too would drivers, due to reduced traffic.

24-8 cont.

A fully developed web of travelways for those who would benefit most from not owning a car would be a proper goal for officials seeking equitable plans.

SANDAG planning has been focused on expanding vehicular travel systems and creating bike lanes. Forming a network of non-auto travel routes would give all residents the free or inexpensive option of walking, biking, 'scooters' or using minibus units to reach local destinations.

24-9

For these reasons, addressing the issue of failure to comply with CA Law intended to prevent flooding of canyons would be a major step toward restoring the public's right to convenient, safe, free pedestrian passage throughout all communities.

24-10

Has SANDAG performed a fully comprehensive study of 'secondary transit' that uses canyons, highway ROWs and 'back streets' to form a web of safe paths-trails-travelways along these routes?

24-11

To summarize:
San Diego residents have shown minimal interest in working with SANDAG because it presents choices between its preferred plans, does not fully illustrate all transit planning options for public consideration.

24-12

RESPONSE TO COMMENT 24-9

Please see response to comment Marple 24-6.

RESPONSE TO COMMENT 24-10

Please see response to comment Marple 24-3.

RESPONSE TO COMMENT 24-11

Many of the Complete Corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

In addition, as referenced in comment Marple 24-8, SANDAG will prepare a Regional Active Transportation Plan that will revisit future active transportation investments, including the feasibility of investments along travel ways such as those listed in the comment.

Thank you for your comment and consideration of the proposed Plan. Please see response to comment Marple 24-3

RESPONSE TO COMMENT 24-12

This comment appears to assert that the Draft EIR does not analyze a reasonable range of alternatives.

As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Project. Courts have noted that for complex projects with a wide scope, "it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects" (*Sierra Club v. City of Orange* (2008) 163 Cal. App. 4th 523).

Please see Master Response 1 for additional discussion of alternatives evaluated in the EIR. Please see response to comment Marple 24-5 regarding stormwater management planning.

24-12 cont.

Integrating its planning with that of every community to maximize rainwater management in keeping with the spirit and intent of the CA Water Code would be a major step toward upgrading the planning process.

James H. Marple
for CRWM and its associates

On Nov 5, 2021, at 10:34 AM, Kirsten Uchitel <Kirsten.Uchitel@sandag.org> wrote:

Dear Mr. Marple,

I received an email from you on the San Diego Forward: 2021 Regional Plan Draft EIR, however, there was no text in the body of your email. I wanted to reach out to you to see if you had a comment that you wanted to submit for response and inclusion in the Final EIR. If yes, please email it to me by the close of business next Friday, November 12, 2021.

Thank you very much,

Kirsten Uchitel
Associate Planner

401 B Street, Suite 800, San Diego, CA 92101

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COMMENT LETTER 25: CITY OF OCEANSIDE



Comment Letter 25

CITY OF OCEANSIDE
OFFICE OF CITY MANAGER

October 11, 2021

Mr. Hasan Ikhrata
Executive Director
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101

RE: Draft Environmental Impact Report for the 2021 Regional Plan

Dear Mr. Ikhrata:

25-1 The City of Oceanside ("City") appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the 2021 Regional Plan ("the proposed Plan"), which combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The proposed Plan looks ahead to 2050, with the purpose of addressing many systematic transportation challenges faced by the entire San Diego region. The City acknowledges SANDAG's bold vision for a transformed mobility network that promotes convenient and cost-effective transportation options, smart growth, environmental justice, social equity, and Greenhouse Gas emissions reduction. However, the City would like to take this opportunity to identify significant concerns regarding 1.) the proposed Plan and Draft EIR's growth projections and land use assumptions for Oceanside, and 2.) SANDAG's continued lack of funding allocation, support, or implementation of two important regional transportation projects identified and relied on in the proposed Plan. These inadequacies effectively result in miscalculated environmental impacts and insufficient analysis pursuant to the California Environmental Quality Act (CEQA). The City's comments on these two issues are detailed below:

25-2 The proposed Plan and associated environmental analysis inadequately address Oceanside's growth and land use assumptions, forecasts, and planning efforts.

In a letter to SANDAG on the proposed Plan from the City's Development Services Department, dated August 6, 2021, City staff raised concerns about the proposed Plan's significant underestimation and inconsistent acknowledgement of Oceanside's growth assumptions and land use projections, which should form the basis of the Draft EIR analysis. As such, the Draft EIR's land use analysis is incomplete. Further details are provided below:

25-3
- The proposed Plan projects roughly 300,000 fewer new residents in the San Diego region compared to the prior (2016) forecast; however, SANDAG projects the region's population will grow by nearly one million people by 2050. The growth in population will drive job growth and housing demand within the region – adding 500,000 jobs and more than 330,000 housing units by 2050 (Series 13: 2050 Regional Growth Forecast).

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RESPONSE TO COMMENT 25-1

SANDAG would like to thank the City of Oceanside for participating in the environmental review process and for acknowledging support for SANDAG's vision of the proposed Plan. Please see below for detailed responses to the concerns listed by the City.

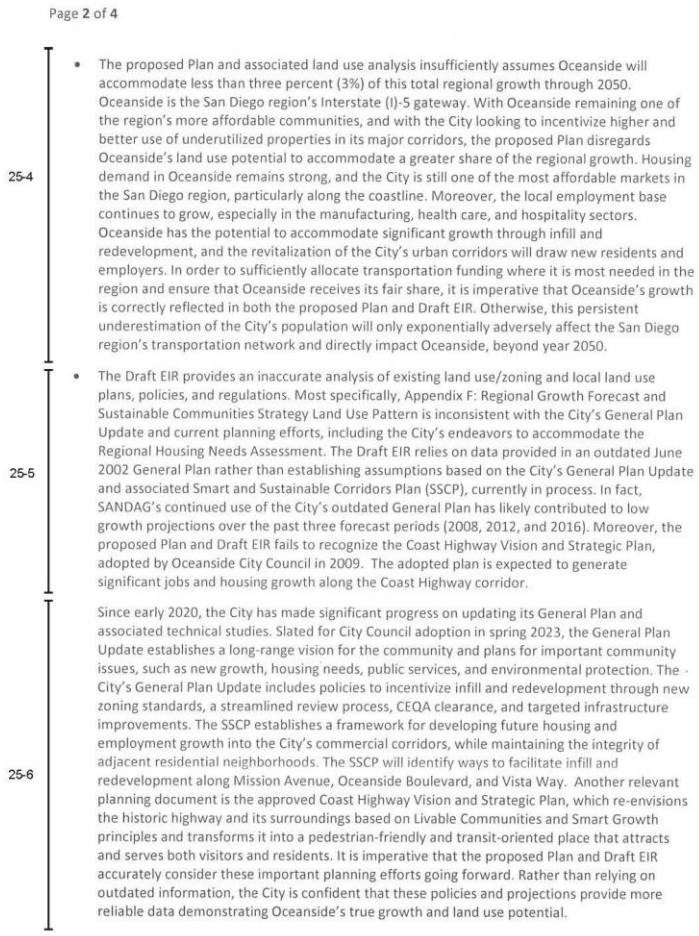
RESPONSE TO COMMENT 25-2

The proposed Plan and associated land use analysis use the most recent planning assumptions considering local general plans and other factors consistent with Government Code Section 65080(b)(2)(B). The SCS must also "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the state-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' general plans. The analysis in the EIR is complete and based on planning assumptions provided to SANDAG by local jurisdictions as of 2018. SANDAG acknowledges that Oceanside is working on a General Plan Update and has completed other planning efforts since 2018 that will inform development of the next forecast.

The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 25-3

The Series 14 Regional Growth Forecast uses the January 2020 vintage of the Department of Finance populations projections, which shows less growth over the next 30 years than previously anticipated in the population projections used for the Series 13 Regional Growth Forecast.



Page 2 of 4

25-4

- The proposed Plan and associated land use analysis insufficiently assumes Oceanside will accommodate less than three percent (3%) of this total regional growth through 2050. Oceanside is the San Diego region's Interstate (I)-5 gateway. With Oceanside remaining one of the region's more affordable communities, and with the City looking to incentivize higher and better use of underutilized properties in its major corridors, the proposed Plan disregards Oceanside's land use potential to accommodate a greater share of the regional growth. Housing demand in Oceanside remains strong, and the City is still one of the most affordable markets in the San Diego region, particularly along the coastline. Moreover, the local employment base continues to grow, especially in the manufacturing, health care, and hospitality sectors. Oceanside has the potential to accommodate significant growth through infill and redevelopment, and the revitalization of the City's urban corridors will draw new residents and employers. In order to sufficiently allocate transportation funding where it is most needed in the region and ensure that Oceanside receives its fair share, it is imperative that Oceanside's growth is correctly reflected in both the proposed Plan and Draft EIR. Otherwise, this persistent underestimation of the City's population will only exponentially adversely affect the San Diego region's transportation network and directly impact Oceanside, beyond year 2050.

25-5

- The Draft EIR provides an inaccurate analysis of existing land use/zoning and local land use plans, policies, and regulations. Most specifically, Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern is inconsistent with the City's General Plan Update and current planning efforts, including the City's endeavors to accommodate the Regional Housing Needs Assessment. The Draft EIR relies on data provided in an outdated June 2002 General Plan rather than establishing assumptions based on the City's General Plan Update and associated Smart and Sustainable Corridors Plan (SSCP), currently in process. In fact, SANDAG's continued use of the City's outdated General Plan has likely contributed to low growth projections over the past three forecast periods (2008, 2012, and 2016). Moreover, the proposed Plan and Draft EIR fails to recognize the Coast Highway Vision and Strategic Plan, adopted by Oceanside City Council in 2009. The adopted plan is expected to generate significant jobs and housing growth along the Coast Highway corridor.

25-6

Since early 2020, the City has made significant progress on updating its General Plan and associated technical studies. Slated for City Council adoption in spring 2023, the General Plan Update establishes a long-range vision for the community and plans for important community issues, such as new growth, housing needs, public services, and environmental protection. The City's General Plan Update includes policies to incentivize infill and redevelopment through new zoning standards, a streamlined review process, CEQA clearance, and targeted infrastructure improvements. The SSCP establishes a framework for developing future housing and employment growth into the City's commercial corridors, while maintaining the integrity of adjacent residential neighborhoods. The SSCP will identify ways to facilitate infill and redevelopment along Mission Avenue, Oceanside Boulevard, and Vista Way. Another relevant planning document is the approved Coast Highway Vision and Strategic Plan, which re-envisions the historic highway and its surroundings based on Livable Communities and Smart Growth principles and transforms it into a pedestrian-friendly and transit-oriented place that attracts and serves both visitors and residents. It is imperative that the proposed Plan and Draft EIR accurately consider these important planning efforts going forward. Rather than relying on outdated information, the City is confident that these policies and projections provide more reliable data demonstrating Oceanside's true growth and land use potential.

RESPONSE TO COMMENT 25-4

Please see response to comment Oceanside 25-2.

RESPONSE TO COMMENT 25-5

The proposed Plan and associated land use analysis use the most recent planning assumptions considering local general plans and other factors consistent with Government Code Section 65080(b)(2)(B). Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11, *Land Use,* of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

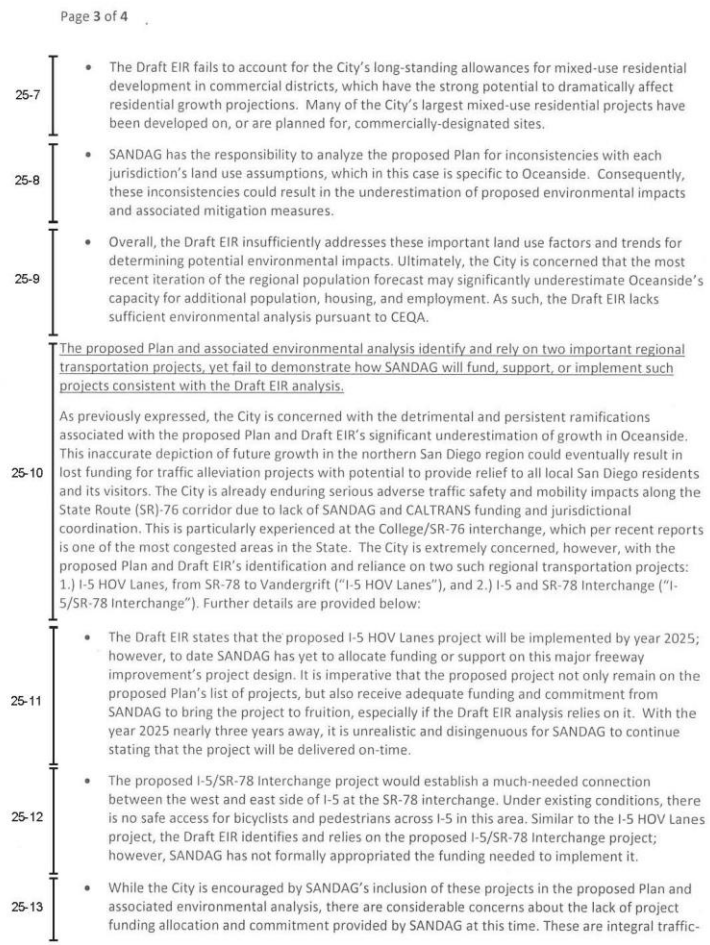
As noted in the comment, the City's General Plan Update has not been adopted and is currently in process and will inform development of the next forecast. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' plans.

RESPONSE TO COMMENT 25-6

The comment describes the City's progress on updating its general plan and associated technical studies. As noted in the comment, the City's General Plan Update is currently in process and anticipated for consideration by the City Council in Spring 2023. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. SANDAG looks forward to coordinating with the City on future Regional Plan updates. Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with

these policies would be considered during project-specific CEQA reviews.

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' plans.



Page 3 of 4

25-7
- The Draft EIR fails to account for the City's long-standing allowances for mixed-use residential development in commercial districts, which have the strong potential to dramatically affect residential growth projections. Many of the City's largest mixed-use residential projects have been developed on, or are planned for, commercially-designated sites.

25-8
- SANDAG has the responsibility to analyze the proposed Plan for inconsistencies with each jurisdiction's land use assumptions, which in this case is specific to Oceanside. Consequently, these inconsistencies could result in the underestimation of proposed environmental impacts and associated mitigation measures.

25-9
- Overall, the Draft EIR insufficiently addresses these important land use factors and trends for determining potential environmental impacts. Ultimately, the City is concerned that the most recent iteration of the regional population forecast may significantly underestimate Oceanside's capacity for additional population, housing, and employment. As such, the Draft EIR lacks sufficient environmental analysis pursuant to CEQA.

25-10
The proposed Plan and associated environmental analysis identify and rely on two important regional transportation projects, yet fail to demonstrate how SANDAG will fund, support, or implement such projects consistent with the Draft EIR analysis.

As previously expressed, the City is concerned with the detrimental and persistent ramifications associated with the proposed Plan and Draft EIR's significant underestimation of growth in Oceanside. This inaccurate depiction of future growth in the northern San Diego region could eventually result in lost funding for traffic alleviation projects with potential to provide relief to all local San Diego residents and its visitors. The City is already enduring serious adverse traffic safety and mobility impacts along the State Route (SR)-76 corridor due to lack of SANDAG and CALTRANS funding and jurisdictional coordination. This is particularly experienced at the College/SR-76 interchange, which per recent reports is one of the most congested areas in the State. The City is extremely concerned, however, with the proposed Plan and Draft EIR's identification and reliance on two such regional transportation projects: 1.) I-5 HOV Lanes, from SR-78 to Vandergrift ("I-5 HOV Lanes"), and 2.) I-5 and SR-78 Interchange ("I-5/SR-78 Interchange"). Further details are provided below:

25-11
- The Draft EIR states that the proposed I-5 HOV Lanes project will be implemented by year 2025; however, to date SANDAG has yet to allocate funding or support on this major freeway improvement's project design. It is imperative that the proposed project not only remain on the proposed Plan's list of projects, but also receive adequate funding and commitment from SANDAG to bring the project to fruition, especially if the Draft EIR analysis relies on it. With the year 2025 nearly three years away, it is unrealistic and disingenuous for SANDAG to continue stating that the project will be delivered on-time.

25-12
- The proposed I-5/SR-78 Interchange project would establish a much-needed connection between the west and east side of I-5 at the SR-78 interchange. Under existing conditions, there is no safe access for bicyclists and pedestrians across I-5 in this area. Similar to the I-5 HOV Lanes project, the Draft EIR identifies and relies on the proposed I-5/SR-78 Interchange project; however, SANDAG has not formally appropriated the funding needed to implement it.

25-13
- While the City is encouraged by SANDAG's inclusion of these projects in the proposed Plan and associated environmental analysis, there are considerable concerns about the lack of project funding allocation and commitment provided by SANDAG at this time. These are integral traffic-

RESPONSE TO COMMENT 25-7

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The SCS land use pattern proposed in the proposed Plan focuses growth and development in the Mobility Hub areas to facilitate access to transit and improved jobs-housing balance. The allocation of housing units to subregional areas represents general areas projected for future growth in Mobility Hub areas, not specific parcels, for future housing development or housing unit type. A number of land uses at the parcel level, aggregated up, comprise these general areas. The exercise of land use authority is reserved for local jurisdictio.

RESPONSE TO COMMENT 25-8

Chapter 4.11 of the Draft EIR evaluates the land use impacts of the proposed Plan, including a consistency analysis with jurisdictions' land use plans. Please also see Draft EIR Appendix L, *Subregional Plan Consistency Analysis*. Environmental impacts of any such inconsistencies are considered throughout the Draft EIR as part of the proposed Plan impact analysis.

RESPONSE TO COMMENT 25-9

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The forecasted development pattern in the SCS does not represent buildout capacity of jurisdictions' general plans. Rather, the SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs and policies in the Plan consistent with SB 375. The Draft EIR's population forecasts are based on substantial evidence using the best-available data, specifically, the Series 14 Regional Growth Forecast and the regional forecast from the California Department of Finance.

RESPONSE TO COMMENT 25-10

SANDAG looks forward to continuing to coordinate with the City of Oceanside to incorporate is latest planning assumptions into future updates of the Regional Plan so that they are included. To the extent this comment refers to the comments above alleging the proposed Plan's population modeling undercounts growth in Oceanside, see response to

comment Oceanside 25-09. See below responses regarding the two specific transportation projects mentioned in the comment.

RESPONSE TO COMMENT 25-11

The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment as part of its project-level environmental analysis (to Harbor/Vandegrift https://www.keepsandiegomoving.com/Documents/NCC_doc/I-5_Final_EIR-EIS.pdf). Although funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Plan.

RESPONSE TO COMMENT 25-12

The I-5/SR 78 project (Interchange and Arterial Operational Improvements) is included in the proposed Plan by 2035. The regional transportation network does not include details regarding the types of bicycle and pedestrian facilities to be included with specific corridor projects, and the analysis of those projects will require future planning and coordination with local jurisdictions, community members, and other stakeholders to determine those details; all to be conducted at the project level.

RESPONSE TO COMMENT 25-13

SANDAG will continue to pursue State and federal funding for these (and other) future projects identified in the proposed Plan.

25-13 cont. alleviating projects that affect the San Diego region, and every effort must be made to implement them in accordance with statements made in the proposed Plan and Draft EIR.

Summary

25-14 The City of Oceanside again thanks SANDAG for the opportunity to comment on the Draft EIR for the proposed Plan. Staff look forward to collaborating with SANDAG as the draft environmental analysis is revised to more accurately reflect Oceanside's more realistic growth and land use projections. The City will continue reaching out to SANDAG staff to express the importance of allocating funding for implementation of the I-5 HOV Lanes and I-5/SR-78 Interchange projects with the goal of realizing their timely construction.

Sincerely,

Deanna Lorson
CITY MANAGER
dlorson@oceansideca.org

cc: Jonathan Borrego, Deputy City Manager/Development Services Director
Hamid Bahadori, Interim Public Works Director/City Traffic Engineer
Darlene Nicandro, Development Services Deputy Director
Jeff Hunt, City Planner
Russ Cunningham, Principal Planner

RESPONSE TO COMMENT 25-14

SANDAG would like to thank the City of Oceanside for the feedback submitted and looks forward to future collaboration.

COMMENT LETTER 26: CITY OF POWAY

Comment Letter 26

From: David De Vries <DDeVries@poway.org>
Sent: Monday, October 11, 2021 6:28:28 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Cc: Andy Loperena <ALoperena@poway.org>; Scott Post <SPost@poway.org>; Melody Rocco <MRocco@poway.org>; Bob Manis <BManis@poway.org>; SDFORWARD <sdforward@sandag.org>
Subject: Draft EIR for the 2021 Regional Plan Comments - City of Poway

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Thank you for allowing us to submit comments on the Draft EIR for the 2021 Regional Plan.

26-1 Regarding Scripps Poway Parkway, the City of Poway would like to see vehicle, bike, pedestrian and transit infrastructure improvements and connections to be added from the Highway 67 through Scripps Poway Parkway to the I-15 Freeway. Please note that the majority of the City of Poway and areas east of the City of Poway are in the Very High Fire Severity Zone. Evacuation routes for the region should consider alternative routes and not only highway routes. Figure 4.9-2 of the EIR shows that there are no evacuation routes through the City of Poway. Providing vehicle, bike, pedestrian and transit infrastructure improvements along Scripps Poway Parkway and establishing it as an Evacuation Route will provide better access for emergency vehicles and sufficient routes for persons evacuating through the City of Poway. I have spoken to several property and business owners within the South Poway Business Park (SPBP) including Geico and parking is a constant issue. There is currently no public transit route into the SPBP. Having public transit, bike, pedestrian and highway/road improvements/connections providing more efficient access to the SPBP is essential for future employment growth and public safety in the area. Many workers in the Poway area live in Ramona and East County and this is a vital connection for the City and the Region. SANDAG has also identified the SPBP as a Tier 3 employment center in their draft Employment Center analysis. Construction is also underway to add thousands of more employees in the SPBP. To be clear, we are recommending that Scripps Poway Parkway be shown as a critical connection, a multimodal corridor, and an evacuation route in the San Diego region (https://www.sandag.org/uploads/publicationid/publicationid_4720_28341.pdf).

26-2 Regarding the Hwy 67, please note that the City of Poway's General Plan Transportation Element includes a multi-use path on the west side of SR-67 (reference p. 3 http://docs.poway.org/weblink/0/doc/50446/Electronic.aspx). This multi-use path would include a separated two-way bike path and a fenced DG equestrian trail. The multi-use path provides a critical and safe pathway for hikers, bikers, runners, walkers, children, and equestrians. A multi-use path also creates a necessary loop between the City's Iron Mountain trailhead and other destinations (e.g., Mt. Woodson, Lake Poway) which is also a goal within the Transportation Element. We recommend the San Vicente corridor plan be consistent with the City's plans. Also, for public safety, please recall that there are considerable traffic collisions along the Hwy 67 and we recommend that traffic safety improvements be considered along the Hwy 67 corridor.

State Route 67 is also designated as a scenic roadway by the Poway General Plan. As a part of the General Plan requirements, a 50-foot wide landscape open space easement is required from adjacent property owners from the ultimate right-of-way line along State Route 67 when development is proposed. This easement shall be landscaped and modified as needed to enhance the scenic quality of the area as discussed in the General Plan Transportation Element Policy B – Scenic Roadways. Providing scenic roadway elements to the design will also help the corridor be more compatible with surrounding open space. To contribute to the General Plan goals, we would suggest that the right-of-way incorporate design elements consistent with a scenic roadway (e.g., naturalized decorative solid walls, native landscaped medians and shoulders, additional landscape areas and trees where feasible, earthen berms). Also, the EIR

1

RESPONSE TO COMMENT 26-1

This comment is related to the proposed Plan and does not address the adequacy of the Draft EIR.

The San Vicente Comprehensive Multimodal Corridor Plan (CMCP) effort is currently underway, and Scripps Poway Parkway is included in the study area for that CMCP. The CMCP will include a suite of solutions for consideration in future planning, implementation, and improvement activities along the corridor, including SR 67 connections with Poway Road and Scripps Poway Parkway. The CMCP will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations. The CMCP stakeholder working group includes representation from the City of Poway, which is intended to integrate jurisdictional priorities into the suite of solutions within the boundaries of the CMCP planning area.

RESPONSE TO COMMENT 26-2

The San Vicente CMCP will consider all relevant and related plans and projects, in collaboration with City of Poway staff, to ensure there is cohesion and consistency between the CMCP and the communities within and adjacent to it, including active and multi-modal transportation considerations.

The CMCP study identifies ways to improve roadway safety, enhance the urban-rural transportation interface (with special consideration given to limiting impacts on surrounding environmental habitats and wildlife), engage with tribal nations, and create greater trip reliability and efficiency throughout the study area while supporting climate action initiatives. The suite of solutions will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations. The City of Poway is an integral member of the stakeholder working group and in the development of the CMCP.

This comment also applies only to the content of the proposed Plan and not the adequacy of the Draft EIR's contents.

for the 2021 Regional Plan Table 4.1-1 and Figure 4.1-1 shows Highway 67 as not an Officially Designated or an Eligible State Scenic Highway, however, the Caltrans Scenic Highway System Lists (https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways) notes Highway 67 as an Eligible State Scenic Highway and the EIR needs to be revised to show Highway 67 as an Eligible State Scenic Highway.

As a part of the San Diego Forward Plan and the 5 Big Moves Plan, SANDAG established the SR-67 corridor as a Comprehensive Multimodal Corridor Plan (CMCP) calling for a multimodal road along the SR-67 (https://www.sdforward.com/docs/default-source/default-document-library/agenda-june-5-2020.pdf?sfvrsn=891afe65_4) . As stated on p. 6-2 of the 2050 RTP, "Our region has consistently supported a multimodal approach to transportation that looks at the overall system and improvements that benefit all modes, rather than prioritizing one over the other. This approach gives all of the transportation system users choices traveling within and through the region." Further, "A well designed and thoughtfully integrated multimodal transportation system will give people choices, allowing them to select the transportation mode that is best suited for a particular trip. In an area as large and diverse as the San Diego region, this approach is necessary to make the best use of our limited transportation resources." As discussed, a multi-modal transportation system provides users transportation options and choices and thereby reduces traffic congestion and ghg emissions. Regional multi-use paths have been a great asset to communities across the country. Here in San Diego, the SR-56 Bike Path is separated from the highway and is often used by runners, walkers, and equestrians. In contrast, it is uncommon to see bikers, walkers, and equestrians in a bike route adjacent to a highway (for instance, SR-76). A multi-use path is also kid friendly because of the separation from the highway and kids are often seen on the SR-56 Bike Path and not commonly seen within bike routes adjacent to a Highway. The multi-use path also accommodates a more rural aesthetic and is safer for users. Multi-use paths have become a critical component to the transportation system and are treasured by the communities they are a part of. The addition of the multi-use path along Hwy 67 is more consistent with the goals and policies of the 2050 RTP. We recommend the San Vicente corridor plan provides a separated mixed-use path throughout the full length of the corridor.

26-2 cont.

Regarding unique geological features or landforms, page 4.7-30 of the EIR for the 2021 Regional Plan notes that the City of Poway General Plan "does not contain policies or regulations specific to unique geological features or landforms." This is incorrect, the General Plan and Habitat Conservation Plan notes unique geological features and landforms and related policies that include the preservation of rock outcroppings, open space, hillsides, ridgelines, and cultural, historical, and paleontological resources. Please update this in the EIR to be accurate.

26-3

Regarding Poway's General Plan, page 4.11-16 of the EIR for the 2021 Regional Plan notes that the City of Poway Comprehensive Plan was adopted November 1991 and that the Housing Element update is in the process of being updated. Please update the EIR as follows: "Poway General Plan November 1991 (Transportation Element updated March 2010; Housing Element updated August 2021; Public Safety Element being updated as of October 2021)."

26-4

Lastly, during the workshop portion for the Draft 2021 Regional Plan, workshops were provide by area (North, East, Central, etc.). Based on the mapped areas shown, Poway residents and community stakeholders were not represented as a part of any region and that outreach with appropriate comment period should be provided prior to moving forward with Draft. I'd be happy to assist you with what an appropriate outreach should be.

26-5

Thank you for considering our comments. Please feel free to reach out to me with any questions.

Thank you,

David De Vries, AICP
City Planner
Development Services
City of Poway | 13325 Civic Center Drive | Poway, CA 92064
Phone (858) 668-4604 | Fax (858) 668-1211
ddevries@poway.org

2

RESPONSE TO COMMENT 26-3

Table 4.7-4 in the Final EIR has been updated to reflect correct notes in the General Plan and Habitat Conservation Plan as provided in the comment.

RESPONSE TO COMMENT 26-4

Table 4.11-5 in the Final EIR has been updated to reflect the General Plan element updates as provided in the comment.

RESPONSE TO COMMENT 26-5

This comment addresses the proposed Plan public outreach process, and is not related to the adequacy of the Draft EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan. As part of outreach on the Draft Plan, a virtual open house was held on June 16, 2021, entitled "County Unincorporated," which included connections to adjacent cities, including Poway.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR

From: David De Vries <DDeVries@poway.org>
Sent: Thursday, August 5, 2021 10:34 AM
To: San Diego Association of Governments - San Diego Association of Governments (sdforward@sandag.org) <sdforward@sandag.org>
Cc: Bob Manis <BManis@poway.org>
Subject: 2021 Regional Plan Comments - City of Poway

Thank you for allowing us to submit comments on the Draft 2021 Regional Plan.

Regarding Scripps Poway Parkway, the City of Poway would like to see vehicle, bike, pedestrian and transit infrastructure improvements and connections to be added from the Highway 67 through Scripps Poway Parkway to the I-15 Freeway. I have spoken to several property and business owners within the South Poway Business Park (SPBP) including Geico and parking is a constant issue. There is currently no public transit route into the SPBP. Having public transit, bike, pedestrian and highway/road improvements/connections providing better more efficient access to the SPBP is essential for future employment growth in the area. Many workers in the Poway area live in Ramona and East County and this is a vital connection for the City and the Region. SANDAG has also identified Scripps Poway as a Tier 3 employment center in their draft Employment Center analysis. Construction is also underway to add thousands of more employees in the SPBP. To be clear, we are recommending that Scripps Poway Parkway become a critical connection and a multimodal corridor (https://www.sandag.org/uploads/publicationid/publicationid_4720_28341.pdf).

Regarding the Hwy 67, please note that the City of Poway's General Plan Transportation Element includes a multi-use path on the west side of SR-67 (reference p. 3 http://docs.poway.org/weblink/0/doc/50446/Electronic.aspx). This multi-use path would include a separated two-way bike path and a fenced DG equestrian trail. The multi-use path provides a critical and safe pathway for hikers, bikers, runners, walkers, children, and equestrians. A multi-use path also creates a necessary loop between the City's Iron Mountain trailhead and other destinations (e.g., Mt. Woodson, Lake Poway) which is also a goal within the Transportation Element. We recommend the San Vicente corridor plan is consistent with the City's plans.

State Route 67 is also designated as a scenic roadway by the Poway General Plan. As a part of the General Plan requirements, a 50-foot wide landscape open space easement is required from adjacent property owners from the ultimate right-of-way line along State Route 67 when development is proposed. This easement shall be landscaped and modified as needed to enhance the scenic quality of the area as discussed in the General Plan Transportation Element Policy B – Scenic Roadways. Providing scenic roadway elements to the design will also help the corridor be more compatible with surrounding open space. To contribute to the General Plan goals, we would suggest that the right-of-way incorporate design elements consistent with a scenic roadway (e.g., naturalized decorative solid walls, native landscaped medians and shoulders, additional landscape areas and trees where feasible, earthen berms).

26-6

As a part of the San Diego Forward Plan and the 5 Big Moves Plan, SANDAG established the SR-67 corridor as a Comprehensive Multimodal Corridor Plan (CMCP) calling for a multimodal road along the SR-67 (https://www.sdforward.com/docs/default-source/default-document-library/agenda-june-5-2020.pdf?sfvrsn=891afe65_4) . As stated on p. 6-2 of the 2050 RTP, "Our region has consistently supported a multimodal approach to transportation that looks at the overall system and improvements that benefit all modes, rather than prioritizing one over the other. This approach gives all of the transportation system users choices traveling within and through the region." Further, "A well designed and thoughtfully integrated multimodal transportation system will give people choices, allowing them to select the transportation mode that is best suited for a particular trip. In an area as large and diverse as the San Diego region, this approach is necessary to make the best use of our limited transportation resources." As discussed, a multi-modal transportation system provides users transportation options and choices and thereby reduces traffic congestion and ghg emissions. Regional multi-use paths have been a great asset to communities across the country. Here in San Diego, the SR-56 Bike Path is separated from the highway and is often used by runners, walkers, and equestrians. In contrast, it is uncommon to see bikers, walkers, and equestrians in a bike route adjacent to a highway (for instance, SR-76). A multi-use path is also kid friendly because of the separation from the highway and kids are often seen on the SR-56 Bike Path and not commonly seen within bike routes adjacent to a

3

RESPONSE TO COMMENT 26-6

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. See Appendix P.2 for the responses to comments on the proposed Plan. The San Vincente CMCP effort is currently underway. The CMCP will include a suite of solutions for consideration in future planning, implementation, and improvement activities along the corridor, including Highway 67 connections with Poway Road and Scripps Poway Road. The CMCP will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations. The CMCP stakeholder working group includes representation from the City of Poway, which is intended to integrate jurisdictional priorities into the suite of solutions within the boundaries of the CMCP planning area.
Your comment has been forwarded to San Diego Metropolitan Transit System (MTS).

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Please see responses L124 through L128 in Appendix P.2.

Highway. The multi-use path also accommodates a more rural aesthetic and is safer for users. Multi-use paths have become a critical component to the transportation system and are treasured by the communities they are a part of. The addition of the multi-use path along Hwy 67 is more consistent with the goals and policies of the 2050 RTP. We recommend the San Vicente corridor plan provides a separated mixed-use path throughout the full length of the corridor.

26-6 cont.

Lastly, during the workshop portion for the Draft 2021 Regional Plan, workshops were provide by area (North, East, Central, etc.). Based on the mapped areas shown, Poway residents and community stakeholders were not represented as a part of any region and that outreach with appropriate comment period should be provided prior to moving forward with Draft. I'd be happy to assist you with what an appropriate outreach should be.

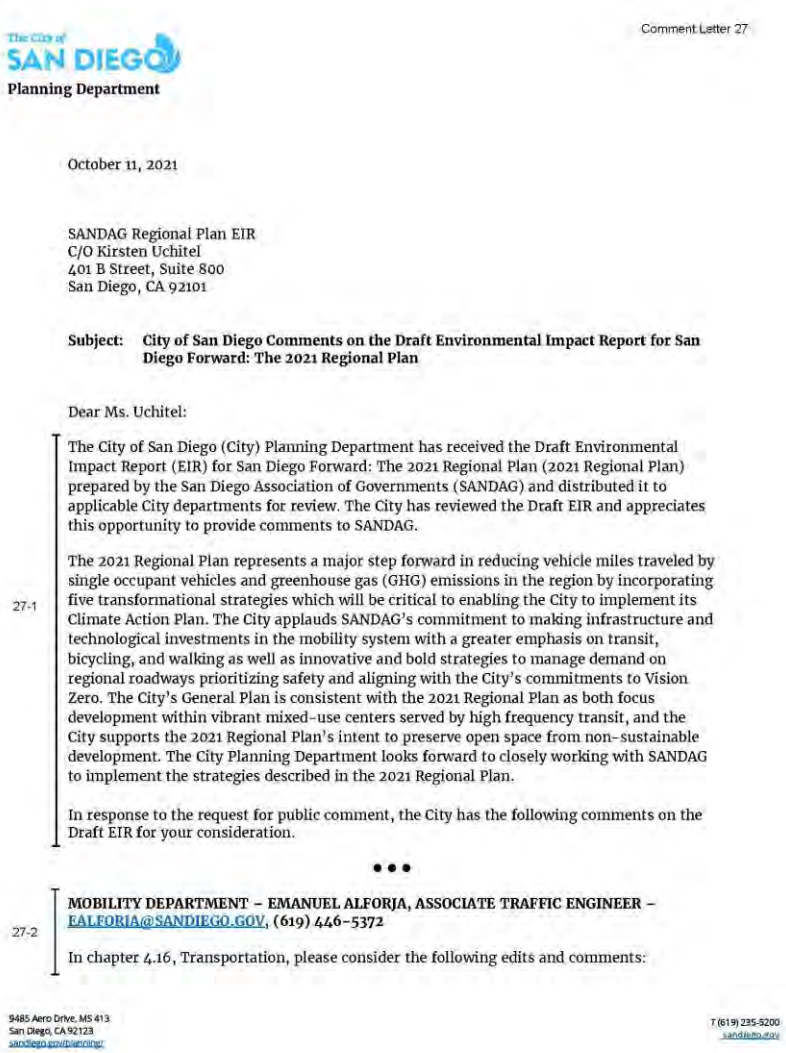
Thank you for considering our comments. Please feel free to reach out to me with any questions.

Thank you,

David De Vries, AICP
City Planner
Development Services
City of Poway | 13325 Civic Center Drive | Poway, CA 92064
Phone (858) 668-4604 | Fax (858) 668-1211
ddevries@poway.org

4

COMMENT LETTER 27: CITY OF SAN DIEGO



The City of SAN DIEGO
Planning Department

Comment Letter 27

October 11, 2021

SANDAG Regional Plan EIR
C/O Kirsten Uchitel
401 B Street, Suite 800
San Diego, CA 92101

Subject: City of San Diego Comments on the Draft Environmental Impact Report for San Diego Forward: The 2021 Regional Plan

Dear Ms. Uchitel:

The City of San Diego (City) Planning Department has received the Draft Environmental Impact Report (EIR) for San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) prepared by the San Diego Association of Governments (SANDAG) and distributed it to applicable City departments for review. The City has reviewed the Draft EIR and appreciates this opportunity to provide comments to SANDAG.

27-1 The 2021 Regional Plan represents a major step forward in reducing vehicle miles traveled by single occupant vehicles and greenhouse gas (GHG) emissions in the region by incorporating five transformational strategies which will be critical to enabling the City to implement its Climate Action Plan. The City applauds SANDAG's commitment to making infrastructure and technological investments in the mobility system with a greater emphasis on transit, bicycling, and walking as well as innovative and bold strategies to manage demand on regional roadways prioritizing safety and aligning with the City's commitments to Vision Zero. The City's General Plan is consistent with the 2021 Regional Plan as both focus development within vibrant mixed-use centers served by high frequency transit, and the City supports the 2021 Regional Plan's intent to preserve open space from non-sustainable development. The City Planning Department looks forward to closely working with SANDAG to implement the strategies described in the 2021 Regional Plan.

In response to the request for public comment, the City has the following comments on the Draft EIR for your consideration.

• • •

27-2 **MOBILITY DEPARTMENT – EMANUEL ALFORJA, ASSOCIATE TRAFFIC ENGINEER – EALFORJA@SANDIEGO.GOV, (619) 446-5372**

In chapter 4.16, Transportation, please consider the following edits and comments:

9485 Aero Drive, MS 413
San Diego, CA 92123
sandiego.gov/planning/

T (619) 235-5200
sandiego.gov

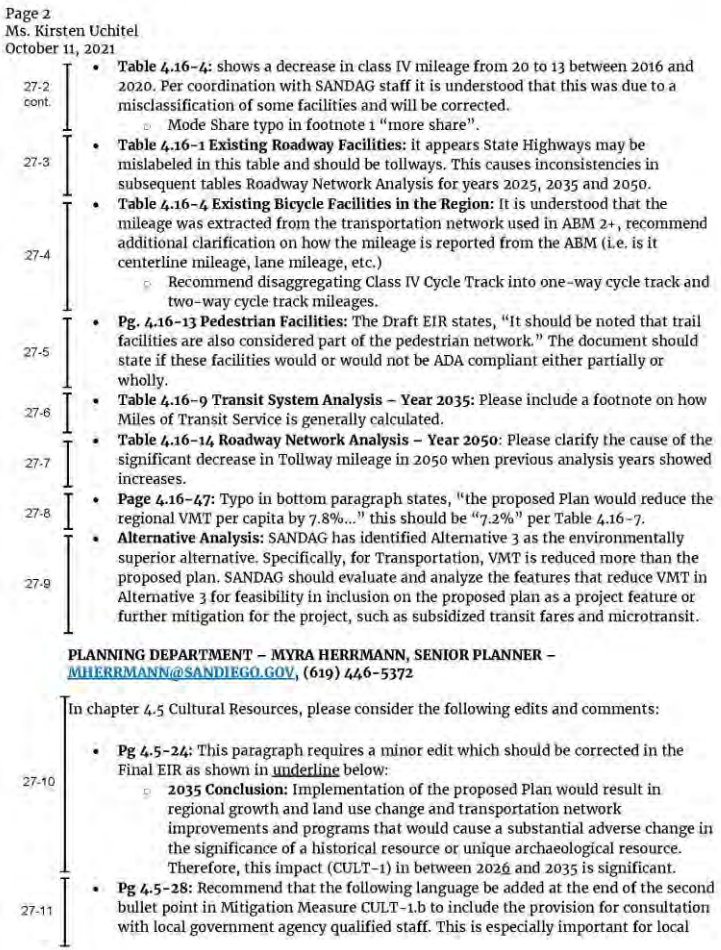
RESPONSE TO COMMENT 27-1

Thank you for your comments and consideration of the proposed Plan.

RESPONSE TO COMMENT 27-2

Table 4.16-4 has been revised to reflect this comment and now shows 20.9 Class IV lane miles under year 2020 conditions.

Table note #2 for Tables 4.16-5 through 4.16-16 has been updated to read "Mode Share" instead of "More Share.".



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27-2 cont.
- **Table 4.16-4:** shows a decrease in class IV mileage from 20 to 13 between 2016 and 2020. Per coordination with SANDAG staff it is understood that this was due to a misclassification of some facilities and will be corrected.
  - Mode Share typo in footnote 1 "more share".

27-3
- **Table 4.16-1 Existing Roadway Facilities:** it appears State Highways may be mislabeled in this table and should be tollways. This causes inconsistencies in subsequent tables Roadway Network Analysis for years 2025, 2035 and 2050.

27-4
- **Table 4.16-4 Existing Bicycle Facilities in the Region:** It is understood that the mileage was extracted from the transportation network used in ABM 2+, recommend additional clarification on how the mileage is reported from the ABM (i.e. is it centerline mileage, lane mileage, etc.)
  - Recommend disaggregating Class IV Cycle Track into one-way cycle track and two-way cycle track mileages.

27-5
- **Pg. 4.16-13 Pedestrian Facilities:** The Draft EIR states, "It should be noted that trail facilities are also considered part of the pedestrian network." The document should state if these facilities would or would not be ADA compliant either partially or wholly.

27-6
- **Table 4.16-9 Transit System Analysis – Year 2035:** Please include a footnote on how Miles of Transit Service is generally calculated.

27-7
- **Table 4.16-14 Roadway Network Analysis – Year 2050**: Please clarify the cause of the significant decrease in Tollway mileage in 2050 when previous analysis years showed increases.

27-8
- **Page 4.16-47:** Typo in bottom paragraph states, "the proposed Plan would reduce the regional VMT per capita by 7.8%…" this should be "7.2%" per Table 4.16-7.

27-9
- **Alternative Analysis:** SANDAG has identified Alternative 3 as the environmentally superior alternative. Specifically, for Transportation, VMT is reduced more than the proposed plan. SANDAG should evaluate and analyze the features that reduce VMT in Alternative 3 for feasibility in inclusion on the proposed plan as a project feature or further mitigation for the project, such as subsidized transit fares and microtransit.

PLANNING DEPARTMENT – MYRA HERRMANN, SENIOR PLANNER – MHERRMANN@SANDIEGO.GOV, (619) 446-5372

In chapter 4.5 Cultural Resources, please consider the following edits and comments:

27-10
- **Pg 4.5-24:** This paragraph requires a minor edit which should be corrected in the Final EIR as shown in underline below:
  - **2035 Conclusion:** Implementation of the proposed Plan would result in regional growth and land use change and transportation network improvements and programs that would cause a substantial adverse change in the significance of a historical resource or unique archaeological resource. Therefore, this impact (CULT-1) in between 2026 and 2035 is significant.

27-11
- **Pg 4.5-28:** Recommend that the following language be added at the end of the second bullet point in Mitigation Measure CULT-1.b to include the provision for consultation with local government agency qualified staff. This is especially important for local

RESPONSE TO COMMENT 27-3

Table 4.16-1 has been updated to reflect this comment.

RESPONSE TO COMMENT 27-4

Tables 4.16-4, 4.16-7, 4.16-11, and 4.16-15 have been updated to clarify that the total miles of bicycle facilities reported in the table are the total centerline miles.

The Class IV Cycle Track improvements contained within the proposed Plan are still at the higher level planning stages. Therefore, the form of cycle track (one-way or two-way) has not yet been determined for any of the identified improvements. This level of analysis will need to be conducted at the individual project level, during the design process. As such, this level of information cannot be provided at this time.

Please note that this information can be provided for the existing facilities outlined in Table 4.16-1; however, to maintain consistency with Tables 4.16-7, 4.16-11, and 4.16-15 of the Draft EIR, the same level of facility summary is maintained throughout all tables.

RESPONSE TO COMMENT 27-5

All trail facilities included within the proposed Plan will be designed and constructed based on the trail design standards of the Member Jurisdiction in which they are located. The trail design standards for each Member Jurisdiction should incorporate all relevant ADA standards, thereby resulting in ADA compliant trails. Please note that the United States Access Board has identified four Conditional Exceptions for when ADA standards do not need to be applied to trail facilities, as identified in the *Accessibility Standards for Federal Outdoor Developed Areas* (May 2014). The four exceptions are as follows:

- Compliance is not practicable due to terrain.
- Compliance cannot be accomplished with the prevailing construction practices.
- Compliance would fundamentally alter the function or purpose of the facility or the setting.
- Compliance is limited or precluded by any of the following laws, or by decisions or opinions issued or agreements executed pursuant to any of the following laws:
  - Endangered Species Act (16 USC 1531 et seq.)
  - National Environmental Policy Act (42 USC 4321 et seq.)
  - National Historic Preservation Act (16 USC 470 et seq.)

- Wilderness Act (16 USC 1131 et seq.)
- Other federal, State, or local law, the purpose of which is to preserve threatened or endangered species; the environment; or archaeological, cultural, historical, or other significant natural features

Further detail is provided through the following link:

https://www.access-board.gov/files/aba/guides/outdoor-guide.pdf.

Because the trail facilities included within the proposed Plan are only conceptual at this time, and have not yet been designed, it is not known if the proposed trail facilities, or a portion of the trail facilities, will need to utilize the ADA exceptions outlined above. Individual trail facilities will be required to go through the CEQA review process, at a project level, and will be subject to design review through the Member Jurisdiction prior to their construction. The level of ADA compliance each trail facility will be able to achieve will be identified, reviewed, and disclosed during this process. This information has been summarized as a footnote on page 4.16-13 of the EIR.

RESPONSE TO COMMENT 27-6

A table note has been added to Table 4.16-9 to describe the methodology used to calculate Miles of Transit.

RESPONSE TO COMMENT 27-7

The decrease in tollway milage under the Year 2050 conditions is due to the expiration of the SR 125 tollway franchise agreement, which ends in 2042. After Year 2042 SR 125, south of SR 54, will be reverted to Caltrans control and the tolls will no longer be issued to the public.

RESPONSE TO COMMENT 27-8

The bottom paragraph of page 4.16-50 has been revised to correct 7.8% to 6.8%..

RESPONSE TO COMMENT 27-9

As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the

major transportation investments and policy options that commenters suggested.

Regarding reduction of fares, mitigation measure GHG-5f provides that during project-level planning, design, and CEQA review of development projects, responsible agencies can and should implement measures including "[s]ubsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets" (Draft EIR pages 4.8-49 and 4.8-50). In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. See Master Response 1 for further information on the role of subsidized fares and microtransit as an alternative.

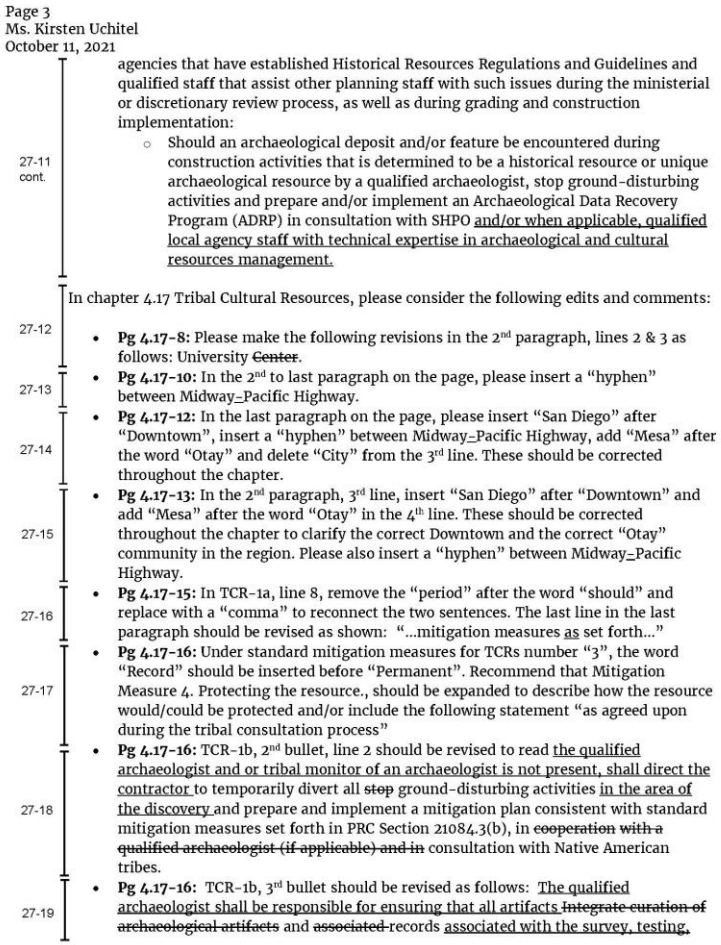
RESPONSE TO COMMENT 27-10

The date has been corrected on page 4.5-24 of the EIR as requested.

RESPONSE TO COMMENT 27-11

Mitigation measure CULT-1b on page 4.5-28 of the EIR has been updated to include the requested language that acknowledges consultation/collaboration with local agencies that have qualified cultural resources staff:

> ...and/or when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management.



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agencies that have established Historical Resources Regulations and Guidelines and qualified staff that assist other planning staff with such issues during the ministerial or discretionary review process, as well as during grading and construction implementation:

- Should an archaeological deposit and/or feature be encountered during construction activities that is determined to be a historical resource or unique archaeological resource by a qualified archaeologist, stop ground-disturbing activities and prepare and/or implement an Archaeological Data Recovery Program (ADRP) in consultation with SHPO and/or when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management. 27-11 cont.

In chapter 4.17 Tribal Cultural Resources, please consider the following edits and comments:

- **Pg 4.17-8:** Please make the following revisions in the 2nd paragraph, lines 2 & 3 as follows: University ~~Center~~. 27-12
- **Pg 4.17-10:** In the 2nd to last paragraph on the page, please insert a "hyphen" between Midway-Pacific Highway. 27-13
- **Pg 4.17-12:** In the last paragraph on the page, please insert "San Diego" after "Downtown", insert a "hyphen" between Midway-Pacific Highway, add "Mesa" after the word "Otay" and delete "City" from the 3rd line. These should be corrected throughout the chapter. 27-14
- **Pg 4.17-13:** In the 2nd paragraph, 3rd line, insert "San Diego" after "Downtown" and add "Mesa" after the word "Otay" in the 4th line. These should be corrected throughout the chapter to clarify the correct Downtown and the correct "Otay" community in the region. Please also insert a "hyphen" between Midway-Pacific Highway. 27-15
- **Pg 4.17-15:** In TCR-1a, line 8, remove the "period" after the word "should" and replace with a "comma" to reconnect the two sentences. The last line in the last paragraph should be revised as shown: "...mitigation measures as set forth..." 27-16
- **Pg 4.17-16:** Under standard mitigation measures for TCRs number "3", the word "Record" should be inserted before "Permanent". Recommend that Mitigation Measure 4. Protecting the resource., should be expanded to describe how the resource would/could be protected and/or include the following statement "as agreed upon during the tribal consultation process" 27-17
- **Pg 4.17-16:** TCR-1b, 2nd bullet, line 2 should be revised to read the qualified archaeologist and or tribal monitor of an archaeologist is not present, shall direct the contractor to temporarily divert all ~~stop~~ ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in ~~cooperation with a qualified archaeologist (if applicable) and in~~ consultation with Native American tribes. 27-18
- **Pg 4.17-16:** TCR-1b, 3rd bullet should be revised as follows: The qualified archaeologist shall be responsible for ensuring that all artifacts ~~Integrate curation of archaeological artifacts~~ and ~~associated~~ records associated with the survey, testing, 27-19

RESPONSE TO COMMENT 27-12

The community name "University Center" is correct; therefore, no change has been made.

RESPONSE TO COMMENT 27-13

Midway Pacific" has been changed to "Midway-Pacific" on page 4.17-10 of the EIR as requested.

RESPONSE TO COMMENT 27-14

The community name "Downtown" is correct and adding "San Diego" after "downtown" is not necessary; therefore, no change has been made. The terms "Otay," "Otay Mesa," and "East Otay Mesa" have been reviewed and corrected where applicable. "Midway Pacific" has been changed to "Midway-Pacific" as requested on page 4.17-12 and throughout the section.

RESPONSE TO COMMENT 27-15

The community name "Downtown" is correct and adding "San Diego" after "downtown" is not necessary; therefore, no change has been made. The terms "Otay," "Otay Mesa," and "East Otay Mesa" have been reviewed and corrected where applicable. "Midway Pacific" has been changed to "Midway-Pacific" as requested throughout the section.

RESPONSE TO COMMENT 27-16

The minor corrections on page 4.17-15 of the EIR have been made as requested.

RESPONSE TO COMMENT 27-17

The comment aligns with the intent of the mitigation measure. The minor corrections have been made as requested. Mitigation measure TCR-1a has been revised on page 4.17-16 of the EIR to state:

3. ~~Permanent~~ Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

4. Protecting the resource as agreed upon during the tribal consultation process.

RESPONSE TO COMMENT 27-18

The comment aligns with the intent of the mitigation measure. Mitigation measure TCR-1b has been revised on page 4.17-16 to

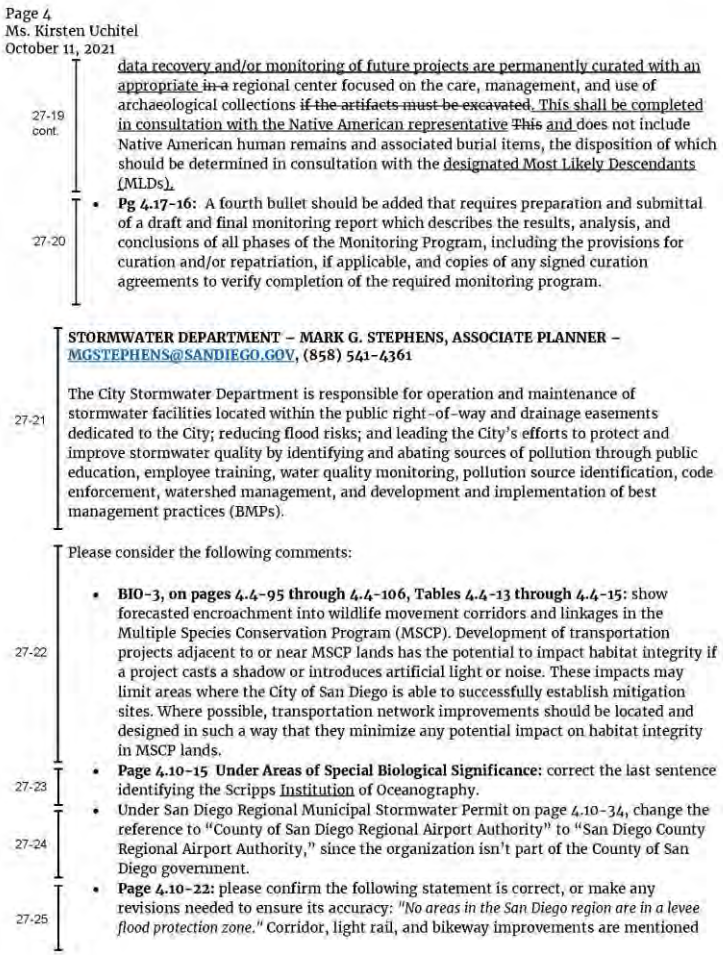
incorporate the comments in order to clarify the process and intent of the measure. The revisions are as follows:

- Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist is not present, shall direct the contractor to temporarily divert all ~~stop~~ ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), ~~in cooperation with a qualified archaeologist (if applicable) and~~ in consultation with Native American tribes.

RESPONSE TO COMMENT 27-19

The comment aligns with the intent of the mitigation measure. Mitigation measure TCR-1b has been revised on page 4.17-16 to incorporate the comments in order to clarify the process and intent of the measure. The revisions are as follows:

- ~~Integrate curation of archaeological~~ The qualified archaeologist shall be responsible for ensuring that all artifacts and ~~associated~~ records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate ~~in a~~ regional center focused on the care, management, and use of archaeological collections ~~if the artifacts must be excavated~~. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants (MLDs).



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27-19 cont.

data recovery and/or monitoring of future projects are permanently curated with an appropriate ~~in a~~ regional center focused on the care, management, and use of archaeological collections ~~if the artifacts must be excavated~~. This shall be completed in consultation with the Native American representative ~~This~~ and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants (MLDs).

27-20

- **Pg 4.17-16:** A fourth bullet should be added that requires preparation and submittal of a draft and final monitoring report which describes the results, analysis, and conclusions of all phases of the Monitoring Program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.

STORMWATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE PLANNER – MGSTEPHENS@SANDIEGO.GOV, (858) 541-4361

27-21

The City Stormwater Department is responsible for operation and maintenance of stormwater facilities located within the public right-of-way and drainage easements dedicated to the City; reducing flood risks; and leading the City's efforts to protect and improve stormwater quality by identifying and abating sources of pollution through public education, employee training, water quality monitoring, pollution source identification, code enforcement, watershed management, and development and implementation of best management practices (BMPs).

Please consider the following comments:

27-22

- **BIO-3, on pages 4.4-95 through 4.4-106, Tables 4.4-13 through 4.4-15:** show forecasted encroachment into wildlife movement corridors and linkages in the Multiple Species Conservation Program (MSCP). Development of transportation projects adjacent to or near MSCP lands has the potential to impact habitat integrity if a project casts a shadow or introduces artificial light or noise. These impacts may limit areas where the City of San Diego is able to successfully establish mitigation sites. Where possible, transportation network improvements should be located and designed in such a way that they minimize any potential impact on habitat integrity in MSCP lands.

27-23

- **Page 4.10-15 Under Areas of Special Biological Significance:** correct the last sentence identifying the Scripps Institution of Oceanography.

27-24

- Under San Diego Regional Municipal Stormwater Permit on page 4.10-34, change the reference to "County of San Diego Regional Airport Authority" to "San Diego County Regional Airport Authority," since the organization isn't part of the County of San Diego government.

27-25

- **Page 4.10-22:** please confirm the following statement is correct, or make any revisions needed to ensure its accuracy: *"No areas in the San Diego region are in a levee flood protection zone."* Corridor, light rail, and bikeway improvements are mentioned

RESPONSE TO COMMENT 27-20

The comment aligns with the intent of the mitigation measure. A fourth bullet has been added to mitigation measure TCR-1b on page 4.17-16 that requires the preparation and submittal of a draft and final monitoring report, per the comment. This addition will ensure and signify the completion of the monitoring program described in mitigation measure TCR-1b. The added language is as follows:

- Upon completion of all ground-disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency that describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.

RESPONSE TO COMMENT 27-21

Thank you for your comment. The responsibilities of the City's Stormwater Department are understood.

RESPONSE TO COMMENT 27-22

nk you for your comment. Figure 4.4-15 has been revised to include the transportation network footprint in the Final EIR.

In regards to development of transportation projects adjacent to or near MSCP lands, direct and indirect impacts from the proposed Plan's land use change and transportation network on the County's adopted MSCP are programmatically addressed under Impact BIO-4 of the EIR. Indirect impacts are assessed qualitatively. Tables 4.4-16 through 4.4-19 quantitatively assess impacts on the County's MSCP Preserve. Consistent with the County's adopted MSCP, the County would be consulted prior to any design of projects that could potentially have an effect on the County's MSCP Preserve. Furthermore, consistent with the EIR, any such projects would be required to be consistent with the County's MSCP, and no impacts on hardline preserve are expected. Should impacts on the MSCP be unavoidable, boundary line adjustments would be required as mitigation for such impacts, pursuant to the County's guidelines and in consultation with the County of San Diego. In addition, please see response to comment USFWS 38-4.

RESPONSE TO COMMENT 27-23

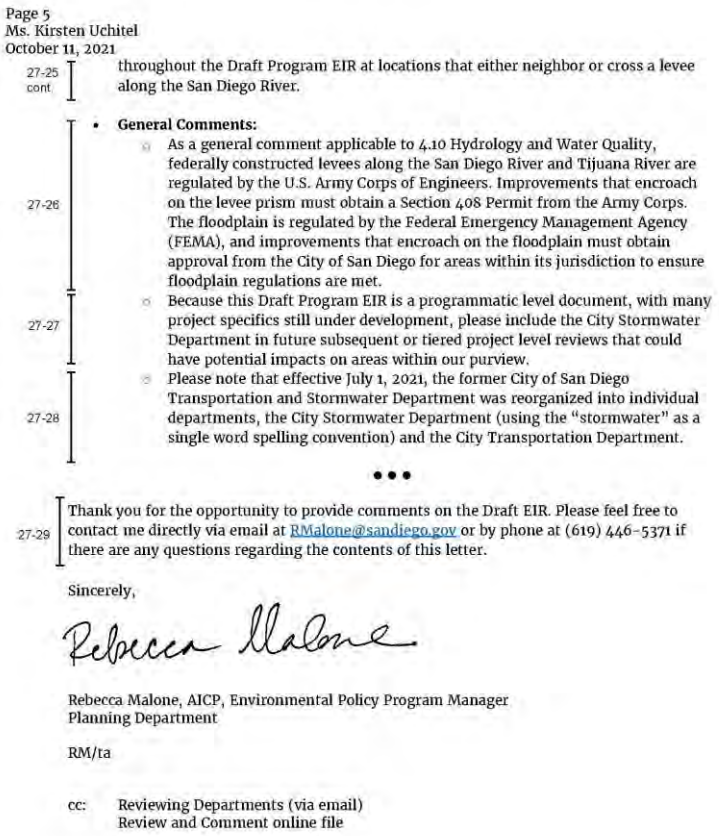
"Scripps Institute of Oceanography" has been revised to "Scripps Institution of Oceanography" on page 4.10-15 of the EIR.

RESPONSE TO COMMENT 27-24

Text has been revised according to the comment to "~~County of~~ San Diego County Regional Airport Authority" on page 4.10-34 of the EIR.

RESPONSE TO COMMENT 27-25

Based on the Department of Water Resource's most recent available data, this statement is correct. No part of the County falls within a levee flood protection zone.



Page 5
Ms. Kirsten Uchitel
October 11, 2021

27-25 cont. throughout the Draft Program EIR at locations that either neighbor or cross a levee along the San Diego River.

- **General Comments:**
  - As a general comment applicable to 4.10 Hydrology and Water Quality, federally constructed levees along the San Diego River and Tijuana River are regulated by the U.S. Army Corps of Engineers. Improvements that encroach on the levee prism must obtain a Section 408 Permit from the Army Corps. The floodplain is regulated by the Federal Emergency Management Agency (FEMA), and improvements that encroach on the floodplain must obtain approval from the City of San Diego for areas within its jurisdiction to ensure floodplain regulations are met. 27-26
  - Because this Draft Program EIR is a programmatic level document, with many project specifics still under development, please include the City Stormwater Department in future subsequent or tiered project level reviews that could have potential impacts on areas within our purview. 27-27
  - Please note that effective July 1, 2021, the former City of San Diego Transportation and Stormwater Department was reorganized into individual departments, the City Stormwater Department (using the "stormwater" as a single word spelling convention) and the City Transportation Department. 27-28

• • •

27-29 Thank you for the opportunity to provide comments on the Draft EIR. Please feel free to contact me directly via email at RMalone@sandiego.gov or by phone at (619) 446-5371 if there are any questions regarding the contents of this letter.

Sincerely,

Rebecca Malone

Rebecca Malone, AICP, Environmental Policy Program Manager
Planning Department

RM/ta

cc: Reviewing Departments (via email)
Review and Comment online file

RESPONSE TO COMMENT 27-26

Thank you for your comment. The proposed Plan provides a framework for meeting its stated goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies, and programs will confirm SANDAG's commitment to fully realizing the strategies in the proposed Plan. Individual projects under the proposed Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 27-27

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. Many individual transportation projects in the RTP would be implemented by Caltrans and local governments. It is the responsibility of these implementing agencies to include the City Stormwater Department in their reviews. SANDAG will contact the City Stormwater Department for second-tier projects it approves or carries out.

RESPONSE TO COMMENT 27-28

Thank you for your comment. It is acknowledged that the former City of San Diego Transportation and Stormwater Department was reorganized into individual departments.

RESPONSE TO COMMENT 27-29

Thank you for your comments and consideration of the proposed Plan.

COMMENT LETTER 28: CITY OF SAN MARCOS



Comment Letter 28

SAN MARCOS
DISCOVER LIFE'S POSSIBILITIES

Development Services

October 7, 2021

SANDAG Regional Plan EIR C/O Kirsten Uchitel, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN DRAFT EIR COMMENTS

Dear Ms. Uchitel,

28-1

Thank you for the opportunity to review SANDAG's Draft Environmental Impact Report (DEIR) for San Diego Forward: The 2021 Regional Plan (Regional Plan). Please accept this letter as the City of San Marcos (City) formal comment letter on the Regional Plan DEIR for response and inclusion in the Final EIR (FEIR).

The City appreciates the intent of the Regional Plan to serve as a "blueprint for a regional transportation system, serving existing and projected residents and workers within the San Diego region… that further enhances quality of life and offers more mobility options for people and goods" (Regional Plan, ES-1). We also value the seven DEIR project objectives to, essentially: facilitate Smart Growth development that conserves sensitive natural areas, reduce greenhouse gas (GHG) and other emissions affecting air quality, promote social equity and enhance the diversity and efficiency of the transportation network. The City recognizes that these objectives are designed to meet State and federal requirements and to improve quality of life within the region.

The City's primary comments are with regard to the assumptions in the "Series 14 Growth Forecast" model that informs the Regional Plan. The City would like to see greater transparency in terms of the assumptions behind the model. It is critical for local jurisdictions to understand these factors, as they appear to drive forecasted land use and population patterns on which future transportation plans are based, and funding will be directed. Most importantly, the City would like to ensure that local land use plans are at the heart of these assumptions. Forecasted growth should be based on local land use plans, potentially with some considerations for growth beyond the respective plan horizons. This is imperative given that local land use authority rests with each individual jurisdiction and the extensive efforts that go into those plans to satisfy legal requirements and community goals.

In addition, the City appreciates the Regional Plan and DEIR discussion of funding and project prioritization. The City agrees that some of the transportation projects in the current TransNet capital program that are not fully funded should be prioritized for funding and advanced as part of the Regional Plan.

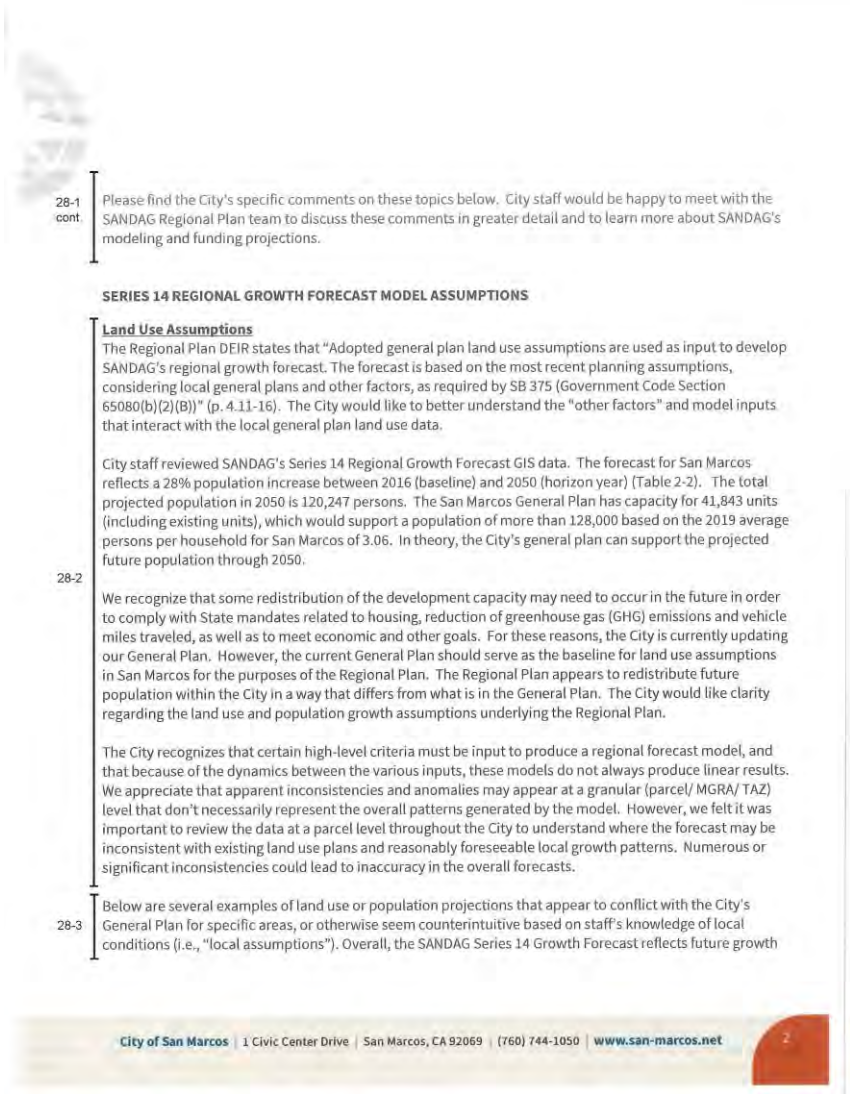
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RESPONSE TO COMMENT 28-1

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern. Among other requirements set forth by SB 375, the SCS must "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan.

See below responses to specific comments mentioned in this general comment.



28-1 cont. Please find the City's specific comments on these topics below. City staff would be happy to meet with the SANDAG Regional Plan team to discuss these comments in greater detail and to learn more about SANDAG's modeling and funding projections.

SERIES 14 REGIONAL GROWTH FORECAST MODEL ASSUMPTIONS

Land Use Assumptions

The Regional Plan DEIR states that "Adopted general plan land use assumptions are used as input to develop SANDAG's regional growth forecast. The forecast is based on the most recent planning assumptions, considering local general plans and other factors, as required by SB 375 (Government Code Section 65080(b)(2)(B))" (p. 4.11-16). The City would like to better understand the "other factors" and model inputs that interact with the local general plan land use data.

City staff reviewed SANDAG's Series 14 Regional Growth Forecast GIS data. The forecast for San Marcos reflects a 28% population increase between 2016 (baseline) and 2050 (horizon year) (Table 2-2). The total projected population in 2050 is 120,247 persons. The San Marcos General Plan has capacity for 41,843 units (including existing units), which would support a population of more than 128,000 based on the 2019 average persons per household for San Marcos of 3.06. In theory, the City's general plan can support the projected future population through 2050.

28-2

We recognize that some redistribution of the development capacity may need to occur in the future in order to comply with State mandates related to housing, reduction of greenhouse gas (GHG) emissions and vehicle miles traveled, as well as to meet economic and other goals. For these reasons, the City is currently updating our General Plan. However, the current General Plan should serve as the baseline for land use assumptions in San Marcos for the purposes of the Regional Plan. The Regional Plan appears to redistribute future population within the City in a way that differs from what is in the General Plan. The City would like clarity regarding the land use and population growth assumptions underlying the Regional Plan.

The City recognizes that certain high-level criteria must be input to produce a regional forecast model, and that because of the dynamics between the various inputs, these models do not always produce linear results. We appreciate that apparent inconsistencies and anomalies may appear at a granular (parcel/ MGRA/ TAZ) level that don't necessarily represent the overall patterns generated by the model. However, we felt it was important to review the data at a parcel level throughout the City to understand where the forecast may be inconsistent with existing land use plans and reasonably foreseeable local growth patterns. Numerous or significant inconsistencies could lead to inaccuracy in the overall forecasts.

28-3 Below are several examples of land use or population projections that appear to conflict with the City's General Plan for specific areas, or otherwise seem counterintuitive based on staff's knowledge of local conditions (i.e., "local assumptions"). Overall, the SANDAG Series 14 Growth Forecast reflects future growth

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RESPONSE TO COMMENT 28-2

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern, which considered local general plans and other factors. Among other requirements set forth by SB 375, the SCS must "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan by focusing growth and development in Mobility Hub areas. The allocation of housing units to Mobility Hub areas represents general areas projected for future growth, not precise parcel locations, for future housing development or housing unit type. A number of land uses at the parcel level, aggregated up, comprise these general areas. The precise zoning at the parcel level is within local jurisdictions' land use authority.

Priority areas for future housing growth were identified through a scoring process applied to all Master Geographic Reference Areas (MGRAs) in the San Diego region. Each MGRA received a score based on Mobility Hub propensity analysis results and a land use mixing criterion. MGRAs associated with conserved lands or military installations were identified as "constraints" and excluded from the scoring. The Mobility Hub propensity analysis is described in proposed Plan Appendix T: Network Development and Performance, and considered the number of local street intersections per square mile, vehicle miles traveled in 2016, employment counts, population density, and proximity to "activity centers" such as hospitals, schools, airports, hotels, military installations, shopping centers, and universities and colleges. The land use mix score was calculated based on the percentage of MGRA acreage associated with land use types that are complementary to residential uses. In general, higher scored areas are more favorable to future housing development, and parcels without existing capacity that had both eligible land uses and high scores were assigned additional capacity for the purpose of developing the SCS land

use pattern. Within high-scoring MGRAs, SANDAG selected land use codes that could be considered for future residential uses (e.g., low-density office, vacant/undeveloped, arterial commercial, surface parking, hotel/resort, and other public services). Details on this methodology are described in the Series 14 Regional Growth Forecast and SCS Land Use Pattern Subregional Allocation Documentation: https://sdforwarddata-sandag.hub.arcgis.com/documents/SANDAG::series-14-regional-growth-forecast-and-scs-land-use-pattern-subregional-allocation-oct-2021-draft/about.

The Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 28-3

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern.

Regarding "areas where Series 14 Growth Forecast Households is higher than local assumption," SANDAG relied upon local general plans and other factors to allocate housing units to subregional areas. Priority areas for future housing growth were identified through a scoring process applied to all MGRAs in the San Diego region. Each MGRA received a score based on Mobility Hub propensity analysis results and a land use mixing criterion. MGRAs associated with conserved lands or military installations were identified as "constraints" and excluded from the scoring. The Mobility Hub propensity analysis is described in proposed Plan Appendix T: Network Development and Performance, and considered the number of local street intersections per square mile, vehicle miles traveled in 2016, employment counts, population density, and proximity to "activity centers" such as hospitals, schools, airports, hotels, military installations, shopping centers, and universities and colleges. The land use mix score was calculated based on the percentage of MGRA acreage associated with land use types that are complementary to residential uses. In general, higher scored areas are more favorable to future housing development, and parcels without existing capacity that had both eligible land uses and high scores were assigned additional capacity for the purpose of developing the SCS land use pattern. Within high-scoring MGRAs, SANDAG selected land use

codes that could be considered for future residential uses (e.g., low-density office, vacant/undeveloped, arterial commercial, surface parking, hotel/resort, and other public services). Details on this methodology are described in the Series 14 Regional Growth Forecast and SCS Land Use Pattern Subregional Allocation Documentation: https://sdforwarddata-sandag.hub.arcgis.com/documents/SANDAG::series-14-regional-growth-forecast-and-scs-land-use-pattern-subregional-allocation-oct-2021-draft/about.

Regarding "areas where Series 14 Growth Forecast Population is lower than local assumptions," the Series 14 Regional Growth Forecast includes assumptions of housing unit production that results in a subregional forecast that includes population declines or lower population growth in certain areas in the region. These housing assumptions, described in proposed Plan Appendix F, include an increase in the region's vacancy rate to 4 percent by 2040, an accounting of vacation rentals and second homes as "unoccupiable," and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036.

The SCS land use pattern advanced in the proposed Plan focuses growth and development in the Mobility Hub areas, which represent general areas projected for future growth and not precise parcel locations. A number of land uses at the parcel level, aggregated up, comprise these general areas. The precise zoning at the parcel level is within local jurisdictions land use authority.

The Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience.

areas roughly consistently with the City's General Plan in key locations (i.e., University District and Creek District Specific Plan Areas). However, the projected changes are tied to parcels in the vicinity but not the same as what is in the City's land use plan. There are some forecasted household or population increases or decreases within individual MGRAs that are directly inconsistent with the City's plan. The City has questions regarding the assumptions and model dynamics that create these apparently random projections.

Areas where Series 14 Growth Forecast Households is higher than local assumptions (Attachment A)

- A1. Single-family developments Coronado Hills and Rancho Tesoro (off of Twin Oaks Valley Road south) are accurately forecast to have an increase in households, but why a reduction in population?
- A2. San Marcos Boulevard mixed use shows significant population increases that would not be supported by the levels of development allowed in this land use designation.
- A3. Residential units are assigned to some individual MGRAs with industrial and commercial land uses. These areas are not currently planned for residential units (i.e., off of Las Posas and Armorlite). Does the model assume that these areas will redevelop as mixed use?
- A4. Residential units are also assigned to areas designated for passive and recreational open space.

28-3 cont.

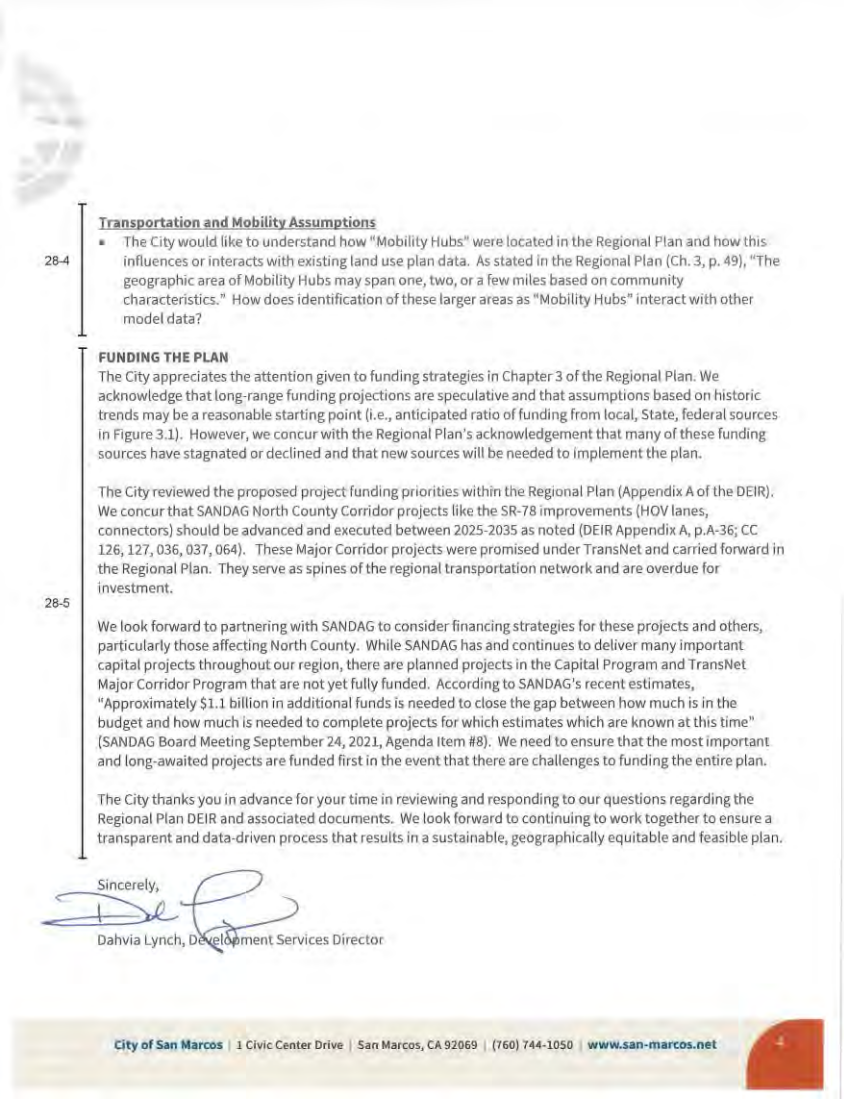
Areas where Series 14 Growth Forecast Population is lower than local assumptions (see Attachment B)

- B1. Population estimates for areas of San Marcos currently under development (i.e., Highlands off of northern Las Posas, Rancho Tesoro area off of Twin Oaks Valley Road) and Santa Fe Hills, as well as large developments like San Elijo Hills (over 3,000 units), seems to assume that populations in these and similar suburban areas will decrease. New units are being constructed in some of these areas and families continue to move into existing suburban homes. While future urbanizing centers will draw population from many places, we do not necessarily expect a major shift from suburban areas.

  We understand the concept that suburban household size may decrease as children leave the home and parents stay in place through middle age. However, regional trends show that household size has increased in San Marcos over the past twenty years, from 3.03 to 3.06 persons per household (U.S. Census American Community Surveys 2010-2019). Anecdotally, given housing prices and demand for larger homes in quality school districts, it seems that turnover of suburban housing to younger families will occur within the Regional Plan horizon. We also anticipate more multi-generational households as children stay in the home through young adulthood or aging parents move in with their children. Additionally, it seems that new State laws streamlining construction of Accessory Dwelling Units and redevelopment of single-family lots will lead to higher, if not at least sustained, populations in suburban neighborhoods. What is the basis for these assumed population decreases?

Staff speculate that some of these inconsistencies could be due to reliance on an amalgamation of land use data combined with TAZ level data, or traffic and development assumptions generated for private project analyses (whether or not these came to fruition). We look forward to discussing further with SANDAG staff and/ or receiving written feedback regarding these questions.

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Transportation and Mobility Assumptions

28-4 ▪ The City would like to understand how "Mobility Hubs" were located in the Regional Plan and how this influences or interacts with existing land use plan data. As stated in the Regional Plan (Ch. 3, p. 49), "The geographic area of Mobility Hubs may span one, two, or a few miles based on community characteristics." How does identification of these larger areas as "Mobility Hubs" interact with other model data?

FUNDING THE PLAN

The City appreciates the attention given to funding strategies in Chapter 3 of the Regional Plan. We acknowledge that long-range funding projections are speculative and that assumptions based on historic trends may be a reasonable starting point (i.e., anticipated ratio of funding from local, State, federal sources in Figure 3.1). However, we concur with the Regional Plan's acknowledgement that many of these funding sources have stagnated or declined and that new sources will be needed to implement the plan.

The City reviewed the proposed project funding priorities within the Regional Plan (Appendix A of the DEIR). We concur that SANDAG North County Corridor projects like the SR-78 improvements (HOV lanes, connectors) should be advanced and executed between 2025-2035 as noted (DEIR Appendix A, p.A-36; CC 126, 127, 036, 037, 064). These Major Corridor projects were promised under TransNet and carried forward in the Regional Plan. They serve as spines of the regional transportation network and are overdue for investment.

28-5

We look forward to partnering with SANDAG to consider financing strategies for these projects and others, particularly those affecting North County. While SANDAG has and continues to deliver many important capital projects throughout our region, there are planned projects in the Capital Program and TransNet Major Corridor Program that are not yet fully funded. According to SANDAG's recent estimates, "Approximately $1.1 billion in additional funds is needed to close the gap between how much is in the budget and how much is needed to complete projects for which estimates which are known at this time" (SANDAG Board Meeting September 24, 2021, Agenda Item #8). We need to ensure that the most important and long-awaited projects are funded first in the event that there are challenges to funding the entire plan.

The City thanks you in advance for your time in reviewing and responding to our questions regarding the Regional Plan DEIR and associated documents. We look forward to continuing to work together to ensure a transparent and data-driven process that results in a sustainable, geographically equitable and feasible plan.

Sincerely,

Dahvia Lynch, Development Services Director

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RESPONSE TO COMMENT 28-4

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see proposed Plan Appendix F, Regional Growth Forecast and SCS Land Use Pattern, for the assumptions used to develop the SCS land use pattern and Appendix T, Network Development and Performance, for information about Mobility Hub network development.

RESPONSE TO COMMENT 28-5

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

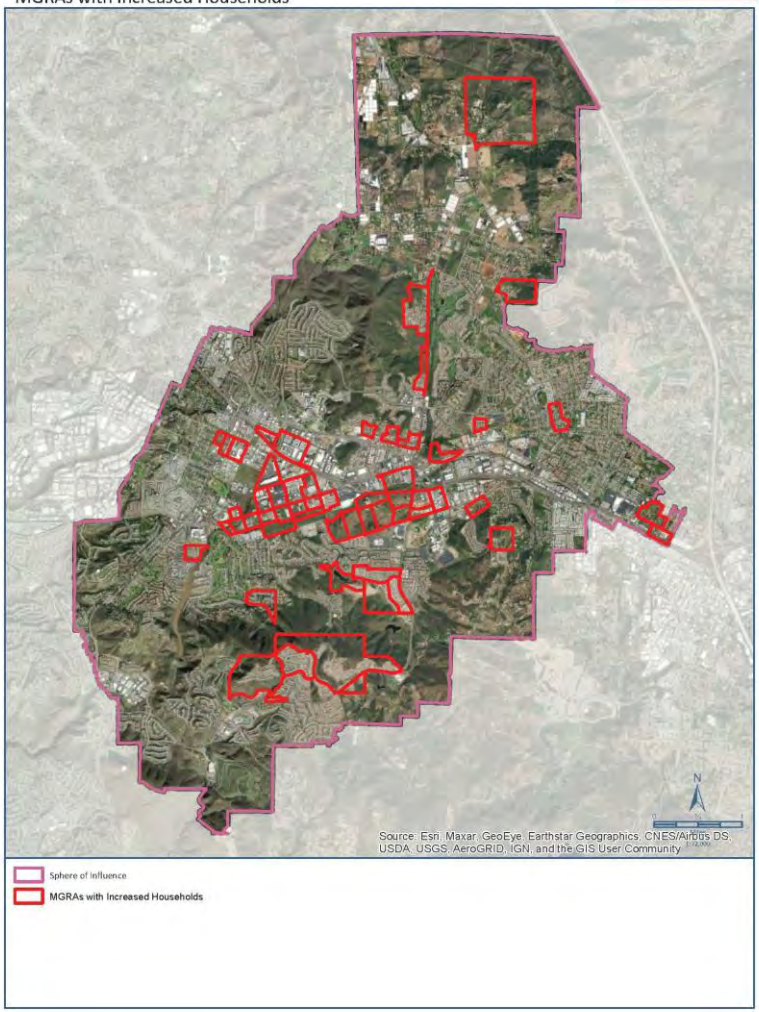
CC: Jack Griffin, City Manager
Isaac Etchamendy, City Engineer
Joseph Farace, Planning Manager

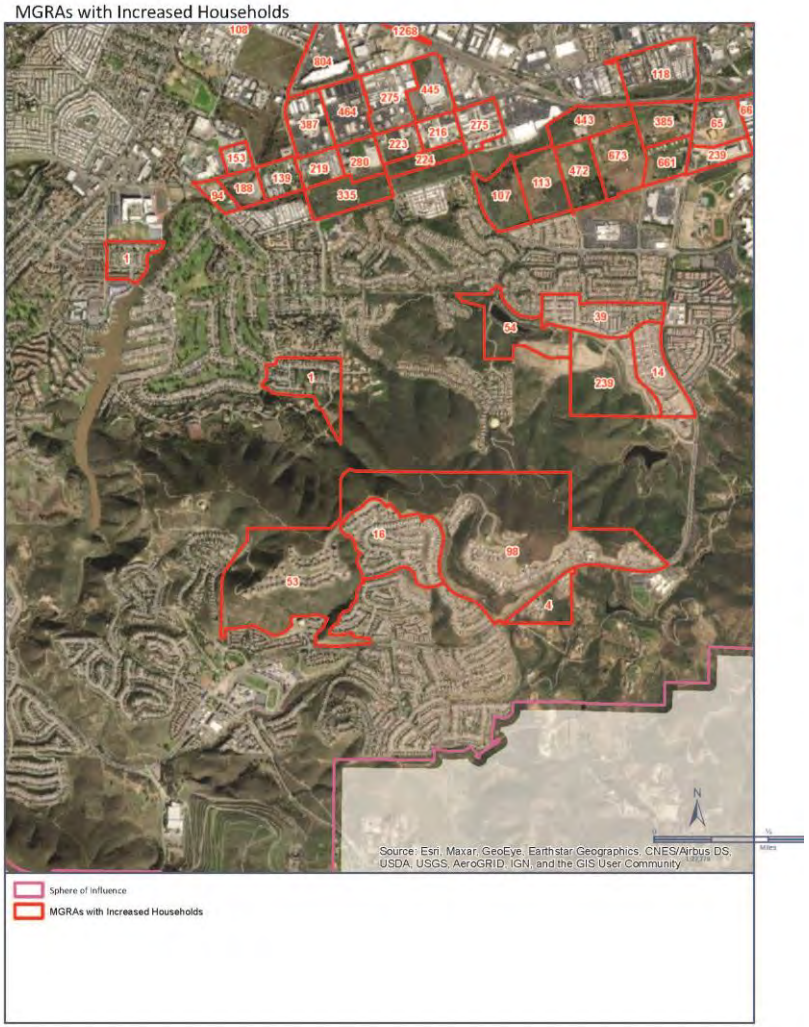
Attachments:

Attachment A- MGRAs with Increased Households

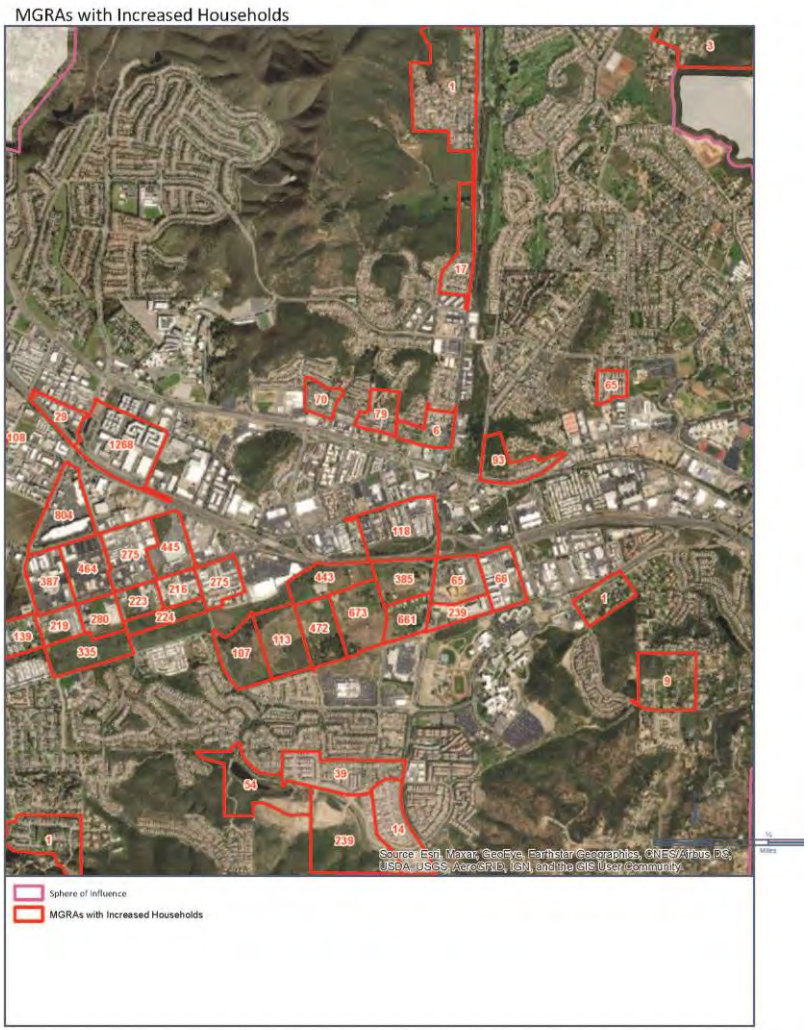
Attachment B- Change in Population

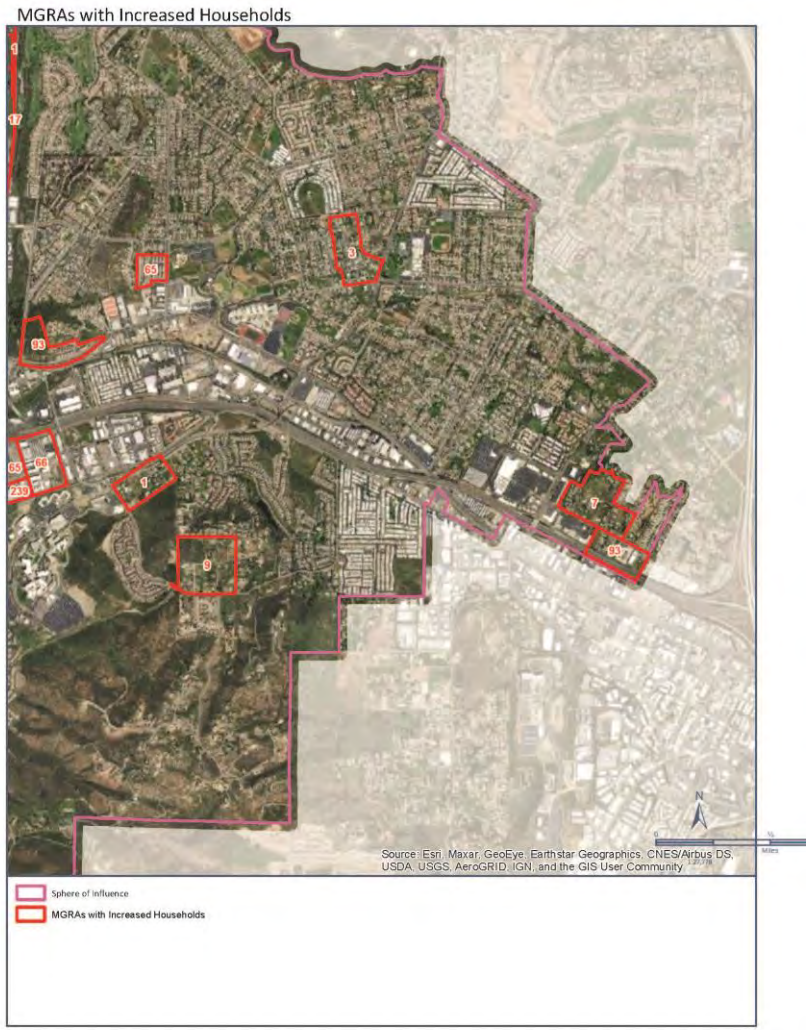
ATTACHMENT A

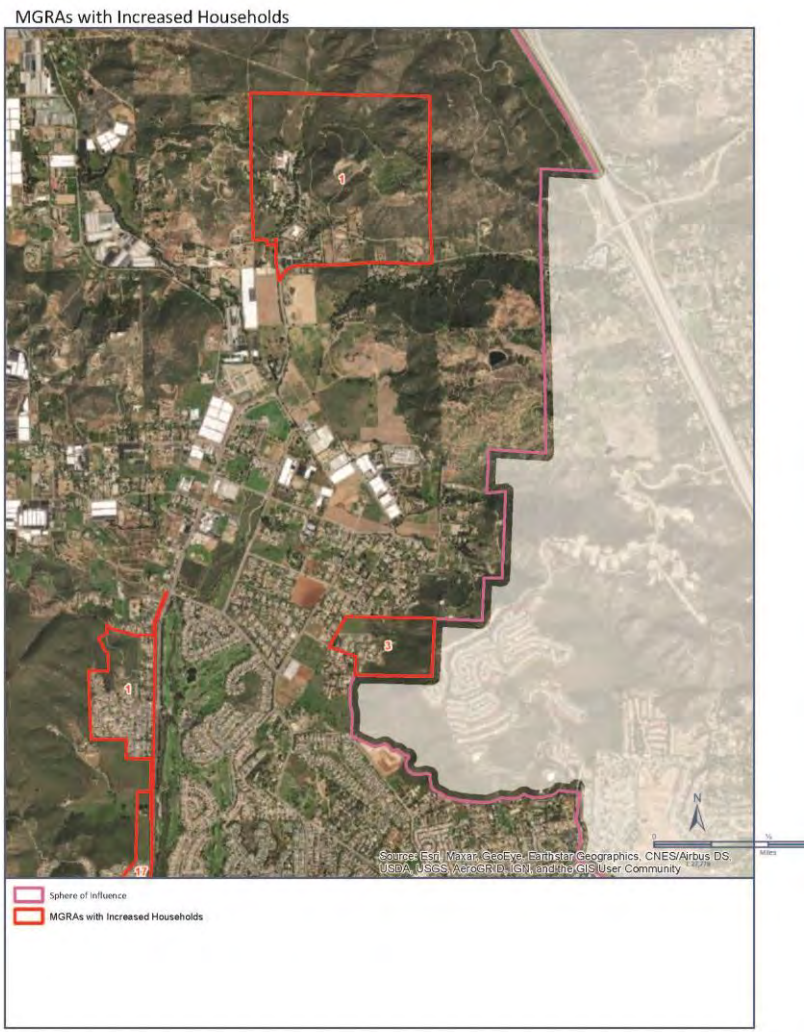


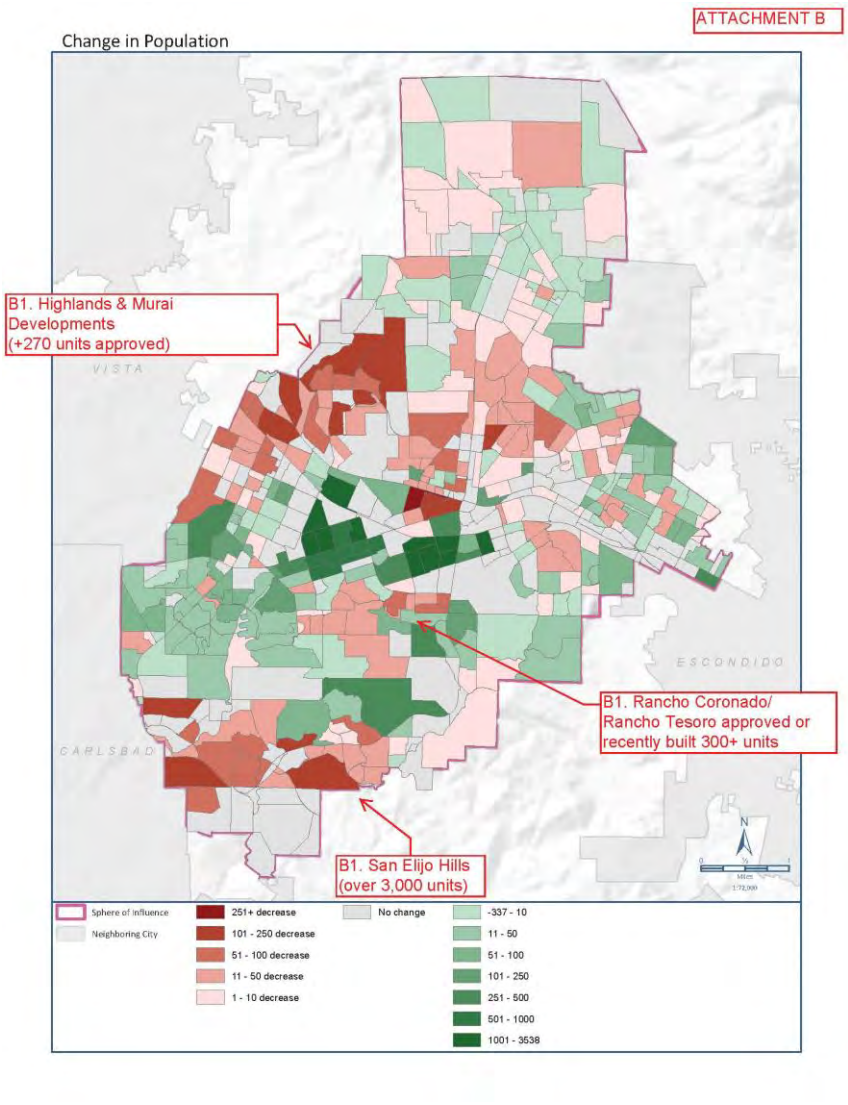

MGRAs with Increased Households
108
1268
804
275
445
118
464
387
216
275
443
385
65
66
153
222
224
673
661
239
218
280
139
188
94
335
107
113
472
1
39
64
1
14
239
16
98
53
4
N
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Sphere of Influence
MGRAs with Increased Households


MGRAs with Increased Households
A3. Industrial Area (no residential in GP)
A2. Mixed Use outside of Creek District
A2. Rancho Coronado/ Rancho Tesoro
A4. Open Space
A4. Open Space
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Sphere of Influence
MGRAs with Increased Households


MGRAs with Increased Households
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Sphere of Influence
MGRAs with Increased Households


MGRAs with Increased Households
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Sphere of Influence
MGRAs with Increased Households


MGRAs with Increased Households
1
3
1
17
N
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Sphere of Influence
MGRAs with Increased Households


ATTACHMENT B
Change in Population
B1. Highlands & Murai Developments (+270 units approved)
B1. Rancho Coronado/ Rancho Tesoro approved or recently built 300+ units
B1. San Elijo Hills (over 3,000 units)
VISTA
ESCONDIDO
CARLSBAD
Sphere of Influence
Neighboring City
251+ decrease
101 - 250 decrease
51 - 100 decrease
11 - 50 decrease
1 - 10 decrease
No change
-337 - 10
11 - 50
51 - 100
101 - 250
251 - 500
501 - 1000
1001 - 3538

COMMENT LETTER 29: SOUTHERN CALIFORNIA TRIBAL CHAIRMEN'S ASSOCIATION

Comment Letter 29

From: Erik De Haro <edeharo@sctca.net>
Sent: Wednesday, September 8, 2021 3:38:04 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Subject: Re: online comments

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

29-1 This new plan seems to be incredibly beneficial for the county as a whole. It not only seems appropriate but long overdue, particularly because it will reduce noise pollution, greenhouse emissions and traffic collisions.

--
Thank you

Erik De Haro
Case Worker
SCTCA Tribal TANF

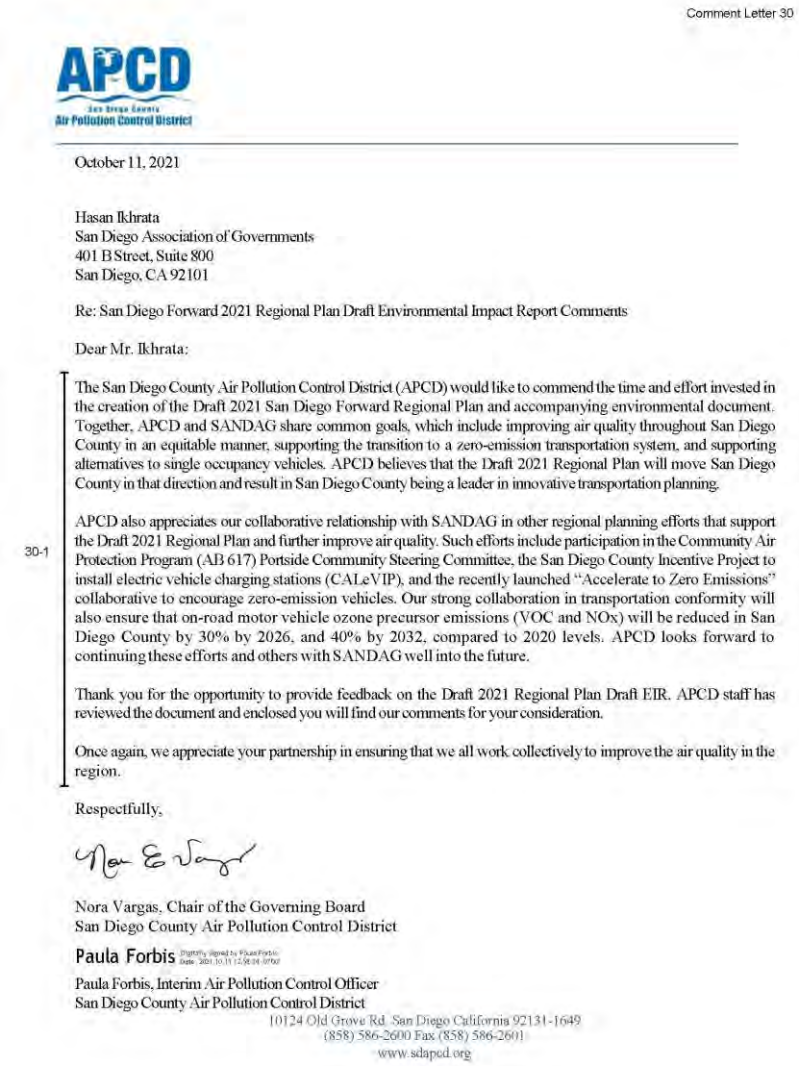
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(760)747-4560 fax
edeharo@sctca.net

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RESPONSE TO COMMENT 29-1

Thank you for your support and for participating in the environmental review process. Please continue to follow along in this process by visiting SDForward.com.

COMMENT LETTER 30: SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT



Comment Letter 30

APCD
San Diego County Air Pollution Control District

October 11, 2021

Hasan Ikhrata
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Re: San Diego Forward 2021 Regional Plan Draft Environmental Impact Report Comments

Dear Mr. Ikhrata:

The San Diego County Air Pollution Control District (APCD) would like to commend the time and effort invested in the creation of the Draft 2021 San Diego Forward Regional Plan and accompanying environmental document. Together, APCD and SANDAG share common goals, which include improving air quality throughout San Diego County in an equitable manner, supporting the transition to a zero-emission transportation system, and supporting alternatives to single occupancy vehicles. APCD believes that the Draft 2021 Regional Plan will move San Diego County in that direction and result in San Diego County being a leader in innovative transportation planning.

30-1 APCD also appreciates our collaborative relationship with SANDAG in other regional planning efforts that support the Draft 2021 Regional Plan and further improve air quality. Such efforts include participation in the Community Air Protection Program (AB 617) Portside Community Steering Committee, the San Diego County Incentive Project to install electric vehicle charging stations (CALeVIP), and the recently launched "Accelerate to Zero Emissions" collaborative to encourage zero-emission vehicles. Our strong collaboration in transportation conformity will also ensure that on-road motor vehicle ozone precursor emissions (VOC and NOx) will be reduced in San Diego County by 30% by 2026, and 40% by 2032, compared to 2020 levels. APCD looks forward to continuing these efforts and others with SANDAG well into the future.

Thank you for the opportunity to provide feedback on the Draft 2021 Regional Plan Draft EIR. APCD staff has reviewed the document and enclosed you will find our comments for your consideration.

Once again, we appreciate your partnership in ensuring that we all work collectively to improve the air quality in the region.

Respectfully,

Nora Vargas, Chair of the Governing Board
San Diego County Air Pollution Control District

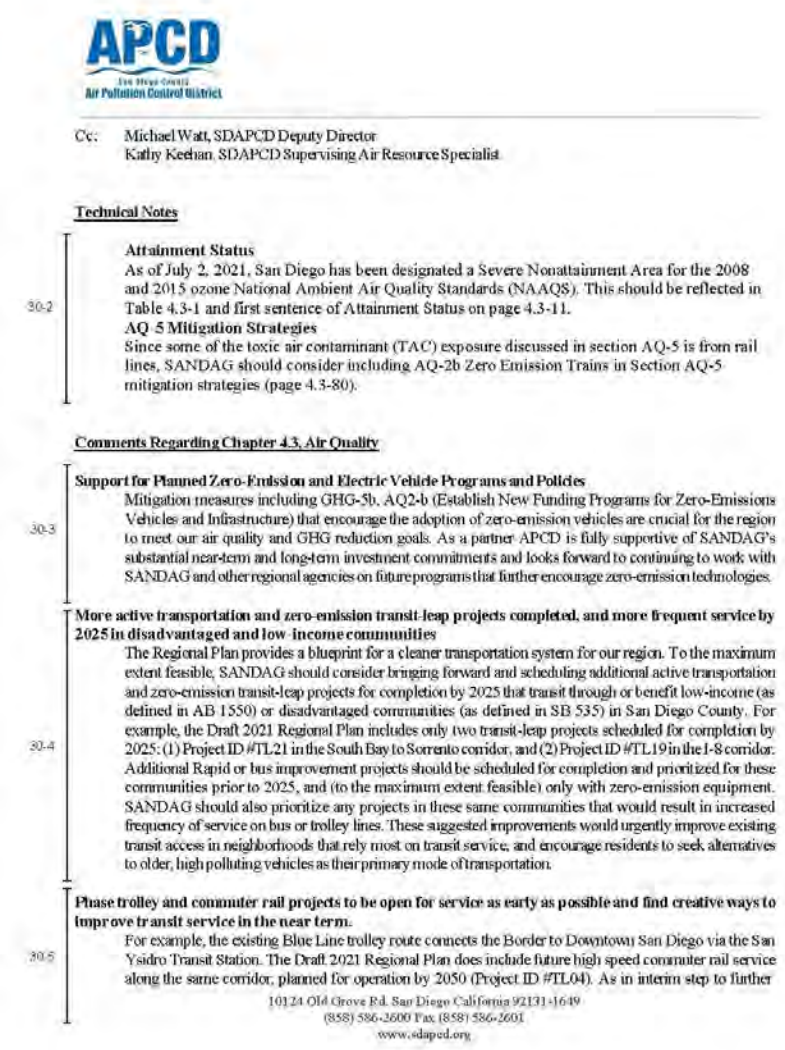
Paula Forbis

Paula Forbis, Interim Air Pollution Control Officer
San Diego County Air Pollution Control District

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RESPONSE TO COMMENT 30-1

SANDAG appreciates the San Diego County Air Pollution Control District's (APCD) expressed support for the proposed Plan and feedback. SANDAG also appreciates the collaborative relationships between our two agencies and looks forward to continued collaboration towards further improving air quality. Please refer to subsequent responses for detailed responses to APCD's comments.



APCD
San Diego County Air Pollution Control District

Cc: Michael Watt, SDAPCD Deputy Director
Kathy Keehan, SDAPCD Supervising Air Resource Specialist

Technical Notes

30-2
Attainment Status
As of July 2, 2021, San Diego has been designated a Severe Nonattainment Area for the 2008 and 2015 ozone National Ambient Air Quality Standards (NAAQS). This should be reflected in Table 4.3-1 and first sentence of Attainment Status on page 4.3-11.
AQ-5 Mitigation Strategies
Since some of the toxic air contaminant (TAC) exposure discussed in section AQ-5 is from rail lines, SANDAG should consider including AQ-2b Zero Emission Trains in Section AQ-5 mitigation strategies (page 4.3-80).

Comments Regarding Chapter 4.3, Air Quality

30-3
Support for Planned Zero-Emission and Electric Vehicle Programs and Policies
Mitigation measures including GHG-5b, AQ2-b (Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure) that encourage the adoption of zero-emission vehicles are crucial for the region to meet our air quality and GHG reduction goals. As a partner APCD is fully supportive of SANDAG's substantial near-term and long-term investment commitments and looks forward to continuing to work with SANDAG and other regional agencies on future programs that further encourage zero-emission technologies.

30-4
More active transportation and zero-emission transit-leap projects completed, and more frequent service by 2025 in disadvantaged and low-income communities
The Regional Plan provides a blueprint for a cleaner transportation system for our region. To the maximum extent feasible, SANDAG should consider bringing forward and scheduling additional active transportation and zero-emission transit-leap projects for completion by 2025 that transit through or benefit low-income (as defined in AB 1550) or disadvantaged communities (as defined in SB 535) in San Diego County. For example, the Draft 2021 Regional Plan includes only two transit-leap projects scheduled for completion by 2025: (1) Project ID #TL21 in the South Bay to Sorrento corridor, and (2) Project ID #TL19 in the I-8 corridor. Additional Rapid or bus improvement projects should be scheduled for completion and prioritized for these communities prior to 2025, and (to the maximum extent feasible) only with zero-emission equipment. SANDAG should also prioritize any projects in these same communities that would result in increased frequency of service on bus or trolley lines. These suggested improvements would urgently improve existing transit access in neighborhoods that rely most on transit service, and encourage residents to seek alternatives to older, high polluting vehicles as their primary mode of transportation.

30-5
Phase trolley and commuter rail projects to be open for service as early as possible and find creative ways to improve transit service in the near term.
For example, the existing Blue Line trolley route connects the Border to Downtown San Diego via the San Ysidro Transit Station. The Draft 2021 Regional Plan does include future high speed commuter rail service along the same corridor, planned for operation by 2050 (Project ID #TL04). As in interim step to further

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RESPONSE TO COMMENT 30-2

The attainment designation for the 2008 ozone standard has been changed to Serious Nonattainment in Table 4.3-1 and within the in-text references on page 4.3-11 of the EIR.

RESPONSE TO COMMENT 30-3

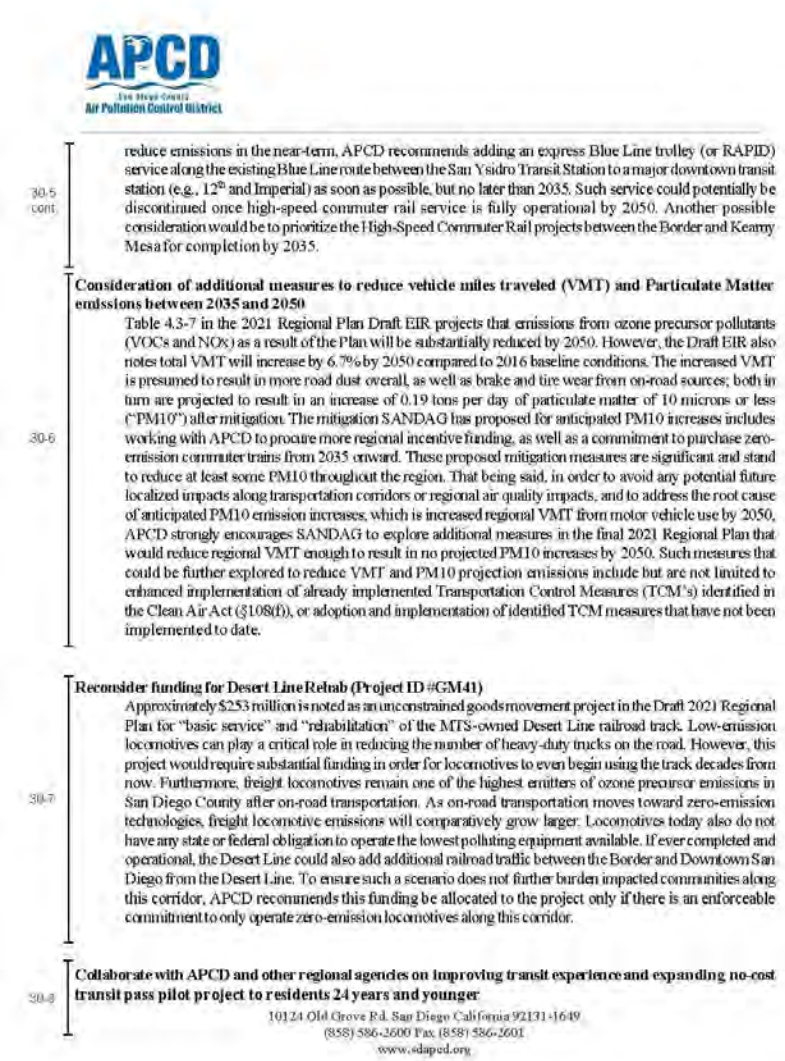
This comment agrees with an EIR mitigation measure, and no further response is required.

RESPONSE TO COMMENT 30-4

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The proposed Final Plan includes additional Rapid bus projects in the 2025 plan phase compared to the Draft Plan that were selected considering equity, system operations, and performance criteria (TL32 in the Coast, Canyons, and Trails corridor, and TL37 in the North County corridor). Frequency and span of service improvements for the transit system have also been added to the proposed Final Plan in Attachment 1 to Appendix A. The proposed Final Plan also supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the proposed Plan include SANDAG's proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website here: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/ict-rollout-plans.

RESPONSE TO COMMENT 30-5

This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. A near-term implementation action (Appendix B) of the proposed Plan includes a Blue Line Trolley study to assess the ability to operate express and 24-hour service along the corridor. The results of this study will help inform decisions regarding express Blue Line trolley service and non-rail operational improvement options. High-Speed Commuter Rail from the vicinity of National City to Kearny Mesa is included in the proposed Plan in the 2035 phase. Subsequent plans will revisit the timeline for extending this rail service to the border.



APCD
San Diego County Air Pollution Control District

reduce emissions in the near-term, APCD recommends adding an express Blue Line trolley (or RAPID) service along the existing Blue Line route between the San Ysidro Transit Station to a major downtown transit station (e.g., 12th and Imperial) as soon as possible, but no later than 2035. Such service could potentially be discontinued once high-speed commuter rail service is fully operational by 2050. Another possible consideration would be to prioritize the High-Speed Commuter Rail projects between the Border and Kearny Mesa for completion by 2035.

30-5 cont.

Consideration of additional measures to reduce vehicle miles traveled (VMT) and Particulate Matter emissions between 2035 and 2050

Table 4.3-7 in the 2021 Regional Plan Draft EIR projects that emissions from ozone precursor pollutants (VOCs and NOx) as a result of the Plan will be substantially reduced by 2050. However, the Draft EIR also notes total VMT will increase by 6.7% by 2050 compared to 2016 baseline conditions. The increased VMT is presumed to result in more road dust overall, as well as brake and tire wear from on-road sources; both in turn are projected to result in an increase of 0.19 tons per day of particulate matter of 10 microns or less ("PM10") after mitigation. The mitigation SANDAG has proposed for anticipated PM10 increases includes working with APCD to procure more regional incentive funding, as well as a commitment to purchase zero-emission commuter trains from 2035 onward. These proposed mitigation measures are significant and stand to reduce at least some PM10 throughout the region. That being said, in order to avoid any potential future localized impacts along transportation corridors or regional air quality impacts, and to address the root cause of anticipated PM10 emission increases, which is increased regional VMT from motor vehicle use by 2050, APCD strongly encourages SANDAG to explore additional measures in the final 2021 Regional Plan that would reduce regional VMT enough to result in no projected PM10 increases by 2050. Such measures that could be further explored to reduce VMT and PM10 projection emissions include but are not limited to enhanced implementation of already implemented Transportation Control Measures (TCM's) identified in the Clean Air Act (§108(f)), or adoption and implementation of identified TCM measures that have not been implemented to date.

30-6

Reconsider funding for Desert Line Rehab (Project ID #GM41)

Approximately $253 million is noted as an unconstrained goods movement project in the Draft 2021 Regional Plan for "basic service" and "rehabilitation" of the MTS-owned Desert Line railroad track. Low-emission locomotives can play a critical role in reducing the number of heavy-duty trucks on the road. However, this project would require substantial funding in order for locomotives to even begin using the track decades from now. Furthermore, freight locomotives remain one of the highest emitters of ozone precursor emissions in San Diego County after on-road transportation. As on-road transportation moves toward zero-emission technologies, freight locomotive emissions will comparatively grow larger. Locomotives today also do not have any state or federal obligation to operate the lowest polluting equipment available. If ever completed and operational, the Desert Line could also add additional railroad traffic between the Border and Downtown San Diego from the Desert Line. To ensure such a scenario does not further burden impacted communities along this corridor, APCD recommends this funding be allocated to the project only if there is an enforceable commitment to only operate zero-emission locomotives along this corridor.

30-7

Collaborate with APCD and other regional agencies on improving transit experience and expanding no-cost transit pass pilot project to residents 24 years and younger

30-8

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RESPONSE TO COMMENT 30-6

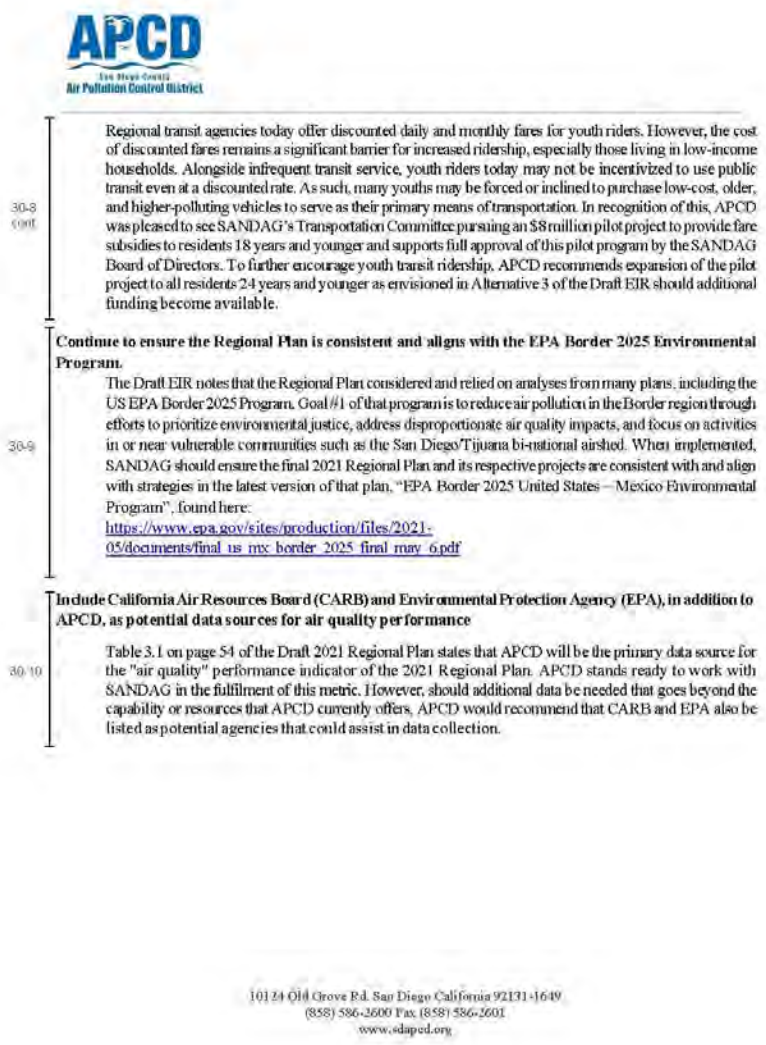
This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. Total VMT is expected to increase by 2050 as a result of increased regional population, resulting in additional transportation-related particulate matter. This increase occurs despite the decrease in VMT per capita achieved under the proposed Plan. SANDAG looks forward to additional coordination with APCD and CARB as increases in PM10 emissions are not isolated to the San Diego region. The additional TCMs included in the Clean Air Act are substantially advanced with the proposed Plan including public transportation, bicycling and walking encouragement, traffic signalization, reduced congestion through transportation infrastructure, incident management, and ITS. The proposed Plan also identifies funding for partnering with local jurisdictions and other stakeholders on measures that could enhance VMT reduction, including Vision Zero programs, Complete Streets in Mobility Hubs, and Flexible Fleet pilots.

RESPONSE TO COMMENT 30-7

This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. The Rehabilitation of the Desert Line is an unconstrained project in the proposed Plan with MTS as the implementing agency. Improvements would be funded by MTS, potentially in partnership with a leaseholder that would operate the freight rail line. SANDAG encourages its regional partners to develop and implement sustainable and innovative freight solutions that reduce emissions while still facilitating trade. In addition, CARB is developing measures aimed at reducing locomotive and railyard emissions in California

RESPONSE TO COMMENT 30-8

One of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth under age 19.



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30-8 cont.

Regional transit agencies today offer discounted daily and monthly fares for youth riders. However, the cost of discounted fares remains a significant barrier for increased ridership, especially those living in low-income households. Alongside infrequent transit service, youth riders today may not be incentivized to use public transit even at a discounted rate. As such, many youths may be forced or inclined to purchase low-cost, older, and higher-polluting vehicles to serve as their primary means of transportation. In recognition of this, APCD was pleased to see SANDAG's Transportation Committee pursuing an $8 million pilot project to provide fare subsidies to residents 18 years and younger and supports full approval of this pilot program by the SANDAG Board of Directors. To further encourage youth transit ridership, APCD recommends expansion of the pilot project to all residents 24 years and younger as envisioned in Alternative 3 of the Draft EIR should additional funding become available.

30-9

Continue to ensure the Regional Plan is consistent and aligns with the EPA Border 2025 Environmental Program.

The Draft EIR notes that the Regional Plan considered and relied on analyses from many plans, including the US EPA Border 2025 Program. Goal #1 of that program is to reduce air pollution in the Border region through efforts to prioritize environmental justice, address disproportionate air quality impacts, and focus on activities in or near vulnerable communities such as the San Diego/Tijuana bi-national airshed. When implemented, SANDAG should ensure the final 2021 Regional Plan and its respective projects are consistent with and align with strategies in the latest version of that plan, "EPA Border 2025 United States – Mexico Environmental Program", found here:
https://www.epa.gov/sites/production/files/2021-05/documents/final_us_mx_border_2025_final_may_6.pdf

30-10

Include California Air Resources Board (CARB) and Environmental Protection Agency (EPA), in addition to APCD, as potential data sources for air quality performance

Table 3.1 on page 54 of the Draft 2021 Regional Plan states that APCD will be the primary data source for the "air quality" performance indicator of the 2021 Regional Plan. APCD stands ready to work with SANDAG in the fulfillment of this metric. However, should additional data be needed that goes beyond the capability or resources that APCD currently offers, APCD would recommend that CARB and EPA also be listed as potential agencies that could assist in data collection.

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RESPONSE TO COMMENT 30-9

he cumulative impacts of the proposed Plan are discussed in in the Draft EIR in consideration of proposed plans such as the U.S. Border Environmental Program: Border 2025, in Chapter 5, *Cumulative Impact Analysis*, of the EIR. Because cumulative air quality impacts throughout Southern California and northern Baja would be significant, it was determined that the proposed Plan's incremental air quality impacts are also cumulatively considerable.

The proposed Plan emphasizes continued collaboration between SANDAG and partners on both sides of the U.S.-Mexico border to plan for improved mobility in the border region. This collaboration builds on years of partnerships and active participation in binational programs that advance these goals, including the EPA and SEMARNAT-led Border 2025 program. SANDAG staff regularly participate in groups such as the San Diego-Tijuana Air Quality Task Force and the AB 617 Steering Committee, and have advocated for air quality measures in border communities. In California, regulation of vehicle emissions is managed by CARB. CARB conducts inspections of heavy-duty trucks traveling in California, including those registered out of state and from foreign countries. At border ports of entry CARB inspects heavy-duty trucks for excessive smoke and engine certification label compliance. SANDAG partners with CARB and the San Diego Air Pollution Control District on air quality conformity (see Appendix C) and emission reduction strategies across the region.

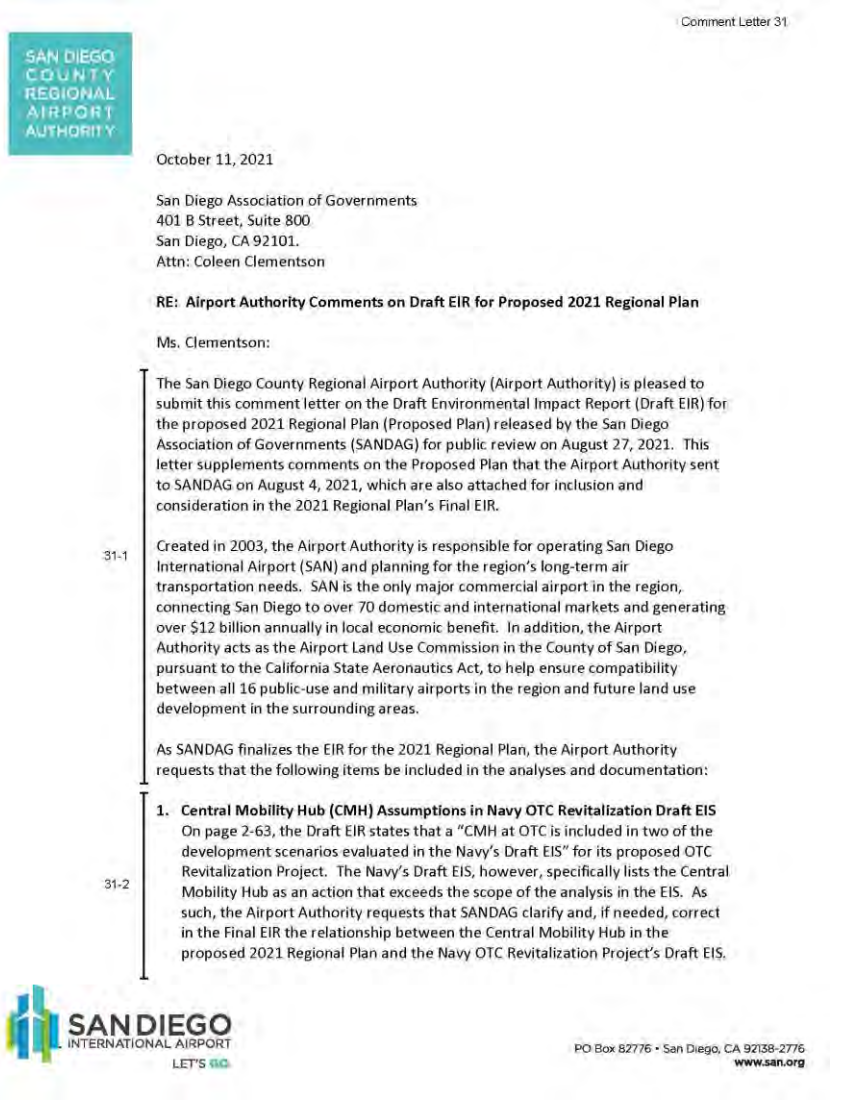
In addition, SANDAG has worked with CARB on updates to the CalEnviroScreen tool to provide data and improve how this tool captures various environmental impacts felt on either side of the border. SANDAG will continue participating in such border and environmental focused programs to support coordination of activities to reduce impacts on the binational community

SANDAG is committed to pursuing programs and projects to further policies focused on electrification of fleets, and EO N-79-20 related to sales of zero-emission personal and medium/heavy-duty vehicles; planning for goods movement strategies that reduce border congestion that exacerbates emissions resulting from vehicle delay; and continuing coordination on strategies identified in the 2021 California-Baja California Border Master Plan.

RESPONSE TO COMMENT 30-10

This comment addresses the proposed Plan and does not relate to the adequacy of the EIR. SANDAG intends to use similar data as prior Performance Monitoring Reports, which included Air Quality Index data from APCD. However, as noted in Chapter 3, *Environmental Setting,* of the proposed Plan, the data sources listed in Table 3.1 are the best sources identified as of the completion of the proposed Plan and are subject to change if new data sources are identified prior to the completion of the Performance Monitoring Report.

COMMENT LETTER 31: SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY



Comment Letter 31

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

October 11, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101.
Attn: Coleen Clementson

RE: Airport Authority Comments on Draft EIR for Proposed 2021 Regional Plan

Ms. Clementson:

The San Diego County Regional Airport Authority (Airport Authority) is pleased to submit this comment letter on the Draft Environmental Impact Report (Draft EIR) for the proposed 2021 Regional Plan (Proposed Plan) released by the San Diego Association of Governments (SANDAG) for public review on August 27, 2021. This letter supplements comments on the Proposed Plan that the Airport Authority sent to SANDAG on August 4, 2021, which are also attached for inclusion and consideration in the 2021 Regional Plan's Final EIR.

31-1 Created in 2003, the Airport Authority is responsible for operating San Diego International Airport (SAN) and planning for the region's long-term air transportation needs. SAN is the only major commercial airport in the region, connecting San Diego to over 70 domestic and international markets and generating over $12 billion annually in local economic benefit. In addition, the Airport Authority acts as the Airport Land Use Commission in the County of San Diego, pursuant to the California State Aeronautics Act, to help ensure compatibility between all 16 public-use and military airports in the region and future land use development in the surrounding areas.

As SANDAG finalizes the EIR for the 2021 Regional Plan, the Airport Authority requests that the following items be included in the analyses and documentation:

31-2 1. **Central Mobility Hub (CMH) Assumptions in Navy OTC Revitalization Draft EIS**
On page 2-63, the Draft EIR states that a "CMH at OTC is included in two of the development scenarios evaluated in the Navy's Draft EIS" for its proposed OTC Revitalization Project. The Navy's Draft EIS, however, specifically lists the Central Mobility Hub as an action that exceeds the scope of the analysis in the EIS. As such, the Airport Authority requests that SANDAG clarify and, if needed, correct in the Final EIR the relationship between the Central Mobility Hub in the proposed 2021 Regional Plan and the Navy OTC Revitalization Project's Draft EIS.

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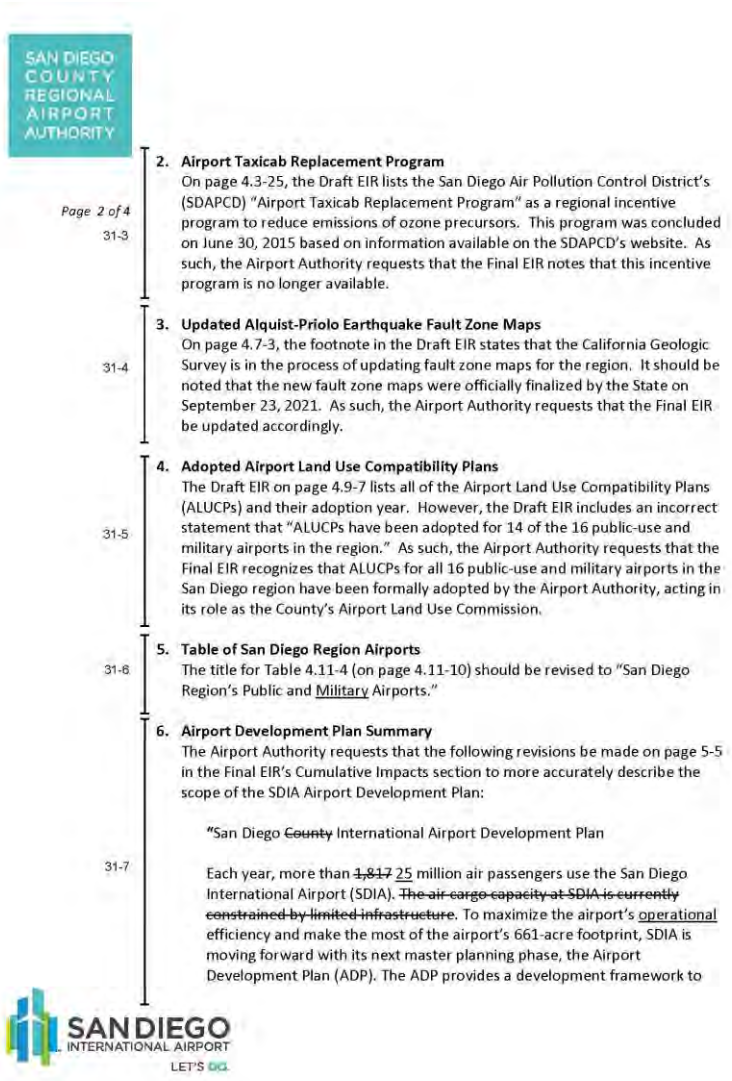
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RESPONSE TO COMMENT 31-1

Thank you for your comments on behalf of the San Diego County Regional Airport Authority (SDCRAA). SANDAG appreciates SDCRAA's input on the EIR and the proposed Plan as well as the background information about the SDCRAA.

RESPONSE TO COMMENT 31-2

Proposed clarifications regarding assumptions related to the Central Mobility Hub in the Navy OTC Revitalization Draft EIS have been made to Chapter 2, *Project Description,* on page 2-64 of the EIR.



SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Page 2 of 4

2. **Airport Taxicab Replacement Program**
On page 4.3-25, the Draft EIR lists the San Diego Air Pollution Control District's (SDAPCD) "Airport Taxicab Replacement Program" as a regional incentive program to reduce emissions of ozone precursors. This program was concluded on June 30, 2015 based on information available on the SDAPCD's website. As such, the Airport Authority requests that the Final EIR notes that this incentive program is no longer available.

31-3

3. **Updated Alquist-Priolo Earthquake Fault Zone Maps**
On page 4.7-3, the footnote in the Draft EIR states that the California Geologic Survey is in the process of updating fault zone maps for the region. It should be noted that the new fault zone maps were officially finalized by the State on September 23, 2021. As such, the Airport Authority requests that the Final EIR be updated accordingly.

31-4

4. **Adopted Airport Land Use Compatibility Plans**
The Draft EIR on page 4.9-7 lists all of the Airport Land Use Compatibility Plans (ALUCPs) and their adoption year. However, the Draft EIR includes an incorrect statement that "ALUCPs have been adopted for 14 of the 16 public-use and military airports in the region." As such, the Airport Authority requests that the Final EIR recognizes that ALUCPs for all 16 public-use and military airports in the San Diego region have been formally adopted by the Airport Authority, acting in its role as the County's Airport Land Use Commission.

31-5

5. **Table of San Diego Region Airports**
The title for Table 4.11-4 (on page 4.11-10) should be revised to "San Diego Region's Public and Military Airports."

31-6

6. **Airport Development Plan Summary**
The Airport Authority requests that the following revisions be made on page 5-5 in the Final EIR's Cumulative Impacts section to more accurately describe the scope of the SDIA Airport Development Plan:

"San Diego ~~County~~ International Airport Development Plan

Each year, more than ~~1,817~~ 25 million air passengers use the San Diego International Airport (SDIA). ~~The air cargo capacity at SDIA is currently constrained by limited infrastructure~~. To maximize the airport's operational efficiency and make the most of the airport's 661-acre footprint, SDIA is moving forward with its next master planning phase, the Airport Development Plan (ADP). The ADP provides a development framework to

31-7

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RESPONSE TO COMMENT 31-3

Reference to Airport Taxicab Replacement Program on page 4.3-25 of the EIR now includes the caveat that the Airport Taxicab Replacement Program ended in 2015.

RESPONSE TO COMMENT 31-4

The footnote on page 4.7-3 of the EIR has been updated to reflect the September 23, 2021, finalization of the fault zone maps by the State.

RESPONSE TO COMMENT 31-5

Suggested edits have been implemented on page 4.9-7 of the EIR to indicate that ALUCPs have been adopted for all 16 public-use and military airports in the region.

RESPONSE TO COMMENT 31-6

Table 4.11-4 of the EIR has been updated to include "Military" in the title.

RESPONSE TO COMMENT 31-7

Suggested edits related to the San Diego International Airport Development Plan have been implemented on page 5-5 of the EIR.

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Page 3 of 4

implement improvements that will enable the San Diego County Regional Airport Authority (SDCRAA) to accommodate future demand for air travel that is anticipated to occur at SDIA with more modern, efficient, and comfortable facilities. The ADP is considered a probable future project for the cumulative impact analysis. The primary components of the project are the replacement of the existing Terminal 1, ~~modifications to Terminal 2,~~ a new administration building, and a new airport access roadway with new bicycle and pedestrian infrastructure. As part of the Terminal 1 replacement, a new ~~access road and~~ parking structure would also be constructed. ~~Other improvements include infrastructure upgrades and the removal/relocation of other airport support facilities to accommodate the terminal improvements.~~ Ultimately, the number of gates at SDIA would increase from 51 to 62~~4~~ (SDCRAA 2019a)."

31-7 cont.

7. **2019 Airport Development Plan vs. 2008 Airport Master Plan**
In section 5.2.13, the Draft EIR cites SDIA's 2008 Airport Master Plan as the source document to inform its cumulative noise impact assessment. The 2008 Airport Master Plan is outdated and has been superseded in terms of the number of current and forecasted aircraft operations. A new aviation activity forecast was formally approved by the FAA and is included in the 2019 Airport Development Plan. As such, the Airport Authority requests that the 2019 Airport Development Plan be used in all cumulative impact analyses and discussions in the Final EIR.

31-8

The Airport Authority appreciates the opportunity to provide formal comments on the Draft EIR for the proposed 2021 Regional Plan. Please feel free to contact me at breed@san.org, if you have any questions or need additional information.

Sincerely,

Brendan Reed
Director of Airport Planning & Environmental Affairs

Attachment: August 4, 2021 Airport Authority Letter to SANDAG on Draft 2021 Regional Plan

cc: Dennis Probst, Airport Authority, Vice President - Development
Ted Anasis, Airport Authority, Airport Planning Manager

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RESPONSE TO COMMENT 31-8

Text has been revised in Section 5.2.13 on page 5-52 of the EIR to reflect the updated 2019 Airport Development Plan.

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Ralph Redman, Airport Authority, Airport Planning Manager
Michelle Brega, Airport Authority, Senior Director of External Relations
Matt Harris, Airport Authority, Director of Government Relations

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SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

ATTACHMENT

August 4, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101.
Attn: Coleen Clementson

RE: Airport Authority Comments on Draft 2021 Regional Plan

Ms. Clementson:

On behalf of the San Diego County Regional Airport Authority (Airport Authority), I am submitting this comment letter in response to the Draft 2021 Regional Plan (Draft Plan) released by the San Diego Association of Governments (SANDAG) for public review on May 28, 2021. The Airport Authority acknowledges SANDAG's hard work over the last 3 years in developing a new vision for the region's surface transportation system and appreciates the opportunity to provide productive feedback on it.

Created in 2003, the Airport Authority is responsible for operating San Diego International Airport (SAN) and planning for the region's long-term air transportation needs. SAN is the only major commercial airport in the region, connecting San Diego to over 70 domestic and international markets and generating over $12 billion annually in local economic benefit. In addition, the Airport Authority acts as the Airport Land Use Commission in the County of San Diego, pursuant to the California State Aeronautics Act, to help ensure compatibility between all 16 airports in the region and future land use development in the surrounding areas.

31-9

As SANDAG further refines the 2021 Regional Plan, and completes its environmental review under the California Environmental Quality Act, the Airport Authority requests that the following items be considered:

1. **Aligning Air & Surface Transportation Planning**
   In 2011, the Airport Authority and SANDAG led the development of a Regional Aviation Strategic Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP), respectively, to ensure a seamless and efficient connection between the region's air and surface transportation infrastructure. The Draft 2021 Regional Plan's Appendix BB (page BB-1) states that "routes included in the 2011 AMAP continue to be identified in the 2021 Regional Plan." However, the following

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RESPONSE TO COMMENT 31-9

Thank you for providing SDCRAA's letter providing comments on the Proposed Plan. Responses to these comments can be found beginning from ID L343 in Appendix P.2.

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

ground access improvements, which were prioritized in the 2011 AMAP, do not appear to be programmed into the Draft Plan:

San Diego International Airport
- Heavy Rail Grade Separation (Whitherby St. to Laurel St.)
- I-5 Direct Access Ramps

McClellan-Palomar Airport
- Palomar Airport Road Widening (I-5 to Hidden Valley Rd.)
- Additional Airport Access at Owens Ave.
- Modification of Future Route 445

Gillespie Field
- Gillespie Field Trolley Station Relocation
- New Bus Rapid Transit (BRT) Station
- Marshall Avenue Intersection Improvements
- BRT Routes (90, 870, & 890) Modifications

31-9 cont.

Cross Border Xpress
- SR 905/Britannia Interchange Capacity Increase
- Britannia Road Widening
- Siempre Viva Road Widening
- Local Bus Route (661) Modifications

As such, the Airport Authority requests that the 2021 Regional Plan clarify whether these AMAP-identified priorities will be implemented or have been substituted with alternative implementation options.

2. **Connecting Regional Transit Network to SAN**
The Airport Authority has been working closely with SANDAG and other public agency partners to identify opportunities to better connect SAN to the regional transit network. As noted in the Draft 2021 Regional Plan, one of the concepts is a fixed-rail transit connection, such as an Automated People Mover (APM), between a Central Mobility Hub at the Old Town Campus and the SAN terminal area. This airport transit connection is anticipated in the Draft Plan to be built in 2035. The Airport Authority looks forward to continuing its collaboration with SANDAG to further refine the APM's alignment and station location concepts.

The 2016 Airport Transit Plan, which was developed in partnership between the Airport Authority, Metropolitan Transit System (MTS), and SANDAG, identified more near-term opportunities for increasing ridership on public transit to and

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from SAN. As recommended in the Airport Transit Plan, the Airport Authority will be launching a new all-electric shuttle service to Old Town Transit Center this fall, in conjunction with the start of the Mid-Coast Trolley Extension operations and increased Coaster service frequency.

Another recommendation in the Airport Transit Plan is the transition of MTS Bus Route 992, which is currently the main transit connection to the Airport, to a Rapid Bus service. It also suggested that combining the new Rapid 992 with other Rapid bus routes, such as the 215 along the El Cajon Boulevard corridor and 235 along the Interstate 15 corridor, could improve airport transit ridership by better linking to major regional destinations and by increasing single-seat access to the San Diego International Airport.

As such, the Airport Authority requests that the 2021 Regional Plan assess the potential ridership benefits from upgrading MTS Bus Route 992 to a Rapid service and extending other existing and planned Rapid routes to serve the SAN terminal areas.

3. **Considering Airport Compatibility in New Development Siting**

31-9 cont.

All 16 public-use and military airports in the San Diego region now have an adopted Airport Land Use Compatibility Plan (ALUCP), which provides guidance on appropriate land uses surrounding them to protect the health and safety of people and property within their vicinity. The Draft 2021 Regional Plan states in Chapter 1 (Page 12) that 3.7 million people will be living in the San Diego region by 2050 (13% greater than 2016 levels), creating a need for 440,000 more jobs and 274,000 more homes. Figure 2.4 (Page 27) in the Draft Plan identifies regional mobility hub areas that could accommodate this increased demand for jobs, housing, shopping, and recreation, while being served by expanded transit networks. In the Airport Authority's initial review, it appears that many of these hub areas are in close proximity to airports.

As such, the Airport Authority requests that the 2021 Regional Plan ensure that new incompatible land uses are not introduced near airports, as outlined in each ALUCP. The Draft Plan's Environmental Impact Report should also formally assess any land use conflicts with the applicable ALUCPs. Important factors include:

- Limiting new noise-sensitive development within an airport's noise contours and ensuring that any new noise-sensitive development includes sound insulation

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- Prohibiting certain sensitive land uses within an airport's safety zones and limiting the number of people in areas subject to the highest risk of aircraft accidents
- Assuring aircraft safety and preserving airport operations by limiting the height of new structures and objects

4. Clarifying SAN Air Cargo Information

The Draft 2021 Regional Plan acknowledges the importance of air cargo in moving goods into and out of the region. Specifically, Appendix Y of the Draft Plan discusses freight movement between the region's highways and arterials, rail corridors, land ports of entry, maritime port, and the San Diego International Airport. The Airport Authority has identified the following inaccuracies in the presented narrative and data:

31-9 cont.

- Page 21 in Appendix Y states that "when combined with the rate at which trucks produce emissions per day, neighborhoods in close proximity to the airport are put at a higher [air quality] risk" without citing any environmental impact study to substantiate this conclusion.

  The Airport Authority has ensured that current and future emissions from the San Diego International Airport's activities are included in the most recent 2020 State Implementation Plan (2020 SIP) for attaining air quality standards in the San Diego region under the federal Clean Air Act. The 2020 SIP determined that SAN's emissions can be accommodated without causing the region to experience additional exceedances of criteria pollutant standards.

- Figure 2.10 in Appendix Y is an outdated map of SAN, which doesn't properly reflect the airport property boundaries and onsite aeronautical uses.

- Page 78 in Appendix Y incorrectly states that Capital International Cargo operates at SAN.

- Page 78 in Appendix Y includes statements that air cargo operations are constrained due to limited airport space for expansion.

  As identified in its 2013 Northside Improvements Environmental Assessment, the Airport Authority is proposing a new *SAN Northside Cargo Development* project. The project would include a consolidated

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SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

warehouse to fully accommodate onsite cargo sorting and staging, as well as expanded apron to accommodate additional cargo aircraft parking.

Additionally, the Airport Authority opened a new 93,000-square-foot Airline Support Building on North Harbor Drive this year, which will allow for more efficient processing of bulky cargo items shipped in the bellies of passenger jets. Approximately 15% of SAN's freight volumes are transported as "belly cargo."

- Page 78 in Appendix Y relies on the outdated 2009 Destination Lindbergh Study to estimate SAN's air cargo capacity and identify cargo operational deficiencies.

  The FAA approved the most recent SAN aviation activity forecast in June 2019, which is publicly available at www.san.org/plan. The forecast anticipates that the number of cargo aircraft operations (i.e. takeoffs or landings) will increase by nearly 71% by 2050, even with the Airport's single-runway configuration.

31-9 cont.

As such, the Airport Authority requests that the 2021 Regional Plan be updated to incorporate the more accurate information presented above.

5. **Updating Airport Ground Access Modeling Assumptions**
   Similar to other regional transportation plans, the Draft 2021 Regional Plan relies on an integrated forecasting model to determine future population, housing, and employment growth. This information is then applied to an activity-based model to simulate detailed transportation behaviors, such as where, when, and how people travel on a daily basis.

   On page 20 in Appendix C, the Draft Plan states that its model relies on airport passenger survey data from 2008 to estimate airport-related travel patterns and demands on local and regional transportation facilities. The Airport Authority notes that ground access characteristics have changed dramatically over the last decade, especially with the introduction of rideshare companies. The Airport Authority also noticed that the modeling appears to be based on SAN aviation activity forecasts that were developed in 2013 (Figure S.18 in Appendix S). As previously stated, the FAA approved the most recent aviation activity forecast in June 2019, which is publicly available at www.san.org/plan. The new "constrained demand scenario" forecast estimates that SAN will serve approximately 20.3 million enplaned passengers in 2050.

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As such, the Airport Authority requests that the 2021 Regional Plan's modeling be updated to be based on more accurate modal assumptions for airport users and the more recent SAN aviation activity forecast.

Again, the Airport Authority appreciates the opportunity to provide feedback on the Draft 2021 Regional Plan. Please feel free to contact me at breed@san.org, if you have any questions or need additional information.

31-9 cont.

Sincerely,

Brendan Reed
Director of Airport Planning & Environmental Affairs

cc: Dennis Probst, Airport Authority, Vice President - Development
Ted Anasis, Airport Authority, Airport Planning Manager
Ralph Redman, Airport Authority, Airport Planning Manager
Michelle Brega, Airport Authority, Senior Director of External Relations
Matt Harris, Airport Authority, Director of Government Relations

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COMMENT LETTER 32: SAN DIEGO TRANSPORTATION EQUITY WORKING GROUP

Comment Letter 32



October 8, 2021

Kirsten Uchitel
Associate Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Via E-mail, RegionalPlanEIR@sandag.org

Re: San Diego Transportation Equity Working Group Comments to the Draft Environmental Impact Report for the 2021 Regional Plan

Respected Ms. Uchitel:

The San Diego Transportation Equity Working Group (SDTEWG) expresses overall support and commends the SANDAG team for all the efforts to advance a transformational Regional Plan (RP) that improves the quality of life of the San Diego Region while addressing climate pollution and greenhouse gas (GHG) emission. **Although visionary, the Draft Environmental Impact Report (DEIR) for the 2021 RP includes significant air quality impacts, housing displacement, and insufficient GHG emission reductions.** The following letter expresses the concerns of the SDTEWG core organizations and provides mitigation measures to best decrease the RP environmental impacts particularly to communities at the frontlines of the climate disaster. 32-1

The SDTEWG was established in 2018 by community-based organizations (CBOs) in an effort to elevate transportation and environmental justice opportunities in Mid-City and South Bay for years to come. The core organizations are the Center on Policy Initiatives (CPI), City Heights Community Development (CH CDC), Environmental Health Coalition (EHC), Mid-City CAN (MCC), and SanDiego350 (SD350). Supporting organizations include Casa Familiar (CF) and the Urban Collaborative Project (UCP).

1. **Air Quality Impacts**
   The DEIR states that Particulate Matter 10 (PM10), 2.5 (PM2.5) will increase and have significant impacts. PM10 and PM2.5 refer to PM emission that are smaller than or equal to 10 or 2.5 microns respectively. Although new vehicle technology will release less fuel emission, road dust from brakes and tire wear will continue to grow and as result emit more PM10 & PM2.5. The SDTEWG recommends that: 32-2

   a. **Mitigation GHG-5b**, which establishes new funding programs for zero-emission vehicles and infrastructure, should be amended to include the acceleration of the region's bus fleet

RESPONSE TO COMMENT 32-1

Thank you for the San Diego Transportation Equity Working Group's (SDTEWG) expressed support for the proposed Plan. SANDAG appreciates SDTEWG's participation in the environmental review process, and SDTWEG's concerns are addressed in detail in the responses to comments that follow.

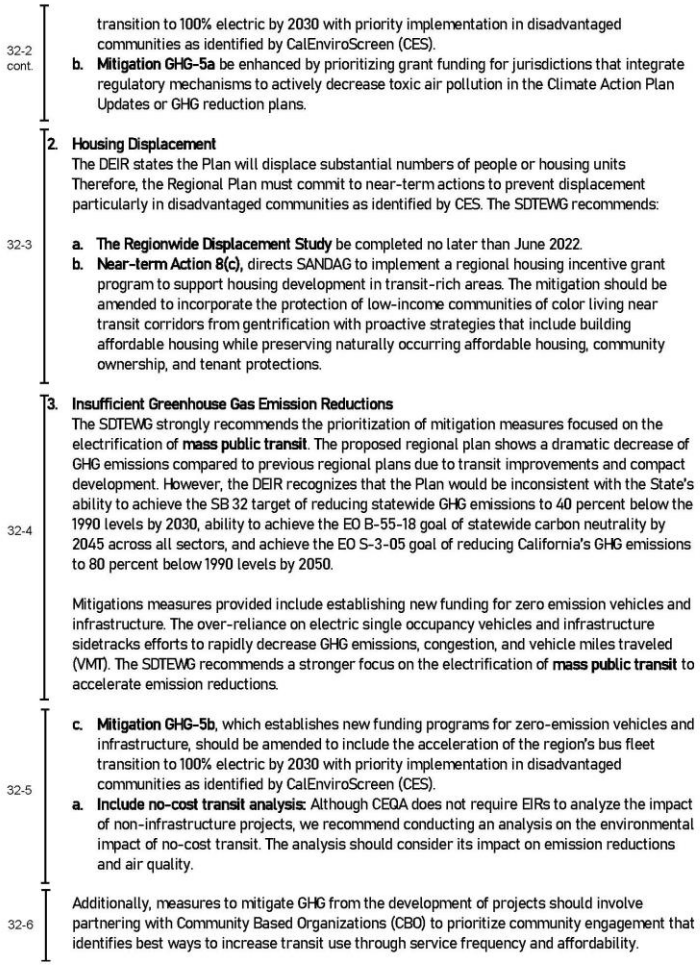
RESPONSE TO COMMENT 32-2

MTS's Zero Emissions Bus (ZEB) Pilot Program has set a 2040 goal for full bus electrification. The ZEB Program prioritizes bus assignments on routes serving SB 535 Disadvantaged Communities (DACs) during fleet transition years.

Changes have been made to mitigation measure GHG-5b as described in response to comment Chatten-Brown 34-2, which accelerate adoption of these measures.

Changes to mitigation measure GHG-5a are not required in response to this specific comment. Reduction measures local jurisdiction's climate action plan (CAP) result in local emission reductions. These local emission reductions can result in air quality co-benefits by reducing natural gas combustion for space and water heading or by reducing VMT from vehicle travel. While many CAPs discuss the potential air quality and public health co-benefits of measures, quantification of these co-benefits is not standard CAP practice nor is it required for CAPs to be adopted by jurisdiction's elected decision-making body.

Lastly, the comment incorrectly states that the proposed Plan will result in significant PM2.5 impacts. No significant PM2.5 impacts are identified in the Draft EIR.



transition to 100% electric by 2030 with priority implementation in disadvantaged communities as identified by CalEnviroScreen (CES).

32-2 cont.

b. **Mitigation GHG-5a** be enhanced by prioritizing grant funding for jurisdictions that integrate regulatory mechanisms to actively decrease toxic air pollution in the Climate Action Plan Updates or GHG reduction plans.

2. **Housing Displacement**

The DEIR states the Plan will displace substantial numbers of people or housing units Therefore, the Regional Plan must commit to near-term actions to prevent displacement particularly in disadvantaged communities as identified by CES. The SDTEWG recommends:

32-3

a. **The Regionwide Displacement Study** be completed no later than June 2022.
b. **Near-term Action 8(c),** directs SANDAG to implement a regional housing incentive grant program to support housing development in transit-rich areas. The mitigation should be amended to incorporate the protection of low-income communities of color living near transit corridors from gentrification with proactive strategies that include building affordable housing while preserving naturally occurring affordable housing, community ownership, and tenant protections.

3. **Insufficient Greenhouse Gas Emission Reductions**

The SDTEWG strongly recommends the prioritization of mitigation measures focused on the electrification of **mass public transit**. The proposed regional plan shows a dramatic decrease of GHG emissions compared to previous regional plans due to transit improvements and compact development. However, the DEIR recognizes that the Plan would be inconsistent with the State's ability to achieve the SB 32 target of reducing statewide GHG emissions to 40 percent below the 1990 levels by 2030, ability to achieve the EO B-55-18 goal of statewide carbon neutrality by 2045 across all sectors, and achieve the EO S-3-05 goal of reducing California's GHG emissions to 80 percent below 1990 levels by 2050.

32-4

Mitigations measures provided include establishing new funding for zero emission vehicles and infrastructure. The over-reliance on electric single occupancy vehicles and infrastructure sidetracks efforts to rapidly decrease GHG emissions, congestion, and vehicle miles traveled (VMT). The SDTEWG recommends a stronger focus on the electrification of **mass public transit** to accelerate emission reductions.

c. **Mitigation GHG-5b**, which establishes new funding programs for zero-emission vehicles and infrastructure, should be amended to include the acceleration of the region's bus fleet transition to 100% electric by 2030 with priority implementation in disadvantaged communities as identified by CalEnviroScreen (CES).

32-5

a. **Include no-cost transit analysis:** Although CEQA does not require EIRs to analyze the impact of non-infrastructure projects, we recommend conducting an analysis on the environmental impact of no-cost transit. The analysis should consider its impact on emission reductions and air quality.

32-6 Additionally, measures to mitigate GHG from the development of projects should involve partnering with Community Based Organizations (CBO) to prioritize community engagement that identifies best ways to increase transit use through service frequency and affordability.

RESPONSE TO COMMENT 32-3

SANDAG is in the process of preparing the Regional Displacement Study, as identified in Appendix B of the proposed Plan. The commenter is requesting a specific completion date of the study as well as implementation of a regional housing incentive grant program, which are beyond the scope of the EIR; these requests will be considered by the SANDAG Board of Directors when it considers adoption of the proposed Plan.

RESPONSE TO COMMENT 32-4

In addition to making observations about GHG emissions under the proposed Plan and summarizing the conclusions of the Draft EIR, this comment also "strongly recommends" mitigation measures related to electrification of public transit. Specifically, it asserts that mitigation measure GHG-5b "should be amended to include acceleration of the region's bus fleet to 100 percent electric by 2030 with priority implementation in disadvantaged communities as identified by CalEnviroScreen (CES)."

Mitigation measure GHG-5b (page 4.8-47) requires that SANDAG shall, prior to December 2025, establish one or more funding programs for zero-emissions vehicles and infrastructure, including, among other things, allocation of "funding for zero-emissions buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations)." Entities eligible for funding under this measure include "public transit operators for zero-emission bus and infrastructure funding." Electric buses and charging infrastructure would qualify to receive funding under this measure.

This mitigation measure was developed in part to help public transit agencies in the San Diego region comply with CARB's Innovative Clean Transit Regulation, which requires all public transit agencies in California to gradually transition to a 100 percent zero-emission bus fleet. The comment does not provide any reason or evidence that narrowing the focus of this measure from zero-emission technology to electric technology or prioritizing implementation within CES-defined

disadvantaged communities would increase the measure's GHG reduction effectiveness.

Mitigation Measure GHG-5b has been accelerated and strengthened in revisions made in response to Draft EIR comments. See response to comment Chatten-Brown 34-2.

Moreover, SANDAG does not have the authority to amend this mitigation measure to require that "the region's bus fleet transition to 100% electric by 2030" or to require that public transit agencies "priorit(ize) implementation in disadvantaged communities as identified by CalEnviroScreen (CES)."

While incorporating this comment into mitigation measure GHG-5b is not required under CEQA, it is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting the proposed Plan. SANDAG has prioritized equity in the proposed Plan more than ever before, promising a system that is a faster, fairer, and cleaner transportation system that is intended to uplift people who have been historically faced with social injustice

RESPONSE TO COMMENT 32-5

The proposed Plan has been developed with equity at the forefront. An equity-specific project list has been included in Appendix H of the proposed Plan. In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. The proposed Plan supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the proposed Plan include SANDAG's proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website at: https://ww2.arb.ca.gov/our-

work/programs/innovative-clean-transit/ict-rollout-plans. Land use authority is reserved to local jurisdictions: the cities and the County.

RESPONSE TO COMMENT 32-6

This comment asserts that "measures to mitigate GHG from the development of projects" should include partnering with Community Based Organizations (CBOs) and community engagement to identify the best ways to increase transit use through service frequency and affordability. For purposes of responding to this comment SANDAG assumes the commenter is referring to Draft EIR mitigation measure GHG-5f. SANDAG agrees with this comment and has revised mitigation measure GHG-5f as follows (page 4.8-51):

- Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
  - Building or funding a major transit stop within or near development, in coordination with transit agencies.
  - Developing car-sharing and bike-sharing programs.
  - Providing pedestrian network improvements and a comprehensive bicycle network.
  - Providing traffic calming measures.
  - Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
  - Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.
  - Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.
  - Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy.
  - Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
  - <u>Implementing measures to increase transit use through service frequency and affordability as identified through community</u>

engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.

32-7 SANDAG's Social Equity Early Action Transit Pilot program serves as a model to build upon. The SDTEWG recommends the following:

a. **Mitigation GHG – 5f**, which includes measures to reduce VMT should be amended to prioritize an increase of frequency and affordability of bus and trolley services particularly in areas under construction informed by the local CBOs and respective stakeholders.

32-8 4. **Coastal Access**
Unfortunately, the draft Regional Plan and associated DEIR do not adequately analyze how the Plan impacts coastal and beach access for disadvantaged communities in San Diego. We ask staff to conduct this analysis and make changes to improve access.

We thank the SANDAG team for all the efforts to integrate equity in the Regional Plan and look forward to continue collaborating.

Sincerely,

The San Diego Transportation Equity Working Group

Center on Policy Initiatives, Keara Piña
City Heights Community Development Corporation, Randy Torres-Van Vleck
Environmental Health Coalition, Laura Benavidez & Carolina Martinez
Mid-City CAN, Diana Ross
SanDiego350, Toshihiko Ishihara & Steven Gelb

RESPONSE TO COMMENT 32-7

The comment recommends that Draft EIR mitigation measure GHG-5f should be amended to "prioritize an increase of frequency and affordability of bus and trolley services particularly in areas under construction informed by the local CBOs and respective stakeholders."

Draft EIR mitigation measure GHG-5f states that the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy during the planning, design, project-level CEQA review, construction, and operation of development projects. It includes several measures that would reduce VMT, including the following related to improving public transit service:

- Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
- Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.
- Implementing a school bus program in areas currently not served by school buses.

As shown above, mitigation measure GHG-5f already includes measures addressing increased frequency and affordability of bus and trolley services as requested by the commenter. Also refer to response to comment Del Mar 13-6, which shows how the text of mitigation measure GHG-5f has been revised to reference measures that increase frequency and affordability of transit services through input by CBOs, other stakeholders, and residents.

RESPONSE TO COMMENT 32-8

It should be noted that as SANDAG developed the proposed network for the proposed Plan, data on trip-making was used to understand the critical connections of the region. Connections to coastal areas are represented in these critical connections. Implementation of the regional bike network as well as complete streets in Mobility Hubs will support enhancement for active transportation in coastal communities, benefiting all residents in the region including disadvantaged communities.

"Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects that would be subject to project-specific environmental review under CEQA and NEPA, where applicable. The corresponding project-

specific environmental documentation would identify significant impacts with regard to conflicts with land use policies of adopted plans, including specific impacts related to coastal access, and identify mitigation measures to avoid or lessen significant physical impacts on the environment resulting from any conflicts.

COMMENT LETTER 33: SIERRA CLUB SAN DIEGO

Comment Letter 33

SIERRA CLUB
SAN DIEGO CHAPTER

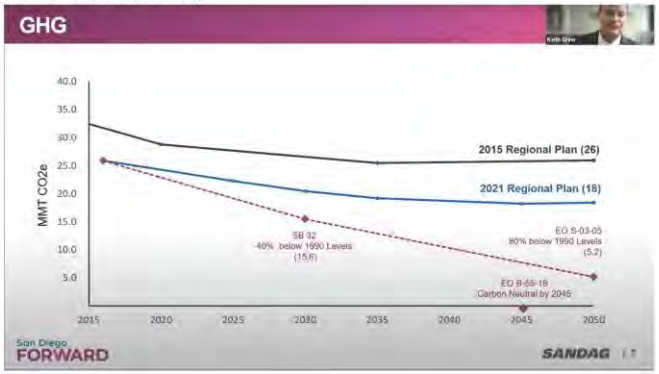
October 11, 2021

Via E-mail (RegionalPlanEIR@sandag.org)
Kirsten Uchitel
Associate Planner, SANDAG
401 B Street, Suite 800
San Diego CA, 92101
Dear Ms. Uchitel,

These comments are in response to the 2021 SANDAG Draft Regional Plan as detailed in the Draft Environmental Impact Review of that plan

SANDAG's Regional Plan has strong reinforcement of important improvements for the San Diego region; however, although we support many of the transit and infill improvements and emissions reductions, the Draft Environmental Impact Report exposes that the plan falls short of the ambition needed to reduce emissions quickly, dramatically force a mode shift, and reduce overall Vehicle Miles Travelled. Specifically, the plan does not meet state goals for GHG reductions, including SB 32, Executive Order B-55-18, and Executive Order S-03-05. (source SANDAG Board Mtg 10/8/21)

33-1



RESPONSE TO COMMENT 33-1

The proposed Plan significantly reduces per capita VMT; however, total VMT increases through the life of the Plan. VMT growth is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the proposed transportation network improvements and programs in the proposed Plan would help to reduce VMT growth. That said, the increase in VMT, from baseline Year 2016 conditions, was identified as a significant impact under Impact TRA-2 in the EIR.

The proposed Plan exceeds the SB 375 target of 19 percent reductions of GHG by 2035 and the Board Resolution for a 30 percent reduction of GHG emissions from all on-road transportation by 2035. However, the proposed Plan's GHG emissions would be inconsistent with the State's ability to achieve the goals of EO B-55-18 and S-3-05. As discussed in additional detail in Section 4.8.4 in the EIR, mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan's GHG emissions with the State's ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, full implementation of the changes required to achieve these goals is beyond SANDAG's and local agencies' current jurisdiction and authority. As such, impacts were identified as significant.

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. However, there is no current legal or planning requirement that the SANDAG region's emissions be reduced by the same percentage ("equal share") as the statewide percentage in order for the State to achieve the Executive Orders' goals. More specifically, there is no legal or planning requirement that the proposed Plan achieve these reductions or be on a trajectory to achieve these reductions.

While the proposed Plan results in significant impacts related to VMT and GHG, anticipated reductions in per capita VMT and GHG, along with proposed mitigation measures, would reduce inconsistency of the proposed Plan with the State's ability to achieve VMT and GHG goals

and puts SANDAG on a trajectory that more closely aligns with regulatory targets.

Furthermore, as discussed in Chapter 2, *Project Description*, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045.

33-2 Transportation represents more than 50% of our regional emissions when fuel procurement is included, and the report explains repeatedly that the region will likely be subjected to average temperature increases of up to 4.8 °F by 2050 and sea level rise up to 4.6' by 2100. Rather than treat those dire predictions as a mandate to create a plan that addresses Climate Crisis with accelerated pace, the plan uses state mandates as the upper limit of ambition, while still managing to miss three of those mandated goals. Plans originally slated to connect the county via proper investment in lasting and extremely low emissions electric rail have been scrapped and replaced with Bus Rapid Transit, allegedly for flexibility to adapt routes to anticipated accepted usage. Urban planners and the science agree that electric rail is the right investment, because increasing the use of electric trains to satisfy our needs is the most efficient, and least emitting method of transporting people long distances. Movement over shorter distances in a deepening Climate Crisis should be centered around active transportation and micromobility, again focusing on extremely low emissions movement.

33-3 The planning initially indicated a network of electric trains through the center of the county, along the I-15 corridor, and also connecting in many East-West configurations. But with an assumption that North County residents will never have a willingness to use trains, instead it resulted in a degraded regional rail plan with pessimistic propensity scores dictating which communities would be served in 2050 by rail and who would have to fall back on Bus Rapid Transit and continue using cars seemingly forever. (images from SANDAG Transportation, Regional Planning, and Borders Committees Joint Meeting 8/7/2020)



RESPONSE TO COMMENT 33-2

As an initial matter, this comment relates to the contents of the proposed Plan and not to the adequacy of the Draft EIR's analysis.

As discussed throughout the Draft EIR and particularly in Appendix C, *Climate Change Projections, Impacts, and Adaptation*, of the EIR, SANDAG is aware of and deeply concerned about the implications of climate change on the San Diego region.

As described in Section 4.8, the 2017 Scoping Plan establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and putting post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California's natural and working lands, and sustainable solid waste management are among many actions the State must take. In addition, the State has not adopted a plan analogous to the 2017 Scoping Plan that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

As discussed in the Final EIR (page 4.8-40), available research and reports indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies and large-scale deployment of new and existing technologies; and in the roles of local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions. The precise pathway to meeting the State's mid-century goals (e.g., achieving carbon neutrality no later than 2045; reducing emissions to 80 percent below 1990 levels by 2050) is still unclear, but would require the decarbonization of the State's electrical sector; decarbonization of existing buildings and new construction; electrification of the entire transportation sector; investments in healthy soils; sustainable solid waste and wastewater management; and carbon dioxide removal

strategies, such as land-based carbon sequestration and direct air capture of CO_2.

The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone.

SANDAG investments will also support the transition of transit and freight vehicles to zero emission including funding for hydrogen fuel cell electric buses and battery electric buses. The proposed Plan supports investments in the electrification of cars, trucks, and buses and their supporting infrastructure (e.g., EV charging stations and hydrogen fueling stations) and supports the transition of transit and freight vehicles to zero emission including funding for hydrogen fuel cell electric buses and battery electric buses. These electric vehicle investments are one of the ways SANDAG is working to reduce regional GHG emissions and improve local air quality. Appendices A (Table A.17) and B of the proposed Plan show SANDAG's proposed EV commitments such as regional electric vehicle and charging infrastructure incentive programs. Innovation and advanced technologies will be critical to meeting regional GHG reduction goals in 2035.

Furthermore, as discussed in Chapter 2, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045.

RESPONSE TO COMMENT 33-3

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Following the 5 Big Moves data-driven approach to develop a comprehensive and integrated transportation system, the project-evaluation criteria methodology relied on regional data and information analyzed with geospatial tools (ArcGIS) and spreadsheets (Excel). SANDAG used GIS analytics and data, including land use density, access to transit, car ownership, and income to refine the networks. Origin-destination pairs were analyzed and refined to assess which routes warranted commuter rail solutions and which warranted alternate transit solutions that would reduce automobile use.



33-3 cont.

This was a massive change in strategy after the 5 Big Moves had been described for more than a year as having a Transit Leap. California's High Speed Rail (HSRA) is only expected to serve Escondido and downtown San Diego, so it does not take the place of a regional rail line on the I-15 corridor.

33-4

The bike infrastructure plans are too slow, incremental, and don't fundamentally pattern streets for the radical mode shift we need. The RP has chosen to wait for a separate plan update for the regional bicycle network. Unfortunately the bike network is treated like a separate ancillary addition, forming a patchwork of insufficiently wide rail trails (actually Multi Use Paths) and painted class 1 bike lanes. It fundamentally fails to restructure the more dense areas as walkable and bikeable cities. This will result in continuing to miss projected targets of increasing Active Transportation that is necessary for lower emissions in our cities' Climate Action Plans. This Regional Plan is for 28 of the most critical years that San Diego will ever face, yet the plans don't meet the depth of mode shift needed. Single occupancy cars are still given deference in 2050, creating no fundamental change.

33-5

This plan's inclusion of new rail in the South Bay is admirable and reinforces the need to move people who are expected to embrace transit. But the plan is placing too little emphasis on mass transit in the rest of the county, attempting to reduce congestion with Managed (HOT) Lanes and underwhelming carpooling strategies, assuming that most San Diegans will never give up their cars. This is not the right response from planners who are tasked with helping us radically reduce VMT. Although the Report does acknowledge the reduction of per capita VMT, it actually predicts an increase in VMT by 6.7% because of new population growth. That is completely unacceptable with our world in the balance.

RESPONSE TO COMMENT 33-4

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR's analysis.

The projects from the active transportation network were laid out and prioritized based on the analysis performed in Riding to 2050, SANDAG's Adopted Regional Bike Plan. While the deadline year for build out is 2050, this just means it would be proposed to be completed by that time. Many projects will likely be completed earlier. This is especially true as new funding sources become available. Additionally, as an early action out of the proposed Plan, SANDAG will be developing a new Regional Active Transportation Network in which projects will be reassessed and reprioritized based on data and community engagement. Finally, the intention of the network proposed in this Plan is a regional framework which facilitates trips associated with regional purposes (trips to school and work, trips within Mobility Hubs, trips to major destinations, and others). The regional network complements the much more extensive networks that local jurisdictions plan and construct on their own streets.

RESPONSE TO COMMENT 33-5

Commuter Rail Line 582 is included in the proposed Plan to serve north-south travel needs in Sorrento Mesa, National City, Kearny Mesa, and University Heights. The South Bay to Sorrento Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of this route.

The proposed Plan is focused on creating more mobility options for all people in the San Diego region through a fast, reliable, and fair public transportation system and micromobility options such as e-bikes and scooters, rideshare, and microtransit shuttles. The Plan also proposes a network of Managed Lanes using existing infrastructure that provides priority access for people using transit, carpooling, or vanpooling. The Managed Lane Network supports transit services making transit a compelling alternative to driving.

The proposed Plan maximizes the region's existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes.

As discussed in Draft EIR Section 4.16, achieving further reductions in the total and per capita VMT generated within the region depends upon additional State policy actions and funding, as well as local jurisdictions' review and entitlement of individual land use development projects and Regional Arterial System (RAS) transportation projects. In addition, transportation sponsors other than SANDAG, such as Caltrans, must evaluate and potentially mitigate any induced VMT that may be associated with the implementation of enhancements to the freeway and State Highway System.

The Draft EIR proposes mitigation measure TRA-2, which focuses on project-specific mitigation measures that can and should be implemented to further reduce the region's total VMT and VMT per capita. SANDAG cannot require local agencies implementing development projects, or other transportation project sponsors not receiving TransNet grants, to adopt the mitigation measures, and it is ultimately the responsibility of the CEQA lead agency to determine and adopt mitigation. In addition, the State has indicated that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals.

The DEIR states, "*RTP transportation network improvements must be "revenue constrained" (23 CFR 450.324(f)(11), meaning that the MPO has specified the public and private funds that are reasonably expected to be available and that are needed to implement the proposed transportation plan.*"
Though the mandate may state that the RTP must be revenue constrained, this ultimately forces
33-6 it to be compromised to the extent that it does not satisfy the other constraints, such as legally mandated climate emissions reductions goals.

It is plain to see that the plan was altered to be more affordable and politically more acceptable by current SANDAG board representatives. That is a disservice to the future generations that this plan underserves. With VMT still going up in the wrong direction, and not enough influence of increasing Passenger Miles Travelled via high density rail movement, the plan fails to account for any worse case scenarios demanded by future emissions reductions goals.

Because the plan is revised every 4 years, if the 2050 vision is valuable for anything, it is critical as a way of driving the big swings in mass transit, and laying the foundation for the difficult task of building electrified permanent infrastructure for transit and walkable and bikeable streets in all our communities to connect them to transit, thus reimagining extremely low impact travel.

This plan relies on Bus Rapid Transit using Managed Lanes to ensure those buses move in a timely manner, which we cannot guarantee without a fully dedicated bus lane. Furthermore, buses leaving the main route to meet riders at off-road transit stations as the 235 route currently does, makes the BRT solution significantly slower, than traveling the same distance by car. The choice to use BRT instead of rail, fails to invest in what would be the faster, cheaper to operate, higher capacity system, not subject to conflict with road traffic. The use of "HOT" paid access to prioritize the wealthy while leaving behind those without the means to pay ever-changing
33-7 Managed Lanes tolls, is an inequitable policy that should be abandoned. If Managed Lanes are a lever to encourage reduction of VMT through the enhancement of per vehicle Passenger Miles Traveled, then the policy cannot have loopholes for the wealthy driving solo, even if HOT lane policy might be expected to fund other programs. While today, there are HOV privileges for EVs, hybrids, and motorcycles, the plan doesn't describe a specific trigger for when those privileges will be rescinded. As internal combustion cars are phased out and EVs are the norm, it will no longer make sense, or be possible, to allow them to use those Managed Lanes in single occupancy mode. Despite the state's insistence the HOV lanes reduce emissions, there is little evidence to show that Managed Lanes induce carpooling. The plan shows only an eventual 6.4% reduction in percentage of car mode share in 2050 compared to 2016 (85.9% -> 79.5%), meaning it is failing miserably to diminish car driving behaviors. If the intention of Managed Lanes is to reduce congestion in the hope that cars move more freely, the reduced congestion will discourage the necessary mode shift to adoption of GHG-reducing, higher PMT mass transit. Marginally reducing congestion is an outdated goal, no longer relevant in a community that is now tasked with eliminating GHG emissions rather than just slightly cutting them. Managed lanes were described during the community engagement phase of the RTP as a dynamic sign-based system in the 5 Big Moves preview, one that could be operated without the creation of any new lanes. Here it is shown as a feature of the Next OS, which is described as

RESPONSE TO COMMENT 33-6

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR's analysis.

Planning a better transportation system that reduces congestion, addresses social equity considerations, and meets State and federal mandates for reducing GHG emissions and air pollution is key to SANDAG's vision for the region. Revenues to fund the projects do not come in all at once, but dollars that are available are applied to ensure that the best projects are initiated first and, as the comment suggests, lays the foundation for future changes to come.

Also as the commenter notes, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region's progress toward the State's goal of carbon neutrality by 2045.

RESPONSE TO COMMENT 33-7

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR's analysis.

The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to meet State and federal greenhouse gas and air quality targets. The proposed Managed Lanes Network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit (including Bus Rapid Transit), carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. Solo drivers will have options to use the lanes, but at a price, and transit services can travel congestion free. The result is better optimization of the system that encourages higher occupancy travel but with real alternatives that are competitive with driving.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are

impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. SANDAG also will collaborate with State and federal agencies that are partnering to evaluate road charge programs in California.

The Plan proposes an expanded public transit network including commuter rail, light rail, Rapid bus, and local bus services. The network was developed to be a comfortable, convenient option to the automobile. The commuter rail service connects the highest demand trip areas between residents and employment centers. The purple line alignment through City Heights is being studied in the South Bay to Sorrento Comprehensive Multimodal Corridor Plan currently underway. Funding for the relocation of rail on the Del Mar Bluffs to a tunnel is prioritized in the proposed Plan.

"allowing it to adapt and respond to changing conditions throughout the day."



33-7 cont.

But the plan calls for the creation of hundreds of miles of additional lanes. Any new lane miles will add capacity and induce new demand, thus increasing VMT and emissions.

33-8

Regarding the Plan Alternatives, Sierra Club prefers Alternative 3 to the actual Plan. The increased focus on infill and associated benefits of access to transit and mobility options are responsible policy that will limit habitat disruption, protect native species, and drive down emissions more quickly, although we feel this is not enough, nor is it fast enough.

33-9

Our community members cannot build their own train system nor can they build their own separated bike lanes. They rely on SANDAG planners to witness the proven low emissions strategies that other cities are using to radically prepare for a low GHG emissions future. The car, truck and SUV have brought us high emissions and pollution, and extremely high congestion, and we cannot afford the time and risk of phasing out internal combustion cars to replace them with an equal number of substantially heavier, battery electric EVs which have no advantage in reducing congestion. The next generation will look at this plan, at how it morphed from one of great promise to one of great fiscal compromise, in a time that we could not afford to favor business-as-usual over dramatic mode shift. The Climate Crisis is expected to get substantially worse, and this plan contains far too much incrementalism. The Climate Emergency demands bold plans with dramatic reductions in overall VMT and with contingencies within the plan, to accelerate more rapid emissions reductions as we continually reevaluate and find that accelerated emissions reductions are absolutely necessary.

Sincerely,
Karl Aldinger
Organizer - Sierra Club San Diego

RESPONSE TO COMMENT 33-8

The Sierra Club's support for Alternative 3 is acknowledged. At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) make final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors (see CEQA Guidelines Section 15091(a)(3)). Therefore, this comment will be provided to the Board of Directors and will be considered before it makes a decision on adopting a final Regional Plan.

RESPONSE TO COMMENT 33-9

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

That said, SANDAG understands the commenter's concerns, which align with the proposed Plan's goal of healthier air and reduced GHG emissions regionwide, while facilitating the efficient movement of people and goods and providing access to affordable, reliable, and safe mobility options for everyone. The proposed Plan is a long-range planning document and is required by federal law to provide a reasonably feasible funding strategy for the projects, policies, and programs of the Plan. Significant additional work, including public involvement, pilot testing, legislation, and much more will be necessary to inform implementation of elements of the proposed Plan. At a minimum this Plan is updated every four years with the latest in planning ideas and concepts.

We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.

COMMENT LETTER 34: CHATTEN BROWN, CARSTENS & MINTEER LLP (ON BEHALF OF SIERRA CLUB SAN DIEGO)

Comment Letter 34

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October 11, 2021

Via E-mail (RegionalPlanEIR@sandag.org)
Kirsten Uchitel
Associate Planner, SANDAG
401 B Street, Suite 800
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Dear Ms. Uchitel,

On behalf of the San Diego Chapter of the Sierra Club, we are providing the following comments regarding the Draft 2021 SANDAG Regional Plan ("Regional Plan" or "Plan") and Draft Environmental Impact Report ("DEIR"). Please also see additional letters submitted separately by members of Sierra Club San Diego for further comments on the Regional Plan and DEIR, explaining deficiencies of the Regional Plan and requesting improvements.

Because the Regional Plan fails to sufficiently reduce greenhouse gases and vehicle miles travelled, and protect biological resources, we urge SANDAG to revise the Plan and recirculate a new DEIR. The DEIR contains deficiencies, which we have described below. 34-1

I. The Regional Plan Fails to Sufficiently Reduce GHG Emissions.

The Regional Plan fails to sufficiently reduce greenhouse gas ("GHG") emissions Courts have emphasized the importance of regional transportation and land use planning in meeting statewide GHG reductions. (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 429 ("*CNFF II*"), *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 533-34 ("*Golden Door II*").) Yet the Regional Plan will have significant and unavoidable impacts to greenhouse gas emissions, as it is inconsistent with the state's ability to achieve statewide GHG reductions under SB 32, EO S-3-05, and EO B-55-18. (Impact GHG-5, DEIR, p. 4.8-35 to -52.)

A. The DEIR's GHG Mitigation Measures Violate CEQA.

"Formulation of mitigation measures shall not be deferred until some future time." (CEQA Guidelines § 15126.4, subd. (a)(1)(B).) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the 34-2

RESPONSE TO COMMENT 34-1

This comment asserts that the proposed Plan fails to sufficiently reduce GHG emissions and refers to more detailed comments provided later in the letter. It is true that the Draft EIR found that the proposed Plan would have significant and unavoidable impacts to greenhouse gas emissions. This comment does not assert any reasons why those findings are inadequate.

RESPONSE TO COMMENT 34-2

The comment restates the program-level mitigation measures. The description of these measures as "impermissible deferred mitigation" is not explained in detail in this comment. In general, however, mitigation measures in a first-tier EIR for a program-level project such as the proposed Plan may contain generalized mitigation criteria and policy-level alternatives (*Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29). See *California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603 (the details of exactly how the required mitigation and its performance standards will be achieved can be deferred pending completion of a future study). The proposed Plan "integrates land use, transportation systems, infrastructure needs, and public investment strategies within a regional framework," and its EIR is a first-tier Program EIR for which mitigation measures may be more generalized than in a project-level EIR. (see Draft EIR page 1-1.)

This comments assert that Draft EIR mitigation measures GHG-5a, GHG-5b, GHG-5c, and GHG-5d lack specific performance criteria. However, these mitigation measures do include specific performance standards as described below.

GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans (pages 4.8-46 to 4.8-47).

By adopting this measure, SANDAG would commit to two actions: (1) implementing a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement strategies or measures included in an adopted climate action plan (CAP) or GHG reduction plan, and (2) as part of next cycle of the *TransNet* Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program, continue to require locally

adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions.

Mitigation measure GHG-5a does include specific performance standards that the grant program(s) will be required to achieve, as described below.

First, the measure commits SANDAG to achieving additional *annual* GHG emissions reductions during the proposed Plan horizon by implementing projects that would otherwise not occur due to insufficient funding and additional *cumulative* GHG emissions reductions during the proposed Plan horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. To ensure that this measure achieves additional annual and/or cumulative GHG emissions reductions, funding applicants are required to demonstrate, to SANDAG's satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding.

Second, to receive the competitively awarded grant funding, projects must be included in an adopted CAP or GHG reduction plan. That adopted CAP or GHG reduction plan is required, in part, to establish a locally appropriate 2030 GHG reduction target for community-wide emissions derived from the State's legislative 2030 target, and to quantify how local GHG reduction strategies, programs, and measures would meet or exceed the 2030 target. Applicants are also required to estimate the GHG emissions reductions from their project, subject to review and approval by SANDAG.

Third, the measure includes a commitment by SANDAG to structure the grant program(s) by using evaluation criteria, evaluation criteria weighting, or similar means that prioritize the allocation of funds to projects that include measurable programs for achieving the GHG emissions reduction targets identified in that jurisdiction's adopted CAP or GHG reduction plan. This measure also includes a commitment by SANDAG to report annually to the Board of Directors on the estimated GHG reductions achieved by the projects funded through this grant program.

It is not possible at this time for SANDAG to establish additional performance criteria for this mitigation measure in the form of a

specific numeric amount of GHG emissions reductions that would be achieved by implementation of the grant program(s). While examples of the types of projects that would be eligible for funding are listed in the measure (e.g., existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems), there is not sufficient information available at this time about the nature, scope, size, location, and other details of specific projects that would apply for funding (e.g., number, type, age, and condition of buildings that would be retrofitted; number, system size, and type of onsite renewable energy systems installed).

Lastly, SANDAG has made the following minor revisions to the text of mitigation measure GHG-5a to clarify the points raised in this response. The following revisions also reflect edits made in response to comment Chatten-Brown 34-3.

> **GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.** ~~Prior to December 2025 (adoption of the next Regional Plan), and beginning as soon as~~ No later than December 2023, SANDAG shall implement a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement the stated strategies or measures in local jurisdiction CAPs or GHG reduction plans. To be eligible, CAPs or GHG reduction plans shall meet the minimum criteria specified below. Examples of such projects to reduce GHG emissions include existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems, activities at the local level that reduce VMT, Smart Cities[3] measures that result in the reduction of GHG, programs and infrastructure to divert organic waste from landfills, and tree planting. The ~~purpose of such~~ new and/or revised grant program(s) shall ~~is to~~: (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan's contribution to climate change.

To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG's satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding. Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of ~~allocate~~ funds to projects based on the amount of ~~that make~~ measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction's adopted CAP or GHG reduction plan.

As part of next cycle of the *TransNet* Smart Growth, Incentive and Active Transportation Grant Programs Smart Growth Incentive Program to be released prior to December 2023, SANDAG shall: (1) continue to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and (2) make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer term State targets and goals for GHG emissions reductions. Any new or updated CAP or GHG reduction plan receiving funding through this program shall also meet the following minimum criteria:

- The CAP or GHG reduction plan shall be adopted by the jurisdiction's elected decision-making body.
- The CAP or GHG reduction plan shall establish a locally appropriate 2030 GHG reduction target for communitywide GHG emissions derived from the State's legislative target for 2030 (as established by SB 32 or as amended by future legislation), and should establish long-term targets.
- The CAP or GHG reduction plan shall quantify, using substantial evidence, how local GHG reduction strategies, programs, and measures would meet or exceed the local GHG reduction target.

[3] Smart Cities use Information and Communications Technology to enhance the quality and performance of public services in order to reduce resource consumption and operate efficiently. Investment in reliable technology and high-speed connectivity are critical to the success of Smart Cities.

- The CAP or GHG reduction plan shall establish a mechanism to monitor the plan's progress toward achieving the target, including reporting data to SANDAG consistent with, and inclusion in, the Climate Action Data Portal or similar database, and a requirement to amend the plan if it is not achieving adopted goals.

Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively). SANDAG shall also pursue federal and State partnerships to leverage additional dollars for these programs. SANDAG shall document and report to the SANDAG Board of Directors the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis.

GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure. (pages 4.8-47 to 4.8-48)

By adopting this measure, SANDAG commits to two actions: (1) establishing one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure; and (2) establishing one or more programs to allocate funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles).

Mitigation measure GHG-5b does include a specific performance standard that the program will be required to achieve, as described below.

As described in the Draft EIR, the mitigation measure requires that new funding awarded through these programs shall be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target. In addition, SANDAG has revised mitigation measure GHG-5b to specify the number of electric bikes, zero-emission buses, and zero-

emission light-duty vehicles and/or chargers that will result from implementation of this measure. SANDAG has also revised this mitigation measure to clarify the timing and other details of implementation. The revisions to the text of mitigation measure GHG-5b are provided below.

GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure. ~~Prior to December 2025,~~ SANDAG shall establish one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure.

Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenans, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure.

SANDAG shall include approximately $100 million by 2025 of the Electric Vehicle Program (Table 2-13 in Chapter 2 and Near-Term Action 9[b] in Appendix K), and approximately $5 million of Transportation Demand Management funding for an electric bike incentive program (Table 2-13 in Chapter 2).

The funding for electric bikes will become available beginning in FY 2022 with the launch of a $500,000 incentive program and will be expanded through FY 2025. This program will reduce GHG emissions by providing funding for, at minimum, 200 electric bikes and associated services.

The funding for zero-emission buses and infrastructure will become available in FY 2023 to enable investments in zero emission transit buses, zero emission school buses, and supporting infrastructure through partnerships with the transit agencies (the Metropolitan Transit System [MTS] and North County Transit District [NCTD]) and San Diego County Air Pollution Control District (APCD). This program

will reduce GHG emissions by providing funding for, at minimum, 100 zero-emission buses, as well as associated fueling/charging infrastructure and services.

Beginning in FY 2022 SANDAG will begin two planning strategies to inform transition to zero-emission goods movement: the California Energy Commission-funded Medium Duty/Heavy Duty EV Blueprint grant for San Diego Region in partnership with Port of San Diego, and the Caltrans-–funded San Diego and Imperial Counties Sustainable Freight Implementation Strategy. SANDAG will also rely on the Portside Community Emissions Reduction Plan (CERP) and Maritime Clean Air Strategy (MCAS) to inform investment decisions. Investments in goods movement vehicle and infrastructure will begin in FY 2024.

~~Prior to December 2025,~~ SANDAG shall also establish one or more programs to allocate approximately $30 million in funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles). Eligible entities could include, but are not limited to, school districts, water districts, local jurisdictions, TNCs, private businesses, and non-profit organizations. New funding will be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target.

Beginning in FY 2023, SANDAG will formalize a partnership with CALeVIP San Diego County Incentive Project administrator to make available incentives for fleet charging infrastructure. Beginning in FY 2024, SANDAG will establish a vehicle incentive program that allocates funding incentives for public and private fleet vehicles. This program will reduce GHG emissions by providing funding for a minimum of 5,000 light-duty vehicles and/or chargers.

To further support this mitigation measure, SANDAG shall also participate in federal and State processes to support transportation electrification as well as pursue federal, State, and local partnerships to leverage additional dollars for these programs.

GHG-5c Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere (pages 4.8-48 to 4.8-49).

By adopting this measure, SANDAG commits to establishing a Nature-Based Climate Solutions Program that will remove CO_2 from the

atmosphere by restoring or enhancing natural infrastructure that uses or mimics natural processes to benefit people and wildlife.

Mitigation measure GHG-5c does include specific performance standards that the program will be required to achieve, as described below.

First, the measure commits SANDAG to implementing, or providing funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions. Toward this end, prior to implementation of any projects proposed for funding under this program, SANDAG shall prepare, or require the preparation of, studies demonstrating that such proposed projects would increase rates of carbon sequestration over baseline conditions. SANDAG shall document the proposed carbon sequestration for each project receiving funding under this program and provide a report to the SANDAG Board on an annual basis.

It is not possible at this time for SANDAG to specify a specific numeric amount of CO_2 that would be removed from the atmosphere. While examples of the types of projects that would be eligible for funding are listed in the measure (e.g., restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of fallow agricultural native coastal sage scrub and chaparral), there is not sufficient information available at this time about the nature, scope, size, location, and other details of specific projects that would apply for funding to be able to estimate the level of GHG reductions that would be achieved. (e.g., acreage, type of vegetative cover, soil type).

SANDAG has revised this mitigation measure to clarify that implementation will begin immediately upon adoption of the proposed Plan. The revisions to the text of mitigation measure GHG-5c are provided below.

> **GHG-5c. Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere.** Beginning immediately upon adoption of the proposed Plan and p~~P~~rior to December 2025 (adoption of the next Regional Plan), SANDAG shall establish a Nature-Based Climate Solutions Program that will restore or enhance natural infrastructure that uses or mimics natural processes to benefit people and wildlife. Through this program SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline

conditions. Examples include, but are not limited to, restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of fallow agricultural native coastal sage scrub and chaparral, and removal of fill within salt and freshwater and restoration with wetland habitat.

Prior to implementation of any projects proposed for funding under this program, SANDAG shall prepare, or require the preparation of, studies demonstrating that such proposed projects would increase rates of carbon sequestration over baseline conditions. SANDAG shall document the proposed carbon sequestration for each project receiving funding under this program and provide a report to the SANDAG Board on an annual basis.

SANDAG shall use the Nature-Based Climate Solutions Program (approximately $40 million) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Action 9(e) in Appendix K) to fund projects under this program. Additional funding could come from the *TransNet* Environmental Mitigation Program Fund for mitigation projects that require restoration and/or land management grants for the restoration of land to native habitat. SANDAG shall also pursue federal and State partnerships to leverage additional dollars for this program.

GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. (pages 4.8-49 to 4.8-50)

By adopting this measure, SANDAG commits to adopting a Regional Digital Equity Strategy and Action Plan that reduces GHG emissions by identifying and addressing gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and associated GHG emissions.

Mitigation measure GHG-5d does include a specific performance standard that the program will be required to achieve, as described below.

As described in the Draft EIR, the measure commits SANDAG to reducing car travel and associated GHG emissions by increasing access to affordable, high-quality broadband service that in turn allows for remote education, telemedicine, and working from home. The increased access to broadband service results from the measure's allocation of

$32 million to undertake projects in the Action Plan that have quantified GHG reductions. The measure also commits SANDAG to identifying and quantifying, where possible, the GHG reductions that will result from the Action Plan, and reporting annually to the SANDAG Board on the measure's funding expenditures and quantified GHG reductions.

It is not possible at this time for SANDAG to establish additional performance criteria for this mitigation measure in the form of a specific numeric amount of GHG emissions reductions that would be achieved by implementation of projects to increase access to broadband service that are identified in the Action Plan. This is because the data needed to quantify GHG reductions that would result from increasing access to broadband service are not currently available. While examples of the types of virtual activities that would be supported by increasing access to broadband service are included in the measure and would reduce car travel and associated GHG emissions (e.g., remote education, telemedicine, teleworking), there is not sufficient information available at this time about the specific attributes of communities that currently lack access to broadband service. Examples of these attributes include: communities' access to telehealth services; the types of jobs held by people in such communities and the ability of those jobs to be performed virtually; the extent of online delivery adoption for packages, medical devices and supplies, and food and household items; and the potential for utilizing remote services for governmental and social services.

SANDAG has revised this mitigation measure to clarify that implementation will begin immediately upon adoption of the proposed Plan. The revisions to the text of mitigation measure GHG-5d are provided below.

GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide. Subsequent to adoption of the proposed Plan and ~~P~~prior to January 2023, SANDAG shall adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and the associated GHG emissions. Investment in reliable technology and high-speed

connectivity are critical to close the digital divide and the foundation of a Smart Cities efforts to become more efficient, use less resources and reduce GHG. The Action Plan will identify specific actions, responsible parties, and a timeline for implementing the strategies identified in the Action Plan. Prior to December 2024, SANDAG commits to researching and evaluating methodologies for ~~and~~ quantifying, where possible, the corresponding GHG reductions associated with improved access to remote services enabled by broadband (e.g., telehealth, remote work, distance learning, and other remote services). SANDAG shall implement the Next OS (approximately $32 million) identified in the proposed Plan (Table B-1, Page B-5 in Appendix K) to fund projects that advance Smart Cities efforts and close the digital divide. SANDAG shall also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs. SANDAG shall document SANDAG's funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis. ~~Prior to December 2025 (adoption of the next Regional Plan), SANDAG will identify and commit approximately $32 million to undertake projects in the Action Plan that have quantified GHG reductions. SANDAG shall document the funding expenditures and quantified GHG reductions and provide a report to the SANDAG Board on an annual basis~~.

"time of project approval." (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.) "Simply stating a generalized goal for mitigating an impact does not allow the measure to qualify for the exception to the general rule against the deferred formulation of mitigation measures." (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 856.) The DEIR relies on the following program-level mitigation measures which constitute impermissible deferred mitigation due to the lack of specific performance criteria:

34-2 cont.

- GHG-5a: Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.
- GHG-5b: Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure.
- GHG-5c: Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere.
- GHG-5d: Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide.

(DEIR, pp. 4.8-45 to -47.)

34-3 GHG-5a requires SANDAG to implement a competitive grant funding program, but does not allow such program to commence until 2023. Further, the mitigation measure does not ensure specific sources of funding for the program (requiring SANDAG to "pursue" funding), nor does it evaluate the performance of funded plans, instead delegating such authority to grant applicants. (DEIR, pp. 4.8-45 to -46.)

34-4 Further, GHG-5b, GHG-5c, and GHG-5d have no stated performance criteria.

34-5 The mitigation measures also lack enforcement mechanisms as required by CEQA. (Pub. Resources Code, § 21081.6, subd. (b); *Lincoln Place Tenants Assn. v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 445.)

34-6 Further, Project-Level Mitigation Measure GHG-5e states that "transportation project sponsors *can and should* implement measures to reduce GHG emissions." (DEIR, p. 4.8-48, emphasis added.) SANDAG states it does not have the authority to require other agencies to implement this measure (DEIR, p. 4.8-51), but to the extent SANDAG controls or provides funding for any such transportation projects, SANDAG must require that these mitigation measures are mandatory as a condition for receiving funding. Additionally, any projects relying on the Regional Plan DEIR must incorporate the Regional Plan DEIR's mitigation measures. (CEQA Guidelines § 15168, subd. (c)(3).)

RESPONSE TO COMMENT 34-3

This comment assets that mitigation measure GHG-5a "does not allow (the competitively funded grant program) to commence until 2023, does not ensure specific funding sources, or evaluate the performance of funded projects. These three points are responded to individually below.

Regarding commencement of the program, SANDAG has revised the mitigation measure to clarify that SANDAG will start to develop the program immediately upon approval of the Plan with award of grants no later than December 2023. Refer to response to comment Chatten-Brown 34-2 for the revised text of mitigation measure GHG-5a. This implementation date is based on the time to develop the program, secure funding, and include in the budget that would be adopted in July of 2022, and time to set out a call for projects, review applications, and get approvals of the Policy Advisory Committees (PACs) and the Board of Directors.

Regarding funding sources, the measure does identify specific funding sources for mitigation measure GHG-5a. It does not only commit SANDAG to pursue funding as asserted by the commenter. The EIR identifies the following specific funding sources for mitigation measure GHG-5a (page 4.8-47):

> Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively).

Refer to response to comment Chatten-Brown 34-2 for the revised text of mitigation measure GHG-5a that clarifies the amount of funding that has been allocated to this measure.

Regarding performance evaluation, the measure does not delegate this authority to grant applicants as asserted by the commenter. As explained in the Draft EIR, grant applications are required to include estimated GHG emissions reductions from the project, and SANDAG is required to document and report to the Board of Directors annually on the estimated GHG reductions achieved from the grant program (pages 4.8-46 to 4.8-47). In addition, refer to response to comment Chatten-Brown 34-2 showing how the text of mitigation measure GHG-5a has

been revised to state that SANDAG shall review and approve the GHG emissions reductions estimates included in grant applications.

RESPONSE TO COMMENT 34-4

This comment asserts that mitigation measures GHG-5b, GHG-5c, and GHG-5d lack stated performance criteria.

Regarding GHG-5b, this measure provides new funding for zero-emissions busses and infrastructure, including at least $100 million by 2025. That $100 million figure is a performance criterion, as well as the requirement that that funding be used for zero-emissions busses and infrastructure. This mitigation measure's performance can easily be tracked by simply calculating the amount of additional funding procured for these zero-emissions buses and infrastructure, and comparing it to the $100 million required by GHG-5b.

Mitigation Measure GHG-5c requires the preparation of studies showing that any proposed nature-based climate solutions would "increase rates of carbon sequestration over baseline conditions." This requirements acts as the performance standard for this measure. Additionally, this measure identified $40 million of funding for this specific program. (Draft EIR 4.8-47.)

Mitigation measure GHG-5d similarly requires SANDAG to commit a specific amount of funds ($32 million) to "to fund projects that advance Smart Cities efforts and close the digital divide" (page 4.8-49). Additionally this measure provides: "SANDAG shall document SANDAG's funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis." The funding commitment and requirement to document expanded access are performance criteria.

Refer to response to comment Chatten-Brown 34-2 for additional information.

RESPONSE TO COMMENT 34-5

This comments asserts "lack of enforcement mechanisms" for mitigation measures GHG-5a, GHG-5b, GHG-5c, and GHG-5d. However, each of these measures does include an enforcement mechanism, as described below.

Mitigation measures GHG-5a through 5d each include a commitment that SANDAG "shall" implement the mitigation measure and each identifies the specific funding source(s) and amounts that SANDAG is committing to use to implement the mitigation measure (pages 4.8-46

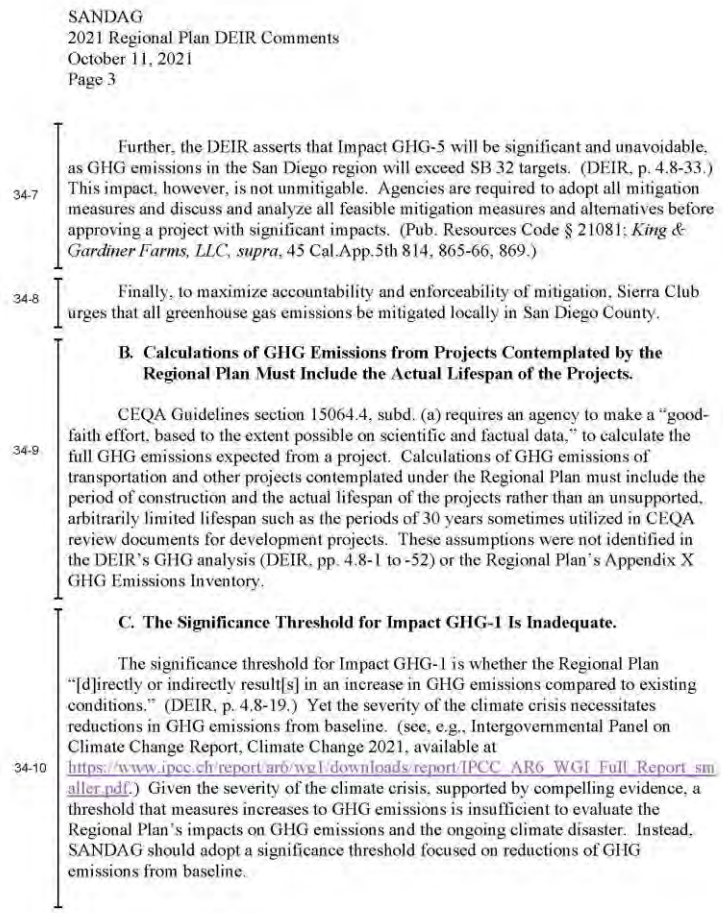
to 4.8-49). To ensure these measures are implemented, SANDAG would adopt them as part of the Mitigation Monitoring and Reporting Program following certification of the EIR and adoption of the proposed Plan (CEQA Guidelines Section 15097). Moreover, as described in the Draft EIR under the heading, *Background: Summary and Status of Previously Adopted GHG Mitigation Measures* (pages 4.8-43 to 4.8-44), SANDAG successfully implemented the GHG emissions mitigation measures that it committed itself to and adopted as part of the EIR prepared for the 2015 Regional Plan.

RESPONSE TO COMMENT 34-6

This comment acknowledges that SANDAG does not have authority to require other agencies to implement certain mitigation measures, such as GHG-5e, but requests that SANDAG should, to the extent it "controls or provides funding for any such transportation projects . . . require that these mitigation measures are mandatory as a condition for receiving funding." SANDAG's ability to require other agencies to implement specific mitigation measures, and the Draft EIR's use of the phrase "can and should" in its mitigation measures, is discussed in Master Response 2.

This response also argues that CEQA Guidelines Section 15168 subdivision (c)(3) requires that all mitigation measures in the proposed Plan be incorporated into any projects relying on this Draft EIR. Section 15168 subdivision (c)(3) states "[a]n agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program." Notably, only "feasible" mitigation measures must be incorporated into a project that tiers off of a programmatic EIR. Because the determination of "feasibility" of any given mitigation measure is made at the project level, this Draft EIR cannot definitively say whether the mitigation measures discussed in the Draft EIR will or will not be incorporated into any specific project that tiers from this analysis. It is therefore not correct that *any* projects tiering off this Draft EIR *must*, in all cases, incorporate *every* mitigation measure discussed in the Draft EIR.

Further, if a second-tier project does not incorporate every EIR mitigation measure, this does not make the Program EIR mitigation measures invalid. Rather, the consequence is that the second -tier CEQA review may not rely on the Program EIR for CEQA streamlining for those significant impacts where Program EIR mitigation measures are not incorporated.



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34-7 Further, the DEIR asserts that Impact GHG-5 will be significant and unavoidable, as GHG emissions in the San Diego region will exceed SB 32 targets. (DEIR, p. 4.8-33.) This impact, however, is not unmitigable. Agencies are required to adopt all mitigation measures and discuss and analyze all feasible mitigation measures and alternatives before approving a project with significant impacts. (Pub. Resources Code § 21081; *King & Gardiner Farms, LLC, supra*, 45 Cal.App.5th 814, 865-66, 869.)

34-8 Finally, to maximize accountability and enforceability of mitigation, Sierra Club urges that all greenhouse gas emissions be mitigated locally in San Diego County.

B. Calculations of GHG Emissions from Projects Contemplated by the Regional Plan Must Include the Actual Lifespan of the Projects.

34-9 CEQA Guidelines section 15064.4, subd. (a) requires an agency to make a "good-faith effort, based to the extent possible on scientific and factual data," to calculate the full GHG emissions expected from a project. Calculations of GHG emissions of transportation and other projects contemplated under the Regional Plan must include the period of construction and the actual lifespan of the projects rather than an unsupported, arbitrarily limited lifespan such as the periods of 30 years sometimes utilized in CEQA review documents for development projects. These assumptions were not identified in the DEIR's GHG analysis (DEIR, pp. 4.8-1 to -52) or the Regional Plan's Appendix X GHG Emissions Inventory.

C. The Significance Threshold for Impact GHG-1 Is Inadequate.

34-10 The significance threshold for Impact GHG-1 is whether the Regional Plan "[d]irectly or indirectly result[s] in an increase in GHG emissions compared to existing conditions." (DEIR, p. 4.8-19.) Yet the severity of the climate crisis necessitates reductions in GHG emissions from baseline. (see, e.g., Intergovernmental Panel on Climate Change Report, Climate Change 2021, available at https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report_smaller.pdf.) Given the severity of the climate crisis, supported by compelling evidence, a threshold that measures increases to GHG emissions is insufficient to evaluate the Regional Plan's impacts on GHG emissions and the ongoing climate disaster. Instead, SANDAG should adopt a significance threshold focused on reductions of GHG emissions from baseline.

RESPONSE TO COMMENT 34-7

This comment asserts that Impact GHG-5 "is not unmitigable" and that agencies are required to adopt all mitigation measures and discuss and analyze all feasible mitigation measures and alternatives before approving a project with significant impacts.

The Draft EIR identifies Impact GHG-5 as a significant impact in the year 2030, 2045, and 2050. The Draft EIR identifies several mitigation measures to reduce this significant impact by achieving additional GHG emissions reductions above and beyond the reductions shown in the analysis for Impact GHG-5 (mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, and GHG-5f). However, even with the additional GHG emissions reductions from these mitigation measures, total regional GHG emissions would remain inconsistent with the State's ability to achieve the 2030 reduction target of SB 32 and the 2045 and 2050 reduction goals of EO B-55-18 and EO S-3-05. Achieving the necessary level of reductions from all GHG emissions sectors will required a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. Therefore, the Draft EIR appropriately concludes that Impact GHG-5 would be significant and unavoidable.

The comment does not identify any additional feasible mitigation measures that would further reduce this significant GHG emissions impact, or provide any evidence to support its assertion that Impact GHG-5 "is not unmitigable." The Draft EIR provides a detailed discussion of the types of actions required to achieve the statewide GHG emissions targets and goals analyzed in Impact GHG-5 and explains why SANDAG alone cannot bring about all of the needed reductions. No further response is required.

RESPONSE TO COMMENT 34-8

This comment "urges that all GHG emissions be mitigated locally in San Diego County." This is not required by CEQA. Further, the Draft EIR mitigation measures (GHG-5a through GHG-5f) are focused on reducing GHG emissions within the San Diego region and on projects within the region that would remove carbon emissions from the atmosphere. EIR

mitigation measures do not include out of-County offsets. No further response is required.

RESPONSE TO COMMENT 34-9

The comment asserts that GHG emissions calculations of transportation and other projects included in the proposed Plan "must include the period of construction and the actual lifespan of the projects" instead of using "an unsupported, arbitrarily limited lifespan such as the periods of 30 years sometimes utilized in CEQA review documents for development projects." The Draft EIR properly estimates GHG emissions under implementation of the proposed Plan including from construction activities resulting from regional growth and land use change and transportation network improvements and programs as described below.

The GHG emissions projections included in the Draft EIR reflect GHG emissions that would be generated by activities associated with implementing the two main physical components of the proposed Plan: regional growth and land use change, and transportation network improvements and programs. It analyzes the combined emissions of these components.

The projections are reported out to 2050, because this the horizon year of the proposed Plan. Further, Executive Order S-3-05, which is included in the significance threshold for Impact GHG-5, also has a 2050 horizon year for GHG emissions reductions, and the 2017 Scoping Plan sets a path for achieving these GHG emissions reductions in 2050. Projecting Regional Plan GHG emissions beyond 2050 would be speculative due to likely but unknown changes in both economic activity and GHG reduction policies and technology.

Specifically, as explained in Draft EIR Section 4.8.4, *Environmental Impacts and Mitigation Measures*, the GHG emissions calculations included in the Draft EIR include "15 emissions categories," one of which is the off-road equipment sector (Draft EIR page 4.8-19). As explained in Draft EIR Appendix H, the off-road equipment sector includes construction equipment emissions from implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan (Draft EIR Appendix H page X-37). Thus, GHG emissions from construction of projects included in the proposed Plan are accounted for in the GHG emissions calculations included in the Draft EIR.

The Draft EIR does not use "an unsupported, arbitrarily limited lifespan such as the periods of 30 years." Further, the GHG emissions projections are not based on the "period of construction and the actual lifespan" of every individual transportation network improvement and land use development project included in the proposed Plan because the project-specific details needed to perform such analysis are not available at this time (e.g., project design, site conditions, type and number of equipment needed, site conditions, construction start date and duration). As explained in Draft EIR Chapter 4, *Environmental Impact Analysis Approach* (Draft EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely. When a first-tier Program EIR is prepared, "leaving project-specific details to subsequent EIRs when specific projects are considered" is a proper approach to CEQA tiering (In re Bay Delta [2008] 43 Cal. 4th 1143, 1174).

RESPONSE TO COMMENT 34-10

This comment asserts that the Draft EIR significance criterion for Impact GHG-1, which addresses whether the proposed Plan would directly or indirectly result in an increase in GHG emissions compared to existing conditions (2016), is inadequate because the severity of the climate crisis requires reductions in GHG emissions from baseline, and that instead SANDAG should use a significance threshold focused on reductions of GHG emissions from baseline.

It is misleading to imply that the significance threshold for Impact GHG-1 is the only Draft EIR GHG significance threshold. The Draft EIR in fact uses five significance criteria to evaluate whether implementation of the proposed Plan would have a significant GHG emissions impact (page 4.8-20). As described in the Draft EIR, these significance criteria were developed based on the Initial Study checklist questions provided in Appendix G of the CEQA Guidelines and CEQA Guidelines Section 15064.4 (page 4.8-20). Impact GHG-1, which is addressed by the commenter, is based on CEQA Guidelines Section 15064.4(b)(1), which states that lead agencies should consider, "the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting."

Three of the significance criteria address reductions of GHG emissions below baseline as requested by the commenter:

- GHG-2, which evaluates whether the proposed Plan would conflict with the SANDAG region's achievement of SB 375 GHG emissions reduction targets for 2035 (a 19 percent reduction from 2005 levels).
- GHG-3, which evaluates whether the proposed Plan would conflict with or impede achievement of an at least 30 percent reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions (2016).

GHG-5, which evaluates whether the proposed Plan would be inconsistent with the State's ability to achieve the 2030 reduction target of SB 32 (40 percent below 1990 levels by 2030) and long-term reduction goals of EO S-3-05 (80 percent below 1990 levels by 2050) and EO B-55-18 (carbon neutrality no later than 2045).

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II. The Regional Plan Has Significant Transportation Impacts Requiring Mitigation.

A. The Regional Plan Overly Emphasizes Roadway Construction and Fails to be Consistent with Statewide Climate Goals and Federal RTP Policy Objectives.

1. The Regional Plan is Inconsistent with Statewide Climate Goals.

"CEQA requires public agencies like SANDAG to ensure that [] analysis stay in step with evolving scientific knowledge and state regulatory schemes." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504 ("*CNFF I*").) Executive Order No. S-03-05, enacted in 2005, established GHG reduction targets to 80 percent below 1990 levels by 2050. (*Golden Door Properties, LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 895 ("*Golden Door I*").) SB 32, enacted in 2016, "adopts a goal of reducing [GHG] emissions by 40 percent below 1990 levels by the year 2030"—a "necessary interim target to ensure that California meets its longer-range goal of reducing [GHG] emissions to 80 percent below 1990 levels by the year 2050." (*Golden Door II, supra*, 50 Cal.App.5th 467, 488.) In 2008, SB 375 was enacted to "*reduce* GHG emissions through improved land use and transportation planning." (*Id.* at 533, emphasis added.)

34-11

The Regional Plan's emphasis on freeway construction is misguided and counterproductive to the goals of Executive Order No. S-03-05, SB 32, and SB 375. As the DEIR notes, on-road transportation of light-duty vehicles and passenger cars contributes the largest share of GHG emissions in the San Diego Region. (Table 4.8-7, DEIR, p. 4.8-23.) According to Table 4.16-6, the Regional Plan *increases* the total number of roadway lane miles within the region under Year 2025 conditions, as compared with baseline. (DEIR, p. 4.16-32.) This includes increases in miles from freeways, tollways, state highways, and arterials. (*Ibid.*) The Regional Plan will also result in an increase of average daily vehicular trips of 122,278. (*Ibid.*) The total number of roadway miles continues to increase under the 2035 scenario (DEIR, p. 4.16-36 [an increase of 622 miles]) and 2050 scenario (DEIR, p. 4.16-40 [an increase of 799 miles]). The DEIR mischaracterizes the increase of 799 roadway miles over baseline in 2050 as a "slight" increase, but that is an increase of 11.5 percent. (DEIR, p. 4.16-40.)

The Regional Plan, however, touts a decrease in roadway mode share under Year 2025 conditions of 3.3% under baseline, and a decrease of 0.18 miles—950 feet—of average length of vehicular trip under baseline. (DEIR, p. 4.16-32.) These paltry figures demonstrate the Regional Plan's lack of ambition in meeting GHG reduction goals. While the roadway mode share decreases further under the 2035 and 2050 scenarios, the

RESPONSE TO COMMENT 34-11

The comment notes that implementation of the proposed Plan will increase the total number of roadway lane miles within the San Diego Region, under each Horizon Year:

- Year 2025 – Increases 233 lane miles
- Year 2035 – Increases 617 lane miles
- Year 2050 – Increases 788 lane miles

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the proposed Plan (page S-104).

The comment also notes that the proposed increase in roadway lane miles is counterproductive to the region's ability to meet the State's GHG emission goals, as prescribed in SB 32 and SB 375.

As an initial matter, it should be noted that much of the increase in lane miles under the proposed Plan would be managed lanes, not general purpose lanes, with the vast majority of new lanes in 2035 and 2050 being managed lanes. Although this comment's notes that the average length of a vehicle trip "does not meaningfully change," trip length alone is not a complete datapoint where managed lanes promotes carpooling, high-occupancy vehicles, and public transportation, all of which tend to lower per-capita VMT.

This comment is addressed in the Draft EIR, under TRA-2, as follows:

2025 Conditions

Page 4.16-51:

Additionally, as displayed previously in Table 4.16-6, implementation of the proposed Plan, in Year 2025, would increase the number of roadway lane miles within the region by ~~245~~ 233 miles. Some of the additional lane miles added to the network would be managed lanes (~~39~~ 34 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel.

Page 4.16-51:

Implementation of the proposed Plan would also result in an increase of ~~477,196~~923,702 daily VMT generated within the San Diego region

compared to Baseline Year 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2025 because the proposed Plan would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

2035 Conditions

Page 4.16-53:

Additionally, as displayed previously in Table 4.16-10, implementation of the proposed Plan, under Year 2035 conditions, would increase the number of roadway lane miles within the region by ~~622~~ 617 net miles. The majority of the additional lane miles added to the network would be managed lanes (~~436~~ 449 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel.

Page 4.16-53:

Implementation of the proposed Plan would result in an increase of ~~2,520,860~~1,798,264 daily VMT generated within the San Diego region compared to Baseline Year 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2035 because the proposed Plan would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

2050 Conditions

Page 4.16-55:

Additionally, as shown in Table 4.16-14, implementation of the proposed Plan under Year 2050 conditions would increase the number of roadway lane miles within the region by ~~798~~ 788 net miles. The majority of the additional lane miles added to the network would be managed lanes (705 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel.

Page 4.16-55:

Implementation of the proposed Plan would result in an increase of ~~5,611,752~~4,519,230 daily VMT generated within the San Diego region compared to 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2050 because the proposed Plan would not achieve the

substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Therefore, the impacts associated with the additional roadway lane miles, as they relate to Section 15064.3 of the CEQA Guidelines as well as the proposed Plan's ability to achieve the substantial VMT reductions needed to help achieve the statewide GHG reduction goals, are identified and disclosed in the Draft EIR.

Additionally, please note that page 4.16-43 of the Draft EIR has been revised to remove the word "slightly" in describing the increase in roadway lane miles.

Finally, please note that Impact GHG-5 does evaluate the consistency of the proposed Plan with the state's ability to achieve statewide climate goals.

34-11 cont. average length of vehicle trip does not meaningfully change over these time horizons. (DEIR, pp. 4.16-36, 4.16-40.)

The Regional Plan emphasizes that its construction of hundreds of new roadway miles over the course of the Plan are primarily "managed" freeway lanes for the supposed benefit of bus rapid transit rather than comparably extensive commuter rail or dedicated bus lanes. (DEIR, p. 4.16-32.) But managed lanes will not be effective for bus rapid transit because these lanes will also be available for use by high occupancy and fee-payer vehicles that in turn will result in congestion and greatly reduced bus efficiency during critical daily "rush hour" transportation periods as evidenced by conditions on existing rapid bus/HOV lanes on Interstate 15, Interstate 805, Interstate 5, and elsewhere. In order

34-12 to fully analyze transportation impacts, we request that SANDAG provide information on the performance of current bus rapid transit routes to compare operations during periods of congestion/non-congestion and determine whether these routes are effective when using the same lanes as HOVs and paying users.

And as shown in the list of projects in DEIR Appendix B, the Regional Plan includes massive new infrastructure to connect managed lanes between freeways and provide separate ramp infrastructure where buses must enter and exit freeways to access transit stations (DEIR, Appendix B) rather than the far more efficient method of bringing people directly to dedicated commuter rail or bus lanes.

2. The Regional Plan is Inconsistent with the 2019 Federal RTP.

The DEIR inaccurately concludes that the Regional Plan is consistent with the goals and "general intent" of the 2019 Federal RTP for 2025, 2035, and 2050. (DEIR, pp. 4.16-30, 4.16-35, 4.16-39, 4.16-43.) Under CEQA, "*any*" inconsistency between a project and an applicable land use plan must be disclosed in an EIR. (CEQA Guidelines § 15125, subd. (d), emphasis added.) Further, a "general" consistency with a plan cannot overcome a specific, fundamental, and mandatory inconsistency. (See *Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 91, 101.) The Regional Plan's

34-13 increases to roadway miles in 2025, 2035, and 2050, increases to vehicle miles travelled (see Section II.B below), and continued dominance in mode share of roadway travel are completely inconsistent with the goal of the Federal RTP to "[m]ake transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living." (DEIR, pp. 4.16-31 to -33, 4.16-37, 4.16-41.) Due to this inconsistency, the DEIR must find that Impact TRA-1 is significant, and propose mitigation measures for this impact.

RESPONSE TO COMMENT 34-12

he performance of the existing Rapid Bus service is not indicative of the projected future operations of the same services, or their effect on future VMT production within the region. This is because the majority of the region's existing Rapid Bus services do not operate within exclusive or managed rights-of-way. Thus, the majority of these routes operate within mixed-flow traffic, which would not be the case with the implementation of the proposed Plan.

As noted in Table 4.16-14 of the Draft EIR, the proposed Plan would implement over 705 lane miles of HOV/Managed Lanes along freeways within the region. This is more than six times the number of HOV/Managed Lane miles that are available within the existing transportation network. Therefore, future Rapid Bus services will have substantially more opportunity to operate within exclusive or managed rights-of-way than what is provided today. It should also be noted that the proposed Plan includes additional operational improvements to the service, transit services, including dynamic transit routing, scheduling, and communications, as well as implementation of smart intersections (see Table A.15 in Appendix A of the proposed Plan for additional details). The benefits associated with these improvements are not reflected through the existing performance of the Rapid Bus services. As such, the existing Rapid Bus operations do not correctly reflect future conditions, and are not relevant to the analysis conducted for Impact TRA-2.

The performance of all future transit services within the San Diego region, including the Rapid Bus services that utilize the Managed Lanes included within the proposed Plan, were evaluated using SANDAG's updated second generation Activity Based Model (ABM2+). The ABM2+ forecasts future travel patterns within the region based on several factors including, but not limited to, population, employment, available transportation facilities (including Managed Lanes) and services (including Rapid Bus), travel speeds, roadway congestion, and pricing. The ABM2+ is the most up-to-date transportation forecast within the San Diego region and is the best tool in which the metrics used to evaluate effects of land use growth and transportation network improvements can be measured at a regional level, including activity and tour (trip) generation, mode split, average trip length, and VMT. As such, the ABM2+ is the most accurate way to project future transit ridership and its effect on VMT within the region. Thus, the regional

VMT analysis conducted under Impact TRA-2 was done as accurately as possible, using the best tools available for projecting future transportation patterns and conditions, including Rapid Bus and other transit services.

Finally, please note that the transit improvements included in Draft EIR Appendix B were coded into and accounted for within the ABM2+ model. The ABM2+ model does account for additional travel times and delays that could occur with buses entering and existing the freeway managed lanes to access transit stations. Therefore, the projected efficiency of the proposed transit system, with the implementation of the proposed Plan, was correctly analyzed under TRA-2..

RESPONSE TO COMMENT 34-13

This comment asserts that the Draft EIR improperly finds that the proposed Plan is "generally consistent" with the 2019 Federal RTP at the 2025, 2035, and 2050 horizons, but that because the proposed Plan results in increases in roadway miles and total-VMT, as well as "continued dominance in mode share of roadway travel," it is actually inconsistent with the goal of the Federal RTP to "[m]ake transportation investment that result in cleaner air, environmental protection, conservation, efficiency, and sustained living."

This comment fails to explain how the proposed Plan is inconsistent with the broad policy goals quotes from the 2019 Federal RTP. The quoted Federal RTP policy goals do not make any increase in roadway capacity inconsistent; to the contrary, as discussed in response to comment Chatten Brown 34-11, much of the roadway capacity increase is for Managed Lanes, which have the effect of lowering per-capita VMT and resulting in cleaner air and greater efficiency.

The Draft EIR's findings are based on substantial evidence. For example, the Draft EIR finds that the proposed Plan is consistent with the Federal RTP goal cited in this comment because "[t]he proposed expansion of the region's transit network would also provide more viable multi-modal options for travelers, resulting in reductions in both VMT per capita and VMT per employee within the region, thus reducing GHG emissions, creating a cleaner and more sustainable environment" (Draft EIR page 4.16-31; see also Table 4.16-15). These calculations were performed using the ABM2+ modeling, the most up-to-date transportation forecast within the San Diego region.

In addition, this comment is addressed directly within the Draft EIR as follows:

Year 2025 – Page 4.16-33

- *Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The proposed expansion of the region's transit network would also provide more viable multi-modal options for travelers, resulting in reductions in both VMT per capita and VMT per employee within the region, thus reducing GHG emissions, creating a cleaner and more sustainable environment.*

Please note that the increase in VMT under Year 2025 conditions is associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lanes miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 3,729,924 miles as well as a decrease in VMT per Capita of 1.07 miles, when compared to Year 2025 no-build conditions (See table below). Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of "*Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.*" It is assumed that growth in regional population and employment is the predominant factor in the projected increase in total VMT from Base Year (2016) conditions.

Year 2035 – Page 4.16-38

- *Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The associated decreases in average vehicular trip length and travel times noted above would result in a lower average VMT per capita and VMT per employee within the region (see Table 4.16-18). These decreases in vehicular traffic would result in lower GHG emissions, creating a cleaner and more sustainable environment.*

Please note that the increase in VMT under Year 2035 conditions is associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lane miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 8,961,822 miles as well as a decrease in VMT per Capita of 2.22 miles, when compared to Year 2035 no-build conditions (See table below). Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of "*Make transportation*

investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living" and that it is assumed that growth in regional population and employment is the predominate factor in the projected increase in total VMT from Base Year (2016) conditions.

Year 2050 – Page 4.16-43

- *Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The associated decreases in average vehicular trip length and travel times noted above would result in a lower average VMT per capita and VMT per employee within the region (see Table 4.16-19). These decreases in vehicular traffic would result in lower GHG emissions, creating a cleaner and more sustainable environment.*

Please note that the increase in VMT under Year 2050 conditions is more associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lanes miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 11,937,229 miles as well as a decrease in VMT per Capita of 2.87 miles, when compared to Year 2050 no-build conditions (See table below). Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of "*Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.* " and that it is the assumed growth in regional population and employment is the predominate factor in the projected increase in total VMT from Base Year (2016) conditions.

To clarify information presented in the Draft EIR, the following tables show that the additional roadway miles included in the proposed Plan will not increase VMT within the region as compared to the No-Build conditions. Therefore, including the additional roadway miles in the proposed Plan is not inconsistent with the Federal RTP.

VMT Analysis – Year 2025

Metric	Base Year (2016)	Year 2025 No Build	Year 2025 Proposed Plan	Δ Proposed Plan to 2016	% Change from Proposed Plan to 2016	Δ Proposed Plan to No Build	% Change from Proposed Plan to No Build
VMT per Capita (miles)	18.94	18.73	17.66	-1.28	-6.8%	-1.07	-5.7%
Total VMT (daily)	83,614,704	88,268,330	84,538,406	923,702	1.1%	-3,729,924	-4.2%
Home-Based VMT	61,848,362	64,134,236	60,470,401	-1,377,961	-2.2%	-3,663,835	-5.7%
Population	3,265,489	3,424,145	3,424,145	158,656	4.9%	0	0.0%
Employment	1,646,419	1,789,965	1,762,747	116,328	7.1%	-27,218	-1.5%
VMT per Employee (miles)	18.91	18.41	16.95	-1.96	-10.4%	-1.46	-7.9%
VMT per Service Population (miles)	17.02	16.93	16.30	-0.72	-4.3%	-0.63	-3.7%
Population within TPAs	764,847	991,785	1,456,876	692,029	90.5%	465,091	46.9%
Employment within TPAs	609,253	742,870	971,340	362,087	59.4%	228,470	30.8%
Service Population within TPAs	1,374,100	1,734,655	2,428,216	1,054,116	76.7%	693,561	40.0%

VMT Analysis – Year 2035

Metric	Base Year (2016)	Year 2035 No Build	Year 2035 Proposed Plan	Δ Proposed Plan to 2016	% Change from Proposed Plan to 2016	Δ Proposed Plan to No Build	% Change from Proposed Plan to No Build
VMT per Capita (miles)	18.94	18.80	16.58	-2.36	-12.5%	-2.22	-11.8%
Total VMT	83,614,704	94,374,791	85,412,968	1,798,264	2.2%	-8,961,822	-9.5%
Home-Based VMT	61,848,362	67,184,526	59,251,034	-2,597,328	-4.2%	-7,933,492	-11.8%
Population	3,265,489	3,573,645	3,573,645	308,156	9.4%	0	0.0%
Employment	1,646,419	1,936,818	1,922,475	276,056	16.8%	-14,343	-0.7%
VMT per Employee (miles)	18.91	18.19	15.26	-3.65	-19.3%	-2.93	-16.1%
VMT per Service Population (miles)	17.02	17.13	15.54	-1.48	-8.7%	-1.59	-9.3%
Population within TPAs	764,847	1,135,597	1,985,967	1,221,120	159.7%	850,370	74.9%
Employment within TPAs	609,253	800,730	1,323,929	714,676	117.3%	523,199	65.3%
Service Population within TPAs	1,374,100	1,936,327	3,309,896	1,935,796	140.9%	1,373,569	70.9%

VMT Analysis – Year 2050

Metric	Base Year (2016)	Year 2050 No Build	Year 2050 Proposed Plan	Δ Proposed Plan to 2016	% Change from Proposed Plan to 2016	Δ Proposed Plan to No Build	% Change from Proposed Plan to No Build
VMT per Capita (miles)	18.94	18.90	16.03	-2.91	-15.4%	-2.87	-15.2%
Total VMT	83,614,704	100,071,163	88,133,934	4,519,230	5.4%	-11,937,229	-11.9%
Home-Based VMT	61,848,362	69,918,150	59,300,949	-2,547,412	-4.1%	-10,617,201	-15.2%
Population	3,265,489	3,699,373	3,699,373	433,884	13.3%	0	0.0%
Employment	1,646,419	2,095,301	2,087,318	440,899	26.8%	-7,983	-0.4%
VMT per Employee (miles)	18.91	18.21	14.32	-4.59	-24.3%	-3.89	-21.4%
VMT per Service Population (miles)	17.02	17.27	15.23	-1.79	-10.5%	-2.04	-11.8%
Population within TPAs	764,847	1,201,517	2,125,868	1,361,021	177.9%	924,351	76.9%
Employment within TPAs	609,253	864,936	1,470,233	860,980	141.3%	605,297	70.0%
Service Population within TPAs	1,374,100	2,066,453	3,596,101	2,222,001	161.7%	1,529,648	74.0%

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B of the Plan. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the Plan (page S-104).

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B. The Regional Plan Subverts Statewide Goals by Increasing Vehicle Miles Travelled.

The Regional Plan results in an increase of 477,196 daily VMT above baseline under 2025 conditions, 2,520,860 daily VMT above baseline under 2035 conditions, and a staggering 5,611,752 daily VMT under 2050 conditions. (DEIR, pp. 4.16-47, 4.16-49, 4.16-51.) The Regional Plan thus fails to meet the qualitative significance threshold adopted by SANDAG—not only does the Regional Plan fail to "achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals," it actively *increases* VMT in the region throughout the life of the Plan. Increase in VMT is completely antithetical to the state's GHG reduction goals. (California Air Resources Board, 2017 Scoping Plan-Identified VMT Reductions And Relationship To State Climate Goals, January 2019; *Golden Door II*, 50 Cal.App.5th 467, 544 ["VMT reduction is an integral part of California's strategy to reach 2030 and 2050 GHG emission reduction targets."].) Further, the Regional Plan fails to meet the VMT per capita reduction goal of 14.3% by 2050 as required by CARB. (DEIR, p. 4.16-51.)

34-14

The DEIR interpolates interim VMT reduction goals for 2025 and 2035 by using a "straight-line interpretation line of the full 14.3 percent reduction in VMT per capita and the 34 years (Base Year 2016 to Horizon Year 2050) the region has to achieve that target," thus assuming a VMT reduction requirement of 0.4% per year. (DEIR, p. 4.16-46.) The DEIR states that even though the interim reductions of 7.2% in 2025 and 11.6% in 2035 do not meet the 14.3% required reduction, they "remain on target" because they meet the interim target goals that SANDAG has interpolated. (DEIR, p. 4.16-47 to -49.) The DEIR offers no analysis that such an interpolation is supported by substantial evidence. (CEQA Guidelines § 15064, subd. (f)(5) ["Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."].)

C. Mitigation Measures for Transportation Impacts Must be Enforceable.

Mitigation measures must be enforceable. (Pub. Resources Code, § 21081.6, subd. (b); *Lincoln Place Tenants Assn. v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 445.) The DEIR's stated mitigation measures for TRA-2, Achieve Further VMT Reductions for Transportation and Development Projects, permits local jurisdictions to implement such VMT reductions at their discretion. For example, the measure states that "SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions *can and should* implement project-level VMT

34-15

RESPONSE TO COMMENT 34-14

As the comment points out, the proposed Plan would result in an increase in the total VMT generated within the region as follows:

- Year 2025 Conditions: 477,196 daily VMT
- Year 2035 Conditions: 2,520,860 daily VMT
- Year 2050 Conditions: 5,611,752 daily VMT

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the proposed Plan (page S-104). Therefore, the increases in total regional VMT are now:

- Year 2025 Conditions: 923,702 daily VMT
- Year 2035 Conditions: 1,798,328 daily VMT
- Year 2050 Conditions: 4,519,230 daily VMT

As noted on page 4.16-48:

> Because there are no State-recommended total VMT significance thresholds for regional plans such as an RTP/SCS, a qualitative threshold is used: would the proposed Plan achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals? If the Regional Plan would cause substantial increases in total VMT, then it would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Therefore, because no guidance has been provided by the State on this issue the Draft EIR used a threshold of no change from baseline conditions as the threshold. To the extent this comment implies the Draft EIR does not disclose the significant impact of increased total VMT, the increase in daily VMT, from baseline Year 2016 conditions, was identified as a significant impact under Impact TRA-2, as noted in the following sections of the Draft EIR:

- 2025 Conditions - Page 4.16-48, Paragraph 5
- 2035 Conditions - Page 4.16-50, Paragraph 4
- 2050 Conditions - Page 4.16-52, Paragraph 2

Lastly, as noted on page 4.16-48 of the Draft EIR (last paragraph), interim VMT per capita targets were derived to identify if the proposed Plan would be on track to meet the State's target of 14.3 percent

reduction in VMT per capita by Year 2050, as compared to baseline conditions. It is clearly stated in the last sentence of the paragraph "*The interim VMT per capita targets were not used to determine impact significance*." This is further reflected in the TRA-2 conclusion sections, for each horizon year, where the State's target of 14.3 percent is used as the significance threshold for each horizon year and not the identified interim VMT per capita target. Thus the methods used for interpolating interim VMT reduction goals are not relevant to the EIR's analysis and disclosure of significant VMT impacts.

RESPONSE TO COMMENT 34-15

This comment refers to the use of the phrase "can and should" in mitigation measures where another agency, and not SANDAG, would have the responsibility to implement and carry out. Please refer to Master Response 2 for a response to this comment, where it is described why the use of this language is specifically allowed by CEQA in these circumstances.

34-15 cont. reduction measures." (DEIR, p. 4.16-53, emphasis added.) This discretionary language makes the mitigation measure non-enforceable, and thus in violation of CEQA.

III. The DEIR Fails to Adequately Analyze and Mitigate Impacts to Biological Resources.

34-16 The Regional Plan fails to sufficiently protect biological resources by erroneously concluding that significant impacts are unavoidable and by failing to identify significant conflicts with several existing and planned regional habitat conservation plans (DEIR, pp. 4.4-61 to 113). The Regional Plan also fails to implement adequate mitigation measures.

A. The Regional Plan is Inconsistent with Federal, State, and Local Goals to Protect Biological Resources.

The DEIR's assertion that Impact BIO-4 is less than significant lacks substantial evidence. The Regional Plan is in clear conflict with state and federal goals to protect 30% of land and water natural resources by 2030 (see Governor's Exec. Order No. N-82-20 (Oct. 7, 2020); Exec. Order No. 14008, 86 Fed. Reg. 7619 (Feb. 1, 2021)). The Regional Plan is also in conflict with regional habitat conservation plans, which must be discussed in the DEIR. (CEQA Guidelines § 15125, subd. (d).)

34-17 If SANDAG maintains its current conclusions of significant and unavoidable impacts to BIO-1, BIO-2, and BIO-3 biological resources, SANDAG must also necessarily conclude that there will be similar significant and unavoidable conflicts with state and federal goals to protect 30% of land and water natural resources by 2030 and local regional habitat conservation plans (i.e., Impact BIO-4) given those plans' reliance on the same minimization and mitigation measures SANDAG asserts cannot be guaranteed under BIO-1, BIO-2, and BIO-3. (See Section III.B below.)

34-18 The Regional Plan is also in conflict with regional habitat conservation plans because it does not provide a clear path to establishment of an essential regional funding source necessary to implement existing and planned regional habitat conservation plans. Existing regional habitat conservation plans like the San Diego Multiple Species Conservation Plan and Multiple Habitat Conservation Program anticipate and require establishment of a regional funding source to support implementation of the plans. The Regional Plan is the most appropriate planning tool available to provide a regional funding source for the regional habitat conservation plans yet does not include any planning for establishment of the regional funding source.

RESPONSE TO COMMENT 34-16

Section 4.4 of the EIR analyzes the impact on biological resources at a programmatic level based on best available information, including impacts on sensitive species, vegetation communities, wetlands, wildlife movement, and consistency with policies and approved HCPs. Impacts were analyzed based on the programmatic footprint developed for the proposed Plan, and mitigation measures were identified accordingly. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. The comment does not explain why the EIR "erroneously" concludes that significant impacts are unavoidable.

RESPONSE TO COMMENT 34-17

The comment asserts that impacts addressed in BIO-4 are not less than significant based on the fact that the proposed Plan is in conflict with State and federal goals to protect 30 percent of land and water resources by 2030, and that this goal would not be achieved if the impacts on BIO-1, BIO-2, and BIO-3 are unavoidable. The MSCP targets to protect 172,000 acres of natural lands (excluding agricultural lands); the MHCP targets to protect 19,000 acres. Approximately 100,000 acres of land in the North County MSCP will be unavailable for development. The majority of lands in the East County (approximately 90 percent) are public lands that are already conserved. The total amount of public lands (undeveloped or in open space) in San Diego County amounts to 1.7 million acres. With San Diego County having almost 3 million acres of landmass, of which approximately 2 million is undeveloped or planned for conservation, the conservation percentage of San Diego County far exceeds 30 percent target. Therefore, the EIR is consistent with the goals identified in EO N-82-20 (October 7, 2020) and EO 14008, 86 *Federal Register* 7619. The comment also asserts that the proposed Plan is in conflict with regional HCPs. All approved HCPs have been included and addressed in this EIR, and impacts on approved HCPs have been analyzed; see discussion under Impact BIO-4 in Section 4.4 and Table 4.4-5. The HCPs have been designed to allow for impacts on biological resources so long as the appropriate mitigation measures are adhered to, including mitigation measures outlined in each participating jurisdiction's ordinances and guidelines that reflect consistency with the regional HCPs and Subarea Plan. These guidelines and ordinances are listed (together with other representative ordinance and guidelines)

in Table 4.4-6. Each Subarea Plan has different conservation classifications, which were included in the data analysis and models in this EIR (see the *Analysis Methodology* under Impact BIO-4). The EIR assumes that all regional and local guidelines and ordinances would be adhered to, and that impacts on hardline preserves would be avoided at the project-specific design level. However, should impacts on hardline preserves be unavoidable, local ordinances governing the implementation of the Subarea Plans have provisions, such as Boundary Line Adjustments, that would be implemented to avoid the loss of highly valuable biological resources and conserved lands consistent with all legal and regulatory provisions of the HCPs. Therefore, the conclusion in Impact BIO-4 correctly identifies that the EIR is not in conflict with any approved HCPs.

RESPONSE TO COMMENT 34-18

Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund in the alternatives. The comment asserts that the proposed Plan does not provide a clear path to the establishment of an essential regional funding source to implement existing and planned regional HCPs. As described in Appendix A of the proposed Plan the final Plan has included a commitment to fund regional habitat conservation, management, and monitoring under a new funding allocation that when combined with the nature-based climate solutions program and habitat mitigation for transportation projects would total $3 billion. Furthermore, each local jurisdiction that is signatory to the conservation plan and the Implementing Agreement with the Wildlife Agencies that provides the legal "take" authorizations identified in the conservation plan is obligated to fund local costs for land conservation, acquisition, management, and monitoring.

B. The DEIR's Biological Resources Mitigation Measures Violate CEQA.

SANDAG significantly undermines the potential effectiveness of measures to minimize and mitigate impacts to biological resources by concluding that impacts will remain significant because other agencies implementing the plan may not fully implement mitigation measures described in the Regional Plan.

34-19 According to the Regional Plan DEIR, "Implementation of mitigation measures BIO-1a through BIO-1e would reduce or minimize this impact (BIO-1). However, while projects under SANDAG's control would adhere to these measures, there is no assurance that these mitigation measures would be implemented by non-SANDAG project sponsors or would be equally effective for all projects … Instances may occur in which impacts are not reduced to less-than-significant levels. Therefore, this impact (BIO-1) would remain significant and unavoidable." (DEIR, p. 4.4-78.)

SANDAG's rationale here renders the mitigation measures non-enforceable, and is an abdication of SANDAG's own responsibility as a lead agency to reach sound conclusions of impacts to the environment and adopt effective mitigation. Rather than minimizing its own responsibility, SANDAG should include language in the DEIR mandating implementation of DEIR mitigation measures for its own projects and for any other agencies implementing projects under the Regional Plan to the extent that they are likely to invoke SANDAG's Regional Plan DEIR for their own CEQA review and compliance. Subsequent projects relying on the Regional Plan DEIR must incorporate the Regional Plan DEIR's mitigation measures. (CEQA Guidelines § 15168, subd. (c)(3).)

34-20 Finally, an EIR is required to discuss and adopt all feasible mitigation measures. (*King & Gardiner Farms, LLC, supra*, 45 Cal.App.5th 814, 865-66, 869.) An additional mitigation measure should be added to BIO-4 requiring preparation of a detailed strategic plan to establish the regional funding source for the regional habitat conservation plans.

IV. The DEIR Failed to Consider a Reasonable Range of Alternatives.

34-21 The EIR failed to adequately analyze alternatives to the Project, because it did not include a reasonable range of alternatives that would "avoid or substantially lessen" the Project's significant impacts, as required by CEQA at Public Resources Code section 21002 and CEQA Guidelines section 15126.6 subdivisions (a), (b). While Alternative 3 is the only alternative to reduce VMT further than the Regional Plan, none of the alternatives avoid or *substantially* lessen the Project's impacts on VMT. (*Golden Door II, supra*, 50 Cal.App.5th 467, 547, citing *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 437 ["it is reasonable to expect

RESPONSE TO COMMENT 34-19

Please see Master Response 2 and response to comment Chatten-Brown 34-6, which explain why the EIR's approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements. As Master Response 2 explains, second-tier transportation project EIR mitigation measures, such as biological resource mitigation measures, would be implemented for transportation projects that SANDAG directly approves or carries out, and implementation of applicable and feasible mitigation measures would be a grant condition for capital projects funded by SANDAG's TransNet grant programs.

RESPONSE TO COMMENT 34-20

To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As such, an additional mitigation measure is not required.

RESPONSE TO COMMENT 34-21

Please refer to Master Response 1 for a response to this comment, which explains why the EIR's alternatives analysis complies with CEQA requirements and addresses potential alternatives to substantially lessen VMT and biological resource impacts.

34-21 cont. at least one project alternative to have been focused primarily on significantly reducing vehicle trips."].) SANDAG also fails to provide an alternative avoiding or substantially lessening the Project's significant impacts on biological resources.

V. Conclusion

34-22 Based on the foregoing comments, we respectfully request that SANDAG revise the Regional Plan and recirculate the DEIR to achieve further GHG and VMT reductions, improve protections for biological resources, and resolve the issues addressed in this letter.

Thank you for your consideration of this matter.

Sincerely,

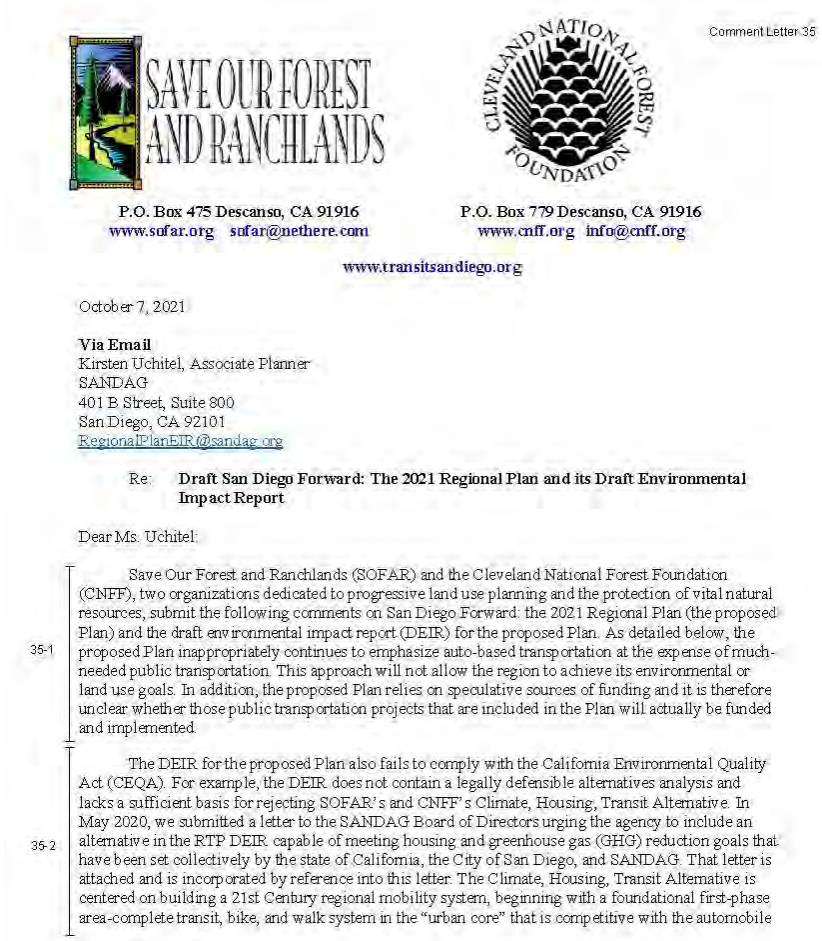


Sunjana Supekar
Josh Chatten-Brown
Attorneys for Sierra Club San Diego

RESPONSE TO COMMENT 34-22

SANDAG appreciates the comments received for consideration. Please refer to prior responses for in depth discussions regarding the feedback received. Please continue to follow along in this process by visiting SDForward.com.

COMMENT LETTER 35: SAVE OUR FOREST AND RANCHLANDS/CLEVELAND NATIONAL FOREST FOUNDATION



Comment Letter 35

SAVE OUR FOREST AND RANCHLANDS

CLEVELAND NATIONAL FOREST FOUNDATION

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October 7, 2021

Via Email
Kirsten Uchitel, Associate Planner
SANDAG
401 B Street, Suite 800
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Re: **Draft San Diego Forward: The 2021 Regional Plan and its Draft Environmental Impact Report**

Dear Ms. Uchitel:

35-1 Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF), two organizations dedicated to progressive land use planning and the protection of vital natural resources, submit the following comments on San Diego Forward: the 2021 Regional Plan (the proposed Plan) and the draft environmental impact report (DEIR) for the proposed Plan. As detailed below, the proposed Plan inappropriately continues to emphasize auto-based transportation at the expense of much-needed public transportation. This approach will not allow the region to achieve its environmental or land use goals. In addition, the proposed Plan relies on speculative sources of funding and it is therefore unclear whether those public transportation projects that are included in the Plan will actually be funded and implemented.

35-2 The DEIR for the proposed Plan also fails to comply with the California Environmental Quality Act (CEQA). For example, the DEIR does not contain a legally defensible alternatives analysis and lacks a sufficient basis for rejecting SOFAR's and CNFF's Climate, Housing, Transit Alternative. In May 2020, we submitted a letter to the SANDAG Board of Directors urging the agency to include an alternative in the RTP DEIR capable of meeting housing and greenhouse gas (GHG) reduction goals that have been set collectively by the state of California, the City of San Diego, and SANDAG. That letter is attached and is incorporated by reference into this letter. The Climate, Housing, Transit Alternative is centered on building a 21st Century regional mobility system, beginning with a foundational first-phase area-complete transit, bike, and walk system in the "urban core" that is competitive with the automobile

RESPONSE TO COMMENT 35-1

This comment inaccurately describes the proposed Plan as emphasizing auto-based transportation at the expense of public transportation. The proposed Plan emphasizes connections to mobility options in neighborhood hubs—whether it be transit, ride share, shuttles, scooter or bike share, walking, or biking. By building out from these centers of activity to an even broader system of smart roadways and transit services, the proposed Plan provides alternatives to driving for both short and long trips around the region.

Transit Leap improvements make public transit a compelling option to driving—fast, convenient, and safe. Improvements include commuter rail, light rail, Rapid, local bus, and ferry service. Next Generation Rapid Service is a Rapid bus service operating in priority travel lanes and/or separated guideways and is given traffic signal priority. Commuter rail includes new and significantly upgraded rail service with high-speed trains that are fast and convenient and provide a compelling alternative to driving. Light Rail Transit (LRT) includes improvements to existing light rail services and new tram services.

Managed Lanes offer priority access to people using transit, carpooling, riding motorcycles, or vanpooling along with emergency vehicles and some low-emission vehicles with appropriate decals. Managed Lanes would be expanded by repurposing shoulders or existing travel lanes, as feasible. Managed Lane improvements are planned for both interregional and urban corridors. Interregional corridors connect us to neighboring counties and beyond and account for about 70 percent of vehicle miles driven on the region's freeways. Urban corridors connect local cities and account for 27 percent of vehicle miles driven on the region's freeways. Interregional corridor trips are typically longer than 20 miles while trips made on urban corridors are often between 5 and 20 miles. See Appendix A, Transportation Projects, Programs, and Phasing, of the proposed Plan at A-2.

This comment also inaccurately describes the financial plan included in the proposed Plan as speculative. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR

450.322(f)(10)(ii)). See Appendix V, Funding and Revenue, of the proposed Plan for additional information about revenue sources.

Also, these introductory comments summarize more detailed comments, for which additional responses are provided below.

RESPONSE TO COMMENT 35-2

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives, that are potentially feasible, and that reduce environmental impacts. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of the reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

(i.e., that achieves at least a 50% transit, bike, and walk mode share in the urban core area).[1] As discussed below, SANDAG inappropriately declined to include this Alternative in the DEIR. Therefore, we respectfully reiterate our request for SANDAG to include the Climate, Housing, Transit Alternative in the EIR for the proposed Plan.

35-2 cont.

SANDAG is Abdicating its Responsibility to Prepare a "Transit First" Plan.

Even a cursory review of the DEIR reveals the proposed Plan does not represent the sea change in regional transportation and land use planning that is necessary to avert a climate catastrophe and to rectify the serious housing challenges facing the region's residents. This past April, SANDAG committed to reimagine how people and goods move in the 21st century by implementing infrastructure that ensures, among other things, that public transit is competitive with automobile travel. *See* SANDAG Resolution No. 2021-17. The proposed Plan, however, eschews these admirable goals in favor of a much more "business-as-usual" approach. It is certainly not a "transit first" plan. Critical projects necessary to advance a comprehensive public transportation network, including for example the Miramar Tunnel and complete double-tracking of the COASTER, would not be constructed until 2050, if ever.

35-3

At the same time, the proposed Plan calls for $50 billion in roadway expenditures. As SANDAG is well aware, projects that increase roadway capacity will continue to exacerbate far-flung sprawl development, which in turn will increase vehicle miles traveled (VMT). Pursuing expansive (and expensive) roadway projects is no longer supportable in the face of the housing and climate crises confronting the region. As SANDAG is aware, in order to achieve the region's environmental and housing goals, the proposed Plan must encourage intensified, compact land use. Unfortunately, antiquated roadway projects—many of which would serve remote destinations—remain front and center in SANDAG's proposed Plan.

The RDEIR claims that this highway-centric Plan would result in a 150 percent increase in "walk to transit" and "drive to transit" mode share. Yet this statistic and the information cited in support are misleading. The fact that people may be within walking distance to transit does not mean those people actually use transit. The DEIR indicates that "current" (2016) transit mode share in the SANDAG Plan area is 1.6% percent and is estimated to increase to 5% under the Build Scenario 2050. (DEIR Appendix T (Table T6: Supporting Measure)). At first glance, this increase in transit mode share would appear to suggest that the region is making substantial progress. Yet, the DEIR's very low estimate of "current" transit mode share appears to be inaccurate, which renders the claimed increase to 5% misleading. The 2010-2012 California Household Travel Survey (CHTS) identifies existing transit mode share for San Diego County as 4.2% (i.e., 2 ½ times greater than that reported in the SANDAG regional travel demand model).[2] If transit mode share is in fact currently just over 4%, the fact that the Plan would increase

35-4

[1] Generally speaking, the urban core includes the trolley ring, downtown, the airport, the newly planned intermodal transit center. This area is approximately 60 square miles but has all the facilities, density, zoning, and jobs to launch a successful transit model for the region.

[2] https://www.nrel.gov/transportation/secure-transportation-data/tsdc-california-travel-survey.html (calculations performed by Norm Marshall).

RESPONSE TO COMMENT 35-3

This comment inaccurately characterizes the nature of the roadway projects in the proposed Plan. The proposed Plan emphasizes connections to mobility options in neighborhood hubs—whether it be transit, ride share, shuttles, scooter or bike share, walking, or biking. By building out from these centers of activity to an even broader system of smart roadways and transit services, the proposed Plan provides alternatives to driving for both short and long trips around the region.

Transit Leap improvements do make public transit a compelling option to driving—fast, convenient, and safe. Improvements include commuter rail, light rail, Rapid, local bus, and ferry service. Next Generation Rapid Service is a Rapid bus service operating in priority travel lanes and/or separated guideways and is given traffic signal priority. Commuter rail includes new and significantly upgraded rail service with high-speed trains that are fast and convenient and provide a compelling alternative to driving. LLRT includes improvements to existing light rail services and new tram services.

Where possible, rather than adding new roads, the proposed Plan repurposes general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every four years, providing opportunities to reflect changes in the network. The proposed Plan's improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and HOV travel.

Rural corridors serve many remote destinations, mostly located along state routes traversing the eastern two-thirds of the region, and provide people access to rural towns and lands, as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region's many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects, including shoulder

widening and curve straightening. The region's rural and tribal communities also need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors, it will enable residents to, for example, work remotely and learn online.

For the roadway component of the proposed Plan, SANDAG is required to analyze induced demand impacts, which are documented in proposed Plan Appendix D. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

With respect to project phasing under the proposed Plan, the proposal for a "Transit First" plan fails to recognize that there are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP) funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

Specific to the comment that critical projects would not be constructed until 2050, the phasing of projects in the proposed Plan depends upon several factors including project readiness, connectivity, social equity, and anticipated revenues by implementation period. As the proposed Plan is implemented, phasing of projects may change if opportunities arise to advance projects into earlier phases of the Plan. All LOSSAN

double tracking projects are phased for completion in 2025 and 2035. Batiquitos Lagoon Double Track, San Onofre to Pulgas Double Track Phase 2, Eastbrook to Shell Double Track, and San Dieguito Double Track projects are phased for completion by 2025. Carlsbad Village Double Track, La Costa to Moonlight Double Track, Moonlight to Swami Double Track, San Onofre Creek Double Track (CP Songs Double Track), and San Mateo Creek Double Track projects are phased for completion by 2035. The Miramar Tunnel is phased for completion by 2050.

Regarding land use and housing, under the SCS for the proposed Plan, 31 Mobility Hub areas were identified as optimal locations for siting transit investments that maximize regional connectivity, and for focusing future transit-oriented growth. By 2050, 53 percent of the population, 71 percent of the jobs, and 54 percent of the housing for the region are projected to be in Mobility Hub areas. See Tables F.4 through F.6 in Appendix F of the proposed Plan for more details on the regional population, jobs, and housing within Mobility Hub areas. Development under the SCS for the proposed Plan is substantially more compact than previous plans, conserving far more land and open space due to densification in the Mobility Hub areas. The proposed Plan does "encourage intensified, compact land use," and includes transportation network improvements, including roadway improvements, that support this land use goal. See Chapter 2 and Sections 4.2, 4.4, 4.11, and 4.14 of the EIR for more discussion of the land use impacts under the proposed Plan.

SANDAG is developing a Regional Housing Incentive Program to meet the goals of the proposed Plan and assist local jurisdictions in achieving housing goals. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, and consider climate change and resiliency, availability of transit and active transportation, and consistency with the transportation improvements included in the proposed Plan. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. The Plan proposes a land use scenario that accommodates the Regional Housing Needs Assessment and, when combined with the transportation system, allows the region to meet its SB 375 greenhouse gas reduction target.

RESPONSE TO COMMENT 35-4

This comment inaccurately characterizes the mode share shifts achieved under the proposed Plan. This comment relies upon mode share numbers generated by the California Household Travel Survey (CHTS), which presents a less accurate picture of regional behavior and mode share than SANDAG's ABM2+ forecast, for several reasons. The CHTS was conducted by Caltrans between 2010 and 2013. This was during the time of the Great Recession, which created unique influences on travel behaviors and characteristics. The SANDAG ABM2+ was updated based on the San Diego Regional Transportation Study (SDRTS) conducted between 2016 and 2017. The SDRTS used smartphone-based travel diaries as the primary means of travel data collection and included nearly 6,200 participating households. From a data quality perspective, the SDRTS is considered superior to the CHTS based on the more recent time period for survey collection, travel survey data collection methodology, and San Diego region sample size.

Additionally, the CHTS and the SDTRS are limited to travel surveys of residents. However, the ABM2+ forecasts travel for all types of trips—resident, visitor, cross border, airport, non-resident trips starting/ending external to San Diego, commercial, and truck. SANDAG collects supplemental travel survey and data on these other travel markets for inclusion in ABM2+ forecasts. Again, from a data perspective, the ABM2+ forecast, including mode share numbers, is superior to the CHTS numbers referenced in SOFAR's comment.

As shown in Appendix O-2 of the EIR, the transit mode share for all trips in 2050 is 5.2 percent under the proposed Plan, and the transit mode share for work trips in 2050 for peak period and all day is 13.2 percent. This comment inaccurately characterizes GHG reductions achieved under the proposed Plan. The proposed Plan achieves 20.4 percent per capita GHG reductions from passenger vehicles and light duty trucks by 2035 and exceeds the regional GHG reduction target of 19 percent.

35-4 cont. transit mode share to 5% reflects almost no change at all. In any event, until SANDAG accurately characterizes existing transit mode share, any future mode share projections are not credible. Moreover, even if the Plan's2050 transit mode share of 5.0% is accurate—which appears highly unlikely—this nominal increase in transit ridership does not come close to achieving the region's GHG reduction goals.[3]

35-5 The proposed Plan's focus on regional mode share also deprives both SANDAG and the public of information necessary to take the first foundational steps toward building a transit bike and walk system that is truly competitive with the auto—i.e., a system that achieves a 50% walk, bike and transit mode share—in areas surrounding mobility hubs. This is the level of investment and innovation that might actually start to meet GHG targets and VMT reduction goals. However, information on current and projected mode shares for specific area-complete transit systems such as the Central Mobility Hub are not to be found in the DEIR. Obviously, this a critical omission because it forecloses discussion on locating the first stepping stones and taking the first steps to meet the looming social, ecological, and health challenges facing the globe and our local region. San Diego is the seventh most ozone-polluted metro area in the country.[4]The proposed Plan fails to take meaningful steps toward mitigating the impacts of continued reliance on automobiles. .

35-6 A definition of insanity often attributed to Albert Einstein is "doing the same thing over and over again and expecting different results". If true, then San Diego is insane because we've been doing the same thing over and over with a growing inability to meet the existential challenges that face the region.

35-7 Paradoxically, the DEIR asserts that the purpose of the Plan's roadway-building component is to increase public transportation. (*See* DEIR at 6-13, stating that the Plan does not include general purpose lanes, but instead focuses on adding Managed Lanes which "increase the efficiency of roadway travel for vehicles and transit."). The DEIR repeats this assertion in rejecting alternatives identified by members of the public. (*See* DEIR at 6-11, 6-13). However, the DEIR fails to provide any factual support for the claim that Managed Lanes promote transit use. In order to justify road building as a measure of increasing transit ridership, the FEIR must actually model the effect that Managed Lanes have on transit ridership (i.e., how many transit trips would occur with Managed Lanes versus without Managed Lanes). It must also disclose the cost effectiveness of Managed Lanes per additional transit trip. Finally, it must disclose whether other types of transit investments would be more cost-effective and result in increased transit ridership compared to Managed Lanes. Without this information, the DEIR's conclusions regarding Managed Lanes' support for transit and its rejection of alternatives lack evidentiary support. The DEIR also fails as an informational document.

[3] The City of San Diego's Climate Action Plan identifies a 50% transit, walk and bike mode share for commuters within ½ mile of a major transit stop within City of San Diego by 2035; see Climate Action Plan p.37; available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf; accessed September 28, 2021.

[4] American Lung Association, State of the Air Report Card, San Diego-Chula Vista-Carlsbad, at https://www.lung.org/research/sota/city-rankings/msas/san-diego-chula-vista-carlsbad-ca#ozone.

RESPONSE TO COMMENT 35-5

DAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its Regional Plans and programs to do its part in reducing GHG emissions from all sources. Section 4.8.1 of the EIR properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, providing descriptions of State legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

CEQA does not require analyzing projected mode share for specific areas within the region in a programmatic impact analysis prepared for a comprehensive regional plan under CEQA. The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity, which is described in the EIR. (CEQA Guidelines Section15146.)

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan consistent with CEQA requirements, and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see EIR Section 4.8 and Chapter 6.0.

RESPONSE TO COMMENT 35-6

This comment expresses an opinion about challenges facing the region. It does not address EIR adequacy, and no further response is required.

RESPONSE TO COMMENT 35-7

is comment inaccurately asserts that Managed Lane investments do not support transit use. The Managed Lane system would support a robust network of Next Generation Rapid Service operating in priority travel

lanes and/or separated guideways and would be given traffic signal priority. Next Generation Rapid routes would provide competitive alternatives to single-occupancy vehicle travel and be connected via the Regional Mobility Hub Network. In addition, the proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to modes of transportation that would reduce VMT over single-occupancy vehicles, i.e., transit, carpools, vanpools, and low-emission vehicles with appropriate decals.

Data from model runs comparing the proposed Plan network with Managed Lane investments to a network consistent with SOFAR's proposed Climate, Housing and Transit Alternative, which omits new Managed Lanes, demonstrates that the proposed Climate, Housing and Transit Alternative's impacts on VMT are similar to the proposed Plan's impacts, and that it does not substantially reduce the proposed Plan's significant impacts.

	Proposed Final Plan		**SOFAR's Climate, Housing and Transit Alternative**	
Database	**2035**	**2050**	**2035**	2050
SB 375 VMT	79,725,710	81,804,496	79,877,932	82,247,926
SB 375 VMT/Person	22.0	21.8	22.1	22.0
Final Per Capita GHG Reductions for 2005	-20.4%	-21.0%	-20.4%	-20.7%

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

The Proposed Plan Relies on Highly Speculative Funding Sources.

The proposed Plan relies on revenue sources that are highly speculative and thus provides no assurance that the Plan's transit projects would be funded. The Plan identifies 163.3 billion in total revenues (2020 dollars). (Draft RTP Appendix V Table V.4, pp. 26-27.) This includes $62.1 billion in "New" revenue sources:

- $10.0 billion from 1/2 cent TransNet sales tax starting in 2025
- $7.2 billion from 1/2 cent MTS sales tax starting in 2025
- $2.2 billion in ride hailing service fees starting in 2026
- $17.2 billion in state road user charges starting in 2026
- another $17.2 billion in regional road user charges starting in 2026
- $4.7 billion from assumed increase in Federal gas tax

35-8

All of these revenue sources are highly speculative. More than half of the "New" revenue is from road user charges that do not yet exist. The Draft RTP's sole justification for including this revenue is that a committee authorized by the Legislature is investigating the possibility of such charges. (*See* Draft RTP Appendix V, p. V-17 - V-18). According to transportation expert Norm Marshall, there is no authorization for or mechanism in place to collect such charges. The next largest components of the "New Revenue" are from two ½ cent sales taxes that the proposed Plan simply assumes will be approved by the voters. SANDAG similarly assumed additional sales tax revenue in connection with the 2015 RTP, but the voters rejected Measure A in 2016.Passage of these two additional tax increases is highly uncertain.

Moreover, the proposed Plan shows that 45% of the total Plan expenditures are for non-capital items including operations, local streets and roads, programs and debt service. These comprise about $73.5 billion. (Draft RTP, Figure 3.3, Section 3, at 7). Without the "New" revenue sources, total revenue is only $103.2 billion, leaving only about $30 billion for capital projects or only one-third of the $90 billion in capital projects in the Plan ($55of $163.6 billion). If complete funding is not assured, there will be a large revenue shortfall. In this event, the FEIR should disclose which capital projects would be prioritized.

35-9

The DEIR Lacks a Legally Defensible Alternatives Analysis.

The alternatives analysis in the DEIR does not remedy the deficiencies identified by the California Court of Appeal in *Cleveland National Forest Foundation v. San Diego Association of Governments*. (17 Cal.App.5th 413, 435-437 (2017)). In that case, the Court determined that the EIR did not identify an alternative that results in a substantial reduction in VMT. The Court found this omission was inexplicable given SANDAG's acknowledgement in its Climate Action Strategy that the state's efforts to reduce GHG emissions from on-road transportation will not succeed if the amount of driving,

35-10

RESPONSE TO COMMENT 35-8

This comment inaccurately describes the revenue sources included in the proposed Plan as highly speculative. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). New funding sources are revenues that do not currently exist or that may require additional steps before the MPO or transit agency can commit such funding to transportation projects (2017 RTP Guidelines for MPOs). Strategies for ensuring their availability must be identified and future revenues may be projected based on historical trends, including consideration of past legislative or executive actions (2017 RTP Guidelines for MPOs). The level on uncertainty in projects based on historical trends is generally greatest for revenues in the "outer years" (10 years or more) of an RTP.

Specific to the revenue sources cited, this comment fails to recognize that SANDAG has succeeded in passing two past sales tax measures to fund transportation in the region, indicating it is reasonable to assume additional transportation sales tax measures would be passed. With respect to ridehailing service fees, SANDAG has an existing partnership with researchers at UC Berkeley to analyze data collected by SANDAG to better understand the time and price tradeoffs of ridehailing service users, exploring opportunities, challenges, and social equity considerations for policies to promote pooled ridehailing trips. This analysis will be completed by FY 2023 and will inform the development of a ridehailing fee program by 2026.

The State is currently studying implementation of a road user charge, and it would be unreasonable for SANDAG to disregard the actions at the State-level that would directly impact anticipated revenue during the period covered by the proposed Plan. The proposed Final Plan now assumes collection of both the State and regional road usage charges would begin by 2030. As a near-term action, SANDAG will launch a study in FY 2022 to evaluate different transportation funding sources, and a working group would oversee the development of a comprehensive value pricing and user fee implementation strategy that supports the goals of the proposed Plan.

SANDAG is partnering with the Sacramento Area Council of Governments and Southern California Association of Governments on a Caltrans Planning Grant to develop a research design framework for pilot projects to test the effectiveness of road pricing strategies combined with demand management approaches (incentives) to advance equity, reduce vehicle miles traveled and GHG emissions, manage roadway congestion, and provide sustainable revenues for system maintenance and operation. This study will put California MPOs in a position to complement the efforts of Caltrans through its Road Charge Pilots Program. Caltrans was recently awarded $2.15 million from the Federal Highway Administration to continue pilot testing user acceptance and the technological feasibility of implementing road user charges.

Both studies will include a robust public-engagement process and lay the foundation for prioritizing different goals and understanding the potential of these tools in advancing these goals. SANDAG will leverage existing coordination efforts with the other major MPOs in California to ensure an integrated approach when possible. Once these initial studies are complete, SANDAG will begin deploying pilot testing by FY 2026 to inform the detailed design of new pricing. Through coordination with State and MPO partners, SANDAG would pursue legislative action for authority to administer a road usage charge program by 2030.

Specific to the federal gas tax, an increase is assumed based on public discussion by members of Congress and the president to introduce legislation to increase the gas tax, a carbon tax, or a tax on other fuels based on the life cycle for carbon emissions in order to fund a modern and strong transportation system.

RESPONSE TO COMMENT 35-9

This comment asserts that the Final EIR should disclose which capital projects would be prioritized in the event of a funding shortfall, which is a speculative scenario. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). See Appendix V, *Funding and Revenue*, of the proposed Plan for additional information about revenue sources.

Further, under CEQA case law, an EIR is entitled to assume that assumptions that are an integral part of the proposed project will become reality (*Village Laguna of Laguna Beach, Inc. v. Board of*

Supervisors (1982) 134 Cal. App. 3d 1022,1030). An EIR can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true (*Environmental Council of Sacramento v. City of Sacramento* (2006) 142Cal. App. 4th 1018,1036).

RESPONSE TO COMMENT 35-10

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

or VMT, is not significantly reduced. The Climate Action Strategy explained, "Lowering vehicle miles traveled means providing high-quality opportunities to make trips by alternative means to driving alone such as walking, bicycling, ridesharing, and public transit, and by shortening vehicle trips that are made." (*Id.*)

35-10 cont.

The current DEIR suffers from this same deficiency because it does not include an alternative that would result in a meaningful reduction in VMT. Nor, as discussed above, does it include an alternative that would result in a meaningful increase in high-quality opportunities to make trips by alternative means to driving.

In addition to the No Project Alternative, the DEIR identifies just two alternatives. Alternative 2: 2019 Transportation Network with New Value Pricing and User Fee Policies and Alternative 3: All Growth Focused in Mobility Hubs and More Progressive Value Pricing and User Fee Policies.

35-11

Alternative 2 would result in higher per capita and overall VMT compared to the proposed Plan and compared to existing (2016) conditions. (DEIR at 6-56; DEIR Appendix O, Table O-3: SB 375 Reductions for Alternatives Considered in Detail in this EIR (pdf page 932).) The DEIR identifies the increase in VMT under this alternative as a significant impact; Alternative 2 would actually *increase* VMT compared to the proposed Plan. (DEIR at 6-56 — 6-59.)

Although Alternative 3 would reduce per capita VMT compared to existing (2016) conditions, there is very little difference in per capita VMT between the proposed Plan and Alternative 3 in 2025, 2035 and 2050. Like Alternative 2, Alternative 3 would *not* reduce VMT impacts to a less than significant level. (DEIR at 6-56—6-59.) Moreover, Alternative 3 would result in an overall increase in VMT in 2035 and 2050 compared to existing conditions. (DEIR at 6-22;Appendix O, Table O-3: SB 375 Reductions for Alternatives Considered in Detail in this EIR (pdf page 932).)

35-12

The end result is that the DEIR fails to provide a *transportation-network* alternative that would result in substantive decreases in VMT and substantive benefits in transit/bike/walk mode share. This is because *Alternative 3 calls for the same transportation network as the proposed Plan.* (DEIR at 6-4.) The fact that Alternative 3 would result in (nominal)VMT reductions compared to the proposed Plan is largely due to its compact land use patterns. (DEIR at 6-6.) While CNFF concurs that development must be concentrated in urban areas to achieve the region's GHG reduction and housing goals, modifications to land use alone are not sufficient to achieve GHG reduction goals. Moreover, it is imperative to note that an RTP alternative that emphasizes land use rather than transportation projects is misguided because, as the DEIR itself acknowledges, SANDAG has little control over land use. (DEIR at 6-14.)

35-13

The DEIR Incorrectly Rejects the Climate, Housing and Transit Alternative.

The DEIR rejects SOFAR's and CNFF's Climate, Housing and Transit Alternative as both duplicative and infeasible. The DEIR's rejection is unsupportable on both grounds. First, the DEIR asserts that the proposed Plan includes the transit components identified in the SOFAR's and CNFF's Alternative. While the proposed Plan does include some of the transit projects identified in the Climate, Housing and Transit Alternative, the proposed Plan also calls for a massive increase in road and freeway building. As we have explained, building a comprehensive regional public transportation network will

35-14

5

RESPONSE TO COMMENT 35-11

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. Alternative 2 was included for detailed consideration because it reduces other significant impacts, including air quality and population and housing, as compared to the proposed Plan. See Chapter 6 and Table 6-3 for additional discussion of the comparative impacts of the proposed Plan and Alternative 2. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

RESPONSE TO COMMENT 35-12

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

SOFAR suggests that the Draft EIR should have evaluated a project alternative that substantially reduced VMT below existing levels. Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the Mobility Hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower VMT than the proposed Plan, though still above existing levels. An alternative including *further* VMT-reduction measures to reduce VMT below existing levels is not currently feasible for several reasons, including:

- *Further* substantial changes needed in State and federal policy and legislation. These would include still *further* changes in state road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.
- Lack of funding for *further and accelerated* major transit service improvements (recognizing that, as discussed in additional detail in

subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already increases fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.
- Lack of authority for SANDAG and local governments to implement such *further* measures. For example, SANDAG has no authority to increase state road pricing, or require local governments to implement land use or parking policies.

SANDAG cannot control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, "CEQA is not intended as a population control measure" (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 220).

RESPONSE TO COMMENT 35-13

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

To be legally adequate under federal transportation law and SB 375, the proposed Plan is required to address transit projects, highway projects, and sustainable land use patterns; all three components are integrated into the basic project objectives described in EIR Section 2.4 (page 2-6). An EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. SOFAR proposes a "transportation-network" alternative but does not address the regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

Given these constraints, Alternative 3 did not assume an alternate transportation network different than that of the proposed Plan. Instead, Alternative 3 included more progressive pricing and user fees, as well as an intensified land use pattern in order to reduce significant impacts on the environment. Inclusion of this more compact land use pattern is appropriate as the SCS land use pattern is an integral component of a regional plan, as mandated by SB 375. As compared to the proposed Plan, Alternative 3 reduces significant impacts on aesthetics and visual resources, agriculture and forestry, air quality, biological resources, cultural resources, geology, GHG, mineral resources, noise, public services and utilities, transportation, and

wildfire. See Chapter 6 and Table 6-3 for additional discussion of the comparative impacts of the proposed Plan and Alternative 3.

RESPONSE TO COMMENT 35-14

his comment inaccurately characterizes the nature of the roadway projects in the proposed Plan.

Where possible, rather than adding new roads, the proposed Plan repurposes general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every four years, providing opportunities to reflect changes in the network. The proposed Plan's improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel.

This comment also inaccurately characterizes the nature and comparative impacts of the proposed Plan as compared to SOFAR's proposed Climate, Housing and Transit Alternative on freeway expansion and roadway capacity. In 2050, under the proposed Plan, the region has 2,122 miles of general purpose freeway lanes (including auxiliary lanes) due to existing lane conversions. In 2050, under SOFAR's proposed Climate, Housing and Transit Alternative, which includes no roadway improvements, the region has 2,352 miles of general purpose freeway lanes (including auxiliary lanes). The proposed Plan includes 821 miles of HOV/Managed Lanes, which SOFAR inaccurately suggests will continue to contribute to substantial increases in VMT and GHG emissions. Data from model runs comparing the proposed Plan network to SOFAR's proposed Climate, Housing and Transit Alternative demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State's GHG reduction goals and does not substantially reduce the proposed Plan's significant impacts.

Database	Proposed Final Plan		SOFAR's Climate, Housing and Transit Alternative	
	2035	2050	2035	2050
SB 375 VMT	79,725,710	81,804,496	79,877,932	82,247,926
SB 375 VMT/Person	22.0	21.8	22.1	22.0
Final Per Capita GHG Reductions for 2005	-20.%	-21.0%	-20.4%	-20.7%

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration, including a discussion of selected elements of SOFAR's alternative that are similar to the proposed Plan's elements.

With respect to project phasing under the proposed Plan, this comment fails to recognize that there are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

35-14 cont. require all of the region's transportation investment dollars for the foreseeable future. For this reason, the Climate, Housing and Transit Alternative *does not include any freeway expansion*. The billions of dollars spent on freeway expansion the past 20 years have a) failed to reduce congestion, b) caused a substantial increase in VMT and GHG emissions, and c) resulted in a severe housing shortage. The Climate, Housing and Transit Alternative is not duplicative of the proposed Plan or any alternative considered in the DEIR.

35-15 The DEIR further opines that it will not be possible to achieve the goals identified in the Climate, Housing and Transit Alternative. The DEIR attempts to justify this conclusion by claiming that even Alternative 3, which includes what the DEIR characterizes as the most progressive transportation measures to reduce VMT and GHG, is unable to meet the VMT goals of the CHT Alternative.(DEIR at 6-14.) This statement is incorrect. Alternative 3 does not include the most progressive transportation measures; *rather, it calls for an identical transportation network to the proposed Plan.* As we explained in our May 6, 2020 letter, the Climate, Housing and Transit Alternative would eliminate the sizable number of road/freeway projects and use that funding to construct and implement a comprehensive transit system.

35-16 We again request that SANDAG model and fully analyze the Climate, Housing and Transit Alternative in the EIR for the proposed Plan. This modeling should advance all of the Alternative's transit projects to the first ten years of the Plan in order to truly understand the effect that a comprehensive transit network would have in achieving the region's environmental and housing goals. We remain optimistic that such modeling will demonstrate that this Alternative will be far more effective than the proposed Plan in achieving the state's GHG reduction goals and substantially reducing the Plan's significant environmental impacts.

Conclusion.

35-17 In the face of a severe, entrenched housing crisis endangering the public welfare and the severe climate crisis endangering the planet, SANDAG owes the public nothing less than a transit alternative that immediately meets these life threatening challenges rather than artificially prolonging them. The DEIR should also be revised and recirculated to correct the deficiencies identified in this letter.

Sincerely,

Duncan McFetridge
Director, CNFF
President, SOFAR

Attachment: Letter from Duncan McFetridge to SANDAG Board of Directors, May 6, 2020

RESPONSE TO COMMENT 35-15

Alternative 3 in the Draft EIR evaluated what additional reductions of VMT and GHG could potentially be achieved by further restricting development to Mobility Hubs, increasing fees associated with automobile use, and decreasing costs associated with transit use. This comment inaccurately characterizes the comparative potential of the proposed Plan network and SOFAR's proposed Climate, Housing and Transit Alternative to reduce VMT and GHG. Data from model runs comparing the proposed Plan network to SOFAR's proposed Climate, Housing and Transit Alternative demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State's GHG reduction goals and does not substantially reduce the proposed Plan's significant impacts.

	Proposed Final Plan		**SOFAR's Climate, Housing and Transit Alternative**	
Database	**2035**	**2050**	**2035**	**2050**
SB 375 VMT	79,725,710	81,804,496	79,877,932	82,247,926
SB 375 VMT/Person	22.0	21.8	22.1	22.0
Final Per Capita GHG Reductions for 2005	-20.%	-21.0%	-20.4%	-20.7%

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

This comment also fails to recognize that there are constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct

to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

RESPONSE TO COMMENT 35-16

The proposal to advance all of the Alternative's transit projects to the first 10 years of the proposed Plan fails to recognize that there are constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

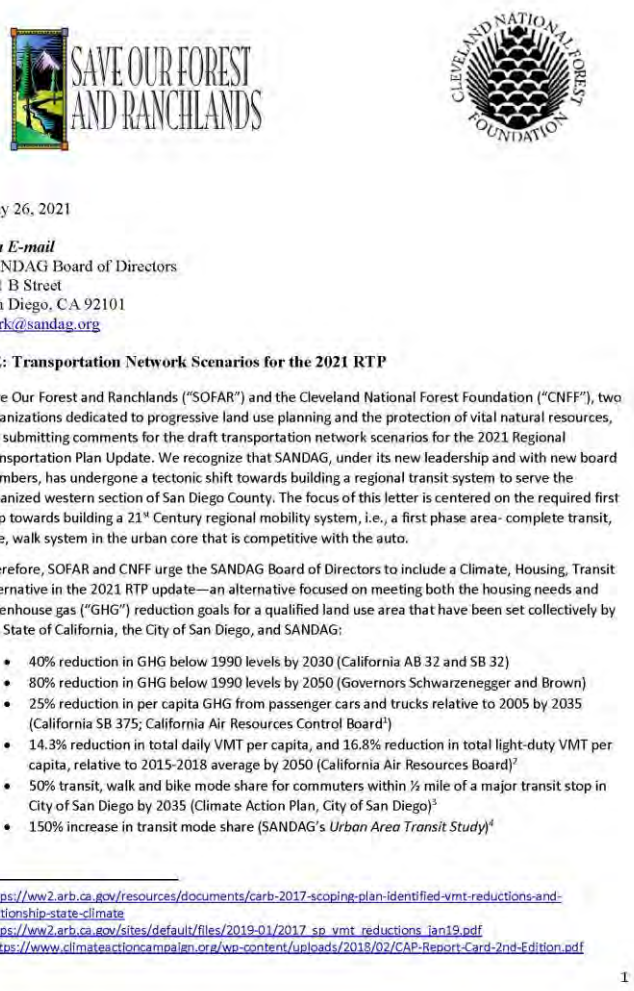
This comment inaccurately characterizes the GHG reductions that can be achieved under the proposed Plan network as compared to SOFAR's proposed Climate, Housing and Transit Alternative. SANDAG modeling data demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State's GHG reduction goals and does not substantially reduce the proposed Plan's significant impacts.

Database	Proposed Final Plan		SOFAR's Climate, Housing and Transit Alternative	
	2035	2050	2035	2050
SB 375 VMT	79,725,710	81,804,496	79,877,932	82,247,926
SB 375 VMT/Person	22.0	21.8	22.1	22.0
Final Per Capita GHG Reductions for 2005	-20.%	-21.0%	-20.4%	-20.7%

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

RESPONSE TO COMMENT 35-17

This comment makes statements about challenges facing the region, to which no further response is required. This comment also asserts the need to recirculate the Draft EIR based on the inaccurate assertions made in comments 35-1 through 35-16, for which responses have already been provided above. No information has been added to the Draft EIR that would trigger recirculation under CEQA Guidelines Section 15088.5.



SAVE OUR FOREST AND RANCHLANDS

CLEVELAND NATIONAL FOREST FOUNDATION

May 26, 2021

Via E-mail
SANDAG Board of Directors
401 B Street
San Diego, CA 92101
clerk@sandag.org

RE: Transportation Network Scenarios for the 2021 RTP

Save Our Forest and Ranchlands ("SOFAR") and the Cleveland National Forest Foundation ("CNFF"), two organizations dedicated to progressive land use planning and the protection of vital natural resources, are submitting comments for the draft transportation network scenarios for the 2021 Regional Transportation Plan Update. We recognize that SANDAG, under its new leadership and with new board members, has undergone a tectonic shift towards building a regional transit system to serve the urbanized western section of San Diego County. The focus of this letter is centered on the required first step towards building a 21st Century regional mobility system, i.e., a first phase area- complete transit, bike, walk system in the urban core that is competitive with the auto.

35-18 Therefore, SOFAR and CNFF urge the SANDAG Board of Directors to include a Climate, Housing, Transit Alternative in the 2021 RTP update—an alternative focused on meeting both the housing needs and greenhouse gas ("GHG") reduction goals for a qualified land use area that have been set collectively by the State of California, the City of San Diego, and SANDAG:

- 40% reduction in GHG below 1990 levels by 2030 (California AB 32 and SB 32)
- 80% reduction in GHG below 1990 levels by 2050 (Governors Schwarzenegger and Brown)
- 25% reduction in per capita GHG from passenger cars and trucks relative to 2005 by 2035 (California SB 375; California Air Resources Control Board[1])
- 14.3% reduction in total daily VMT per capita, and 16.8% reduction in total light-duty VMT per capita, relative to 2015-2018 average by 2050 (California Air Resources Board)[2]
- 50% transit, walk and bike mode share for commuters within ½ mile of a major transit stop in City of San Diego by 2035 (Climate Action Plan, City of San Diego)[3]
- 150% increase in transit mode share (SANDAG's *Urban Area Transit Study*)[4]

[1] https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate
[2] https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf
[3] https://www.climateactioncampaign.org/wp-content/uploads/2018/02/CAP-Report-Card-2nd-Edition.pdf

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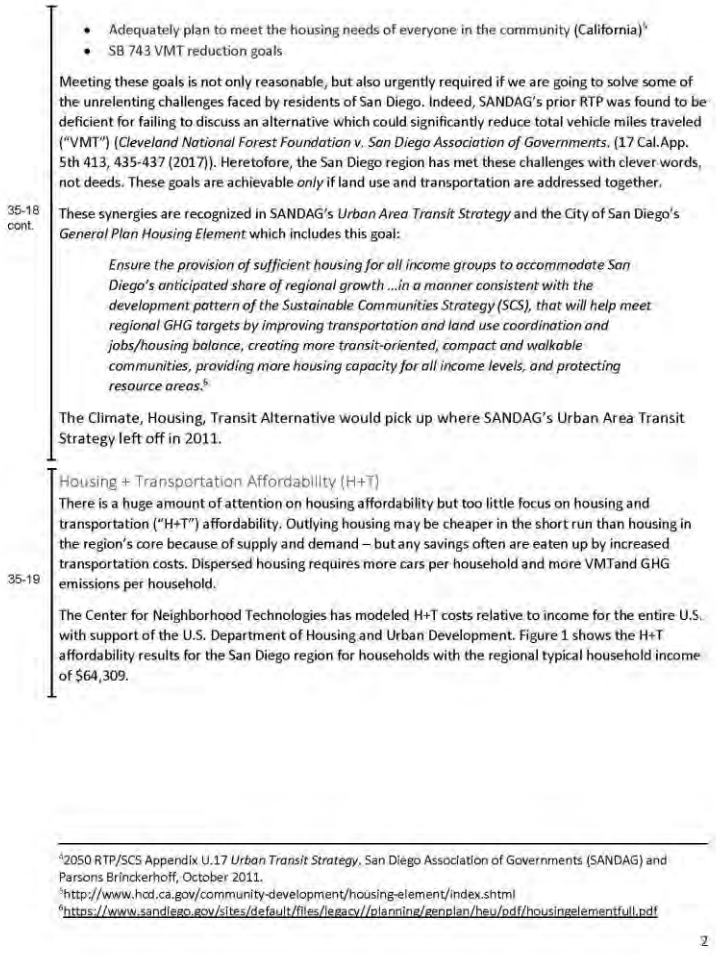
RESPONSE TO COMMENT 35-18

The proposed Plan aligns with many of the elements of the Climate, Housing and Transit Alternative while meeting all legal requirements. As the Plan is implemented, SANDAG looks forward to continuing to advance efforts related to climate, housing, and transit.

SANDAG is developing a Regional Housing Incentive Program to meet the goals of the proposed Plan and assist local jurisdictions in achieving housing goals. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, and consider climate change and resiliency, availability of transit and active transportation, and consistency with the transportation improvements included in the Regional Plan. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. The proposed Plan proposes a land use scenario that accommodates the Regional Housing Needs Assessment and, when combined with the transportation system, allows the region to meet its SB 375 greenhouse gas reduction target.

This comment inaccurately assumes the proposed Climate, Housing and Transit Alternative would significantly reduce VMT and GHG emissions, and substantially increase transit use. The Climate, Housing and Transit Alternative would have similar impacts as the proposed Plan on VMT and GHG emissions, and there is no evidence transit use would be greater.

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration, including a discussion of selected elements of SOFAR's alternative that are similar to the proposed Plan's elements.



- Adequately plan to meet the housing needs of everyone in the community (California)[5]
- SB 743 VMT reduction goals

Meeting these goals is not only reasonable, but also urgently required if we are going to solve some of the unrelenting challenges faced by residents of San Diego. Indeed, SANDAG's prior RTP was found to be deficient for failing to discuss an alternative which could significantly reduce total vehicle miles traveled ("VMT") (*Cleveland National Forest Foundation v. San Diego Association of Governments*. (17 Cal.App. 5th 413, 435-437 (2017)). Heretofore, the San Diego region has met these challenges with clever words, not deeds. These goals are achievable *only* if land use and transportation are addressed together.

35-18 cont.

These synergies are recognized in SANDAG's *Urban Area Transit Strategy* and the City of San Diego's *General Plan Housing Element* which includes this goal:

> *Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth ...in a manner consistent with the development pattern of the Sustainable Communities Strategy (SCS), that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas.*[6]

The Climate, Housing, Transit Alternative would pick up where SANDAG's Urban Area Transit Strategy left off in 2011.

Housing + Transportation Affordability (H+T)

There is a huge amount of attention on housing affordability but too little focus on housing and transportation ("H+T") affordability. Outlying housing may be cheaper in the short run than housing in the region's core because of supply and demand – but any savings often are eaten up by increased transportation costs. Dispersed housing requires more cars per household and more VMTand GHG emissions per household.

35-19

The Center for Neighborhood Technologies has modeled H+T costs relative to income for the entire U.S. with support of the U.S. Department of Housing and Urban Development. Figure 1 shows the H+T affordability results for the San Diego region for households with the regional typical household income of $64,309.

[4]2050 RTP/SCS Appendix U.17 *Urban Transit Strategy*. San Diego Association of Governments (SANDAG) and Parsons Brinckerhoff, October 2011.
[5]http://www.hcd.ca.gov/community-development/housing-element/index.shtml
[6]https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/heu/pdf/housingelementfull.pdf

2

RESPONSE TO COMMENT 35-19

Under the SCS for the proposed Plan, 31 Mobility Hub areas were identified as optimal locations for siting transit investments that maximize regional connectivity, and for focusing future growth. Nine factors were used to assess the propensity for transit-based trip making to identify the Mobility Hub areas integrated into the proposed Plan, including employment, population density, age, proximity to activity centers, trips within census block groups, communities of concern, and VMT per capita.

The areas indicated in the figure provided by SOFAR are well-aligned with the Mobility Hub areas identified in the proposed Plan. The Mobility Hub areas contain 70 percent of the Center for Neighborhood Technology's H+T index values that are considered affordable, i.e., less than the regional median. The remaining 30 percent of the H+T index values that are considered affordable are located primarily in East County, where development would contribute to urban sprawl in the backcountry and impede achieving regional reductions of VMT and GHG emissions.

While land use authority is reserved to local jurisdictions—the 18 cities and the County—SANDAG will work closely with jurisdictions to incentivize building of housing in the Mobility Hub areas. In coordination with the development of the proposed Plan, SANDAG will embark on developing a housing incentive program that will support jurisdictions in the development and adoption of policies and process improvements to accelerate housing production. The program will also look for ways to leverage funding from the State to provide more housing in the region and meet the goals of the proposed Plan.

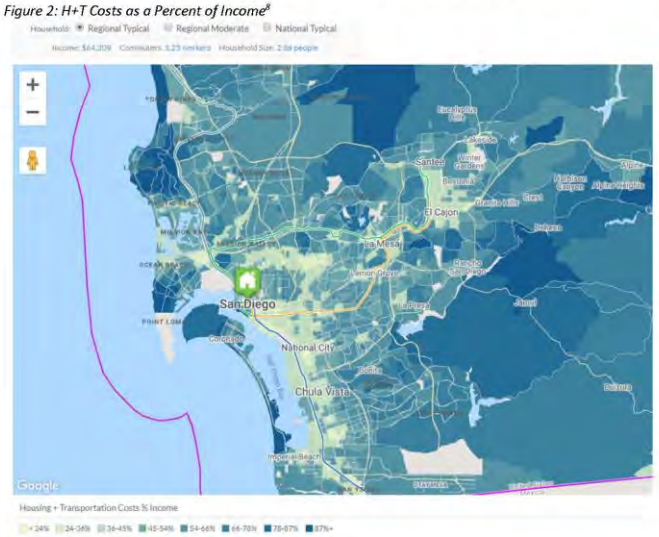
Figure 1: H+T Costs as a Percent of Income[7]



35-19 cont.

Figure 1 shows that, on average, transportation costs are about two-thirds as large as housing costs. However, transportation costs vary greatly across the region. Figure 2 maps H+T affordability.

Figure 2: H+T Costs as a Percent of Income[8]



[7] Center for Neighborhood Technologies. https://htaindex.cnt.org/fact-sheets/?focus=cbsa&gid=42
[8] Center for Neighborhood Technologies. https://htaindex.cnt.org/

3

As shown in Figure 2, when both housing and transportation costs are considered,the most affordable areas are in the light-colored areas primarily in the region's core and along major transit corridors. The housing affordability problem cannot be solved by building new housing in the darker-colored areas because high transportation costs make those areas inherently unaffordable. The areas in the more remote locations in San Diego County (i.e., even further from the City center) are not shown in order to make the map more readable, but these areas also tend to be more unaffordable when taking into account H+T.[9]

35-19 cont.

Real estate developers and their allies are currently pressuring San Diego County to retain its unlawful and inaccurate thresholds for assessing VMT impacts under SB 743, claiming that mitigation for VMT impacts will make housing in more remote parts of the County unaffordable. But housing in these areas is already unaffordable when transportation costs—that is, costs of driving long distances from locations not served by transit—are taken into account. SANDAG can help facilitate a better approach through the RTP, one that encourages the County to plan for housing in areas where transportation costs are low rather than allowing developers to build in remote areas and then trying to "mitigate" for the resulting VMT.

The answer to housing affordability is H+T affordability. It is building more housing in the H+T affordable light-colored areas and in expanding the supply of H+T affordable areas through increased transit service.

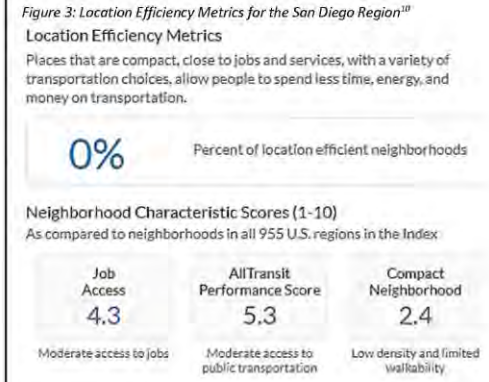
[9]Transportation costs—both in absolute terms and as a percentage of income—are even higher in many North County and East County communities (for example, transportation costs alone range from 25% of income in Alpine and Fallbrook to 27% of income in Borrego Springs and 28% of income in Julian and Pala).See https://htaindex.cnt.org/fact-sheets/.

4

35-20

As shown in Figure 3, the San Diego region currently scores extremely low on location efficient neighborhoods which are defined as "compact, close to jobs and services, with a variety of transportation choices."

Figure 3: Location Efficiency Metrics for the San Diego Region[10]



Increasing this score will require more housing and jobs in areas served by transit today. It will also require a significant expansion of transit infrastructure and a substantial increase in service. The State of California, SANDAG and the County's municipalities are working towards increasing the supply of housing in location efficient neighborhoods, but more can and should be done.

The Regional Housing Needs Allocation ("RHNA") Determination, provided by the California Department of Housing and Community Development ("HCD") in July 2018, requires the San Diego region to plan for 171,685 housing units in the 6th Housing Element Cycle (2021-2029). This 6th Element Cycle gives significant weight to transit availability. As shown in Figure 4, the 6th Element Cycle makes a substantial shift relative to the previous 5th Element Cycle away from the unincorporated areas and into the cities served by transit including San Diego, Escondido, La Mesa, and National City.

[10] Center for Neighborhood Technologies. https://htaindex.cnt.org/fact-sheets/?focus=cbsa&gid=42

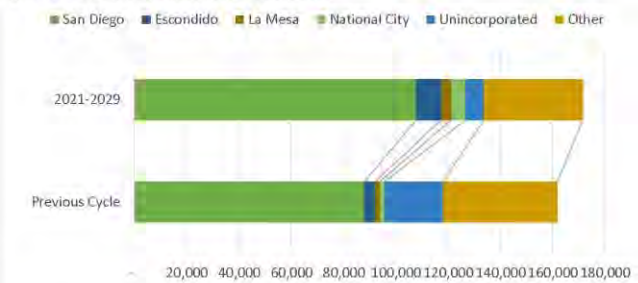
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RESPONSE TO COMMENT 35-20

This comment largely describes positive changes at the State and local level to increase housing supply, which requires no further response. It also inaccurately asserts that all transportation spending can be shifted towards transit and non-motorized infrastructure. There are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

35-20 cont.

Figure 4: RHNA Allocations 2020-2029 and 2010-2019[11]



	Previous Cycle	2021-2029
San Diego	88,096	107,901
Escondido	4,175	9,607
La Mesa	1,722	3,797
National City	1,863	5,437
Unincorporated	22,412	7,000
Other	43,712	37,943

TheCity of San Diego's share of the total has risen from 54% of the total in the previous cycle to 63% in the new cycle. The City has ample capacity for this housing. It has identified capacity to construct 164,142 housing units or 56,241 more than required.[12] A large percentage of this capacity is in transit corridors.

These are positive changes. However, in the past, the housing allocations have been aspirational but not enforced. The State has signaled that it plans to be more aggressive about enforcement during this cycle. SANDAG can help the municipalities achieve their housing goals by shifting all transportation spending towards transit and non-motorized (walk and bike) infrastructure. These investments, which will facilitate getting people out of the cars, will also help the region increase density without large impacts on neighborhoods.

35-21

In addition to personal savings on car ownership (e.g., acquisition, registration, and insurance) and costs associated with driving (e.g., gasoline, replacement parts, and repairs), municipalities are beginning to recognize that neighborhoods served by transit require fewer parking spaces. Last year, the City of San Diego passed a parking reform package that eliminated parking requirements for sites located within

[11] Center for Neighborhood Technologies. https://htaindex.cnt.org/
[12] City of San Diego General Plan Housing Element 2021-2029 (March 2020 Draft), p. HE-38.

6

RESPONSE TO COMMENT 35-21

This comment describes past changes to parking space requirements, and no further response is required.

35-21 cont. 1/2-mile of a transit stop. This is a tremendously important reform for housing affordability because construction of parking can cost as much as $90,000 per space in structures.[13]

Building a RealRegional Transit System - the Climate, Housing, Transit Alternative

SANDAG's Executive Director Hasan Ikhata said:

> ***I don't buy the debate that transit doesn't work. Transit doesn't work now because it's not designed to work. You know, if you come from the border to downtown and it takes you, you know… it's about 20 some miles… it takes you an hour in transit, that's not real transit, as far as I'm concerned.***[14]

The San Diego region's transit system performs much more poorly than its west coast peers. As shown in Figure 5, a much smaller share of the region's workers commute by transit than other west coast regions.

Figure 5: Transit Work Mode Share in Four West Coast Regions

35-22



Source: U.S. Census American Community Survey

[13] https://timesofsandiego.com/politics/2019/03/04/san-diego-city-council-votes-to-repeal-minimum-parking-requirements-for-new-housing/

[14] *San Diego Tribune*, February 27, 2019. https://www.sandiegouniontribune.com/opinion/commentary/sd-utbg-sandag-ikhrata-transit-interview-20190227-story.html

7

RESPONSE TO COMMENT 35-22

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

SANDAG cannot confirm the metrics used for the comparison depicted in Figures 5 and 6 in the comment, nor can SANDAG confirm the accuracy of the transit work mode share and commute time data for other metropolitan regions based on the information provided in the comment. For the San Diego region, 3.4 percent of the work trips were made by public transit in 2016 (Final Plan, Table T6.2). With implementation of the proposed Plan, the transit mode share for all work trips increases to 11.7 percent in 2035 and 13.2 percent in 2050. As for the ratio of average transit commute time to average auto commute time, that ratio is not calculated in the proposed Plan. However, Table T6.3 of the Final Plan includes travel times for transit, auto, and carpool by corridor.

This comment relies upon commute times generated by the CHTS, which presents a less accurate picture of regional behavior and mode share than SANDAG's ABM2+ forecast, for several reasons. The CHTS was conducted by Caltrans between 2010 and 2013 during the Great Recession, which created unique influences on travel behaviors and characteristics. The SANDAG ABM2+ was updated based on the San SDRTS conducted between 2016 and 2017, which used smartphone-based travel diaries as the primary means of travel data collection and included nearly 6,200 participating households. From a data quality perspective, the SDRTS is considered superior to the CHTS based on the more recent time period for survey collection, travel survey data collection methodology, and San Diego region sample size.

Additionally, the CHTS and the SDTRS are limited to travel surveys of residents. However, the ABM2+ forecasts travel for all types of trips—resident, visitor, cross border, airport, non-resident trips starting/ending external to San Diego, commercial, and truck. SANDAG collects supplemental travel survey and data on these other travel markets for inclusion in ABM2+ forecasts. Again, from a data perspective, the ABM2+ forecast is superior to the CHTS numbers referenced in SOFAR's comment.

The proposed Plan includes the Miramar tunnel to support improvements to the Coaster, new commuter rail service, and upgrades to existing light rail service, including grade separations and eliminating

stops for express service. The proposed Plan also includes a Central Mobility Hub to connect the urban core, the airport, the LOSSAN corridor, the trolley system, and many bus routes.

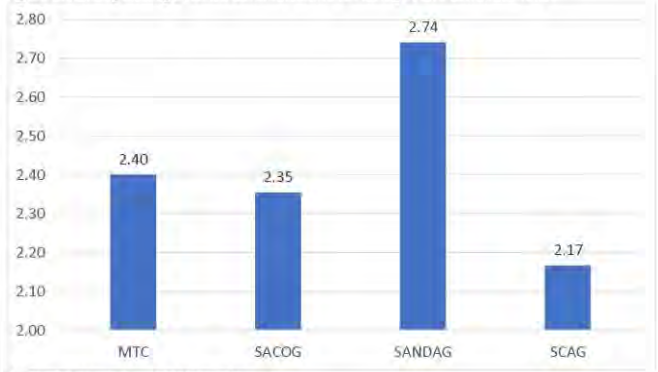
Specific to express bus service, the proposed Plan includes an expanded network of Rapid buses and improvements to the local bus system to facilitate more frequent and longer spans of service. The Rapid bus network is envisioned to connect to Mobility Hubs, communities, job centers, and other destinations. The infrastructure to support these connections includes better connectivity on city streets, direct access ramps from freeway facilities, plus an assortment of transit operational improvements to facilitate access. By 2035, about 30.4 percent of the region's population is projected to be living within a half-mile of a Rapid transit stop. For those living further from Rapid transit stops, the proposed Plan investments in Flexible Fleets will allow for more options to facilitate first mile/last mile connections with solutions that can be customized for different communities (microtransit, ridesharing, bikeshare, etc.).

The proposed Plan also includes a land use pattern that focuses growth in Mobility Hub areas to align with transportation investments and facilitate more bikeable and walkable communities. SANDAG is working closely with the City of San Diego to ensure that the proposed Plan complements the City's efforts to achieve the mode share goals of its Climate Action Plan.

35-22 cont

Those who do commute by transit in the San Diego region suffer an enormous travel time penalty relative to the other large regions in California (Figure 6).

Figure 6: Ratio of Average Transit Commute Time to Average Auto Commute Time



Source: California Household Travel Survey

Improving the regional transit system is not a new idea in the San Diego region; there just has not been enough follow through. Almost a decade ago, SANDAG prepared the *Urban Area Transit Strategy*("UATS") as part of its 2011 RTP to connect regional housing needs with transit infrastructure:

> *The overarching goal of the UATS was to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region.*
>
> *The vision called for a network of fast, flexible, reliable, safe, and convenient transit services that connect our homes to the region's major employment centers and destinations. Achievement of this vision would make transit a more appealing option for many trips, reducing the impact of vehicular travel on the environment and on public health. Other key goals included:*
>
> - *Making transit more time-competitive with automobile travel;*
> - *Maximizing the role of transit within the broader transportation system; and*
> - *Reducing vehicle miles traveled and greenhouse gas emissions in the region. (p. TA 7-5)*[15]

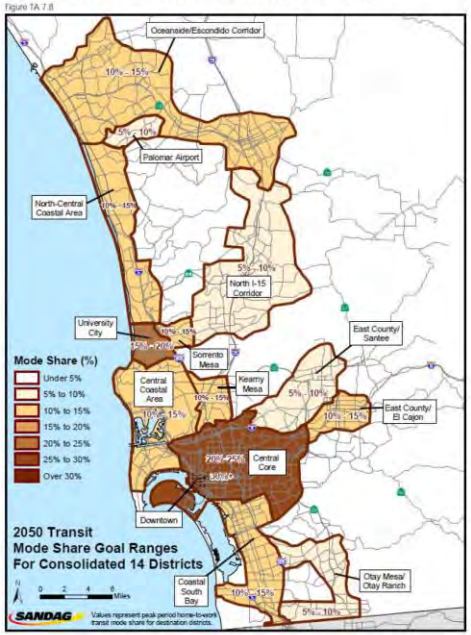
[15] SANDAG. Urban Area Transit Study. http://www.sandag.org/index.asp?projectid=368&fuseaction=projects.detail

8

35-22 cont.

The UATS showed a high potential for transit ridership in the region's urban core (Figure 7).

Figure 7: SANDAG Urban Area Transit Study Figure TA 7.8

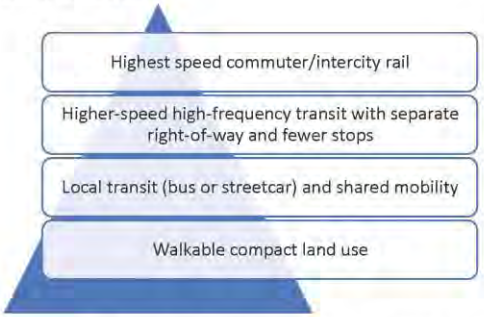


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35-22 cont.

For transit to become time-competitive with the automobile, the Climate, Housing, Transit Alternative will require much more than a few isolated projects. It will require comprehensive investments at each of the four levels shown in Figure 8.

Figure 8: Complete Transit System

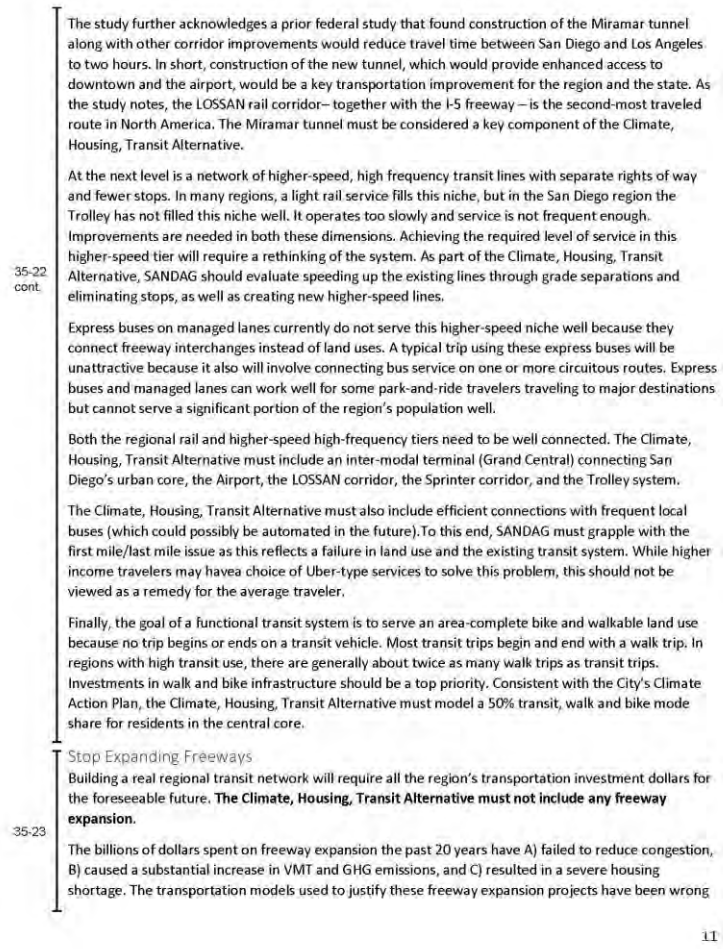


At the top level, improving rail service in the Los Angeles to San Diego ("LOSSAN") corridor is a top priority. To this end, an important study by Caltrans and CNFF has just been completed regarding the potential transit ridership on the LOSSAN rail corridor between San Diego and Los Angeles. This study arose as a result of litigation filed by CNFF challenging the planned expansion of the I-5 freeway between La Jolla and Oceanside as inconsistent with California's GHG emission targets. CNFF and Caltrans reached a settlement that focused on the potential to improve rail service on the LOSSAN corridor. In particular, the parties agreed to study the feasibility of constructing a double-track rail tunnel through Miramar Hill to facilitate transit on the corridor. The parties believed that the Miramar tunnel could reduce travel times and provide improved connections to local transit services in the University Town Center (UTC) area.

The recently-completed study concludes that the Miramar tunnel and rail line straightening would add a critical link to the LOSSAN rail corridor. *See* Exhibit #1 (Miramar Tunnel Feasibility Study).Critically, it finds that the feasibility criteria for the Miramar tunnel have been satisfied. Its specific findings include the following:

1. The project would increase discretionary passengers by 1,300 to 1,700 per day, thereby reducing annual VMT 200 million to 240 million miles and GHG by 70,000 to 84,000 tons.
2. The project would provide competitive travel times, including a transit system average clock time that is approximately 3% faster than the automobile.
3. The project would be cost competitive, with transit riders cost at $180/month versus automobile costs of $507/month.
4. The project has no fatal engineering flaws.

10



The study further acknowledges a prior federal study that found construction of the Miramar tunnel along with other corridor improvements would reduce travel time between San Diego and Los Angeles to two hours. In short, construction of the new tunnel, which would provide enhanced access to downtown and the airport, would be a key transportation improvement for the region and the state. As the study notes, the LOSSAN rail corridor– together with the I-5 freeway – is the second-most traveled route in North America. The Miramar tunnel must be considered a key component of the Climate, Housing, Transit Alternative.

At the next level is a network of higher-speed, high frequency transit lines with separate rights of way and fewer stops. In many regions, a light rail service fills this niche, but in the San Diego region the Trolley has not filled this niche well. It operates too slowly and service is not frequent enough. Improvements are needed in both these dimensions. Achieving the required level of service in this higher-speed tier will require a rethinking of the system. As part of the Climate, Housing, Transit Alternative, SANDAG should evaluate speeding up the existing lines through grade separations and eliminating stops, as well as creating new higher-speed lines.

35-22 cont.

Express buses on managed lanes currently do not serve this higher-speed niche well because they connect freeway interchanges instead of land uses. A typical trip using these express buses will be unattractive because it also will involve connecting bus service on one or more circuitous routes. Express buses and managed lanes can work well for some park-and-ride travelers traveling to major destinations but cannot serve a significant portion of the region's population well.

Both the regional rail and higher-speed high-frequency tiers need to be well connected. The Climate, Housing, Transit Alternative must include an inter-modal terminal (Grand Central) connecting San Diego's urban core, the Airport, the LOSSAN corridor, the Sprinter corridor, and the Trolley system.

The Climate, Housing, Transit Alternative must also include efficient connections with frequent local buses (which could possibly be automated in the future).To this end, SANDAG must grapple with the first mile/last mile issue as this reflects a failure in land use and the existing transit system. While higher income travelers may havea choice of Uber-type services to solve this problem, this should not be viewed as a remedy for the average traveler.

Finally, the goal of a functional transit system is to serve an area-complete bike and walkable land use because no trip begins or ends on a transit vehicle. Most transit trips begin and end with a walk trip. In regions with high transit use, there are generally about twice as many walk trips as transit trips. Investments in walk and bike infrastructure should be a top priority. Consistent with the City's Climate Action Plan, the Climate, Housing, Transit Alternative must model a 50% transit, walk and bike mode share for residents in the central core.

Stop Expanding Freeways

Building a real regional transit network will require all the region's transportation investment dollars for the foreseeable future. **The Climate, Housing, Transit Alternative must not include any freeway expansion.**

35-23

The billions of dollars spent on freeway expansion the past 20 years have A) failed to reduce congestion, B) caused a substantial increase in VMT and GHG emissions, and C) resulted in a severe housing shortage. The transportation models used to justify these freeway expansion projects have been wrong

11

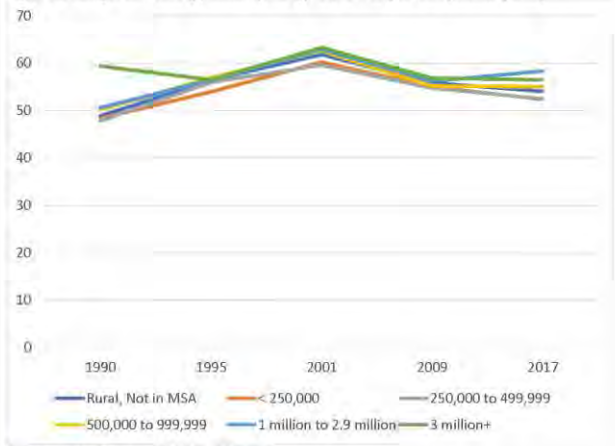
RESPONSE TO COMMENT 35-23

Appendix D of the proposed Plan includes an induced demand analysis (as required by CARB) to be factored into estimated 2035 greenhouse gas emissions. This analysis utilized the Induced Demand Calculator referenced in the comment.

35-23 cont.

on all counts. These models - both in the San Diego region and in regions throughout the U.S. – forecast dire increases in travel time if freeways are not widened, and substantial increases in travel time even if they are widened. In fact, as shown in Figure 9, travel time has stayed remarkably constant in the U.S. for decades.

Figure 9: Average Time Driving (minutes per day) 1990-2017 by MSA Population (NHTS)



Source: National Household Travel Survey.

Figure 9 shows the "average time spent driving a private vehicle in a typical day." There was an increase during the 1990s, a time when many women were joining the labor force, but since 2000 there has been little change. Time spent driving also is very similar across differently sized regions. There is evidence that people have a "travel time budget". If travel speeds drop, they (on average) will adapt to travel a shorter distance.

In contrast, if travel speeds increase, people (on average) will travel longer distances. This phenomenon is known as "induced travel". In work for the California Air Resources Board ("CARB"), researchers at the University of California and the University of Southern California reviewed the literature on induced travel and concluded:

> *Thus, the best estimate for the long-run effect of highway capacity on VMT is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new*

12

35-23 cont.

capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG in the long-run.[16]

The SANDAG regional transportation model fails to account properly for induced travel although there now are newer algorithms that could address this deficiency.[17]

Senate Bill 743 establishes VMT as the appropriate metric for determining the impacts of transportation projects. This has made properly accounting for induced VMT critical in the regulatory process. The Office of Planning and Research's ("OPR") *Technical Advisory on Evaluating Transportation Impacts in CEQA* recommends:

> *Whenever employing a travel demand model to assess induced vehicle travel, any limitation or known lack of sensitivity in the analysis that might cause substantial errors in the VMT estimate (for example, model insensitivity to one of the components of induced VMT described above) should be disclosed and characterized, and a description should be provided on how it could influence the analysis results. A discussion of the potential error or bias should be carried into analyses that rely on the VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise.*[18]

The National Center for Sustainable Transportation at the University of California at Davis has produced an *Induced Travel Calculator*[19] to help address the deficiencies in the models. Recently, Caltrans also has issued new draft guidance on accounting for induced travel. It recommends following the OPR recommendations:

> *Caltrans recommends using the VMT analysis approaches recommended in OPR's advisory when evaluating the transportation impacts of projects on the State Highway System (SHS).*[20]

Neither expanding freeways nor not expanding freeways will have any effect on regional congestion or average travel times. However, expanding freeways will cause significant increases in VMT and GHG emissions, and will continue to starve the transit system of needed investments.

[16] Handy, Susan and Marlon G. Boarnet. "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief" prepared for California Air Resources Board, September 30, 2014.
[17] Marshall (2018). Forecasting the impossible: The status quo of estimating traffic flows with static traffic assignment and the future of dynamic traffic assignment. *Research in Transportation Business & Management*. **29**, 85-92 (2018)
[18] California Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA, p. 29, December 2018. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf
[19] https://ncst.ucdavis.edu/research-product/induced-travel-calculator
[20] Caltrans. Draft Transportation Analysis Framework: Induced Travel Analysis, March 2020. https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-04-13-taf-a11y.pdf

13

35-24

A Completely New Direction is Needed

Given that transit in the San Diego region has been and continues to be severely under-funded and under-built compared to roadway projects, as discussed above, the Climate, Housing, Transit Alternative must exclude roadway/freeway funding and expansion. Heretofore, SANDAG's planning has arbitrarily segmented freeway and transit projects. This artificial segmentation is not only irrational, it is fatal in achieving sustainable housing goals because **transit, bike, and walk mobility and auto-based mobility serve contradictory land use purposes**. SANDAG's failure to historically recognize this fundamental truth is the Achilles heel of its planning and lies at the doorstep of the agency's on-going inability to deliver a plan that truly unites our community on an ecologically sustainable foundation.

It is abundantly clear that SANDAG's past planning efforts have not only beendeficient buthave repeatedly failed to heed the ominous warnings from the courts, the public, and the planet itself. With California literally on fire due largely to climate change induced drought and high temperatures, SANDAG has failed the public by not aggressively pursuing a transportation scenario that would meet the State's GHG and VMT reduction goals.[21] The Climate, Housing, Transportation Alternative would help achieve targets set in legislation, the California Air Resources Board's Climate Change Scoping Plan, and relevant Executive Orders.

Similarly, with regard to the local housing crisis, it is inconceivable that SANDAG's prior RTPs have not called for a 50% transit, bike, and walk mode share alternative necessary to activate infill housing, especially since the urban core is already zoned for such housing. Here too, the Climate, Housing, Transit Alternative would facilitate this infill housing and help the City of San Diego achieve the targets set forth in its Climate Action Plan.

Additionally, the County's continued business-as-usual approach to planning makes the need for SANDAG to strengthen guidance regarding future development in the region all the more pressing. In spite of all the talk of a new direction, the County recently unveiled a plan update for the forest community of Alpine which can only be described as a VMT and ecosystem catastrophe. This planning contradiction was noted in Shute Mihaly's comment letter on the Alpine plan[22]. The tectonic shift in regional transit mobility mentioned in the opening paragraph of this letter must become a reality soon to avoid irreversible damage to our wild lands and a missed opportunity for the region.

Faced with these pressing social and environmental challenges, SANDAG's new regional direction can be strengthened by following established judicial, executive, and local legislative guidelines designed to meet the housing and climate crises. The public urgently deserves to see what it would take for the region to build a world-class transit system and to develop reasonably priced infill housing. Common sense dictates that the Climate, Housing, Transit Alternative would necessarily begin with a complete, first phase transit, bike, and walk system with an inter-modal terminal connecting the Airport, the Central Core, the LOSSAN Corridor, the Sprinter corridor, and the Trolley system. It is important to note that the Climate, Housing, Transit Alternative would not only be the "environmentally superior alternative", it would also be the socio-economic superior alternative because a true transit, bike and walk system reduces both the cost and shortage of housing and the cost of driving.

[21] https://abcnews.go.com/Politics/climate-change-make-wildfires-spread-factor/story?id=56937704
[22] https://drive.google.com/file/d/1Nt6sc7weFGbHCNIHsNOlMFCIQKicCVfP/view

14

RESPONSE TO COMMENT 35-24

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

This comment inaccurately characterizes the GHG reductions that can be achieved under the proposed Plan network as compared to SOFAR's proposed Climate, Housing and Transit Alternative. SANDAG modeling data demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State's GHG reduction goals and does not substantially reduce the proposed Plan's significant impacts.

	Proposed Final Plan		**SOFAR's Climate, Housing and Transit Alternative**	
Database	**2035**	**2050**	**2035**	**2050**
SB 375 VMT	79,725,710	81,804,496	79,877,932	82,247,926
SB 375 VMT/Person	22.0	21.8	22.1	22.0
Final Per Capita GHG Reductions for 2005	-20.%	-21.0%	-20.4%	-20.7%

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.

35-25 In conclusion, in the face of a severe, entrenched housing crisis endangering the public welfare and the severe climate crisis endangering the planet, SANDAG owes the public nothing less than a transit alternative that immediately meets these life threatening challenges rather than artificially prolonging them.

Duncan McFetridge



Director, CNFF

President, SOFAR

Exhibit #1: Miramar Tunnel Feasibility Study

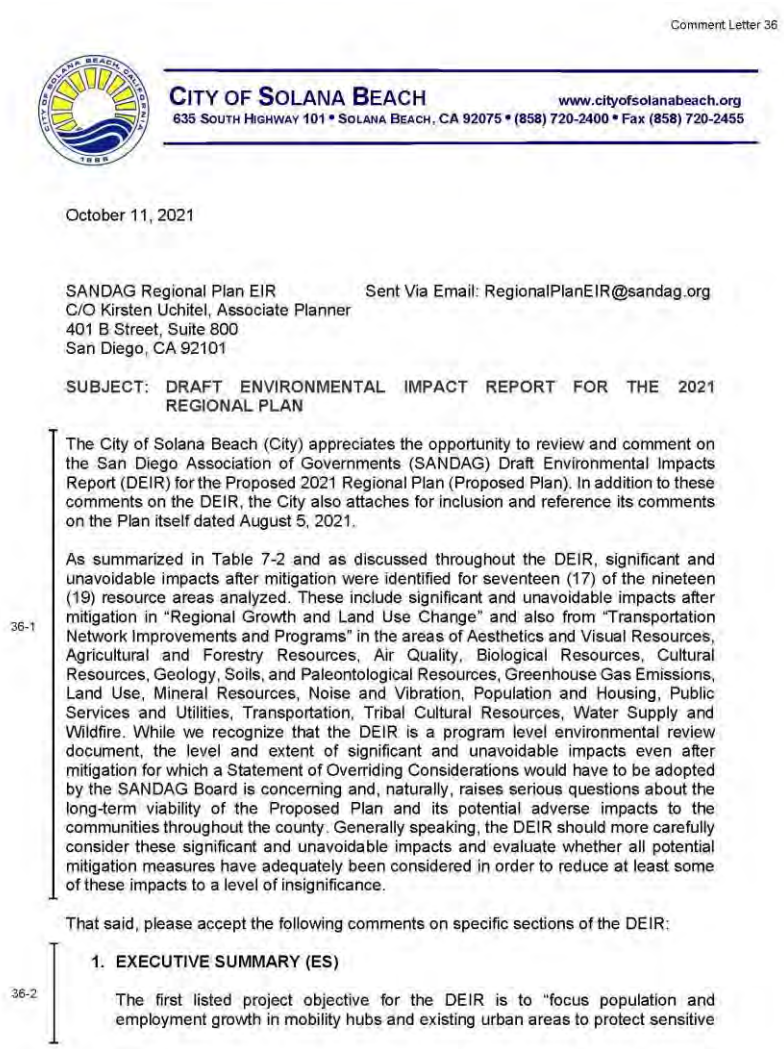
15

RESPONSE TO COMMENT 35-25

This conclusory comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. See prior responses to this comment letter for explanations of why the Climate, Housing, Transit Alternative would not achieve the benefits asserted by the commenter, as well as why it was rejected from detailed consideration in the Draft EIR.

SANDAG recognizes that substantial reductions in global, State, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. It describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, and a detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region is provided in EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of goals adopted by the Legislature and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor's EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

COMMENT LETTER 36: CITY OF SOLANA BEACH



Comment Letter 36

CITY OF SOLANA BEACH
635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075 • (858) 720-2400 • Fax (858) 720-2455
www.cityofsolanabeach.org

October 11, 2021

SANDAG Regional Plan EIR
C/O Kirsten Uchitel, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101

Sent Via Email: RegionalPlanEIR@sandag.org

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2021 REGIONAL PLAN

The City of Solana Beach (City) appreciates the opportunity to review and comment on the San Diego Association of Governments (SANDAG) Draft Environmental Impacts Report (DEIR) for the Proposed 2021 Regional Plan (Proposed Plan). In addition to these comments on the DEIR, the City also attaches for inclusion and reference its comments on the Plan itself dated August 5, 2021.

36-1 As summarized in Table 7-2 and as discussed throughout the DEIR, significant and unavoidable impacts after mitigation were identified for seventeen (17) of the nineteen (19) resource areas analyzed. These include significant and unavoidable impacts after mitigation in "Regional Growth and Land Use Change" and also from "Transportation Network Improvements and Programs" in the areas of Aesthetics and Visual Resources, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Geology, Soils, and Paleontological Resources, Greenhouse Gas Emissions, Land Use, Mineral Resources, Noise and Vibration, Population and Housing, Public Services and Utilities, Transportation, Tribal Cultural Resources, Water Supply and Wildfire. While we recognize that the DEIR is a program level environmental review document, the level and extent of significant and unavoidable impacts even after mitigation for which a Statement of Overriding Considerations would have to be adopted by the SANDAG Board is concerning and, naturally, raises serious questions about the long-term viability of the Proposed Plan and its potential adverse impacts to the communities throughout the county. Generally speaking, the DEIR should more carefully consider these significant and unavoidable impacts and evaluate whether all potential mitigation measures have adequately been considered in order to reduce at least some of these impacts to a level of insignificance.

That said, please accept the following comments on specific sections of the DEIR:

1. **EXECUTIVE SUMMARY (ES)**

36-2 The first listed project objective for the DEIR is to "focus population and employment growth in mobility hubs and existing urban areas to protect sensitive

RESPONSE TO COMMENT 36-1

As noted in the comment, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. Because the specifications of second-tier projects such as the timing, location, and size, associated with implementation of the Plan, are not known at this time, it cannot be concluded with certainty that the mitigation measures identified in the Draft EIR would sufficiently reduce impacts to less-than-significant levels. In addition, many Draft EIR mitigation measures for second-tier projects recognize that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, stating that such agencies "can and should" implement them. SANDAG can commit to feasible mitigation measures that are within its responsibility and jurisdiction. However, SANDAG will not be the agency for many of the second-tier projects that implement the proposed Plan. In those instances, SANDAG in its CEQA findings may find that those measures are within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency (Guidelines Section 15091(a)(2)).

The Draft EIR also recognizes that due to project or site-specific circumstances it may not be feasible for individual lead agencies to implement all of the "can and should" mitigation measures listed for a particular significant impact. Implementing agencies are required by CEQA to exercise discretion in selecting and imposing mitigation measures based on all relevant feasibility concerns, including costs and available funding, enforcement mechanisms, effectiveness as applied to the specific project in question, and collateral environmental or other effects that may result from implementation of the mitigation measure. How these factors may affect individual mitigation decisions for the many individual projects anticipated in the proposed Plan cannot be realistically assessed in a Program EIR for the entire proposed Plan.

As such, the EIR takes a conservative approach when making significant and unavoidable impact determinations. It does propose all potentially feasible programmatic mitigation measures for significant impact, and

some EIR mitigation measures have been strengthened in response to public comments on the Draft EIR.

RESPONSE TO COMMENT 36-2

Mobility Hubs are meant to be a general geographic area for concentration of future development and travel choices, but that does not mean that the entire area within the Mobility Hub will be developed. During the design of the elements of the Solana Beach Mobility Hub, project-specific biological field surveys and analysis will be conducted that will consider impact avoidance and minimization measures on sensitive biological resources, including southern coastal salt marsh and southern maritime chaparral.

habitat and natural resource areas." This objective seemingly ignores the fact that some areas where mobility hubs are proposed – particularly the Coastal Mobility Hub proposed for Solana Beach – are themselves replete with environmentally sensitive habitat areas (ESHA) and natural resources that must be protected. The City's 2018 updated EHSA Mapping for our Certified Local Coastal Program's Land Use Plan (LCP/LUP) identified 2,192.11 total acres of sensitive habitat and/or vegetation communities in Solana Beach, many of which the Proposed Plan and the DEIR are intended to protect. These include Southern Maritime Chapparal, Diegan Coastal Sage Scrub (described on page 4.4-64 of the DEIR as "one of the most sensitive vegetation communities in the County") and Southern Coastal Salt Marsh. This sensitive habitat is distributed throughout much of the Coastal Mobility Hub proposed for Solana Beach. While mitigation is identified to protect such habitat, like most impacts analyzed in the DEIR, even with mitigation this impact is significant and unavoidable. Absent additional mitigation for sensitive habitat within our Coastal Mobility Hub, the objective to focus population and housing in a mobility hub with significant sensitive habitat in order to protect that habitat is counterintuitive and effectively increases the impact within our City.

36-2 cont.

Request: The DEIR should be revised to address this discrepancy within the Solana Beach Mobility Hub and should place equal value on preserving the sensitive habitat and coastal resources – both physical and visual – within Solana Beach.

2. PROJECT DESCRIPTION – MOBILITY HUBS (Section 2.5.1)

The DEIR (and the Proposed Plan) describe Mobility Hubs as having "coverage areas" of 1, 2, or 4 miles from each node around which they are centered and are further described as "unique to each community based on community characteristics and travel needs." This uniqueness and stated objective to respect the character, scale and visual qualities of each Mobility Hub, although acknowledged and addressed throughout the DEIR including in Sections 4.1 (Aesthetics and Visual Resources), 4.11 (Land Use) and 4.14 (Population and Housing), is seemingly overlooked inasmuch as the DEIR identifies significant and unavoidable impacts for each of these analyzed resource areas due to the Sustainable Community Strategy's (SCS's) focusing of densification in these Mobility Hubs.

36-3

Additionally, Figures 2-35 and 2-36 (as well as Figures 2-20 and 2-21) illustrate the Mobility Hub Network. However, each Mobility Hub is very generally depicted and does not follow any specific geographic, visual or roadway boundaries. It is unclear how these amorphous mobility hub boundaries should be interpreted.

Request: The City requests that SANDAG staff work with City officials and their respective staffs to more clearly define these boundaries and provide more clear exhibits.

RESPONSE TO COMMENT 36-3

As stated in Chapter 2, *Project Description,* of the Draft EIR, potential locations for Mobility Hubs were identified for communities with a high concentration of people, destinations, and travel choices where densification is envisioned in the SCS, subject to the approval of local jurisdictions. As such, as part of the implementation of the proposed Plan, SANDAG will be working with the staff of the local jurisdictions to define the exact specifications of Mobility Hubs, including location and any other criteria to meet the unique characteristics and reflect the respective community transportation needs of each community. As noted above under Solana Beach 36-1, the significant and unavoidable determinations were based on a conservative approach based on a variety of factors related to determining the feasibility of mitigation measures in this first-tier Program EIR.

3. AESTHETICS AND VISUAL RESOURCES (Section 4.1)

Pages 4.1-9 of the DEIR accurately note that, under the California Coastal Act of 1976, scenic and visual qualities of the coast must be considered and protected as a visual resource. Additionally, page 4.1-10 notes that Section 30251 of the Coastal Act requires that permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance the visual quality in visually degraded areas. Solana Beach is located entirely within the Coastal Zone while the entire western half of the City is also identified as a Coastal Mobility Hub in the Proposed Plan and DEIR. Therefore, the objective to focus jobs, housing and densification within this area as contemplated in the DEIR while also complying with the Coastal Act mandate to preserve scenic and visual qualities, protect views of the ocean and require new development to be compatible with the surrounding areas conflict with one another. More pointedly, the Proposed Plan is inconsistent with the Coastal Act in this regard. Not surprisingly, the DEIR
36-4 determined that the Proposed Plan would, even after mitigation, have a significant and unavoidable impact effect in each of the following areas:

AES-1	Have a substantial adverse effect on a scenic vista.
AES-2	Substantially damage scenic resources, including but not limited to, trees, rocks, outcroppings, and historic structures within a state scenic highway.
AES-3	Substantially degrade the existing visual character or quality of public views of the site and its surroundings, including adding a visual element of urban character to an existing rural or open space area, conflicting with regulations governing scenic quality.
AES-4	Substantially degrade the existing visual character or quality of public views of the site and its surroundings by creating a new source of substantial light or glare that would adversely affect day or nighttime views.

This determination points to the significant challenges coastal cities like Solana Beach already face and will continue to face in light of the Coastal Mobility Hub designation in attempting to balance our local needs with both state and regional mandates and policies.

Additionally, Table 4.1-3 of the DEIR lists the Visual Resource Protection Plans and Regulations Governing Scenic Quality in the San Diego Region by Local Jurisdiction. In so doing, however, it fails to include the City's LCP/LUP Policies (2014) that mandate the protection of visual and scenic resources in compliance with the Coastal Act as well as our local Dark Sky Zones adjacent to the San Elijo Lagoon along the City's northern boundary and adjacent to the San Dieguito Lagoon at the southeastern boundary of the City.

RESPONSE TO COMMENT 36-4

Requested edits have been made to Table 4.1-3 to reference policies from Solana Beach's LCP/LUP regarding scenic quality as well as the Dark Sky Zones ordinance. In addition, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects, including Mobility Hubs. Development of Mobility Hubs that would occur as part of the implementation of the proposed Plan would undergo separate, project-specific environmental review, and any impacts on aesthetic and visual resources, including consistency with CCA policies related to preservation of such resources, would be evaluated and mitigated when the timing, location, and other specifications of a specific project have been defined. Draft EIR Section 4.1.2 describes the CCA policies that apply to coastal development to protect views to and along the ocean and other scenic coastal areas, and edits have been made to mitigation measures AES-2a and AES-2b to address coastal areas more specifically.

36-4 cont.

Request: The City requests that Table 4.1-3 be revised to include reference to our LCP/LUP Policies (2014) and our Dark Sky Zones as additional plans governing scenic qualities in our City. Further, the DEIR should provide a more detailed analysis of the inherent conflict between the Proposed Plan (specifically the Coastal Mobility Hub in Solana Beach) and the requirements of the Coastal Act to preserve scenic and visual qualities, protect views of the ocean and require new development to be compatible with the surrounding areas.

4. AIR QUALITY (Section 4.3)

Page 4.3-42 of the DEIR states that VMT, freight rail, and passenger rail activity is projected to increase between 2016 and 2035 and that reductions in emissions across the board are due primarily to federal and state regulations that reduce emissions from vehicles and locomotives over time. It goes on to state that, while passenger rail activity increases, "all passenger rail lines (both current and new) are assumed to be operating completely with modern, Tier 4 engines by 2035" concluding that, "while activity and fuel consumption increase, emissions are reduced, because Tier 4 engines emit fewer emissions per gallon of fuel consumed that the current locomotive fleet." Based on this, the Air Quality impact is determined to be less than significant in 2035. However, the DEIR does not explain the basis for the assumption that all passenger lines (both current and new) would be operating completely with modern, Tier 4 engines by 2035. If they are not, it stands to reason their emissions might not "trend down" by 2035 and, conversely, that significant, adverse impacts to Air Quality might instead result.

36-5

Request: Since reductions in emissions are based on an assumption that all rail lines will be operating with completely modern, Tier 4 engines by 2035, additional analyses should be conducted to assess Air Quality impacts if that assumption is not met and that a certain percentage of passenger rail lines are not operating with modern, Tier 4 engines.

5. BIOLOGICAL RESOURCES (Section 4.4)

In addition to the comments noted under the Executive Summary above, page 4.4-1 of the DEIR lists several agencies that identify sensitive vegetation communities in their ordinances and guidelines. Although this list does not include Solana Beach, as noted above, the City update its LCP/LUP EHSA Mapping in 2018 and the City's General Plan Conservation and Open Space Element also identifies policies to preserve sensitive habitat. Table 4.4-6 includes Relevant General Plan Policies and Biological Resource Protection Ordinances in the San Diego Region. Solana Beach is included in this list, however, the updated ESHA Mapping for the City's LCP LUP is not included.

36-6

Given the Significant and Unavoidable Impacts After Mitigation that are identified in the DEIR for Biological Resources, the City is concerned that focusing additional

RESPONSE TO COMMENT 36-5

See response to comment Del Mar 13-29. The air quality analysis assumes that all passenger lines will be operating with Tier IV or better engines by 2025. However, both the Coaster and Amtrak Pacific Surfliner lines are operating their full fleet with Tier IV locomotives today, which is ahead of the schedule assumed in the Draft EIR. Both Coaster and Amtrak have retired the older diesel locomotives that were assumed under the EIR's baseline conditions. Moreover, any new locomotive purchases will be Tier IV or better, in compliance with federal locomotive standards (40 CFR 1033). Also, mitigation measure AQ-2b ensures that all new train purchases shall be zero emission after 2035. The suggested additional analysis and mitigation measure are therefore not required.

RESPONSE TO COMMENT 36-6

The reference to the City's ESHA Mapping has been added to Table 4.4-6 in the Final EIR. Please also see response to comment Solana Beach 36-2. At the time of implementation of the elements of the Solana Beach Mobility Hub, project-specific biological field surveys and analysis will be conducted as applicable to address impact avoidance and protection of sensitive biological resources, including sensitive habitat.

jobs, housing and densification in the City's proposed Coastal Mobility Hub would further impact the 2,192.11 total acres of sensitive habitat and vegetation communities in Solana Beach, that the Proposed Plan and the DEIR are intended to protect.

36-6 cont. **Request:** The City requests that Table 4.4-6 be revised to include reference to Solana Beach's updated ESHA Mapping associated with its Certified LCP/LUP. Additionally, the Proposed Plan and DEIR should analyze and make room for the preservation and protection of sensitive habitat and coastal resources (i.e., wetlands and bluffs) that are located within the proposed Solana Beach Coastal Mobility Hub.

6. GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES (Section 4.7)

Table 4.7-3 lists Local Policies Concerning Geologic and Seismic Hazards of local jurisdictions. On page 4.7-28 of the DEIR, Solana Beach's policies are listed, however, there is no mention of the City's Certified LCP/LUP which has an extensive list of Land Use Policies regarding the City's coastal and inland bluffs, coastal erosion, shoreline protection and protection of public's health, safety and welfare against coastal hazards and erosion.

36-7 **Request:** The City requests that Table 4.7-3 be revised to include specific policies of the City's Certified LCP/LUP (Update in 2014). Land Use Policies of the LCP/LUP that should be noted are those within Chapter 4 – Hazards & Shoreline/Bluff Development including those regarding General Development (Chapter 4, Section 1), Shoreline Development (Chapter 4, Section 2), Shoreline Erosion and Protective Structures (Chapter 4, Section 3), and Beach Sand Replenishment and Retention (Chapter 4, Section 4). The Proposed Plan should be analyzed against these policies for consistency.

7. LAND USE (Section 4.11)

Page 4.11-12 of the DEIR provides an overview of the California Coastal Act and page 4.11-17 contains a very brief discussion of Local Coastal Plans (Programs). While this discussion briefly describes and summarizes the intent of the Coastal Act and general location of the Coastal Zone, it does not provide any meaningful discussion about land use priorities and policies of the Coastal Act and its relationship to the Proposed Plan, which this section of the DEIR specifically

36-8 analyzes. The entire City of Solana Beach is located within the Coastal Zone and is therefore subject to the provisions of the Coastal Act. As required under the Coastal Act, the City's Certified LCP/LUP (Amended 2014) LUP emphasizes visitor-serving and coastal dependent uses on and near the coast and throughout the City. The Proposed Plan's designation of much of our City within the Solana Beach Coastal Mobility Hub, including the entire western portion of the City closest to the coast, is expressly intended to focus more jobs, housing and densification in the City conflicts with several provisions of the Coastal Act that emphasize visitor

RESPONSE TO COMMENT 36-7

Table 4.7-3 has been updated with a discussion of policies related to geologic hazards from the Solana Beach LCP/LUP. While the Draft EIR did not individually analyze consistency with all of the local policies of all of the jurisdictions listed in Table 4.7-3, the Draft EIR states that existing federal, State, and local laws, regulations, and programs included in Section 4.7.2 would require each improvement or project to be reviewed by appropriate regulatory agencies prior to construction and would require each improvement or project to adhere to design standards described in the CBC and all standard design, grading, and construction practices to avoid or reduce impacts from geologic hazards. As such, any site-specific transportation network improvements and development projects occurring within Solana Beach would be subject to the policies identified in the City's LCP/LUP.

RESPONSE TO COMMENT 36-8

The identified sections of the Coastal Act have been added to the Regional and Local Laws, Regulations, Plans, and Policies discussion related to LCPs on Final EIR pages 4.11-12 and 4.11-13. Conflicts with land use plans, policies, or regulations are evaluated in the EIR on a program-level basis. As discussed for Impact LU-2, the forecasted development of the proposed Plan is based on the Series 14 Regional Growth Forecast SCS land use pattern, which is, in turn, based on the adopted general plans of the cities and County of San Diego and on the most recent planning assumptions, considering local general plans and other factors, as required by SB 375 (Government Code Section 65080(b)(2)(B)), including local coastal programs, which are components of local general plans. In a few cases, the SCS land use pattern may conflict with specific land use designations in general plans, but impacts of SCS implementation are already evaluated in other sections of the EIR, so these conflicts would not cause new significant impacts.

serving, coastal dependent and recreational land uses over residential use. Therefore, a more detailed analysis of the Coastal Act's requirements and, more specifically, the areas in which land use conflicts may arise, should be provided. Coastal Act provisions that should be analyzed and/or considered include but are not limited to the following:

Section 30212.5. Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Section 30213. Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30221. Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

36-8 cont.

Section 30222. The use of private lands suitable for visitor serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Section 30222.5. Oceanfront land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.

Section 30223. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Section 30255. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

36-9 Additionally, the City's Certified LCP/LUP contains Policies intended to implement the Coastal Act that should be considered that include but are not limited to the following:

RESPONSE TO COMMENT 36-9

Due to the programmatic nature of the EIR analysis, the EIR does not call out specific policies from local jurisdiction's LCPs/LUPs; thus, the specific Solana Beach LCP/LUP is not specifically called out in the analysis. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

Policy 2.31: Priority shall be given to the development of visitor serving and commercial recreational facilities designed to enhance public opportunities for coastal recreation. On land planned for visitor serving commercial and/or recreational facilities, priority shall be given to such uses over private residential or general commercial development. New visitor serving uses may not displace existing low-cost visitor serving uses unless an equivalent replacement is provided.

Policy 2.33: Coastal recreational and visitor serving uses and opportunities, especially Lower and moderate cost opportunities, shall be protected, encouraged, and where feasible, provided by both public and private means. Removal or conversion of existing lower cost opportunities, including overnight accommodations, shall be discouraged unless the use will be replaced with another use offering comparable visitor serving or recreational opportunities.

36-9 cont.

Policy 2.34: Priority shall be given to the development of visitor serving commercial and/or recreational uses that complement public recreation areas or supply recreational opportunities not currently available in public parks or beaches. Visitor serving commercial and/or recreational uses may be located near public park and recreation areas only if the scale and intensity of the visitor serving commercial recreational uses is compatible with the character of the nearby parkland and all applicable provisions of the LCP.

36-10 As noted above, both the Coastal Act and the City's LCP/CUP Policies prioritize visitor serving commercial and/or recreational land uses over residential use. The Proposed Plan's explicit focus on and prioritization of housing densification within the Solana Beach Coastal Mobility Hub clearly conflicts with these provisions of the Coastal Act and our Certified LCP/LUP. In a City like Solana Beach, a built-out city of only 3.4 square miles that is entirely located within the Coastal Zone, the ability to comply both with the Coastal Act and the Proposed Plan's objective to focus housing and jobs in the proposed Solana Beach Coastal Mobility Hub is and will continue to be a challenge. The DEIR should consider and/or analyze these conflicting objectives.

36-11 Table 4.11-5 of the DEIR lists the adoption and updates to the General Plans and Housing Elements of jurisdictions in the County. For Solana Beach, however, this table indicates that our Housing Element is "being updated as of December 2020." Our City Council approved our 6th Cycle Housing Element on April 14, 2021, and submitted it to the Department of Housing and Community Development (HCD) immediately thereafter. In response to comments from HCD, the City is preparing revisions to our Housing Element for approval by our City Council before the end of 2021.

RESPONSE TO COMMENT 36-10

Solana Beach is a major destination due to its commercial and recreational resources for visitors from both outside and within San Diego County. These trip-inducing factors contribute to the area's high propensity for Regional Mobility Hub designation.

Not all Mobility Hub areas are created equal, and they do not all require construction of a major transit center. Coastal Mobility Hubs in the North County area are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the Final EIR can be tailored to meet the needs of people traveling to and within Solana Beach. SANDAG staff will continue to coordinate with Solana Beach on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community.

RESPONSE TO COMMENT 36-11

The text in Table 4.11-5 has been updated to reference the current Housing Element status, as provided in this letter.

36-12

Request: Section 4.11 of the DEIR should include a more detailed description and analysis of provisions of the Coastal Act and local LCP Policies that conflict with the Proposed Plan's stated objective that jobs, housing and densification should be focused in designated Coastal Mobility Hubs. Where conflicts exist, the Proposed Plan should state that provisions of the Coastal Act should prevail.

Please update Table 4.11-5 of the DEIR regarding the status of the City's Housing Element.

8. 4.13 NOISE AND VIBRATION

The DEIR discusses noise and vibration associated with Phased Transit Leap improvements, which includes double-tracking at certain locations on the LOSSAN rail corridor along with increases in COASTER frequencies. The DEIR states that land uses considered to be sensitive to human annoyance caused by vibration are generally the same as those that would be sensitive to noise.

The City appreciates the analysis of noise and vibration resulting from improvements associated with regional growth and land use changes and transportation network improvements as well as the mitigation measures proposed to address these impacts. Despite this analysis and proposed mitigation, Significant and Unavoidable Impacts After Mitigation are identified in 2025, 2035 and 2050 for noise and vibration impacts (NOI-1 and NOI-2).

36-13

The DEIR discusses and analyzes the Generation of Excessive Groundborne Vibration or Groundbourne Noise Levels and similarly determines that improvements associated with regional growth and land use changes and transportation network improvements could generate an increase in gourndbourne noise and vibrations. These impacts are also determined to be Significant and Unavoidable After Mitigation in 2025, 2035 and 2050 and could result both from construction activity and from ongoing operation of the transportation network under the Proposed Plan.

Absent from the analysis, however, is any discussion regarding the potential vibrational impacts to coastal bluffs, inland bluffs and other sensitive landforms through which the newly double-tracked LOSSAN rail corridor and the anticipated increased COASTER services do and will run. Similarly, when combined with the transportation network impacts, new construction activity anticipated within the City's Coastal Mobility Hub could create more severe groundborne vibration impacts to natural landforms and/or to existing development. The City of Solana Beach is characterized by extensive coastal and inland bluffs that are within close proximity to the LOSSAN corridor. The City routinely experiences coastal erosion and bluff failures that create a public safety hazard. Additionally, most of the City is designated within the proposed Solana Beach Mobility Hub which is intended to be the focus of additional jobs, housing and densification under the Proposed Plan. While mitigation measures are proposed to address these impacts, Section 4.13

RESPONSE TO COMMENT 36-12

Requested revisions have been made to Table 4.11-5 in Section 4.11, *Land Use*, of the Final EIR. In addition, due to the programmatic nature of the EIR analysis, the EIR does not call out specific policies from local jurisdiction's LCP/LUPs; thus, these specific Solana Beach LCP/LUP items are not specifically called out in the analysis. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including Mobility Hubs, would be subject to project-specific environmental review and would include project-specific consistency analyses with applicable CCA and LCP policies. Project-design adjustments and mitigation measures would be identified to reduce impacts related to potential conflicts with applicable policies at that time.

RESPONSE TO COMMENT 36-13

Impacts from vibration associated with projects that would occur under the proposed Plan are described under Impact NOI-2 in Section 4.13, *Noise and Vibration*. The discussion is generic and outlines some of the projects that would occur during the time horizons referenced in the document. This analysis is not meant to clear projects that would require project-level analysis and does not include an exhaustive list of projects as the document is a program-level EIR. The analysis requested by the commenter for the referenced project would be included in the project-level environmental document. Language has been added to Section 4.13 to discuss generally the impacts of vibration-related impacts to coastal and inland bluffs.

and Section 7.2.8 of the DEIR should include discussion and analysis of specific impacts to coastal bluffs, inland bluffs and to the existing development within these areas.

36-13 cont.

Request: The DEIR should include discussion and analysis of the potential impact of groundborne vibrations to coastal bluffs, inland bluffs and existing development from the construction and operation of the proposed transportation network and regional growth and new development contemplated and/or proposed under the Proposed Plan.

9. POPULATION AND HOUSING (Section 4.14)

Section 4.14.2 of the DEIR, Regulatory Setting, discusses federal, state, regional and local laws, regulations, plans and policies associated with the Proposed Plan and the DEIR. However, this section of the DEIR appears only to discuss a narrow set of regulations that directly relate to the Proposed Plan and DEIR. The list of regulations does not appear to be exhaustive. On an annual basis, the State Legislature passes, and the Governor signs a number of bills that apply directly to local jurisdictions. Increasingly, these bills are focusing on increasing housing throughout every city in the state and, in many cases, incentivize high density housing, streamlined permit processing, no parking and additional CEQA exemptions for such housing, particularly when located within close proximity to major transit stops or high quality transit corridors. Despite this, the DEIR does not include a meaningful discussion state housing legislation and, more specifically, how it may further impact development along the proposed transportation network and/or within the Mobility Hub Network.

36-14

Section 4.11 of the DEIR discussed local General Plans and Community Plans and states that infill development of new housing and employment land uses within established communities would typically occur in accordance with adopted general plans, community plans and or zoning ordinances. Additionally, on page 4.1-18 of Section 4.1, the DEIR states that "…all development or redevelopment projects would undergo further environmental and design review on a project-by-project basis to ensure that substantial adverse effects on scenic vistas are identified and avoided or reduced to the extent feasible." However, housing legislation proposed over the past several years has continuously sought to provide for ministerial or "by-right" housing which effectively eliminates the ability for local jurisdictions to review or condition such housing development. This year, Senate Bill (SB) 9 was signed by Governor Newsom which provides for the ministerial approval of housing development on single-family zoned property and also allows for the ministerial approval of a lot split of such parcels to provide additional housing. Not only does this eliminate the discretion of a city to review such projects to protect against adverse visual and aesthetic impacts, but it also sets the stage for future legislation to do the same. Additionally, by definition, a ministerial permit process does not require CEQA review. Therefore, the comment for the DEIR is not accurate as projects may be approved without project-by-project review. As noted above, other

36-15

RESPONSE TO COMMENT 36-14

The Regulatory Setting in Section 4.14, *Population and Housing*, discusses federal, State, regional, and local laws, regulations, plans, and policies pertaining to and relevant to the proposed Plan. While it is correct to say that housing legislation in recent years has sought to provide for ministerial housing, which may mean that future CEQA analysis would not occur on each and every specific development project, each jurisdiction has a local entitlement process to follow and specific ordinances, including design measures, that projects would be required to adhere to. Therefore, even for projects that are exempt from CEQA, review at a local level for compliance with the local jurisdiction's entitlement process and specific local ordinances, including design measures, would still occur. As such, future development occurring as part of the implementation of the proposed Plan would be evaluated at a local level on a project-by-project basis, whether the evaluation occurs as part of the CEQA process or as part of the local entitlement process.

RESPONSE TO COMMENT 36-15

While it is correct to say that housing legislation in recent years has sought to provide for ministerial housing, which may mean that future CEQA analysis would not occur on each and every specific development project, each jurisdiction has a local entitlement process to follow and specific ordinances, including design measures, that projects would be required to adhere to. Therefore, even for projects that are exempt from CEQA, review at a local level for compliance with local jurisdiction's entitlement process and specific local ordinances, including design measures, would still occur. As such, aesthetic impacts would be evaluated at a local level on a project-by-project basis, whether the evaluation occurs as part of the CEQA process or as part of the local entitlement process. The EIR does not dismiss aesthetic impacts but acknowledges that impacts would occur on a local level and would be evaluated at a local level on a project-by-project basis.

36-15 cont. recently adopted state housing legislation provides for streamlined review of projects located near major transit stops or high quality transit corridors. The DEIR should consider and evaluate additional state housing legislation for its potential impact on land use, population and housing and visual quality.

36-16 **Request 1:** The DEIR should expand its discussion of state legislation to include recently adopted housing legislation including those that incentivize housing development, housing density, streamlined permit review and/or CEQA exemptions.

Request 2: The City requests that the underlying source documents be provided for the population and job growth projections used in the DEIR. The numbers used in the DEIR appear to be inconsistent with numbers and projections used by SANDAG previously including during the RHNA process.

10. TRANSPORTATION (Section 4.16)

36-17 On page 14.16-13 of the DEIR, Pedestrian Facilities are discussed. The DEIR states that walking is a part of an active transportation network and identifies pedestrian facilities to primarily include sidewalks and crosswalks associated with arterials and roadways, as well as bridges and other connections across highways and rail facilities. The Active Transportation is an important element of the Regional Plan and is discussed in many sections throughout the DEIR. Compared to other modes of transportation as identified and discussed in the DEIR, Pedestrian Facilities, arguably, is the most impactful and important mode of transportation and yet, less than one page of the Transportation section is dedicated to Pedestrian Facilities. In that short section, the DEIR places the Safe Routes to School Program as the main strategy to address the Pedestrian mode of the Proposed Plan. While the Safe Routes to School Program needs to be discussed, the Pedestrian Facilities Section should be expanded with additional discussion and analysis.

36-18 **Request 1:** The DEIR should add stand-alone pedestrian bridges and pedestrian under-crossings into the Pedestrian Facilities category and include the required discussion for potential impacts and required mitigation measures for such facilities. The DEIR should identify the need for and incorporate Pedestrian Facilities into major corridor and transportation improvements where other modes of transportation have created barriers or made the pedestrian mode of travel less desirable or safe as compared to other modes of transportation.

Request 2: Additionally, the Lomas Santa Fe corridor is identified as a major transportation element which is divided into two segments by the I-5 freeway. The Pedestrian Facility in the east/west direction at the I-5 Interchange is inadequate to a point that the City, in collaboration with the Solana Beach School District, has placed crossing guards to assist pedestrians, often young school children, in crossing the interchange. This is particularly important at the northbound on-ramp

RESPONSE TO COMMENT 36-16

Regarding Request 1, please see responses to comments Solana Beach 36-14 and 36-15. Regarding Request 2, the proposed Plan's Appendix F, Series 14 Regional Growth Forecast and SCS Land Use Pattern, details the development of the population and job growth projections that are reflected in the Draft EIR. The Series 14 Regional Growth Forecast aligns with the regional population projection from the California Department of Finance (DOF) released in January 2020. The California Department of Housing and Community Development issued the San Diego region's Regional Housing Needs Assessment Determination on July 5, 2018, and used an earlier version of the DOF population projection.

RESPONSE TO COMMENT 36-17

n general, pedestrian facilities are more focused in localized areas and are not planned at the regional level. Due to its regional focus, the proposed Plan need not provide substantial detail on the pedestrian facilities that currently exist within the region or locally planned improvements to pedestrian networks under future year conditions. Additionally, the proposed Plan does not include any specific pedestrian-related infrastructure; instead, the proposed Plan includes grant funding opportunities for local jurisdictions to plan, design, and construct pedestrian improvements at the local level (see Table A.14 and A.17 of the proposed Plan). Therefore, because the pedestrian infrastructure funded by the proposed Plan will generally be planned, designed, and implemented by local jurisdictions, it has not been identified at this time and could not be summarized or included within the Draft EIR. Finally, it should be noted that subsequent, project-level, CEQA review will be required for the pedestrian infrastructure funded by the proposed Plan prior to such infrastructure's implementation.

Please also note that an analysis of how the implementation of the proposed Plan will affect pedestrian travel within the region was conducted under Impact TRA-1. A summary of the pedestrian analysis result, including trip generation, average trip length, and mode split is provided for each Horizon Year in Tables 4.16-8 (Year 2025), 4.16-12 (Year 2035), and 4.16-16 (Year 2050).

RESPONSE TO COMMENT 36-18

As an initial matter, Request 1 relates to the contents of the proposed Plan, not the adequacy of the analysis within the DEIR. The proposed

Plan aims to create safe and well-connected routes for pedestrians and bicyclists. The intention of the network in the Plan is a framework that facilitates trips associated with regional purposes designed to enhance neighborhood connections to schools, employment centers, and other everyday destinations. At the regional scale, the regional transportation network does not include details regarding the types of bicycle and pedestrian facilities to be included within specific corridor projects, and the analysis of those projects will require future planning and coordination with local jurisdictions, community members, and other stakeholders to determine such details, all of which would be conducted at the project level.

In addition to specific projects and corridors, the Plan includes funding for "Complete Streets in Mobility Hubs," which will include active transportation improvements on local streets within the hubs that will facilitate these kinds of connections. The intention is to make trips less than 3 miles more attractive for walking and biking. Local jurisdictions also have access to Safe Routes to Schools programs and funding, which can assist with infrastructure, outreach, and other elements. Appendix A of the proposed Plan includes *Mobility Hubs* and *Policies and Programs* sections that describe investments that would benefit school sites and school access. Within the *Mobility Hub* investments, programs aim to make streets safer for people who walk and bike by investing in traffic calming and pedestrian improvements. Under *Policies and Programs* the proposed Plan includes Vision Zero programming that prioritizes safety through roadway design while working with cities to develop community engagement programs that identify local street safety issues and provide technical guidance to resolve those issues through investment, policies, and programs.

Request 2 states that the Draft EIR should incorporate a mitigation measure to improve pedestrian access along Lomas Santa Fe at the I-5 interchange. The issues described at the east/west direction at the I-5 Interchange, however, describe an existing condition, not an impact of the proposed Plan. This comment is therefore directed towards the content of the proposed Plan, not the adequacy of the EIR's mitigation measure for the significant impacts *caused* by the proposed Plan. The comment will be considered by the SANDAG Board of Directors when it considers adoption of the proposed Plan

36-18 cont. location where pedestrian crossing is uncontrolled. The City requests that the DEIR incorporate a mitigation measure that improves pedestrian access along Lomas Santa Fe at the I-5 interchange.

11. WATER SUPPLY (Section 4.18)

36-19 The DEIR concentrates its discussion and analysis on the San Diego County Water Authority (SDCWA). While it generally discusses SDCWA member agencies, there is little discussion about adequate water supply at the local level within each jurisdictions' respective water district(s). Given the ongoing and worsening drought and severely low water levels in the state's reservoirs as well as at Lake Mead and Lake Powell, additional analysis should be conducted on local water districts and water supply, particularly those that serve the Proposed Plan's Mobility Hub Network.

Request: The DEIR should include more detailed analysis of SDCWA Member Agencies' local water supplies, particularly those serving areas located within the Proposed Plans' Mobility Hub Network.

12. WILDFIRE (Section 4.19)

On page 4.19-18, the DEIR states that the western portion of the [San Diego] region is also at high risk for fire hazards as it contains hundreds of miles of WUI (Wildland Urban Interface) due to the multitude of canyons throughout the area. Solana Beach is no exception as our entire northern boundary fronts the San Elijo Lagoon, with the southeastern boundary adjacent to several finger canyons emanating from the San Dieguito Lagoon across Via de la Valle. Consequently, an extensive are of the northern portion of Solana Beach is within a Very High Fire Hazard Severity Zone (VHFSZ Map). Thought not easily discernible in Figures 4.19-3 and 4.19-4 of the DEIR, much of this area overlaps with the Proposed Plan's Solana Beach Mobility Hub.

36-20 Again, the DEIR determined that there will be Significant and Unavoidable Impacts After Mitigation for all three significance criterion (WF-1, WF-2 and WF-3) in 2025, 2035 and 2050. These impacts are associated both to the risks of wildfire itself and to the exposure of pollutant concentrations of wildfire smoke. Page 4.19-18 of the DEIR also notes that insufficient water supply, which is discussed in Section 4.18 and which also experiences Significant and Unavoidable Impacts After Mitigation, "may also contribute to an increased risk of wildland fire hazard."

Request: Given that the City's existing VHFSZ areas overlap with the Solana Beach Mobility Hub, the DEIR should assess and/or analyze whether including such areas within a designated Mobility Hub increases the risks to the public.

RESPONSE TO COMMENT 36-19

The Draft EIR analyzes at a program level the effects of the planned transportation network, and the resulting patterns of land use and development, on a regional basis. The analysis incorporates the population growth projected for the County's cities and unincorporated areas projected by SANDAG Series 14 statistics. The water supply analysis examines the adequacy of the region's future water supply assuming future projected population levels. The availability of future water supplies to meet this future demand is assessed using the legally mandated UWMPs prepared by the agencies supplying water to the region, the SDCWA and the MWD. For the SDCWA service area, the EIR does not analyze the water supply of particular geographic areas or jurisdictions; instead, it analyzes the adequacy of supply on a regional basis. It should be noted, however, that the water planning of the SDCWA's 24 member agencies is incorporated into the SDCWA UWMP. This planning includes both supply and demand.

The proposed Plan designates areas that, due to planned investment in transportation infrastructure and a potential for increased employment and residences, are potential Mobility Hubs. As described in the Chapter 2 of the EIR, Mobility Hubs are proposed for communities with a high concentration of people, destinations, and travel choices where densification is envisioned in the SCS, *subject to approval of local jurisdictions*. In order for a Mobility Hub to become a reality a very large number of plans and projects would need to be proposed over many years. These plans and projects would be subject to local discretionary review, including review pursuant to CEQA. As part of this plan and project-level review, the adequacy of local water supplies, storage capacity, and conveyance infrastructure would be evaluated. The results of these analyses would determine what water infrastructure investments would be necessary in order for a Mobility Hub to meet its ultimate growth potential in terms of jobs and residences, or if less intensive future development is warranted as a result of limited water supplies or inadequate infrastructure.

RESPONSE TO COMMENT 36-20

The EIR concludes that transportation network improvements and programs associated with the proposed Plan would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildland. Revisions have

been made to Section 4.19, *Wildfire*, regarding the 2025 (Final EIR page 4.19-21), 2035 (Final EIR page 4.19-24), and 2050 (Final EIR page 4.19-25) as follows:

> Risks would be exacerbated in areas where designated Mobility Hubs, characterized by a higher density of jobs and residences, would develop within and adjacent to VHFSZs.

Also, please see response to comment Solano Beach 36-19 regarding project-specific review of projects implementing Mobility Hubs; such reviews would consider and mitigate wildfire impacts.

Once again, the City of Solana Beach greatly appreciates the opportunity to review and comment on the DEIR. We look forward to coordinating with you further on this and appreciate SANDAG's consideration of the City's comments as noted above.

36-21

If you have any questions or comments, please feel free to contact Community Development Director Joseph Lim at jlim@cosb.org or 858-720-2434 or me at gwade@cosb.org or 858-720-2444.

Sincerely,

Gregory Wade
City Manager

Attachment 1: Draft 2021 Regional Plan Letter dated August 5, 2021

C: Lesa Heebner, City of Solana Beach Mayor and SANDAG Board Member
David Zito, City of Solana Beach Council Member and SANDAG Board Alternate
Joseph Lim, City of Solan Beach Community Development Director

RESPONSE TO COMMENT 36-21

Thank you for your comments on behalf of the City of Solana Beach. SANDAG appreciates Solana Beach's input on the EIR and the proposed Plan.

Attachment 1

CITY OF SOLANA BEACH www.cityofsolanabeach.org
635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075 • (858) 720-2400 • Fax (858) 720-2455

August 5, 2021

Attn: 2021 Regional Plan
SANDAG
401 B Street, Suite 800
San Diego CA, 92101

Via Email: SDForward@sandag.org

SUBJECT: DRAFT 2021 REGIONAL PLAN

The City of Solana Beach appreciates the opportunity to review and comment on the San Diego Association of Governments (SANDAG) Draft 2021 Regional Plan (Draft Plan). It is clear that much time and effort went into this important document. Submitted for your consideration are the following comments:

- **Mobility Hubs** – Page 19 of Chapter 2 of the Draft Plan, the Sustainable Communities Strategy (SCS), describes planned "Mobility Hubs" as areas or communities in the region with "a high concentration of people, destinations, and travel choices" that "offer on-demand travel options and supporting infrastructure that enhance connections to high-quality Transit Leap services." While the SCS seems to acknowledge that these Mobility Hubs can vary both in size and transit availability and can "span one, two or a few miles based on community characteristics," the SCS and the Draft Plan do not separately categorize or discuss these Mobility Hubs based on these unique characteristics despite having done so previously as well as in Appendix T (Network Development and Performance). Pages 15 through 18 of Appendix T of the Draft Plan – Network Development and Performance – contains a Propensity Analysis for both Transit Leap Services and Mobility Hubs. These analyses identified which transit routes were most likely to meet the needs of transit riders now and in the future and which communities were most suitable for Mobility Hubs. While it should be noted that Solana Beach ranked at the lower end of both (see Figures 12 and 14), these analyses resulted in the apparent establishment of five (5) distinctive types of Mobility Hubs – Coastal, Gateway, Major Employment Center, Suburban and Urban Core – with Solana Beach identified in Figure 15 as a Coastal Mobility Hub. However, the SCS contains no meaningful discussion of these distinctive and unique Mobility Hub areas referring to them only in Figure 2.5 of the SCS where projected future growth is illustrated. The dramatic difference in projected future growth for each of these distinct Mobility Hub Areas, with Coastal Mobility Hubs well below the other four Mobility Hub Areas in both the percentage of future housing and future jobs (5% and 2%, respectively), clearly demonstrates their

36-22

RESPONSE TO COMMENT 36-22

Thank you for providing the City of Solana Beach's letter providing comments on the proposed Plan. Responses to these comments can be found beginning from ID L142 in Appendix P.2.

uniqueness with respect to jobs, housing and access to high-quality transit and the extent to which each area should be relied upon (or not) to satisfy the region's future growth.

The adopted 2021 Regional Transportation Plan (Adopted Plan) and the SCS should contain a detailed discussion of the five (5) Mobility Hub Areas and a description of the unique characteristics and transit needs for each – both now and in the future.

Additionally, by virtue of the fact that the Solana Beach Train Station is within 2 ½ miles of the cities of Del Mar, Encinitas and San Diego and the County of San Diego, this regional Coastal Mobility Hub Area in the Adopted Plan should, for purposes of planning for future housing and job growth, extend into and cover the City of Del Mar and the Del Mar Fairgrounds and areas of the cites of Encinitas and San Diego and the County of San Diego immediately adjacent to Solana Beach.

36-22 cont.

- **Transit Leap Services** – As noted above, the Propensity Analysis discussed in Appendix T for both Transit Leap Services and Mobility Hubs determined that Solana Beach and its Train Station were at the lower end in the region both in meeting the needs of transit riders now and in the future and for suitability as a Mobility Hub. While the City acknowledges that the presence of the Train Station in Solana Beach might make it reasonable to include as a potential future Mobility Hub in the Adopted Plan, during the recent Regional Housing Needs Assessment (RHNA) allocation process, the City also made it clear that, both now and in the near term, the Train Station does not currently provide adequate Coaster or Amtrak headways, nor does it provide meaningful connections to other transit services to be considered a Mobility Hub now. Indeed, despite the North County Transit District (NCTD) Board recently voting to increase Coaster service beginning in October 2021, such a designation is still largely aspirational. While, again, the City acknowledges that the Draft Plan and the Adopted Plan are just that – a plan for the future – Appendix A of the Draft Plan – Transportation Projects, Programs, and Phasing – appears to support this position. Table A.5 (Interstate 5 North Coastal Corridor) identifies one Transit Leap project (TL40) – *Rapid 473* – for implementation in the year 2035. Similarly, Table A.9 (State Route 56) identifies one Transit Leap project (TL026) – *Rapid 103* – for implementation in the year 2050. These 15 to 30-year forward-looking Transit Leap projects, while helpful for the future, do not appear to satisfy the near-term objectives of a Coastal Mobility Hub.

  In order to justify the designation of the Solana Beach Train Station as a Coastal Mobility Hub, both now an in the future, more immediate Transit Leap service connections should be considered for inclusion in the Adopted Plan.

Appendix B: Implementation Actions – Appendix B provides detail on commitments and key actions to implement elements and strategies of the Draft Plan. Key to this objective is the involvement of and coordination with each member agency as they are most knowledgeable of the needs of their respective communities. Indeed, Near-term Implementation Action No. 2 in Table B.1 identifies the need to partner with local governments to develop five initial Comprehensive Multimodal Corridor Plans (CMCPs). Therefore, the City requests that the following minor edits to Appendix B (page 16) under "Land Use and Regional Growth" be included:

"The 2021 Regional Plan vision for land use focuses on development and growth in ~~Mobility Hub areas~~ urbanized areas near jobs to preserve San Diego's open space and support transportation investments by reducing vehicle miles traveled (VMT). Mobility Hubs are ~~the~~ an opportunity to provide housing to address the Regional Housing Needs Assessment. Land use authority is reserved to local jurisdictions because they are best positioned to effectively implement the objectives outlined in the 2021 Regional Plan through understanding of the unique needs of their communities and geographies. Because land use authority is reserved to local jurisdictions, SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grants to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs to realize ~~this~~ their vision for their communities. SANDAG will continue its existing grant programs, partner with member agencies on state funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan."

36-22 cont.

- **Regional Housing Needs Assessment** – Following adoption of the Draft RHNA allocation by the SANDAG Board in September 2020, appeals of the allocation were filed by the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach. In order that these appeals are correctly noted for the record, there are two locations in the Draft Plan to which a clarifying footnote and additional language should be added to the Adopted Plan. Specifically, the City requests the following for the Adopted Plan:

    - On page 33 of the Draft Plan, after the sentence: "The SANDAG Board of Directors adopted the RHNA Plan on July 10, 2020, with the final housing unit allocation" the following footnote should be added:

      ** In September 2020, the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach filed a Petition for Writ of Mandate in San Diego Superior Court challenging, among other things, the Board's adoption of the RHNA Plan. SANDAG demurred to the cities' Petition and the demurrer was sustained by the court in February 2021. The petitioning cities have*

appealed the ruling on the demurrer to their Writ Petition, and that appeal remains pending in the Fourth District Court of Appeal.

- On page 14 of Appendix K (Regional Housing Needs Assessment Plan), the following paragraph should be added to the end of this page/section:

On September 24, 2020, the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach filed a Petition for Writ of Mandate in San Diego Superior Court, Case No. 37-2020-00033974-CU-MC-CTL, against SANDAG and SANDAG's Board of Directors seeking an order requiring that SANDAG give those cities a fair hearing on their RHNA appeals and decide the cities' appeals in a legal manner without bias and without the use of the weighted voting mechanism. Specifically, the petitioning cities asked the court to order: (1) that the final RHNA allocation approval by SANDAG be rescinded; (2) that SANDAG's denial of the cities' RHNA appeals be rescinded; (3) that the appeals be remanded to SANDAG for fair consideration; and (4) that SANDAG be prohibited from utilizing a weighted vote on the cities' RHNA appeals. On February 5, 2021, SANDAG's demurrer to the Petition for Writ of Mandate was sustained by the Superior Court. The petitioning cities have appealed the ruling on the demurrer to their Writ Petition. That appeal remains pending in the Fourth District Court of Appeal. So long as the litigation is pending, the Board's adoption of the RHNA Plan cannot be considered final.

36-22 cont.

Once again, the City of Solana Beach greatly appreciates the opportunity to review and comment on the Draft Plan. We also apricate SANDAG's consideration of our comments and requested changes for inclusion in the Adopted Plan as noted above.

If you have any questions or comments, please feel free to contact Community Development Director Joseph Lim at jlim@cosb.org or 858-720-2434 or me at gwade@cosb.org or 858-720-2444.

Sincerely,

Gregory Wade
City Manager

C: Lesa Heebner, City of Solana Beach Mayor and SANDAG Board Member
David Zito, City of Solana Beach Council Member and SANDAG Board Alternate
Joseph Lim, City of Solan Beach Community Development Director

COMMENT LETTER 37: SOUTHWEST WETLANDS INTERPRETIVE ASSOCIATION

Comment Letter 37

From: Bill Tippets <billtippets@gmail.com>
Sent: Monday, October 11, 2021 1:13 PM
To: Kirsten Uchitel; Mike McCoy
Cc: Robert Miller; Yvonne Oden; Gary Brown; Mayda Winter
Subject: Comments on the RTP/SCS (San Diego Forward: The Regional Plan) Draft EIR

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Ms. Uchitel:

37-1 I am submitting these comments on behalf of the Board of the Southwest Wetlands Interpretive Association (SWIA), which has advocated for and worked to conserve native habitats in San Diego and southern California for over four decades. We appreciate the efforts by SANDAG to present a new approach and set of concrete elements to make our region less autocentric, reduce associated GHG emissions, improve social/environmental justice and reduce impacts to natural lands. The significance of potential impacts from the proposed Plan, and reasonable ways to improve it to reduce impacts, suggests that a new alternative plan is desirable and feasible. Our letter proposes the framework for that alternaitive.

Regards,

Bill Tipperts (Board Member, SWIA)

1

RESPONSE TO COMMENT 37-1

Thank you for your comment on behalf of the Southwest Wetlands Interpretive Association (SWIA). SANDAG appreciates SWIA's proposal regarding a framework for a new alternative. Please refer to response to comment SWIA 37-11 for further elaboration regarding this comment.



SWIA

Southwest Wetlands Interpretive Association
700 Seacoast Drive, Suite 108
Imperial Beach, CA 91932

11 October 2021

Kirsten Uchitel, Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

(submitted 11 October 2021 via email to Kirsten.Uchitel@sandag.org)

Subject: Draft EIR for San Diego Forward: The 2021 Regional Plan (RTP/SCS)

Dear Ms. Kristen Uchitel:

The Southwest Wetlands Interpretive Association (SWIA) is a non-profit organization dedicated to helping preserve and enhance wetlands throughout southern California – and also to supporting land uses and planning to conserve upland habitats and species. SWIA provides the following comments on the Draft EIR for SANDAGs RTP/SCS. After decades of incremental changes to our transportation system and associated land use/development, the RTP/SCS Plan presents important elements for a blueprint to transform how our region accommodates projected growth in our region's population, housing, and jobs. 37-2

Given the length (2330 pages) and complexity of the EIR/Appendices, we are limiting our comments and recommendations for changes to reduce impacts to several components: (1) changes to the proposed transportation infrastructure; (2) need for additional funding (regional habitat conservation fund) to address impacts to habitats and species; (3) a new alternative is necessary to address/reduce significant deficiencies in the Plan and impacts from its implementation.

General Comments

SANDAGs proposed Plan (the RTP/SCS) attempts to strike a balance between what is optimal and what is achievable, having to contend with the historical failures of previous plans to address the region's transportation needs and allied concerns. As stated in the EIR (Page ES-1): "The proposed Plan includes a blueprint for a regional transportation system, serving 37-3

RESPONSE TO COMMENT 37-2

SANDAG appreciates SWIA's overall support for the Plan. Please refer to the responses to comments below for further discussion.

RESPONSE TO COMMENT 37-3

Regarding significant and unavoidable impacts, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. Many Draft EIR mitigation measures for second-tier projects, recognizing that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, state that such agencies "can and should" implement the measures. See Master Response 2 for further discussion of these mitigation measures.

SANDAG can commit to feasible mitigation measures that are within its responsibility and jurisdiction. However, SANDAG will not be the lead agency for many of the second-tier projects that implement the proposed Plan. In those instances, SANDAG in its CEQA findings may find that those measures are within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency (Guidelines Section 15091(a)(2)).

The Draft EIR also recognizes that due to project- or site-specific circumstances, it may not be feasible for individual lead agencies to implement all of the "can and should" mitigation measures listed for a particular significant impact. Implementing agencies are required by CEQA to exercise discretion in selecting and imposing mitigation measures based on all relevant feasibility concerns, including costs and available funding, enforcement mechanisms, effectiveness as applied to the specific project in question, and collateral environmental or other effects that may result from implementation of the mitigation measure. How these factors may affect individual mitigation decisions for the many individual projects anticipated in the proposed Plan cannot be realistically assessed in a program EIR for the entire Plan.

As such, the EIR takes a conservative approach when making significant and unavoidable impact determinations. Further elaboration regarding specific comments is provided below.

existing and projected residents and workers within the San Diego region (Figure 2-1) that further enhances quality of life and offers more mobility options for people and goods. The proposed Plan looks ahead to 2050, and accommodates more than 430,000 new residents, approximately 440,000 new jobs, and over 280,000 new housing units. The underlying purpose of the proposed Plan, in summary, is to develop a Regional Plan that addresses the many regional transportation challenges that are deeply connected to larger societal issues that impact everyone's quality of life, including economic and social inequities, climate change, public health, and safety."

37-3 cont.

We concur with the purpose and many components of the proposed Plan but it also contains deficiencies and would result in many Significant and Unavoidable Impacts (summarized on Pages 7-12 to 23). In light of those findings and our identified concerns, we provide the following specific comments.

Specific Comments

As the EIR describes, the proposed Plan would not put the region on the trajectory to reduce total VMT -and associated GHGs - to meet the state's long-term GHG reduction targets. While the Plan is a welcome break from former "freeway/roadway-centric" RTPs, it does not ensure the necessary land use changes nor the shift to a functional transit/active transportation system that is needed to rapidly reduce our reliance on vehicular use and put the region on a GHG emissions reduction trajectory that aligns more closely with State targets.

37-4

Transportation: The EIR frames a fundamental purpose of the RTP/SCS (Page ES-2) as: "Under Senate Bill (SB) 375, the regional transportation plan must include an SCS consisting of land use, housing, and transportation strategies that, if implemented, would allow the region to meet its regional targets for greenhouse gas (GHG) emissions reductions from passenger vehicle use established by the California Air Resources Board (CARB)." GHG emission reductions. Rather than framing that statement as "..if implemented…), we believe the GHG emissions reductions are a strict requirement and that the final Plan and its EIR certification must acknowledge that requirement. The sentence should be rewritten as: "Under Senate Bill (SB) 375, the regional transportation plan must include an SCS consisting of land use, housing, and transportation strategies that~~, if~~ **will be** implemented~~, would allow~~ **to ensure** the region ~~to~~ meets its regional targets for greenhouse gas (GHG) emissions reductions from passenger vehicle use established by the California Air Resources Board (CARB)."

37-5

The 5 Big Moves (Pages 2-38, et seq.) describe the proposed transportation system and sequencing for its major components. Notably, the Plan relies on the addition of managed

RESPONSE TO COMMENT 37-4

As an initial matter, this comment relates to the content of the proposed Plan, not the DRAFT EIR. The proposed Plan significantly reduces per capita VMT; however, total VMT increases through the life of the proposed Plan. VMT growth is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the proposed transportation network improvements and programs in the proposed Plan would help to reduce VMT growth. That said, the increase in VMT, from baseline Year 2016 conditions, was identified as a significant impact under Threshold TRA-2 in the EIR.

The proposed Plan exceeds the SB 375 target of 19 percent reductions of GHG by 2035 and the Board Resolution for a 30 percent reduction of GHG emissions from all on-road transportation by 2035. However, the proposed Plan's GHG emissions would be inconsistent with the State's ability to achieve the goals of EO B-55-18 and EO S-3-05. As discussed in additional detail in Section 4.8.4 in the EIR, mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan's GHG emissions with the State's ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, full implementation of the changes required to achieve these goals is beyond SANDAG's and local agencies' current jurisdiction and authority. As such, they were identified as significant and unavoidable.

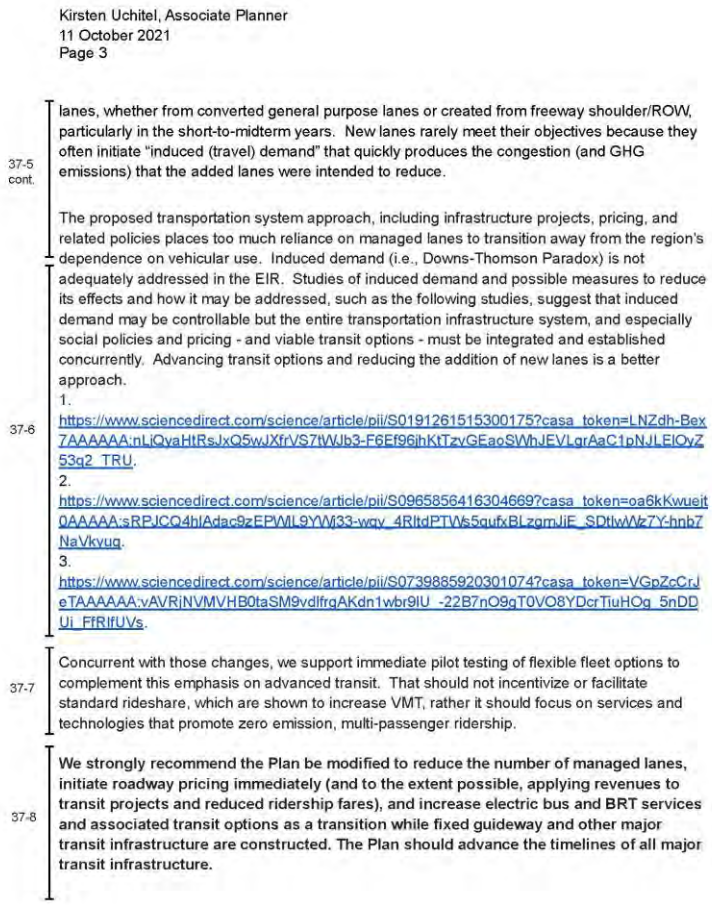
While the proposed Plan results in significant impacts related to VMT and GHG, anticipated reductions in per capita VMT and GHG, along with proposed mitigation measures, would reduce inconsistency of the proposed Plan with the State's ability to achieve VMT and GHG goals, and puts SANDAG on a trajectory that more closely aligns with regulatory targets.

RESPONSE TO COMMENT 37-5

SB 375 language is quoted accurately, and SB 375 does not require regional planning agencies like SANDAG to guarantee emissions reduction targets will be met, so no change to the DRAFT EIR is warranted. That being said, GHG reductions necessary to meet State targets are expected to be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and

stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. Therefore, while it is SANDAG's intention to follow through with this plan in an attempt to ensure that regional GHG emissions reductions targets are met, due to the scope of the efforts, it would not require to commit in certainty.

A better transportation system that is less reliant on the automobile is a fundamental component of the proposed Plan. The investments in Managed Lanes will support high speed transit service to ensure time competitive trips as compared to automobile use. The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to meet State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap, Flexible Fleets, and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network in the future.



Kirsten Uchitel, Associate Planner
11 October 2021
Page 3

37-5 cont. lanes, whether from converted general purpose lanes or created from freeway shoulder/ROW, particularly in the short-to-midterm years. New lanes rarely meet their objectives because they often initiate "induced (travel) demand" that quickly produces the congestion (and GHG emissions) that the added lanes were intended to reduce.

The proposed transportation system approach, including infrastructure projects, pricing, and related policies places too much reliance on managed lanes to transition away from the region's dependence on vehicular use. Induced demand (i.e., Downs-Thomson Paradox) is not adequately addressed in the EIR. Studies of induced demand and possible measures to reduce its effects and how it may be addressed, such as the following studies, suggest that induced demand may be controllable but the entire transportation infrastructure system, and especially social policies and pricing - and viable transit options - must be integrated and established concurrently. Advancing transit options and reducing the addition of new lanes is a better approach.

37-6 1. https://www.sciencedirect.com/science/article/pii/S0191261515300175?casa_token=LNZdh-Bex7AAAAAA:nLiQyaHtRsJxQ5wJXfrVS7tWJb3-F6Ef96jhKtTzvGEaoSWhJEVLgrAaC1pNJLElOyZ53q2_TRU.
2. https://www.sciencedirect.com/science/article/pii/S0965856416304669?casa_token=oa6kKwueit0AAAAA:sRPJCQ4hlAdac9zEPWL9YWj33-wqy_4RltdPTWs5qufxBLzgmJiE_SDtlwWz7Y-hnb7NaVkyuq.
3. https://www.sciencedirect.com/science/article/pii/S0739885920301074?casa_token=VGpZcCrJeTAAAAAA:vAVRjNVMVHB0taSM9vdlfrqAKdn1wbr9lU_-22B7nO9gT0VO8YDcrTiuHOg_5nDDUi_FfRIfUVs.

37-7 Concurrent with those changes, we support immediate pilot testing of flexible fleet options to complement this emphasis on advanced transit. That should not incentivize or facilitate standard rideshare, which are shown to increase VMT, rather it should focus on services and technologies that promote zero emission, multi-passenger ridership.

37-8 **We strongly recommend the Plan be modified to reduce the number of managed lanes, initiate roadway pricing immediately (and to the extent possible, applying revenues to transit projects and reduced ridership fares), and increase electric bus and BRT services and associated transit options as a transition while fixed guideway and other major transit infrastructure are constructed. The Plan should advance the timelines of all major transit infrastructure.**

RESPONSE TO COMMENT 37-6

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the proposed Plan have been through SANDAG's peer review process and are documented in the technical methodology submitted to CARB, which is also included in Appendix D. Where possible, the proposed Plan proposes repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools and low-emission vehicles with appropriate decals. The system of managed lanes and supporting connectors support Transit Leap and high occupancy vehicles to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. As such, investment in managed lanes would be beneficial to transit usage. It would not shift investment from additional transit projects and advancing transit options is not feasible because, as discussed in Master Response 1, the request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced.

SANDAG also is currently working with the Social Equity Working Group to develop near-term solutions to address transit service improvements, amenities, and subsidized transit fares. Appendix U, *Cost Estimation Methodology*, Table U.2, in the proposed Plan, captures the transit fare subsidies to riders throughout FY2026–FY2050. For more information on the Value Pricing and User Fee Implementation and the Regional Fare Impact Study, please see Appendices B and U of the proposed Plan.

The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 37-7

The deployment of Flexible Fleets such as e-bikes, shuttles, or ridesharing is envisioned as part of the proposed Plan to provide convenient and affordable options in different communities. SANDAG is developing a Flexible Fleet Implementation Strategic Plan to identify

near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

RESPONSE TO COMMENT 37-8

Please see Master Response 1 explaining why this type of alternative was not considered in detail in the EIR.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the proposed Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, in addition to providing fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, has been added to Appendix A in the Final Plan.

The proposed Plan includes increased service spans for the trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.

37-9 As a related concern, the EIR does not adequately address an issue that was raised many times during the Plan's preparation: More clear and definitive mechanisms are needed in the Plan to ensure that its actions - particularly those that rely upon the local jurisdictions for land use zoning, development, and other supportive actions - are implemented (and monitored and corrected/adjusted, as necessary) in accordance with the Plan's expectations. The metrics for monitoring Plan implementation must be more specific; for example, are the locations and numbers of future population, jobs and housing developments (units) in accord with the Plan (i.e., meeting the expected allocations in the mobility hubs/smart growth areas) by the time periods (e.g., are annual increases consistent with the RHNA), are the primary transportation route improvements being constructed on the anticipated timelines and matching with the new development/growth, etc. Those and other monitoring parameters must be collected, analyzed and reported on a timely (annual or at least biannual) basis and corrective measures undertaken when/where necessary.

The potential impacts from implementing the Plan while population, housing, and job growth are not aligning with the transportation infrastructure would be a potentially fatal flaw unless the Plan incorporates new mechanisms - that are agreed-to by the jurisdictions per formal agreements - to ensure conformance.

37-10 Biology: The EIR acknowledges potentially significant and unavoidable impacts to biological resources, including to wetlands, sensitive species, and movement corridors/wildlife connectivity. Pages 4.4-61 to 79 describe the substantial adverse effects on riparian habitat, wetlands and other sensitive natural habitats, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-79 to 95 describe the proposed Plan's anticipated impacts to sensitive and rare, threatened and endangered species, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-95 to 106 present comparable descriptions of the anticipated impacts to corridors and linkages that are essential to the continued survival of wildlife (and plants), their potential significance, and possible mitigation for unavoidable impacts. We concur with the analyses and findings that, even with mitigation, those potential impacts to all of these biological resources would be significant (and unavoidable). It is particularly important to highlight that SANDAG has no land use authority, so it cannot ensure that the impacts from land use/development - and climate change effects - will not be greater than what was assumed and analyzed. For those reasons, **we strongly recommend adding a funding mitigation measure that would provide the region's extant - and future - preserved conservation lands (i.e., not just the project-specific mitigation lands) sufficient regional habitat conservation funding to address unanticipated impacts to rare, threatened and endangered species from growth/development and associated climate change effects.**

RESPONSE TO COMMENT 37-9

Please refer to Master Response 1 for explanation regarding why this element was not considered in detail in the alternatives.

RESPONSE TO COMMENT 37-10

Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund in the alternatives.

37-11 Alternatives: As stated in our introductory comments, the proposed Plan contains many reasonable components. And we concur that Alternative 3 is the Environmentally Superior Alternative of the three analyzed alternatives. However, the EIR fails to describe and analyze a range of reasonable alternatives (CEQA Guidelines, Section 15126.6), including one that would prioritize transit/active transit over managed lanes, specify and institute a much more rigorous monitoring system of the transportation system's buildout and performance; add a regional habitat conservation fund; and ensure enforcement of the jurisdictions' compliance with the Plan. **Based on the deficiencies we identify in the proposed Plan, and the significant impact findings for that Plan in this EIR, we strongly recommend that a new alternative be prepared and adopted, consistent with our recommendations, as the preferred Plan.**

Our contact for this comment letter is Bill Tippets (billtippels@gmail.com or 619-822-4323), who is available to discuss it with SANDAG.

Sincerely,

Mike McCoy
President

Bill Tippets
Board Member

Cc: SWIA Board

RESPONSE TO COMMENT 37-11

The comment asserts that the range of alternatives evaluated in the EIR does not meet CEQA's requirement to evaluate a reasonable range of potentially feasible alternatives because the EIR does not include an alternative that :

- Prioritizes transit/active transit over Managed Lanes
- Institutes a much more rigorous monitoring system of the transportation system's buildout and performance
- Adds a regional habitat conservation fund; and
- Ensures enforcement of the jurisdictions' compliance with the Plan.

Please see Master Response 1 explaining why this type of alternative was not considered in detail in the EIR.

COMMENT LETTER 38: UNITED STATES FISH AND WILDLIFE SERVICE

Comment Letter 38

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

In Reply Refer to:
FWS-SDG-22B0003-22CPA0003

October 8, 2021
Sent Electronically

Kirsten Uchitel
Associate Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, California 92101

Subject: Comments on the Draft Environmental Impact Report for the San Diego Forward: 2021 Regional Plan, San Diego County, California

Dear Kirsten Uchitel:

38-1 The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (EIR) for the San Diego Association of Government's (SANDAG) San Diego Forward: 2021 Regional Plan (Plan) in San Diego County, California. The comments provided in this letter are based on information provided in the Draft EIR, our knowledge of sensitive and declining species and habitats, and our participation in regional conservation planning efforts.

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 Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(l) of the Act.

PROJECT DESCRIPTION

38-2 San Diego Association of Government has prepared the Draft EIR in accordance with the California Environmental Quality Act (CEQA) to analyze the significant environmental impacts of the Plan, which is an update to the San Diego Forward: 2015 Regional Plan, adopted in October 2015, and the 2019 Federal Regional Transportation Plan, adopted in October 2019. The Plan updates the Regional Comprehensive Plan (RCP) for the San Diego region and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The Plan includes a blueprint for a regional transportation system to serve existing and projected workers and residents within the San Diego region up to the year 2050. The Plan includes the following objectives:

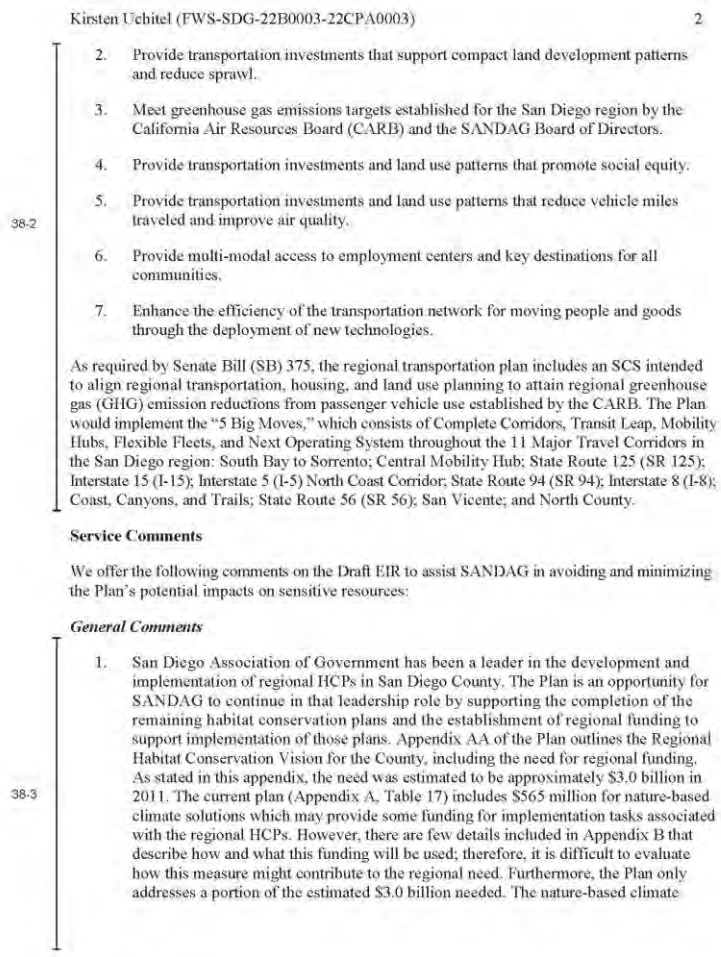
1. Focus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas.

RESPONSE TO COMMENT 38-1

Thank you for the U.S. Fish and Wildlife Service's (USFWS) review of the Draft EIR and participation in the environmental review process. Detailed responses to USFWS' comments are provided in subsequent discussions below.

RESPONSE TO COMMENT 38-2

The summary of the proposed project description is acknowledged.



Kirsten Uchitel (FWS-SDG-22B0003-22CPA0003) 2

2. Provide transportation investments that support compact land development patterns and reduce sprawl.

3. Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board (CARB) and the SANDAG Board of Directors.

4. Provide transportation investments and land use patterns that promote social equity.

5. Provide transportation investments and land use patterns that reduce vehicle miles traveled and improve air quality.

38-2

6. Provide multi-modal access to employment centers and key destinations for all communities.

7. Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

As required by Senate Bill (SB) 375, the regional transportation plan includes an SCS intended to align regional transportation, housing, and land use planning to attain regional greenhouse gas (GHG) emission reductions from passenger vehicle use established by the CARB. The Plan would implement the "5 Big Moves," which consists of Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next Operating System throughout the 11 Major Travel Corridors in the San Diego region: South Bay to Sorrento; Central Mobility Hub; State Route 125 (SR 125); Interstate 15 (I-15); Interstate 5 (I-5) North Coast Corridor; State Route 94 (SR 94); Interstate 8 (I-8); Coast, Canyons, and Trails; State Route 56 (SR 56); San Vicente; and North County.

Service Comments

We offer the following comments on the Draft EIR to assist SANDAG in avoiding and minimizing the Plan's potential impacts on sensitive resources:

General Comments

1. San Diego Association of Government has been a leader in the development and implementation of regional HCPs in San Diego County. The Plan is an opportunity for SANDAG to continue in that leadership role by supporting the completion of the remaining habitat conservation plans and the establishment of regional funding to support implementation of those plans. Appendix AA of the Plan outlines the Regional Habitat Conservation Vision for the County, including the need for regional funding. As stated in this appendix, the need was estimated to be approximately $3.0 billion in 2011. The current plan (Appendix A, Table 17) includes $565 million for nature-based climate solutions which may provide some funding for implementation tasks associated with the regional HCPs. However, there are few details included in Appendix B that describe how and what this funding will be used; therefore, it is difficult to evaluate how this measure might contribute to the regional need. Furthermore, the Plan only addresses a portion of the estimated $3.0 billion needed. The nature-based climate

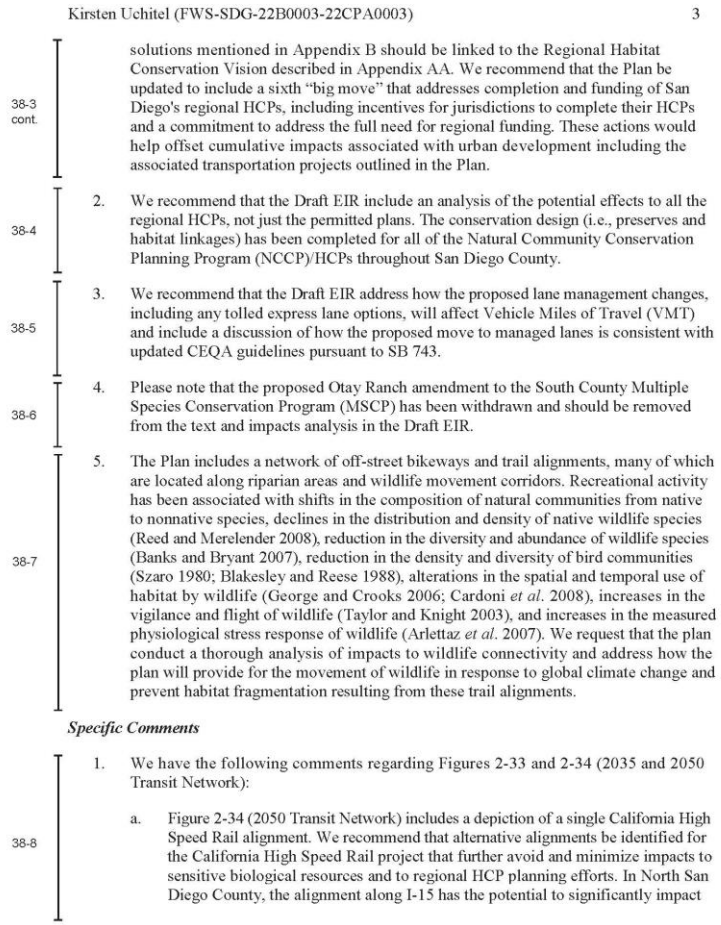
38-3

RESPONSE TO COMMENT 38-3

As an initial matter, this comment relates to the content of the proposed Plan, not the Draft EIR.

Appendix AA of the proposed Plan describes the history and status of the HCPs within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP was granted "take" authorization for impacts on endangered and threatened species. The local jurisdiction's commitment was to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

The transportation network and the land use pattern proposed in the SCS do not impact the ability of the local jurisdictions to seek a regional funding source, and therefore there is no impact under CEQA and no required mitigation. SANDAG will continue its existing grant programs, partner with member agencies on State funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the proposed Plan. To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan)..



Kirsten Uchitel (FWS-SDG-22B0003-22CPA0003) 3

solutions mentioned in Appendix B should be linked to the Regional Habitat Conservation Vision described in Appendix AA. We recommend that the Plan be updated to include a sixth "big move" that addresses completion and funding of San Diego's regional HCPs, including incentives for jurisdictions to complete their HCPs and a commitment to address the full need for regional funding. These actions would help offset cumulative impacts associated with urban development including the associated transportation projects outlined in the Plan. 38-3 cont.

2. We recommend that the Draft EIR include an analysis of the potential effects to all the regional HCPs, not just the permitted plans. The conservation design (i.e., preserves and habitat linkages) has been completed for all of the Natural Community Conservation Planning Program (NCCP)/HCPs throughout San Diego County. 38-4

3. We recommend that the Draft EIR address how the proposed lane management changes, including any tolled express lane options, will affect Vehicle Miles of Travel (VMT) and include a discussion of how the proposed move to managed lanes is consistent with updated CEQA guidelines pursuant to SB 743. 38-5

4. Please note that the proposed Otay Ranch amendment to the South County Multiple Species Conservation Program (MSCP) has been withdrawn and should be removed from the text and impacts analysis in the Draft EIR. 38-6

5. The Plan includes a network of off-street bikeways and trail alignments, many of which are located along riparian areas and wildlife movement corridors. Recreational activity has been associated with shifts in the composition of natural communities from native to nonnative species, declines in the distribution and density of native wildlife species (Reed and Merelender 2008), reduction in the diversity and abundance of wildlife species (Banks and Bryant 2007), reduction in the density and diversity of bird communities (Szaro 1980; Blakesley and Reese 1988), alterations in the spatial and temporal use of habitat by wildlife (George and Crooks 2006; Cardoni *et al*. 2008), increases in the vigilance and flight of wildlife (Taylor and Knight 2003), and increases in the measured physiological stress response of wildlife (Arlettaz *et al*. 2007). We request that the plan conduct a thorough analysis of impacts to wildlife connectivity and address how the plan will provide for the movement of wildlife in response to global climate change and prevent habitat fragmentation resulting from these trail alignments. 38-7

Specific Comments

1. We have the following comments regarding Figures 2-33 and 2-34 (2035 and 2050 Transit Network):

   a. Figure 2-34 (2050 Transit Network) includes a depiction of a single California High Speed Rail alignment. We recommend that alternative alignments be identified for the California High Speed Rail project that further avoid and minimize impacts to sensitive biological resources and to regional HCP planning efforts. In North San Diego County, the alignment along I-15 has the potential to significantly impact 38-8

RESPONSE TO COMMENT 38-4

The EIR addresses draft NCCP Subarea Plans and any updates to these plans when the respective jurisdiction implements the Draft Subarea Plan through ordinances, planning guidelines, or local directives, or when there are signed agreements between the jurisdiction and the Wildlife Agencies (i.e., for the North County and East County MSCPs). However, the CEQA analysis only considers adopted HCPs pursuant to CEQA guidance (see CEQA Guidelines question IV.e and Section 15125(d)(e)) and the criteria identified in the EIR. The word "approved" has been changed to "adopted" throughout the document when referencing NCCPs and HCPs. (See *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134.).

RESPONSE TO COMMENT 38-5

The tolling lanes and Managed Lanes included in the proposed Plan were coded into SANDAG's ABM2+, which was the main tool used to conduct the VMT analysis and identify VMT-related impacts under Threshold TRA-2. As such, the effects of the proposed tolling lanes and Managed Lanes were accounted for in the VMT impact analysis of the proposed Plan, as shown in Tables 4.16-6, 4.16-10, and 4.16-14. Please note that the Draft EIR provides a programmatic analysis of the proposed Plan and is only intended to evaluate the impacts of the proposed Plan as a whole. The Draft EIR does not analyze the effect of individual improvements or specific changes to the region's transportation network and/or land uses patterns. Subsequent project-level CEQA analysis will be required to isolate and identify the impacts associated with the individual components of the proposed Plan prior to their implementation.

It should be noted that measure RTP-1 of the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Green House Gas Mitigation Measures, August 2010* identifies that the implementation of cordon pricing and/or tolling to get in and out of central business districts can reduce VMT by a magnitude of 7.9–22.0 percent. The determination of the specific percentage can vary from location to location based on factors such as pricing levels and the associated levels of congestion. As noted previously, this level of analysis was included within the ABM2+ results and was therefore accounted for within the

VMT analysis conducted for the proposed Plan; however, the VMT reductions were not calculated for individual facilities.

Finally, as identified under Threshold TRA-2, implementation of the proposed Plan will result in a conflict and/or is inconsistent with CEQA Guidelines Section 15064.3 by not achieving the substantial VMT reductions needed to help achieve statewide GHG reduction goals. As such, the Draft EIR discloses that implementation of the proposed tolling lanes and Managed Lanes, in conjunction with the implementation of rest of the proposed Plan, would result in a significant impact.

RESPONSE TO COMMENT 38-6

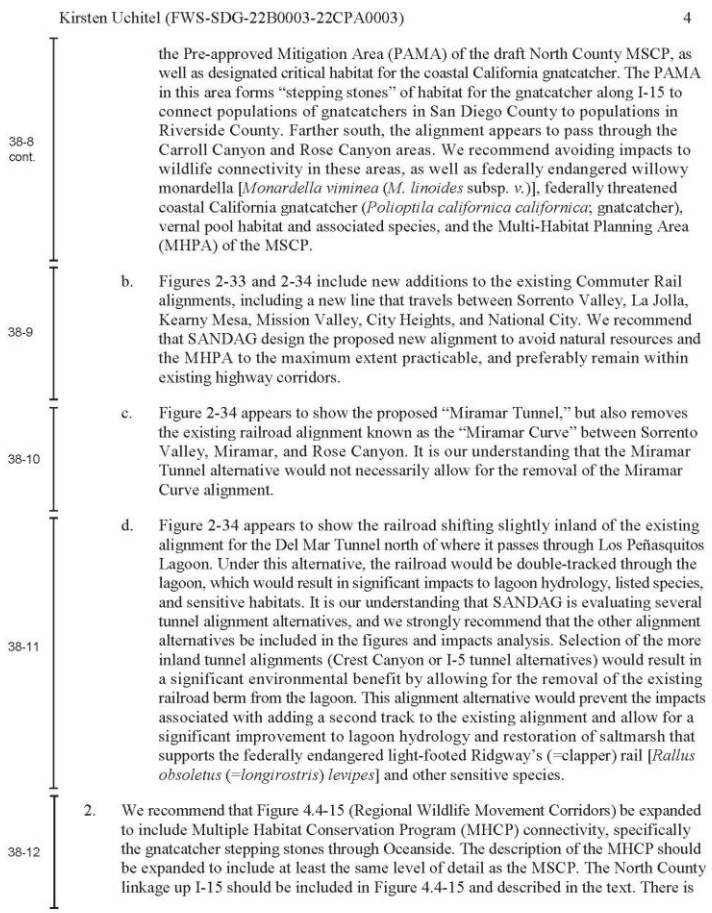
The references to the Otay Ranch and Quino checkerspot amendments have been removed from the Final EIR.

RESPONSE TO COMMENT 38-7

The EIR is a programmatic document that assesses projects on a large scale. Threshold BIO-3 in Section 4.4, *Biological Resources,* addresses impacts on wildlife movement corridors on a programmatic level based on best available data. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the effects of an individual project on wildlife movement corridors, including the potential for habitat fragmentation, will be analyzed in the project-specific CEQA document.

RESPONSE TO COMMENT 38-8

The California High Speed Rail project has been added to Appendix A of the proposed Plan, and SANDAG will track its progress as it is developed by the State; however, it is not a project that would be designed or constructed by SANDAG or other entities within the region. Regarding specific project-level impacts (e.g., Commuter Rail), the proposed Plan is a high-level, programmatic document. Specific details regarding impacts and mitigation are not known at this time but will be covered when future projects go through project-level environmental review.



Kirsten Uchitel (FWS-SDG-22B0003-22CPA0003) 4

38-8 cont.

the Pre-approved Mitigation Area (PAMA) of the draft North County MSCP, as well as designated critical habitat for the coastal California gnatcatcher. The PAMA in this area forms "stepping stones" of habitat for the gnatcatcher along I-15 to connect populations of gnatcatchers in San Diego County to populations in Riverside County. Farther south, the alignment appears to pass through the Carroll Canyon and Rose Canyon areas. We recommend avoiding impacts to wildlife connectivity in these areas, as well as federally endangered willowy monardella [*Monardella viminea* (*M. linoides* subsp. *v.*)], federally threatened coastal California gnatcatcher (*Polioptila californica californica*; gnatcatcher), vernal pool habitat and associated species, and the Multi-Habitat Planning Area (MHPA) of the MSCP.

38-9

b. Figures 2-33 and 2-34 include new additions to the existing Commuter Rail alignments, including a new line that travels between Sorrento Valley, La Jolla, Kearny Mesa, Mission Valley, City Heights, and National City. We recommend that SANDAG design the proposed new alignment to avoid natural resources and the MHPA to the maximum extent practicable, and preferably remain within existing highway corridors.

38-10

c. Figure 2-34 appears to show the proposed "Miramar Tunnel," but also removes the existing railroad alignment known as the "Miramar Curve" between Sorrento Valley, Miramar, and Rose Canyon. It is our understanding that the Miramar Tunnel alternative would not necessarily allow for the removal of the Miramar Curve alignment.

38-11

d. Figure 2-34 appears to show the railroad shifting slightly inland of the existing alignment for the Del Mar Tunnel north of where it passes through Los Peñasquitos Lagoon. Under this alternative, the railroad would be double-tracked through the lagoon, which would result in significant impacts to lagoon hydrology, listed species, and sensitive habitats. It is our understanding that SANDAG is evaluating several tunnel alignment alternatives, and we strongly recommend that the other alignment alternatives be included in the figures and impacts analysis. Selection of the more inland tunnel alignments (Crest Canyon or I-5 tunnel alternatives) would result in a significant environmental benefit by allowing for the removal of the existing railroad berm from the lagoon. This alignment alternative would prevent the impacts associated with adding a second track to the existing alignment and allow for a significant improvement to lagoon hydrology and restoration of saltmarsh that supports the federally endangered light-footed Ridgway's (=clapper) rail [*Rallus obsoletus* (=*longirostris*) *levipes*] and other sensitive species.

38-12

2. We recommend that Figure 4.4-15 (Regional Wildlife Movement Corridors) be expanded to include Multiple Habitat Conservation Program (MHCP) connectivity, specifically the gnatcatcher stepping stones through Oceanside. The description of the MHCP should be expanded to include at least the same level of detail as the MSCP. The North County linkage up I-15 should be included in Figure 4.4-15 and described in the text. There is

RESPONSE TO COMMENT 38-9

Regarding specific project-level impacts (e.g., Commuter Rail), the proposed Plan is a high-level, programmatic document. Specific details regarding impacts and mitigation are not known at this time but will be covered when future projects go through project-level environmental review.

RESPONSE TO COMMENT 38-10

The inclusion of the Miramar Tunnel is intended as a replacement of the Miramar Curve to meet future transit needs. Future use of the Miramar Curve corridor is unknown but not assumed as part of the alignment of future proposed Plan transit projects.

RESPONSE TO COMMENT 38-11

Specific details regarding the review of project alternatives, impacts, and mitigation of those impacts are not known at this time but will be covered when the tunnel alignment alternatives go through project-level environmental review.

RESPONSE TO COMMENT 38-12

The MHCP cores and linkages map has been added to Figure 4.4-16 of the Final EIR.

The Santa Ana-Palomar linkage across I-15 is also included in Figure 4.4-15 (species-specific linkage) as part of the model prepared by Jennings et al. (2020).

No GIS data exist yet for the potential Jacumba-Sierra Juarez linkage. This linkage was identified in concept by South Coast Wildlands (SCW) and The Nature Conservancy (TNC), but was never modeled. TNC is planning to model this linkage in the future as part of their Las Californias Binational Conservation effort. The model developed by Jennings et al. (2020) includes the U.S. side of the Jacumba-Sierra Juarez linkage, which is included in Figure 4.4-15 of the EIR.

38-12 cont.

also a north/south linkage with Mexico near Jacumba that should be included in the figure and text.

3. Under the heading "Multiple Species Conservation Program" (starting on page 4.4-48), we have the following suggested edits:

   a. On page 4.4-48, please note that the MSCP was approved in 1997 and the updated document was printed in August 1998.

   b. We recommend revising the first sentence on page 4.4-49 as follows: "The USFWS and CDFW have issued permits (50-year permit term) to five of the nine jurisdictions within the MSCP plan boundary."

38-13

   c. On page 4.4-49, we recommend revising the second half of the paragraph as follows: "While the County is not yet implementing the North County MSCP, it has completed the conservation design and identified priority areas for conservation that are being considered in the CEQA analysis of development projects within the North County MSCP planning area. While a planning effort for the eastern portions of the San Diego region was considered by the County of San Diego in 2008, the East County MSCP planning efforts have slowed because of staffing constraints. Preliminary conservation design was been completed for this area and identified focused areas for conservation that are considered during CEQA analysis as described above for the North County."

   d. On page 4.4-49, paragraph starting with "In March 2021:" Please note that wetland habitats are covered by all the plans, but take of certain covered species within those habitat types is not covered. Therefore, we recommend removing the third sentence in this paragraph.

4. We recommend the following edits to Table 4.4-5 (page 4.4-50):

38-14

   a. Please note that the Vernal Pool HCP was only permitted by the Service, not the California Department of Fish and Wildlife (CDFW). We also recommend removing the first sentence in the description of the Vernal Pool HCP, as the planning agreement is not relevant, and we recommend adding that the Vernal Pool HCP has the same plan boundaries as the City's subarea plan.

   b. Reference to the Otay Ranch and Quino checkerspot butterfly amendments should be deleted as these proposals have been withdrawn.

38-15 5. We recommend revising Figure 4.4-16 to show all the different planned preserve areas in one color with symbology (i.e., hatching) indicating what has already been conserved.

38-16 6. The section entitled "San Diego Gas & Electric Subregional NCCP" (page 4.4-53) should be updated to note that the Service and CDFW are coordinating with San Diego Gas and Electric (SDG&E) on an amendment to their HCP/NCCP.

RESPONSE TO COMMENT 38-13

The text has been revised as suggested; the third sentence in the paragraph starting with "In March 2021" has been removed from the Final EIR.

RESPONSE TO COMMENT 38-14

Table 4.4-5 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 38-15

Figure 4.4-16 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 38-16

The text has been revised as suggested in the Final EIR.

38-17 7. On page 4.4-62, we recommend defining "conserved" to clarify the difference between areas where impacts will be avoided vs. areas that are truly conserved with site protection instruments, management, and monitoring.

38-18 8. Tables 4.4-7, 4.4-8, and 4.4-9 (Estimated Direct Impacts on Vegetation Communities and Regulated Aquatic Resources within the San Diego Region) include estimated impacts to sensitive vegetation communities. Please provide a description of the types of projects that would result in such significant impacts to marsh (54.5 acres) due to regional growth and land use change by 2025.

38-19 9. Tables 4.4-7, 4.4-8, and 4.4-9 identify almost all the natural vegetation communities that would be impacted by the Plan, with the exception of desert dunes, desert scrub, and forest/woodland, as "sensitive vegetation communities… that may require mitigation." It is unclear why these specific vegetation communities would be considered not sensitive or why impacts to these communities would not be offset in a manner similar to the other vegetation communities.

38-20 10. Figure 4.4-17 (Undeveloped to Developed Land Use Conversions) shows a large amount of development in Otay Mesa, Chula Vista, and Warner Springs. We are familiar with the proposed development projects reflected on the map for Otay Mesa and Chula Vista, which, with the exception of potential impacts to the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*), were addressed by the MSCP. But development in the Warner Springs area has not yet been addressed through a regional planning effort or other consultation or permitting processes with the Service. Because the Warner Springs area is not adjacent to urban centers and regional transportation corridors, we recommend that the Plan include a description of proposed development in this area and its consistency with the Plan's objectives.

38-21 11. Under the heading "Transportation Network Improvements and Programs: Direct Impacts" for 2025 (page 4.4-68), the text references significant vegetation impacts due to the new four-lane toll road SR 11/Otay Mesa East Port of Entry (POE) from SR 125 to Mexico. This project is already under construction, and it is unclear if the resulting impacts, which were already addressed under CEQA, are included in this analysis.

38-22 12. BIO-1d (page 4.4-78): We recommend including consistency with the San Diego Management and Monitoring Program's (SDMMP) Management Strategic Plan.

38-23 13. The analysis for BIO-2 (page 4.4-79) appears to rely on known species occurrences. Given the lack of comprehensive surveys, we recommend also conducting an analysis using modeled habitat (e.g., County of San Diego Species Models) to evaluate potential impacts to sensitive species.

38-24 14. The proposed mitigation measures BIO-2b and BIO-2c (page 4.4-91) are limited to species covered under approved NCCPs/HCPs. We recommend including species that would be covered under draft plans as well. We also recommend including species addressed under the County's Resource Protection Ordinance.

RESPONSE TO COMMENT 38-17

The text has been revised. The following footnote has been added on Page 4.4-62:

> The term "conserved" reflects the projected conservation of habitats and biological resources as identified in the HCPs. Hard-line preserves cannot be developed and impacts will be avoided. When allowed development occurs in other preserve dedications such as the PAMA, FPA, or MHPA, the conservation component required by the respective HCP will be implemented through the dedication of conservation easements or other site protection instruments that require the conservation, management, and monitoring of the conserved resources in perpetuity.

RESPONSE TO COMMENT 38-18

The impacts on marshes (including coastal salt marsh) occur due to land use changes as a result of regional land use changes rather than specific projects. Specifically in the City of National City, the programmatic proposed Plan footprint shows commercial development that may affect the Sweetwater and E-Street marshes. However, this is due to the programmatic nature of the footprint, which shows an approximate impact area rather than a project-specific footprint, because the project designs have not yet been developed. Project design, impact avoidance and minimization measures, and subsequent CEQA analysis will consider avoidance or mitigation of any impacts on conserved lands, sensitive coastal salt marsh habitat, and special-status species.

RESPONSE TO COMMENT 38-19

The County of San Diego requires mitigation for the vegetation communities included in the collapsed categories of desert dunes, desert scrub, and forest/woodland. Because all vegetation communities in Tables 4.4-7 through 4.4-9 are sensitive, in the Final EIR, the word "sensitive" has been added to vegetation communities in the table titles, and asterisks and footnotes have been removed. Any impacts on these vegetation communities would be offset based on the County's *Report Format and Content Requirements for Biological Resources* (2010) mitigation ratios.

RESPONSE TO COMMENT 38-20

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The SCS Land Use Pattern does not contemplate new residential development in the Warner Springs area. The area identified by the comment in and around Warner Springs contains one parcel with 15 sub-parcels. The assignment of the land use type is based on the logic of the forecast model to roll unique sub-parcel based land uses to the predominant land use at the parcel level. In this case, commercial and office use (Resort) was assigned to one of the sub-parcels, and Spaced Rural Residential was assigned to 14 sub-parcels based on the County's General Plan where these sub-parcels were designated under "Rural Lands RL-80." While the land use designation changed, no new housing units are projected for this area in the SCS Land Use Pattern.

RESPONSE TO COMMENT 38-21

As discussed in Chapter 4, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of this EIR, corresponding with the release of the NOP on November 14, 2016, and the start of EIR preparation. Therefore, SR 11 is included in analysis of this EIR because it was part of the 2016 baseline. The EIR provides a programmatic analysis; the CEQA document prepared for SR 11 provides more in-depth, project-specific analysis of the project's impacts and mitigation measures.

RESPONSE TO COMMENT 38-22

The following text has been added to the Final EIR on page 4.4-79:

> The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), and describe management in perpetuity….

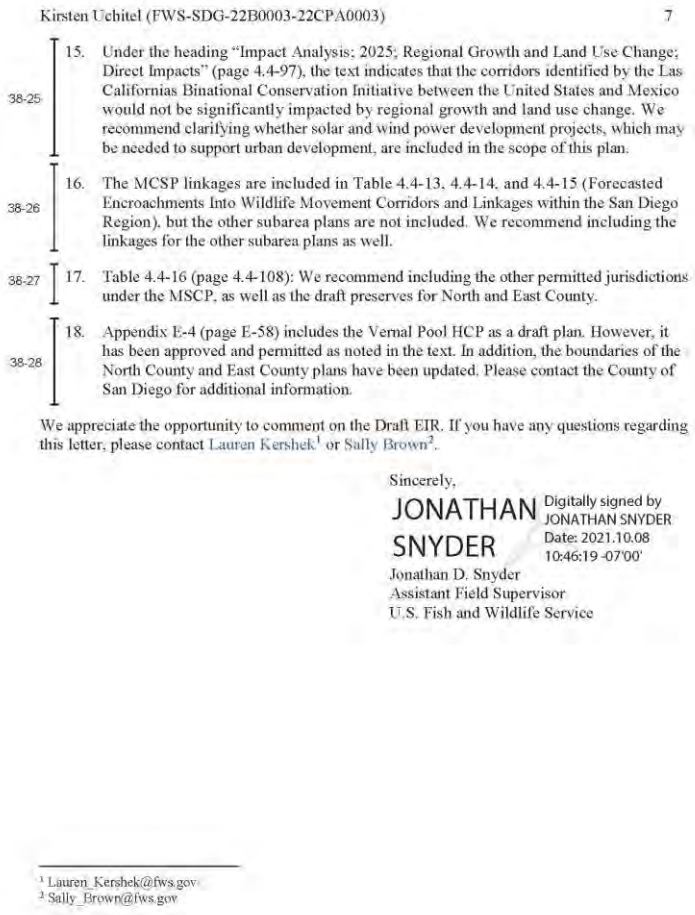
RESPONSE TO COMMENT 38-23

Modeled habitat for sensitive species has been added to and included in the analysis in the Final EIR, and has also been added to EIR Appendix E-7, Table E-7-6.

RESPONSE TO COMMENT 38-24

Please see response to comment USFWS 38-4.

Reference to the County's Resource Protection Ordinance has been added to mitigation measures BIO-2b and BIO-2c in the Final EIR.



Kirsten Uchitel (FWS-SDG-22B0003-22CPA0003) 7

38-25 15. Under the heading "Impact Analysis: 2025; Regional Growth and Land Use Change; Direct Impacts" (page 4.4-97), the text indicates that the corridors identified by the Las Californias Binational Conservation Initiative between the United States and Mexico would not be significantly impacted by regional growth and land use change. We recommend clarifying whether solar and wind power development projects, which may be needed to support urban development, are included in the scope of this plan.

38-26 16. The MCSP linkages are included in Table 4.4-13, 4.4-14, and 4.4-15 (Forecasted Encroachments Into Wildlife Movement Corridors and Linkages within the San Diego Region), but the other subarea plans are not included. We recommend including the linkages for the other subarea plans as well.

38-27 17. Table 4.4-16 (page 4.4-108): We recommend including the other permitted jurisdictions under the MSCP, as well as the draft preserves for North and East County.

38-28 18. Appendix E-4 (page E-58) includes the Vernal Pool HCP as a draft plan. However, it has been approved and permitted as noted in the text. In addition, the boundaries of the North County and East County plans have been updated. Please contact the County of San Diego for additional information.

We appreciate the opportunity to comment on the Draft EIR. If you have any questions regarding this letter, please contact Lauren Kershek[1] or Sally Brown[2].

Sincerely,

JONATHAN SNYDER Digitally signed by JONATHAN SNYDER Date: 2021.10.08 10:46:19 -07'00'

Jonathan D. Snyder
Assistant Field Supervisor
U.S. Fish and Wildlife Service

[1] Lauren_Kershek@fws.gov
[2] Sally_Brown@fws.gov

RESPONSE TO COMMENT 38-25

Solar and wind power developments are future land uses to be approved by the local jurisdictions and would be addressed on a project-specific CEQA level; project-specific analysis would evaluate impacts on wildlife movement corridors and consistency with Habitat Conservation Programs and Plans.

RESPONSE TO COMMENT 38-26

Wildlife Movement Corridors and Linkages were identified in the umbrella MSCP and MHCP documents and were adopted by the subarea plans; ergo, the subarea plan cores and linkages are the same as those identified in the umbrella documents. Table 4.4-15 has been revised to add the MHCP core and linkage areas (BCLA) in the Final EIR.

RESPONSE TO COMMENT 38-27

The permitted jurisdictions with preserves that were not included in the South County MSCP and City of San Diego MHPA, the MHCP (FPA/BCLA) and Chula Vista MSCP Preserves, have been added to Tables 4.4-16, 4.4-17, and 4.4-18. The other approved jurisdiction's preserve designs were captured by the MSCP preserves. Because the EIR only addresses approved NCCPs (see response to comment USFWS 38-4), the Draft North and East County MSCPs are not evaluated in this document.

RESPONSE TO COMMENT 38-28

Appendix E-4 of the EIR has been revised to remove the Vernal Pool HCP since it has been approved. Please also see response to comment USFWS 38-4.

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COMMENT LETTER 39: KARIN ZIRK



Comment Letter 39

From: "Karin Zirk, Ph.D." <me@karinzirk.com>
Date: October 10, 2021 at 10:27:19 AM PDT
To: Denise Friedman <denisewfriedman@icloud.com>, derekstattin@hotmail.com
Subject: RE: Sponsor Save Marian Bear Park
Reply-To: me@karinzirk.com

39-1 SANDAG is proposing increasing the number of lands on Hwy 52 which will gobble up some of Marian Bear Park. Plus they want to have designated carpool connector lans from I-5 and I-805 to Hwy 52 which will further encroach on the park and end up destroying more oaks, sycamores and upland habitat.

39-2 You can find the petition at https://www.change.org/p/save-marian-bear-park

Warmly,

Karin Zirk, Ph.D. (she/her/hers)
Executive Director
Friends of Rose Creek
***** Connecting Our Communities *****
http://www.saverosecreek.org

RESPONSE TO COMMENT 39-1

This is a comment on the content of the proposed Plan, and does not raise issues on the adequacy of the Draft EIR. The impacts of the proposed Plan on recreational facilities are discussed in Section 4.15 of the EIR.

The proposed Plan includes freeway improvements along I-5 and implementation of the Coastal Rail Trail in this area for the 2035 horizon. In addition, the SR 52 bikeway from I-5 to Santo Road would impact Marian Bear Memorial Park. Although SANDAG appreciates the concerns expressed in this comment, the improvements are required to accommodate planned population growth and related transportation improvements identified in the proposed Plan.

The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document, including the implementation of mitigation measures identified in Section 4.4, *Biological Resources*, of the EIR.

RESPONSE TO COMMENT 39-2

Please see response to comment Zirk 39-1 above. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document.

COMMENT LETTER 40: UNIDENTIFIED WEB COMMENT

Comment Letter 40

Commenter: Not Provided
Agency: Not Provided
Contact Information: Not Provided
Date Received: 9/17/2021
Comment:

40-1 The EIR should consider a net-zero GHG emission alternative within the confines of current feasibility. Another alternative could be to maximize GHG emission reductions using expected levels of funding.

40-2 The EIR should also consider the regional plan's consistency with agency's mode share targets using modeled mode share for the regional plan as compared to the mode share targets. For example, the City of San Diego sets specific mode share targets for transit by 2035 within transit priority areas. The regional plan should be consistent with these mode share targets or at least expressly discuss the inconsistency within the EIR.

RESPONSE TO COMMENT 40-1

As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested.

As of July 2021, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. It is anticipated that achieving this goal would require a combination of GHG emissions reduction and GHG emissions removal strategies; however, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal.

Many features currently included in the proposed Plan (e.g., the SCS, increased transit, and active transportation investments) have the effect of reducing GHG emissions that might otherwise occur. Mitigation measures presented in this EIR are additional feasible GHG reduction measures not included in the proposed Plan that SANDAG would or other agencies could implement.

SANDAG has direct responsibility for planning for achieving passenger vehicle GHG reduction targets through the development and implementation of an SCS pursuant to SB 375. The proposed Plan includes an SCS and demonstrates that, if the proposed Plan is implemented, the San Diego region would achieve its SB 375 target for 2035. Analysis performed by SANDAG and included in the SCS documentation for the proposed Plan demonstrates that the San Diego region has achieved its SB 375 target for 2020 (Appendix H of this EIR).

In addition, the proposed Plan incorporates several demand management strategies such as teleworking, private pooling programs, vanpool programs, carshare programs, and transit fare subsidies. The land use strategy in the proposed Plan consists of the SCS land use pattern, which considers jobs-housing balance, mixing of uses, and

transit-oriented development. Please see Section 4.8 for more information about these strategies.

Please see Master Response 1 for further explanations why the EIR did not consider a "net zero emissions alternative" in detail. Similar reasons explain why an alternative that maximizes GHG emission reductions using expected levels of funding was not considered in detail.

RESPONSE TO COMMENT 40-2

SANDAG's ABM2+ estimates the mode shift performance of the proposed plan. The mode share estimates from ABM2+ are reported for the entire region.

Data on mode share is provide in Appendix T, Table T6.2 of the proposed Plan. Other agencies' mode share targets are specific to their plans. For the City of San Diego, the City's climate action plan acknowledges that additional strategies must be implemented in addition to the proposed Plan to achieve the City's mode share targets.

Section 4.16, *Transportation*, discussed mode share. Because the proposed Plan identifies and proposes transportation network improvements at a regional level,

plan consistency was reviewed against other regional plans and policies. (Draft EIR page 4.16-30.) Consistency with specific local plans regarding mode share targets would be done on a project level.

COMMENT LETTER 41: UNIDENTIFIED WEB COMMENT

Comment Letter 41

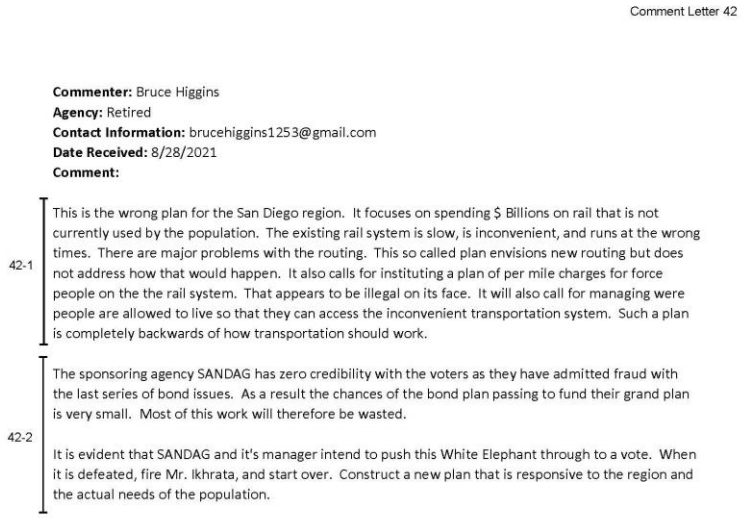
Commenter: Not Provided
Agency: Not Provided
Contact Information: Not Provided
Date Received: 9/20/2021
Comment:

41-1 Electric vehicles and battery power has destroyed more trees, rainforests and jungles than any used resource used for power.

RESPONSE TO COMMENT 41-1

Thank you for your comments and consideration of the proposed Plan. This comment does not appear to be a comment about the content or analysis of the Draft EIR or the proposed Plan, and as such, no response is required. However, please see Section 4.8, *Greenhouse Gas Emissions*, for more information about greenhouse gases and the proposed Plan.

COMMENT LETTER 42: BRUCE HIGGINS



Comment Letter 42

Commenter: Bruce Higgins
Agency: Retired
Contact Information: brucehiggins1253@gmail.com
Date Received: 8/28/2021
Comment:

42-1 This is the wrong plan for the San Diego region. It focuses on spending $ Billions on rail that is not currently used by the population. The existing rail system is slow, is inconvenient, and runs at the wrong times. There are major problems with the routing. This so called plan envisions new routing but does not address how that would happen. It also calls for instituting a plan of per mile charges for force people on the the rail system. That appears to be illegal on its face. It will also call for managing were people are allowed to live so that they can access the inconvenient transportation system. Such a plan is completely backwards of how transportation should work.

42-2 The sponsoring agency SANDAG has zero credibility with the voters as they have admitted fraud with the last series of bond issues. As a result the chances of the bond plan passing to fund their grand plan is very small. Most of this work will therefore be wasted.

It is evident that SANDAG and it's manager intend to push this White Elephant through to a vote. When it is defeated, fire Mr. Ikhrata, and start over. Construct a new plan that is responsive to the region and the actual needs of the population.

RESPONSE TO COMMENT 42-1

Thank you for your comments and consideration of the proposed Plan. This Plan has been carefully researched and tailored to be specific to the unique challenges, land uses, resources and communities of the San Diego region.

As an initial matter, this comment relates to the contents of the proposed Plan, not the analysis within the Draft EIR.

Regarding "new routing," the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. For subsequent project activities, a site-specific environmental review would be the responsibility of the implementing agency prior to project implementation.

The Vision of the proposed Plan is "A fast, fair, and clean transportation system and a resilient region." The proposed Plan sets three primary goals to achieve this Vision:

- The efficient movement of people and goods.
- Access to affordable, reliable, and safe mobility options.
- Healthier air and reduced GHG.

The general concept for the proposed Plan was informed significantly by early work on the 2019 Regional Plan, which led to the 2019 Federal RTP. This work included a four-phased approach: concept development, network development, network refinement, and transportation system validation. Additional information about the four phases can be found in Appendix T of the proposed Plan.

Based on regional travel data, SANDAG identified critical regional nodes for travel connections for trips taken to and from the top 15 employment centers in San Diego County. See Section 2.2.1, *Development of the Proposed Plan: A Data Driven Process*, of this EIR for more information about these areas and elements.

In addition, the proposed Plan incorporates several demand management strategies such as teleworking, private pooling programs, vanpool programs, carshare programs, and transit fare subsidies. The land use strategy in the proposed Plan consists of the SCS land use

pattern, which considers jobs-housing balance, mixing of uses, and transit-oriented development. Please see Section 4.8 for more information about these strategies.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

RESPONSE TO COMMENT 42-2

This comment is not related to the adequacy of the Draft EIR, or the contents of the proposed Plan, and no further response is given.

COMMENT LETTER 43: BRENT TANNER

Comment Letter 43

Commenter: Brent Tanner
Agency: Aggregate Technologies
Contact Information: btannerr@gmail.com
Date Received: 9/30/2021
Comment:

URGENT REQUEST: Environmental Review
Dear SANDAG and respected SANDAG counsel commissioners,
My name is Brent Tanner. As the owner of a large development (a 620 unit project currently under construction) in your area, I'm very grateful for San Diego County's past and current efforts at environmental stewardship. However, I do have some concerns going forward, specifically regarding the environmental impact of concrete, and I believe a review of the most recent developments in materials science and environmentally friendly concrete offers great potential for enhancing San Diego County's efforts at minimizing its carbon footprint.

The natural process for producing Portland cement, the main reactive component in concrete, is among the most carbon-unfriendly of all essential materials, with approximately one ton of CO2 released for every one ton of cement made. That becomes very significant when you consider the vast infrastructure applications of concrete in modern life. The environmental cost of traditional concrete becomes difficult to avoid because of the basic chemistry of one of its primary components: limestone plus heat equals calcium oxide plus carbon dioxide. But what if there was an alternative?

43-1 Recent innovations in particle-size optimized cement means we can produce concrete that uses 25% less Portland cement "which means a 25% lower carbon footprint per cubic yard of concrete poured. Not only that, this concrete product resists salt, chloride, and other elements far better than traditional concrete because it incorporates limestone powder and other mineral fillers1 to create cement paste which has a higher solids density and reduced porosity, which creates superior salt resistance and durability. That means it's longer-lasting, and that means you save cost and reduce carbon over the long haul.

Why should San Diego lead the way on environmentally-green (or "reduced carbon") cement? Because it's an opportunity to create an impact across the country and across government and business. More than half of all cement is purchased by
government entities. Think road projects, bridges, airports, hydroelectric dams. So, where the government leads, everyone else follows. When reduced carbon concrete becomes the standard in your county, for at-or-near the cost of traditional solutions, you'll become recognized as the leaders in green concrete use, and you will inspire others to follow suit.

Bill Gates has indicated that he believes green concrete would cost 243% more than traditional concrete, but it can in fact be produced for around the same price because the cost of mineral fillers should be the same or less than the cost of Portland cement they partially replace. But even if that were not so, it would still be worth paying a small premium for the meaningful environmental benefits.

1 Covered by ACI 211.7R-15 :Guide for Proportioning Concrete Mixtures with Ground Limestone and Other Mineral Fillers" also covered by ASTM C1797-17 "Standard Specification for Ground Calcium Carbonate and Aggregate Mineral Fillers for use in Hydraulic Cement Concrete".
1

RESPONSE TO COMMENT 43-1

As an initial matter, this comment relates to the proposed Plan and does not address the adequacy of the Draft EIR. The potential use of low carbon concrete is discussed in Section 4.8 of the Draft EIR and is incorporated into mitigation measure GHG-5e: "Implement sustainable construction measures through construction bid specifications, including. . . [u]se lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements" (page 4.8-50).

43-1 cont.

San Diego needs more efficient concrete. With the availability of green concrete that uses 25% less Portland cement, therefore producing concrete with 25% lower carbon footprint and reduced environmental impact, it becomes clear that your imperative is to explore securing a procurement that meets this new, attainable goal. Such a procurement would align well with SANDAG's Sustainable Communities Strategy (SCS).
This innovation is the direction the concrete industry is headed...wouldn't San Diego rather be leading than following? Please contact me immediately to discuss how using green concrete can begin making a significant difference for San Diego and for the whole country.

Best Regards,

Brent R. Tanner

COMMENT LETTER 44: CRAIG FORMAN

Comment Letter 44

Commenter: Craig Forman
Agency: Not Provided
Contact Information: craigforman@live.com
Date Received: 8/28/2021
Comment:

44-1 Unsure where to leave this comment. An increase in the sales tax to pay for improvements is regressive and (a) will force lower income individuals into less populated areas of the county with less expensive rents but less public transportation and (b) affect retired and unemployed individuals. Maybe suggest a greater sharing % of the exploding property tax assessments which will not increase taxes, just allocate more of it to public transporation?

RESPONSE TO COMMENT 44-1

As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR.

The funding strategy for the proposed Plan includes over 30 different funding sources, including local sales tax revenue and property taxes from an Enhanced Infrastructure Financing District (EIFD) surrounding the Central Mobility Hub project. An EIFD works by diverting future increases in property tax revenues that will result from the project due to the increasing property values.

COMMENT LETTER 45: JOHN WOTZKA

Comment Letter 45

Commenter: John Wotzka
Agency: Public speaker, self, Regional Transportation Committee and research of energy issues.
Contact Information: johnwotzka@gmail.com
Date Received: 8/31/2021
Comment:

45-1 Hope you are keeping up with the developments in Floating Offshore Wind coming into the area and the jobs that will be created with this technology for ports and renewable energy manufactures. Examples are being shown on the East Coast too including the Great Lakes. There are endless examples of both of these technologies in Europe, Asia and most parts the rest of the World. The U.S. is behind but will adjust to what it will need. High Speed Rail is another area where where there will be jobs the long term future and it will improve the health of the people of California with cleaner air and many jobs for the manufacture of the HSR systems.

RESPONSE TO COMMENT 45-1

Thank you for your comments and consideration of the proposed Plan. This comment does not appear to be a comment about the content or analysis of the Draft EIR or the proposed Plan, and as such no response is required.

COMMENT LETTER 46: JAMES FERGUSON

Comment Letter 46

Commenter: James Ferguson
Agency: Not Provided
Contact Information: jpf.morpheus@gmail.com
Date Received: 8/28/2021
Comment:

46-1 I have reviewed the executive summary and concur with its priorities. We must reduce vehicle miles traveled, and attendant emissions. Public transportation infrastructure and housing development patterns that eliminate sprawl, enhance compact business/residential access, and reduce GHG emissions are essential for our future, sooner rather than later. It is very difficult to 'retrofit' after a long history of laissez faire development policy. But, we must begin.

RESPONSE TO COMMENT 46-1

Thank you for your comments and consideration of the proposed Plan. Thank you for your support.

COMMENT LETTER 47: CRAIG NELSON

Comment Letter 47

Commenter: craig nelson
Agency: Citizens business bank
Contact Information: cnelson_madison@hotmail.com
Date Received: 8/31/2021
Comment:

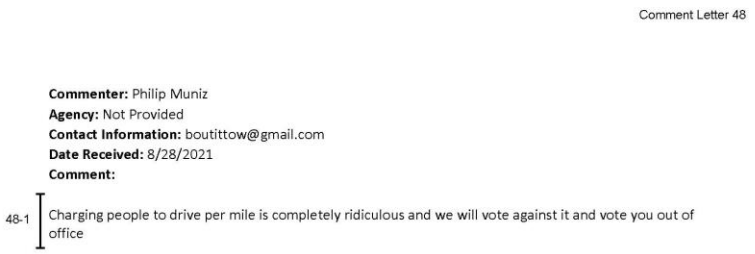
47-1 Every bus I see is EMPTY , you will never get people of SD to ride the inefficient , nasty slow bus. Period. I dare you to publish the actual %23 of riders per mile driven. It would be cheaper and better on the environment if you bought every single side a Prius vs. driving empty buses around in circles. DUMP IKY .

RESPONSE TO COMMENT 47-1

Thank you for your comments and consideration of the proposed Plan.

As shown in Section 4.16, *Transportation,* of the EIR, there is currently an average of 257,891 daily transit trips (page 4.16-32). The number of trips is projected to increase to 416,061 in 2025, to 805,642 in 2035, and to 944,876 in 2050. Transit Mode Share would increase from 1.7 percent in 2016 to 5.6 percent in 2050 (Draft EIR page 4.16-41).

COMMENT LETTER 48: PHILIP MUNIZ



Comment Letter 48

Commenter: Philip Muniz
Agency: Not Provided
Contact Information: boutittow@gmail.com
Date Received: 8/28/2021
Comment:

48-1 Charging people to drive per mile is completely ridiculous and we will vote against it and vote you out of office

RESPONSE TO COMMENT 48-1

As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR.

The proposed Plan incorporates a variety of value pricing and user strategies as tools to improve mobility by encouraging changes in travel behaviors while generating revenue to address the region's aging infrastructure and expand travel options. Specifically, the proposed Plan explores a network of Managed Lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by Transportation Network Companies, and further subsidization of transit fares. Strategies such as these are in different phases of planning, design, pilot, and deployment in different areas of the region and are also being explored at the State and federal level. SANDAG will rely on coordination with the other MPOs in California along with Caltrans to integrate the selection of technology, collection methods, and account management to ensure a consistent experience for travelers. Meanwhile, the design of these strategies, such as the fee structure and distribution of revenue, should be specifically developed for the San Diego region's unique environment and priorities.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed

program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

COMMENT LETTER 49: JUSTIN WONG

Comment Letter 49

Commenter: Justin Wong
Agency: Not Provided
Contact Information: pustin14@gmail.com
Date Received: 9/3/2021
Comment:

49-1 I would like to receive info about expanding NCTD Transit options to Miracosta

RESPONSE TO COMMENT 49-1

Thank you for your comments and consideration of the proposed Plan.

The proposed Plan includes Rapid 477, which would run from Carlsbad Village to SR 76 via College Boulevard and would serve Mira Costa College. In addition, the Plan proposes Flexible Fleets as a variety of on-demand services that could offer mobility options for Mira Costa College.

COMMENT LETTER 50: JUSTIN WONG

Comment Letter 50

Commenter: Justin Wong
Agency: Not Provided
Contact Information: pustin14@gmail.com
Date Received: 9/3/2021
Comment:

50-1 I would like to receive info about expanding NCTD Transit options to Miracosta

RESPONSE TO COMMENT 50-1

See response to the duplicate comment above (49-1).

COMMENT LETTER 51: ELIZABETH FATTAH

Comment Letter 51

Commenter: Elizabeth Fattah
Agency: Not Provided
Contact Information: elizfattah@yahoo.com
Date Received: 10/11/2021
Comment:

51-1 Route 52 should not be expanded to more lanes. Use the money for public transit and making it easier and cheaper for people to use Public Transportation. We are in a climate crisis which means that we need to sequester carbon, not to add more to the planet

RESPONSE TO COMMENT 51-1

As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR. It will be considered by the SANDAG Board of Directors when it considers approval of the proposed Plan.

Also note that, as included under mitigation measure GHG-5c in Section 4.8, SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions.

SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Phone (619) 699-1900
Fax (619) 699-1905
sandag.org

***Resolution No.* 2022-10**

A Resolution of the San Diego Association of Governments Board of Directors Adopting the Air Quality Conformity Determination, Finding that the Sustainable Communities Strategy (SCS) Achieves the Regional Greenhouse Gas Reduction Targets established by the California Air Resources Board; and Adopting San Diego Forward: the 2021 Regional Plan, including its SCS, its Supporting Analyses, and the Series 14 Regional Growth Forecast

WHEREAS, the San Diego Association of Governments (SANDAG) is the federally designated Metropolitan Planning Organization (MPO), pursuant to Title 23 United States Code Sections 134(a) and (g), and the state designated Regional Transportation Planning Agency, for the San Diego County region pursuant to California Public Utilities Code Section 132005; and

WHEREAS, Title 23, Part 450 and Title 49, Part 613 of the Code of Federal Regulations (CFR), require SANDAG, as the MPO, to prepare and update a long-range Regional Transportation Plan (RTP) every four years; and

WHEREAS, Section 65080 of the California Government Code requires SANDAG as the regional transportation planning agency for the San Diego region to prepare and update a long-range RTP and Sustainable Communities Strategy (SCS) every four years; and

WHEREAS, on October 8, 2019, Governor Gavin Newsom signed into law California Assembly Bill 1730 (Gonzalez) (AB 1730), which amended California Government Code Section 65080(d) to provide that the regional transportation plan, sustainable communities strategy, and Environmental Impact Report adopted by SANDAG on October 9, 2015, shall remain in effect for all purposes, including for purposes of consistency determinations and funding eligibility until SANDAG adopts its next update to its Regional Transportation Plan on or before December 31, 2021; and

WHEREAS, to ensure compliance with federal laws applicable to regional transportation plans and air quality conformity, on October 25, 2019, the SANDAG Board of Directors found the Revenue Constrained San Diego Forward: The 2019 Federal Regional Transportation Plan in conformance with all applicable State Implementation Plan (SIP) requirements for air quality, in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7506) as amended, and the 2016 Regional Air Quality Strategy (RAQS) in accordance with California law; and

WHEREAS, Section 132360 of the California Public Utilities Code states that SANDAG should update its Regional Comprehensive Plan (RCP) so that it is compatible with its RTP; the RCP was integrated into the Regional Plan in 2015 resulting in one comprehensive planning document for the region; and

WHEREAS, through the conduct of a continuing, comprehensive, and coordinated transportation planning process in conformance with all applicable federal and state requirements, SANDAG developed its latest RTP, San Diego Forward: The 2021 Regional Plan (Regional Plan), with a 2050 horizon

year, which incorporates an SCS for the San Diego region consistent with Government Code Section 65080 requirements; and

WHEREAS, the Regional Plan considers how the region will grow, where people will live, and how people and goods will move around the region. It provides a framework for a fast, fair, and clean transportation system and a resilient region through the efficient movement of people and goods, access to affordable, reliable, and safe mobility options, and healthier air and reduced greenhouse gas emissions; and

WHEREAS, the Regional Plan includes the mandatory policy, action, and financial elements as identified in the Code of Federal Regulations Title 23 Part 450 and Title 49, Part 613, and the SCS and other state RTP requirements as identified in California Government Code Section 65080; and

WHEREAS, on April 9, 2021, the SANDAG Board of Directors adopted Resolution No. 2021-17 directing staff to consider the following when drafting the Regional Plan: (1) the health results caused by implementing the Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution; (2) alternatives to driving for the most disadvantaged communities; (3) consistency with local climate action plans; (4) at least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035; (5) a transit rate structure that increases ridership and expands access to mobility; (6) infrastructure that helps ensure that public transit is safe, comfortable, convenient and competitive with automobile travel; (7) local workforce and careers in construction for our region through project labor agreements; and (8) biodiversity, natural habitats, open space and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program, and their supporting land use plans and zoning; Attachment 4 to the Board of Directors December 10, 2021, agenda documents on how Regional Plan preparation considered these factors; and

WHEREAS, the Regional Plan considers, analyzes, and reflects, as appropriate, the metropolitan transportation planning process as identified in the federal Fixing America's Surface Transportation Act (P.L. 114-94) as well as the National Highway System Designation Act of 1995, and is based on reasonably available funding provisions; and

WHEREAS, the Regional Plan serves as a Congestion Management Process consistent with 23 CFR Part 450.322, which includes regional objectives, a multimodal transportation network, performance measures, data collection, analysis of congestion, strategy identification, strategy implementation, and evaluation; and

WHEREAS, SANDAG has conducted an air quality conformity analysis for the Regional Plan (Regional Plan Appendix C), using the most recent planning assumptions, emissions model, and consultation provisions that complies with the San Diego Transportation Conformity Procedures adopted in July 1998, which in turn complies with federal requirements under 40 CFR Part 93 and includes a quantitative regional emissions analysis that meets emissions budget requirements of the U.S. Environmental Protection Agency transportation conformity rule (40 CFR Part 93); and

WHEREAS, transportation control measures (TCMs) from the 2016 RAQS and 1982 SIP for air quality have been given emphasis in the Regional Plan, which provides for the expeditious implementation of all applicable TCMs; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(E) and federal public participation requirements (23 CFR Part 450.316), the Regional Plan, including its SCS, was developed through a strategic, proactive, comprehensive public outreach and involvement program, which included implementing an adopted public participation plan; a virtual meeting on February 12, 2021, with representatives from the County Board of Supervisors and from all city councils, noticed to the clerks of the Board of Supervisors and cities, pursuant to Government Code Section 65080(b)(2)(E); six virtual public

engagement gatherings in June 2021 to facilitate public comment on the Draft Regional Plan, pursuant to Government Code Section 65080(b)(2)(F)(iii); and two noticed virtual public hearings to receive testimony on the Draft Regional Plan and its SCS, pursuant to Government Code Section 65080(b)(2)(F)(v), and a Board of Directors meeting on October 8, 2021, to provide an overview of the Environmental Impact Report; and interagency coordination and involvement; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the Regional Plan SCS used the most recent planning assumptions considering local general plans and other factors, including the Series 14 Regional Growth Forecast was developed working with local jurisdictions and which is based on the California Department of Finance population projections released in January 2020; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the Regional Plan SCS also: (i) identifies the general location of uses, residential densities, and building intensities within the region; (ii) identifies areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (iii) identifies areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (iv) identifies a transportation network to service the transportation needs of the region; (v) gathers and considers the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Government Code Section 65080.01; (vi) considers the state housing goals specified in Government Code Sections 65580 and 65581; and (viii) allows the RTP to comply with Section 176c of the federal Clean Air Act (42 U.S.C. Sec. 7506); and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B)(vii), the Regional Plan SCS also sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, if implemented, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve the regional greenhouse gas emission targets set by the California Air Resources Board (CARB); and

WHEREAS, CARB set the per capita greenhouse gas emission reduction targets for automobiles and light trucks for the San Diego region at 15 percent by 2020 and 19 percent by 2035 from a 2005 base year.

WHEREAS, pursuant to Government Code Section 65080(b)(2)(G), the Regional Plan SCS considered spheres of influence adopted by the San Diego Local Agency Formation Commission; and

WHEREAS, the Regional Plan includes the elements of the RCP pursuant to Section 132360 et seq. of the California Public Utilities Code, and SANDAG followed the public participation and consultation process described therein.

NOW THEREFORE BE IT RESOLVED BY the SANDAG Board of Directors that the foregoing recitals are true and correct and incorporated by this reference; and

BE IT FURTHER RESOLVED THAT the SANDAG Board of Directors finds the Revenue Constrained Regional Plan is in conformance with all applicable SIP requirements for air quality, and the emissions budgets included in the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020), in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7506) as amended, and the 2015 revisions to the National Ambient Air Quality Standards for ground-level ozone pursuant to Sections 108 and 109 of the Clean Air Act (42 U.S.C. Sec 7408 and Sec. 7409) as amended, as well as the 2016 RAQS, in accordance with California law; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the Regional Plan, including its SCS, if implemented, achieves the regional greenhouse gas reduction targets established by the CARB and meets all other applicable requirements of Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq.; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the following were considered when drafting the Regional Plan: (1) the health results caused by implementing the Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution; (2) alternatives to driving for the most disadvantaged communities; (3) consistency with local climate action plans; (4) at least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035; (5) a transit rate structure that increases ridership and expands access to mobility; (6) infrastructure that helps ensure that public transit is safe, comfortable, convenient and competitive with automobile travel; (7) local workforce and careers in construction for our region through project labor agreements; and (8) biodiversity, natural habitats, open space and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program and their supporting land use plans and zoning; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors does hereby adopt San Diego Forward: The 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast.

PASSED AND ADOPTED this 10th of December, 2021.

Attest:

Chair	**Secretary**

Member Agencies: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.

Advisory Members: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico.

Discussion of Topics in SANDAG Board of Directors Resolution No. 2021-17

On April 9, 2021, the SANDAG Board directed staff to consider specific topics in developing the 2021 Regional Plan by adopting Resolution No. 2021-17. The following documents how each topic has been considered.

The health results caused by implementing the 2021 Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution

A critical component of reviewing the impacts of the 2021 Regional Plan is evaluating the effects on historically underserved and systemically marginalized groups. This evaluation is known as a social equity analysis and focuses on communities of color, residents with low incomes, and seniors. While the 2021 Regional Plan delivers improvements to the entire region, this review ensures that the benefits are shared by everyone and that the burdens of the 2021 Regional Plan's changes are not disproportionally shouldered by any social equity focus population. Appendix H includes results of the Social Equity Analysis for the 2021 Regional Plan and Attachment 2 to Appendix A describes how strategies in the 2021 Regional Plan reduce pollution exposure in disadvantaged communities. In addition, the Community Health Equity Evaluation concludes that disadvantaged communities would equally benefit from the implementation of the 2021 Regional Plan as would the San Diego County region and have slightly greater reductions in total avoided mortalities compared to the region.

Alternatives to driving for the most disadvantaged communities

Appendix H analyzes access to transit and bicycle facilities for low-income, minority, and senior populations. For each of these populations, the percentage of people living within .5 miles of commuter rail, light rail, or Rapid transit increases by at least 20% by 2035, and the percentage of people living within .25 miles of a bicycle facility increases by at least 10% by 2035. In addition, Appendix A, Attachment 2 describes strategies to reduce pollution exposure in disadvantaged communities (as designated by CalEnviroScreen 3.0). Many of these strategies to reduce pollution exposure also provide alternatives to driving for disadvantaged communities.

Consistency with local Climate Action Plans

SANDAG will support local jurisdictions with implementing and monitoring Climate Action Plans (CAPs) by providing grant funding, guidance resources, and templates for CAP implementation (see Climate Action Planning Program in Appendix B). Resources include the Regional Climate Action Planning Framework (ReCAP) and the Climate Action Data Portal, which houses greenhouse gas inventory and CAP monitoring data to help jurisdictions monitor progress toward CAP goals. These resources help jurisdictions use consistent approaches, methodologies, and data, while also preserving their flexibility to form their own local policies.

At least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035

Section 4.8.3 of the Environmental Impact Report evaluates whether the 2021 Regional Plan would achieve at least a 30% reduction in per capita emissions from the entire on-road transportation sector by 2035. It concludes that implementation of the 2021 Regional Plan would reduce 2035 per-capita greenhouse gas emissions from the on-road transportation sector by 39% compared to 2016 levels, which is higher than the 30% reduction identified in SANDAG Board Resolution No. 2021-17.

A transit rate structure that increases ridership and expands access to mobility

The 2021 Regional Plan assumes a 50% transit fare subsidy for people with low-income by 2027 and a 50% subsidy for all by 2035. Implementation of the 2021 Regional Plan, including this rate structure, is expected to increase daily transit boardings from 380,540 in 2016, to 1,235,770 in 2035, and 1,440,963 in 2050

(see Appendix T, Attachment 6). In addition, Appendix B includes an implementation action to evaluate the transition to free public transit by 2030, which could further increase transit ridership.

Infrastructure that helps ensure that public transit is safe, comfortable, convenient, and competitive with automobile travel

SANDAG, the Metropolitan Transit System (MTS), and the North County Transit District believe that more can be done to improve the safety on and near transit and are working to make those improvements now and in the future. For example, MTS has reprioritized security funding from fare enforcement to safety improvements. Performance measures for the 2021 Regional Plan demonstrate convenient public transit by increasing transit access (measured by time) to different types of destinations, including basic needs (retail, parks, and medical facilities) and opportunities (employment centers and higher education). For all measures, the percent of population that can access these destinations via transit improves with implementation of the 2021 Regional Plan. Performance measures for the 2021 Regional Plan demonstrate that public transit is competitive with automobile travel in terms of corridor travel times for several major corridors. Appendix T, Attachment 6 contains detailed performance measure results.

Local workforce and careers in construction for our region through Project Labor Agreements

On July 23, 2021, the Board of Directors authorized staff to begin negotiations with the San Diego County Building and Construction Trades Council to execute a Community Benefits Agreement. Staff will return to the Board with updates as negotiations progress.

Biodiversity, natural habitats, open space, and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program, and their supporting land use plans and zoning

SANDAG will continue and expand its existing grant programs, partner with member agencies on state funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan. To meet the region's habitat conservation goals, the 2021 Regional Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B), and $300million to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A).

Appendix C:

Air Quality Planning and Transportation Conformity

Final

December 2021

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Appendix C: Air Quality Planning and Transportation Conformity

Executive Summary

The San Diego Association of Governments (SANDAG), as the region's Metropolitan Planning Organization (MPO), must make a transportation air quality conformity determination for regional transportation plans (RTPs) and regional transportation improvement programs (RTIPs). The purpose of transportation conformity is to ensure that federally funded or approved activities are consistent with the State Implementation Plan (SIP). This ensures that no transportation activities will cause or contribute to new air quality violations, worsen existing violations, or delay the attainment of any relevant National Ambient Air Quality Standards (NAAQS). This appendix documents a demonstration of conformity for the 2008 and 2015 ozone NAAQS for San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) and air quality analysis for the 2021 Regional Transportation Improvement Program (2021 RTIP) Amendment No. 06. The 2021 Regional Plan serves as the region's RTP.

Background

The federal Clean Air Act (CAA), which was last amended in 1990, requires the U.S. Environmental Protection Agency (U.S. EPA) to set NAAQS for pollutants considered harmful to public health and the environment. California has adopted state air quality standards that are more stringent than the NAAQS. [1] Areas with levels that violate the standard for specified pollutants are designated as Nonattainment Areas.

The U.S. EPA requires that each state containing Nonattainment Areas develop and adopt plans to attain the NAAQS by a specified attainment deadline. These attainment plans are called SIPs. The San Diego County Air Pollution Control District (SDAPCD), in collaboration with the California Air Resources Board (CARB), prepares the San Diego portion of the California SIP. Once the standards are attained, further plans—called Maintenance Plans—are required to demonstrate continued maintenance of the NAAQS.

SANDAG and the U.S. Department of Transportation (U.S. DOT) must make a determination that the RTP and the RTIP conform to the SIP for air quality. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the NAAQS. Conformity determinations are guided by U.S. EPA's Transportation Conformity rule (40 CFR 93.100 et seq.).

[1] While most California air quality standards are more stringent than those developed by U.S. EPA, the 2015 Eight-Hour Ozone Standards are the same.

This document demonstrates regional transportation conformity to the 2020 San Diego Ozone SIP (2020 SIP) for both the 2008 and 2015 ozone NAAQS. The year of the SIP corresponds to the year SDAPCD developed the document.

On November 19, 2020, CARB adopted the proposed San Diego Eight-Hour Ozone Attainment Plan SIP submittal, which addresses both the 2008 and 2015 ozone standards. Included in the San Diego 2020 SIP is a request for a voluntary reclassification from Serious to Severe nonattainment for the 2008 ozone standard and a voluntary reclassification from Moderate to Severe nonattainment for the 2015 ozone standards as permitted under Section 181(b)(3). The reclassification extends the timeline to meet the standards and aligns with air quality modeling. Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Serious to Severe for the 2008 ozone standard and Moderate to Severe for the 2015 ozone standard.

On June 4, 2021, U.S. EPA posted on the Office of Transportation and Air Quality website the adequacy review and public comment on the 2008 and 2015 Eight-Hour Ozone Attainment Plan budgets. On October 4, 2021, U.S. EPA published in the Federal Register the adequacy finding for the on-road transportation air quality budgets in the 2008 and 2015 Eight-Hour Ozone Attainment Plans with an effective date of October 19, 2021.

On July 12, 2021, the San Diego 2020 SIP was found complete by U.S. EPA by operation of law six months after the submittal date. Under the CAA, U.S. EPA has twelve months from the completeness date to take a final action on the 2020 SIP.

2008 Ozone Standard

On May 21, 2012, the U.S. EPA designated the San Diego air basin as a Nonattainment Area for the 2008 Eight-Hour Ozone Standard and classified it as a marginal area with an attainment date of July 20, 2015. This designation became effective on July 20, 2012. SANDAG demonstrated conformity of the 2011 Regional Plan and 2012 RTIP to the 2008 ozone standard on May 24, 2013, using the applicable model approved by the U.S. EPA to forecast regional emissions (EMFAC2011). The U.S. DOT, in consultation with the U.S. EPA, made its conformity determination on June 28, 2013.

Effective June 3, 2016, the U.S. EPA determined that 11 areas, including the San Diego air basin, failed to attain the 2008 ozone NAAQS by the applicable attainment date of July 20, 2015, and thus were reclassified by operation of law as Moderate for the 2008 ozone NAAQS (81 FR 26697). States containing these new Moderate areas were required to submit SIP revisions that met the statutory and regulatory requirements that apply to 2008 ozone Nonattainment Areas classified as Moderate by January 1, 2017. The 2016 SIP addressed the required SIP revisions.

On August 23, 2019, U.S. EPA published a final rule in the Federal Register reclassifying the San Diego air basin by operation of law from a Moderate Nonattainment Area for the 2008 ozone NAAQS to Serious, effective September 23, 2019 (84 FR 44238). This rulemaking changed the 2008 ozone NAAQS attainment deadline to July 20, 2021, with an attainment year of 2020.

Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Serious to Severe for the 2008 Eight-Hour Ozone Standard. The reclassification of the 2008 Eight-Hour Ozone Standard from Serious to Severe changed the attainment date from July 20, 2021, (as a Serious area) to July 20, 2027, (as a Severe area) and the attainment demonstration year from 2020 to 2026.

2015 Ozone Standard

On October 26, 2015, the U.S. EPA announced a revised ozone standard, referred to as the 2015 ozone standard (80 FR 65292). The new standard revised the allowable ozone level to 0.070 parts per million (ppm). The 2015 ozone standard became effective on December 28, 2015. On June 4, 2018, U.S. EPA published a final rule that designated the San Diego air basin as nonattainment, with a classification of Moderate, for the 2015 ozone NAAQS with an attainment deadline of August 3, 2024, and an attainment year of 2023 (83 FR 25776, effective August 3, 2018).

On May 24, 2019, the SANDAG Board of Directors (Board) adopted the 2015 Ozone National Ambient Air Quality Standard Conformity Demonstration for San Diego Forward: The 2015 Regional Plan (2015 Regional Plan) and the 2018 RTIP. The conformity demonstration found the 2015 Regional Plan and 2018 RTIP, as amended, in conformity with the requirements of the federal CAA and applicable SIP. The U.S. DOT, in consultation with U.S. EPA, made its conformity determination on June 21, 2019, indicating that all air quality conformity requirements have been met, including those for the 2015 ozone standard.

Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Moderate to Severe for the 2015 Eight-Hour Ozone Standard. The reclassification of the 2015 Eight-Hour Ozone Standard from Moderate to Severe changed the attainment date from August 3, 2024, (as a Moderate area) to August 3, 2033, (as a Severe area) and the attainment demonstration year from 2023 to 2032.

Carbon Monoxide Standard

The San Diego region had been designated by the U.S. EPA as a federal maintenance area for the Carbon Monoxide (CO) standard. On November 8, 2004, CARB submitted the 2004 revision to the California SIP for CO to the U.S. EPA, which extended the maintenance plan demonstration to 2018. Effective January 30, 2006, the U.S. EPA approved this maintenance plan as an SIP revision. On March 21, 2018, the U.S. EPA documented in a letter that transportation conformity requirements for CO would cease to apply after June 1, 2018. Therefore, this appendix does not include a CO conformity analysis.

Conformity Determinations for the 2019 Federal Regional Transportation Plan, 2018 RTIP, and 2021 RTIP

On October 25, 2019, the Board adopted San Diego Forward: The 2019 Federal Regional Transportation Plan (2019 Federal RTP) and 2018 RTIP Amendment No. 08 and found the 2019 Federal RTP and 2018 RTIP, as amended, in conformity with the requirements of the

federal CAA and applicable SIP. The U.S. DOT, in consultation with U.S. EPA, made its conformity determination on November 15, 2019.

On February 26, 2021, the Board adopted the 2021 RTIP, found the 2021 RTIP in conformity with the requirements of the federal CAA and applicable SIP, and redetermined air quality conformity of the revenue-constrained 2019 Federal RTP. On April 16, 2021, the Federal Highway Administration provided conformity determination on the full Federal Statewide Transportation Improvement Program.

Transportation Conformity: Modeling Procedures

Introduction

Conformity determination of the 2021 Regional Plan and conformity analysis of the 2021 RTIP Amendment No. 06 have been conducted simultaneously for consistency purposes. Table C.9 includes the conformity analysis for both the 2021 Regional Plan and 2021 RTIP Amendment No. 06. The 2021 Regional Plan provides information on revenue assumptions in Chapter 3 and Appendix V: Funding and Revenues. In addition, this conformity determination fulfills the requirement of California Senate Bill 375 (Steinberg, 2008), which requires a Sustainable Communities Strategy (SCS) to allow for compliance with Section 176 of the federal CAA. (California Government Code Section 65080[b][2][B][viii].)

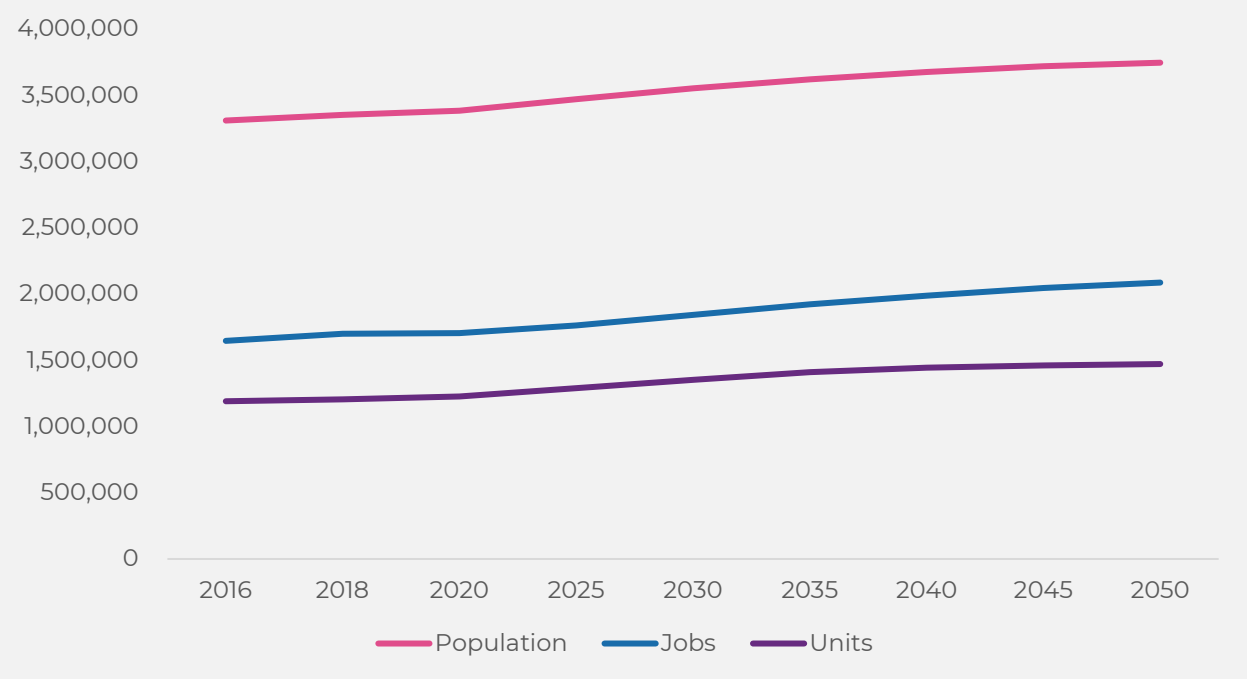
The following sections provide an overview of models, modeling inputs, and processes used in transportation conformity. For additional details on population, employment, and land use, refer to Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern. Appendix S: Travel Demand Modeling Tools provides additional modeling documentation and Appendix T, Attachment 5: Strategies Applied in ABM2+ provides details on strategy applications within modeling structure.

Growth Forecasts

Every three to five years, SANDAG produces a long-range forecast of population, housing, and employment growth for the San Diego region. The forecast process relies upon an integrated forecasting model. The first element is the San Diego Demographic and Economic model, which provides a detailed socioeconomic forecast for the region. Next, the regionwide data are allocated to the parcel level based upon the forecasted development pattern for the 2021 Regional Plan (SCS land use pattern), which must use the most recent planning assumptions considering local general plans and other factors. This includes current plans and policies of the jurisdictions and increasing density near transit and job centers, consistent with regional goals for sustainability, mobility, housing affordability, and economic prosperity. The parcel-level forecast data can be aggregated up to larger subregional areas of interest.

On January 6, 2021, SANDAG consulted with the San Diego Region Conformity Working Group (CWG) on the use of the Series 14 Regional Growth Forecast, SCS land use pattern, for the air quality conformity analysis of the 2021 Regional Plan. Previously, both the U.S. DOT and the U.S. EPA concurred that approved plans should be used as input in the air quality conformity process. Figure C.1 and Table C.1 show the regional population, jobs, and housing growth forecast for the San Diego region through 2050.

Figure C.1: San Diego Regional Population, Jobs, and Housing Forecast



Source: Series 14 Regional Growth Forecast, SCS land use pattern, SANDAG

Table C.1: San Diego Regional Population and Employment Forecast

San Diego Regional Population and Employment Forecast

Year	Population	Employment
2016	3,309,510	1,646,419
2025	3,470,848	1,761,747
2035	3,620,348	1,921,475
2050	3,746,073	2,086,318

Source: Series 14 Regional Growth Forecast, SCS land use pattern, SANDAG

The Series 14 Regional Growth Forecast, SCS land use pattern, uses planning assumptions from the adopted general plans and community plans and policies of the 18 cities and the county.[2] Because many of the local general plans have horizon years of 2030—20 years before the Series 14 Regional Growth Forecast horizon year—the later part of the forecast was developed in collaboration with each of the local jurisdictions through an iterative process that allowed each city to provide their projections for land uses in those later years. The Series 14 Regional Growth Forecast, SCS land use pattern, thus represents in compliance with 40 CFR 93.110(a), the "latest planning assumptions" in force at the time this conformity analysis began.

Travel Modeling

The following sections provide an overview of the SANDAG travel model and the travel model flow, spatial and temporal resolution, residents travel model, special market models, trip assignment, model inputs, data sources, and emissions modeling.

SANDAG uses an updated second-generation activity-based model (ABM2+) that incorporates the latest planning assumptions at the time the conformity analysis began per 40 CFR 93.110 to support the development of the RTP and its conformity demonstration. An ABM simulates individual and household transportation decisions that comprise their daily travel itinerary. It predicts whether, where, when, and how people travel outside their home for activities such as work, school, shopping, healthcare, and recreation.

The SANDAG ABM2+ includes a number of methodological strengths. It predicts the travel decisions of San Diego residents at a detailed level, taking into account the way people schedule their day, their behavioral patterns, and the need to cooperate with other household members. When simulating a person's travel patterns, the ABM takes into consideration a multitude of personal and household attributes like age, income, gender, and employment status. The model's fine temporal and spatial resolution ensures that it is able to capture subtle aspects of travel behavior.

To support the 2021 Regional Plan, SANDAG enhanced the ABM2+ functionality for application to the 5 Big Moves planning efforts. These enhancements included functions to address new trends in teleworking, use of micromobility modes and transportation network companies (TNC), and new mobility options for Flexible Fleets and microtransit within Mobility Hubs.

The ABM2+ outputs are used as inputs for regional emissions forecasts. The estimates of regional transportation-related emissions analyses conducted for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 conformity analysis meet the requirements established in the Transportation Conformity Regulation (40 CFR §93.122[b] and §93.122[c]). These requirements relate to the procedures to determine regional transportation-related

[2] The Series 14 Regional Growth Forecast assumptions were presented to the Board May 25, 2018 (sandag.org/uploads/meetingid/meetingid_4785_23865.pdf). On July 10, 2020, the Board also adopted the 6th Cycle Regional Housing Needs Assessment Plan, which allocated the regional housing need at the subregional level (sandag.org/uploads/meetingid/meetingid_5410_27706.pdf).

emissions, including the use of network-based travel models, methods to estimate traffic speeds and delays, and the estimation of vehicle miles traveled (VMT).

The ABM2+ accounts for a variety of different weekday travel markets in the region, including San Diego region resident travel, travel by Mexico residents and other travelers crossing San Diego County's borders, visitor travel, airport passengers at both the San Diego International Airport and the Cross Border Xpress (CBX) bridge to the Tijuana International Airport, and commercial travel. Many of the models used to represent demand are simulation-based models, such as activity-based or tour-based approaches, while others use an aggregate three- or four-step representations of travel. Table C.2 lists the SANDAG travel markets along several key dimensions.

There are two broad types of models and three specific types of models identified in Table C.2. Disaggregate models refer to models whose demand is generated via a stochastic simulation paradigm. Both activity-based and tour-based models are simulation-based. They rely upon a synthetic population to generate travel and stochastic processes to choose alternatives. The models output disaggregate demand in the form of tour and trip lists.

The resident travel model is an activity-based model, in which all tours and activities are scheduled into available time windows across the entire day. The approach recognizes that a person can be in only one place at one time, and their entire day is accounted for in the model. A tour-based treatment is used for other special travel markets, such as Mexico resident crossborder travel, visitor travel, airport passenger travel, and commercial vehicle travel. Tour-based models do not attempt to model all travel throughout the day for each person; rather, once tours are generated, they are modeled independently of each other. A tour-based model does not attempt to schedule all travel into available time windows.

Aggregate models rely upon probability accumulation processes to produce travel demand and output trip tables. The external heavy-duty truck model and certain external travel models are aggregate.

Table C.2: SANDAG ABM2+ Travel Markets

SANDAG ABM2+ Travel Markets				
Travel Market	**Description**	**Model Type**	**Temporal Resolution**	**Spatial Resolution**
San Diego resident travel (internal)	Average weekday travel made by San Diego residents within San Diego County	Disaggregate activity-based	30-minute	MGRA [3]
San Diego resident travel (internal–external)	Average weekday travel by San Diego residents between San Diego County and another county (Mexico)	Disaggregate tour-based	30-minute	Internal MGRA – external cordon TAZ [4]
Mexico resident crossborder travel (external–internal and internal–internal)	Average weekday travel by Mexico residents into, out of, and within San Diego County	Disaggregate tour-based	30-minute	Internal MGRA – external cordon TAZ
Overnight visitor	Average weekday travel made by overnight visitors in San Diego County	Disaggregate tour-based	30-minute	MGRA
Airport passenger (San Diego Airport and CBX)	Average weekday travel made by air passengers and related trips such as taxis to/from airport	Disaggregate trip-based	30-minute	MGRA
External–external	Average weekday travel with neither origin nor destination in San Diego County	Aggregate trip-based	5 time periods	External cordon TAZ
Other U.S.–internal travel	Average weekday external–internal trips made by non-San Diego and non-Mexico residents	Aggregate trip-based	5 time periods	External cordon TAZ – internal TAZ
Commercial vehicle model	Average weekday vehicle trips made for commercial purposes (in addition to heavy trucks, includes light truck goods movements and service vehicles)	Disaggregate tour-based	5 time periods	TAZ
External heavy-duty truck model	Average weekday vehicle trips for 3 weight classes for external truck travel	Aggregate trip-based	5 time periods	External cordon TAZ – external cordon TAZ; external cordon TAZ – internal TAZ

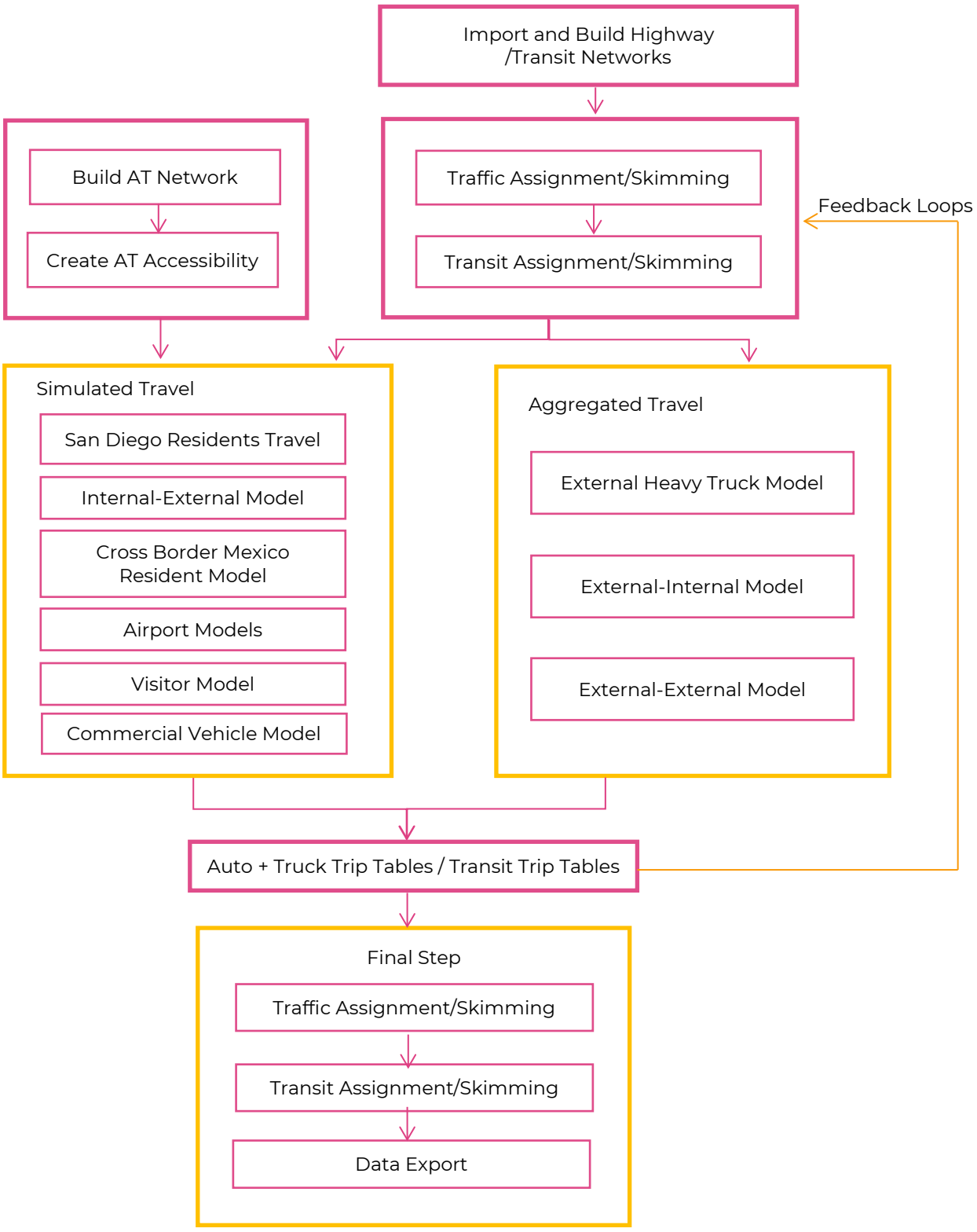
[3] MGRA = Master Geographic Reference Area; 23,002 MGRAs in the region.
[4] TAZ = Traffic Analysis Zone; 4,996 TAZs in the region.

ABM2+ Model Flow

To simulate how San Diego residents, non-residents, and freight travel in the region, the SANDAG ABM2+ includes several models and steps. Figure C.2 outlines the overall flow of the SANDAG ABM2+. It starts with building an all-street-based active transportation network and creating Master Geographic Reference Area (MGRA) to MGRA and MGRA to Transit Access Point (TAP) walk, micromobility, or microtransit equivalent accessibility files; highway and transit network building and importing into Emme (traffic modeling software licensed from INRO); then traffic and transit assignment with warm start trip tables to get the congested highway and transit skims.

After the network skims and walk access files are created, the resident travel model is executed, followed by the other disaggregate models (visitor, San Diego International Airport, CBX terminal, crossborder, and commercial vehicle) and aggregate models (external heavy truck, external–external, and external–internal). The trip tables from all the models are summed up by vehicle classes, time of day (TOD), and value of time (VOT) and are used by traffic assignment. The skims after the traffic assignment are used for the subsequent iteration in a three-feedback-loop model run. The final traffic and transit assignment and data export concludes the ABM2+ modeling procedure. The outputs from the final step are used to generate input for Emission Factors (EMFAC) emissions modeling.

Figure C.2: SANDAG ABM2+ Flow Chart



Spatial and Temporal Resolution

As indicated in Table C.2, different travel markets are operated in different model types with different spatial and temporal resolutions. The following section describes the treatment of space and time in the SANDAG ABM2+.

SANDAG ABM2+ utilizes the SANDAG MGRA zone system, which is one of the most disaggregate zonal systems used in travel demand models in the United States. The SANDAG MGRA system used in ABM2+ consists of 23,002 zones, which are roughly equivalent to Census blocks. To avoid computational burden, SANDAG relies on a 4,996 Traffic Analysis Zone (TAZ) system for roadway skims and assignment but performs transit calculations at the more detailed MGRA level. All activity locations are tracked at the MGRA level. The MGRA geography offers both the advantage of fine spatial resolution and consistency with network levels of service that make it ideal for tracking activity locations.

The disaggregated models function at a temporal resolution of one-half hour. These one-half hour increments begin with 3 a.m. and end with 3 a.m. the next day, though the hours between 1 a.m. and 5 a.m. are aggregated to reduce computational burden. Temporal integrity is ensured so that no activities are scheduled with conflicting time windows except for short activities/tours that are completed within a one-half hour increment. For example, a person may have a very short tour that begins and ends within the 8 a.m. to 8:30 a.m. period as well as a second, longer tour that begins within this time period but ends later in the day.

Time periods are typically defined by their midpoint in the scheduling software. For example, in a model system using one-half hour temporal resolution, the 9 a.m. time period would capture activities of travel between 8:45 a.m. and 9:15 a.m. If there is a desire to break time periods at “round” half-hourly intervals, either the estimation data must be processed to reflect the aggregation of activity and travel data into these discrete half-hourly bins or a more detailed temporal resolution must be used, such as half hours (which could then potentially be aggregated to “round” half hours).

A critical aspect of the model system is the relationship between the temporal resolution used for scheduling activities and the temporal resolution of the network simulation periods. Although each activity generated by the model system is identified with a start time and end time in one-half hour increments, level-of-service matrices are only created for five aggregate time periods: (1) early a.m.; (2) a.m.; (3) midday; (4) p.m.; and (5) evening. The trips occurring in each time period reference the appropriate transport network depending on their trip mode and the midpoint trip time. All aggregated models operate on the five aggregated time periods. Table C.3 lists the definition of time periods for level-of-service matrices.

Table C.3: Time Periods for Level-of-Service Skims and Assignment

Time Period for Level-of-Service Skims and Assignment			
Number	**Description**	**Begin Time**	**End Time**
1	Early	3 a.m.	5:59 a.m.
2	a.m. Peak	6 a.m.	8:59 a.m.
3	Midday	9 a.m.	3:29 p.m.
4	p.m. Peak	3:30 p.m.	6:59 p.m.
5	Evening	7 p.m.	2:59 a.m.

Resident Travel Model

The resident travel model is based on the Coordinated Travel Regional Activity-Based Modeling Platform family of activity-based models. This model system is an advanced, but operational, activity-based model that fits the needs and planning processes of SANDAG.

The resident travel model has its roots in a wide array of analytical developments. They include discrete choice forms (multinomial and nested logit), activity duration models, time-use models, models of individual microsimulation with constraints, entropy-maximization models, etc. These advanced modeling tools are combined to ensure maximum behavioral realism, replication of the observed activity-travel patterns, and model sensitivity to key projects and policies. The model is implemented in a microsimulation framework. Microsimulation methods capture aggregate behavior through the representation of the behavior of individual decision-makers. In travel demand modeling, these decision-makers are typically households and persons.

Decision Modeling Units

Decision-makers in the model system include both persons and households. These decision-makers are created (synthesized) for each simulation year based on tables of households and persons from Census data and forecasted TAZ-level distributions of households and persons by key socioeconomic categories. These decision-makers are used in the subsequent discrete-choice models to select a single alternative from a list of available alternatives according to a probability distribution. The probability distribution is generated from a logit model that takes into account the attributes of the decision-maker and the attributes of the various alternatives. The decision-making unit is an important element of model estimation and implementation and is explicitly identified for each model specified in the following sections.

To simulate trips and tours made by individuals and households, the SANDAG ABM2+ includes a total of eight person types (shown in Table C.4). The person types are mutually exclusive with respect to age, work status, and school status.

Table C.4: Person Types

Person Types				
Number	**Person-Type**	**Age**	**Work Status**	**School Status**
1	Full-time worker [5]	18+	Full-time	None
2	Part-time worker	18+	Part-time	None
3	College student	18+	Any	College+
4	Non-working adult	18–64	Unemployed	None
5	Non-working senior	65+	Unemployed	None
6	Driving-age student	16–17	Any	Pre-college
7	Non-driving student	6–15	None	Pre-college
8	Preschooler	0–5	None	None

Further, workers are stratified by their occupation to take full advantage of information provided by the land use and demographic models. Table C.5 outlines the worker categories. These models are used to segment destination choice attractiveness for work location choice based on the occupation of the worker.

Table C.5: Occupation Types

Occupation Types	
Number	**Description**
1	Management, Business, Science, and Arts
2	Services
3	Sales and Office
4	Natural Resources, Construction, and Maintenance
5	Production, Transportation, and Material Moving
6	Military

The SANDAG ABM2+ assigns one of the activity types to each out-of-home location that a person travels to in the simulation (shown in Table C.6). The activity types are grouped according to whether the activity is mandatory, maintenance, or discretionary. The classification scheme of activities into the three categories helps differentiate the importance of the activities. “Mandatory” includes work and school activities. “Maintenance” includes household-related activities, such as drop-off and pick-up of children, shopping, and medical appointments. “Discretionary” includes social and

[5] Full-time employment is defined in the SANDAG 2016 household survey as at least 30 hours/week. Part-time is less than 30 hours/week on a regular basis.

recreational activities. To determine which person types can be used for generating each activity type, the model assigns eligibility requirements. For example, a full-time worker will generate mandatory work activities, while a non-working adult or senior is eligible for non-mandatory activities. The classification scheme of each activity type reflects the relative importance or natural hierarchy of the activity, where work and school activities are typically the most inflexible in the person's daily travel itinerary.

Table C.6: Activity Types

Activity Types				
Type	**Purpose**	**Description**	**Classification**	**Eligibility**
1	Work	Working at regular workplace or work-related activities outside the home	Mandatory	Workers and students
2	University	College+	Mandatory	Age 18+
3	High School	Grades 9–12	Mandatory	Age 14–17
4	Grade School	Grades K–8	Mandatory	Age 5–13
5	Escorting	Pick-up/drop-off passengers	Maintenance	Age 16+
6	Shopping	(auto trips only)	Maintenance	5+ (if joint travel, all persons)
7	Other Maintenance	Shopping away from home	Maintenance	5+ (if joint travel, all persons)
8	Social/ Recreational	Personal business/services and medical appointments	Discretionary	5+ (if joint travel, all persons)
9	Eat Out	Recreation, visiting friends/family	Discretionary	5+ (if joint travel, all persons)
10	Other Discretionary	Eating outside of home	Discretionary	5+ (if joint travel, all persons)

The ABM2+ includes 22 modes available to residents, including auto by occupancy by VOT; walk; micromobility and bike modes; and walk and drive access to local, premium, or local and premium transit modes. All auto modes are included in traffic assignment, with Kiss & Ride to transit and TNC and taxi as shared ride modes and Park & Ride to transit as drive-alone mode. All transit modes are included in transit assignment, with TNC to transit as Kiss & Ride to transit. Table C.7 lists the trip modes defined in the resident travel model.

To model transit flow, the ABM2+ uses three transit modes of local bus only, premium transit only, and local bus plus premium modes. Each mode is by three access modes of walk, Park & Ride, Kiss & Ride (including TNC) to transit, resulting in total of nine transit trip TAP–TAP matrices. The premium modes include any non-local bus modes: Tier 1 heavy rail; commuter rail (COASTER); hybrid rail (SPRINTER); light rail transit (LRT) (including Trolley and Streetcar); Bus *Rapid* Transit (*Rapid*); and Express Bus. The local bus plus premium mode includes transfer between local bus and premium modes.

Table C.7: Trip Modes

Trip Modes	
Number	**Mode**
1	Drive-Alone Non-Transponder
2	Drive-Alone Transponder
3	Shared Ride 2 Person
4	Shared Ride 3+ Person (non-toll)
5	Walk – Local Bus Only
6	Walk – Premium Transit Only
7	Walk – Local Bus and Premium Transit
8	Park & Ride – Local Bus Only
9	Park & Ride – Premium Transit Only
10	Park & Ride – Local Bus and Premium Transit
11	Kiss & Ride – Local Bus Only
12	Kiss & Ride – Premium Transit Only
13	Kiss & Ride – Local Bus and Premium Transit
14	TNC to Transit – Local Bus Only
15	TNC to Transit – Premium Transit Only
16	TNC to Transit – Local and Premium Transit
17	Walk (walk, micromobility, and microtransit modes)
18	Bike
19	Taxi
20	TNC Single
21	TNC Pooled
22	School Bus (only available for school purpose)

The resident travel model comprises numerous interacting components, called "submodules." It starts with generating a representative population for the San Diego region. Once a representative population is created, the model predicts long-term and medium-term decisions such as a choice of work or school location and a household's choice of number of cars to own. Next, each person's day is scheduled, taking into account the priority of various activities and interaction among the household members. Once all journeys to and from home have been scheduled, the model predicts specific travel details such as mode, the number of stops to make, where to stop, and when to depart from each stop to continue the tour. A tour is a journey that begins and ends at home, and it can include stops at other destinations on the way to or from the primary destination. The results of resident travel model are a list of trips and tours by person by household by time of day.

The following section discusses the submodules in the order that each submodule is taken within the resident travel model.

Step 1: Population Synthesis (Build a Representative Population That Looks Like San Diego)

The first step is to create a "synthetic" population of San Diego County. A synthetic population is a table that has a record for every individual and household with the individual's and the household's characteristics. For example, if there are 41,000 18-year-old males in the region in 2050, there would be approximately 41,000 records in the table for males age 18, with each record also having other characteristics, such as school enrollment and labor force participation status. Taken as a whole, this synthetic population represents the decision-makers whose travel choices the model will simulate in later steps. For each simulation year, a full population is synthesized to match the forecasted socioeconomic and housing characteristics of each part of the region at the zonal level. These forecasts, a key ABM2+ input, come from the land use model. Synthesis works by replicating a sample of Census records (each containing complete household and individual characteristics) and placing them around the region in such a way that the forecasted characteristics of each zone are matched.

Step 2: Work and School Location (Assign a Work Location to Workers and a School Location to Students)

The second step predicts if a worker works from home, or where each worker will go to work and where each student will go to school, if applicable. Before workplace/university/school location choice, a car ownership submodule is run to select a preliminary car ownership level for calculation of accessibilities for location choice. The submodule uses the same variables as the full car-ownership submodule except for the work/university/school-specific accessibilities that are used in the full car-ownership submodule. The work and school location submodule simulates each worker's choice of work location, taking into account many factors, including ease of travel and the number of employees by occupation type in each location. The submodule also simulates each student's choice of school, taking into account factors that include the distance from home to school, school enrollment, and district boundaries. The results from this step affect later travel choices significantly because of the prominent role that workplace and school usually play in the itinerary of workers and students.

Step 3: Determine Certain Mobility Characteristics of Individuals and Households

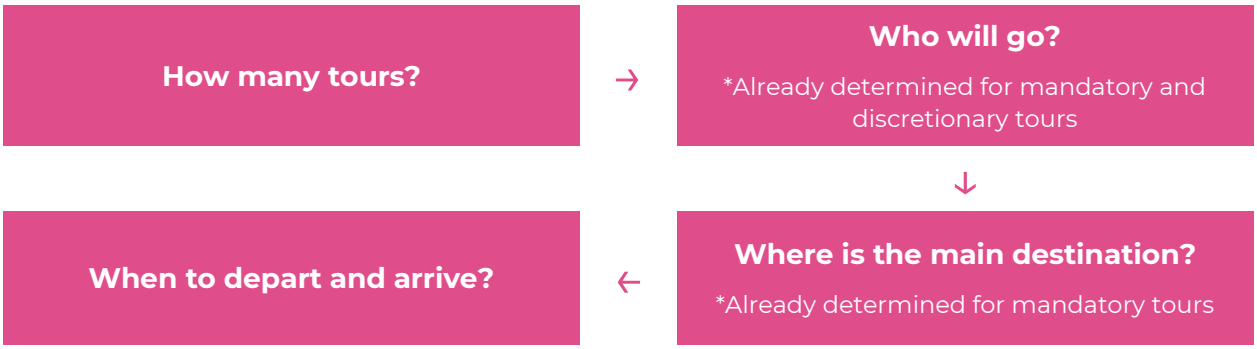
This step includes a few submodules. The full car-ownership submodule predicts the number of automobiles each household owns; the toll transponder ownership submodule predicts whether each household owns a toll transponder based on the aggregate characteristics of the zone and household car ownership (given NextOS and other technology advancements and policies, the ownership could be ubiquitous in future years); the free parking eligibility submodule predicts whether worker parking costs are employer reimbursed; and the telework frequency submodule predicts a worker's occasional telework frequency. The car ownership submodule assigns each household zero cars, one car, two cars, three cars, or four or more cars, taking into account a number of criteria, including household size, income, number of drivers, and how easy it is to reach destinations from the household's place of residence. ABM2+ includes two types of telework: permanent and occasional telework. Permanent telework is modeled in the work-from-home submodule, while the impact of occasional telework is reflected in daily activity pattern, non-mandatory tour frequency, and non-mandatory tour stop frequency submodules mentioned in the following sections. This step sets certain mobility characteristics that influence how people travel.

Step 4: Schedule the Day

The fourth step begins by predicting a "daily activity" pattern for each individual. A daily activity pattern is a theme that dictates an individual's schedule. A "mandatory" pattern means that an individual travels to work and/or school, then schedules other activities around work/school. An "at-home" pattern means that an individual's daily schedule involves no travel in the region. A "nonmandatory" pattern means that an individual's daily schedule involves traveling, but only to destinations other than work or school. The pattern type of other household members influences an individual's daily pattern type. For example, if a child stays home from school, a working parent might be more likely to stay home from work as well.

Once the submodule selects an individual's daily activity pattern, it schedules the tours that he or she will take. The ABM2+ deals with three main categories of tours: (1) mandatory tours; (2) joint tours; and (3) non-mandatory tours. Mandatory tours have work or school as the primary destination. Joint tours involve out-of-home activities that multiple members of a household partake in together. Non-mandatory tours involve purposes other than work or school that an individual undertakes independent of other members of his or her household. The submodule schedules each tour type by predicting how many tours of that type there are, who will participate in the tour, where the main destination is, and when to depart and arrive (see Figure C.3).

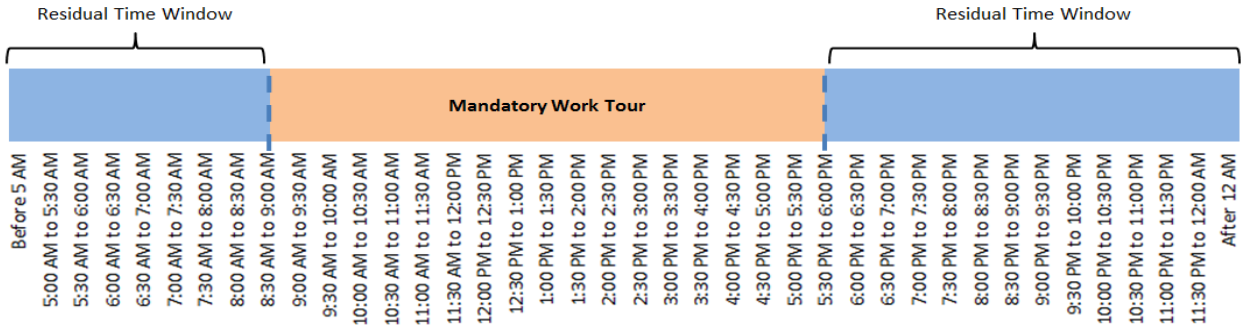
Figure C.3: Predicting Tour Type Scheduling Details



For individuals assigned a "mandatory" activity pattern, the submodule first assigns the number of work tours and/or school tours they will make. After the number of these mandatory tours has been determined, the submodule selects the time of departure from and arrival back home for each tour.

After scheduling the mandatory tours, the submodule calculates time remaining for other tours. Remaining intervals of time are called "residual time windows," and other tours can only be scheduled in these open slots (see Figure C.4 for an example) to guarantee temporal consistency.

Figure C.4: Tour Scheduling Windows



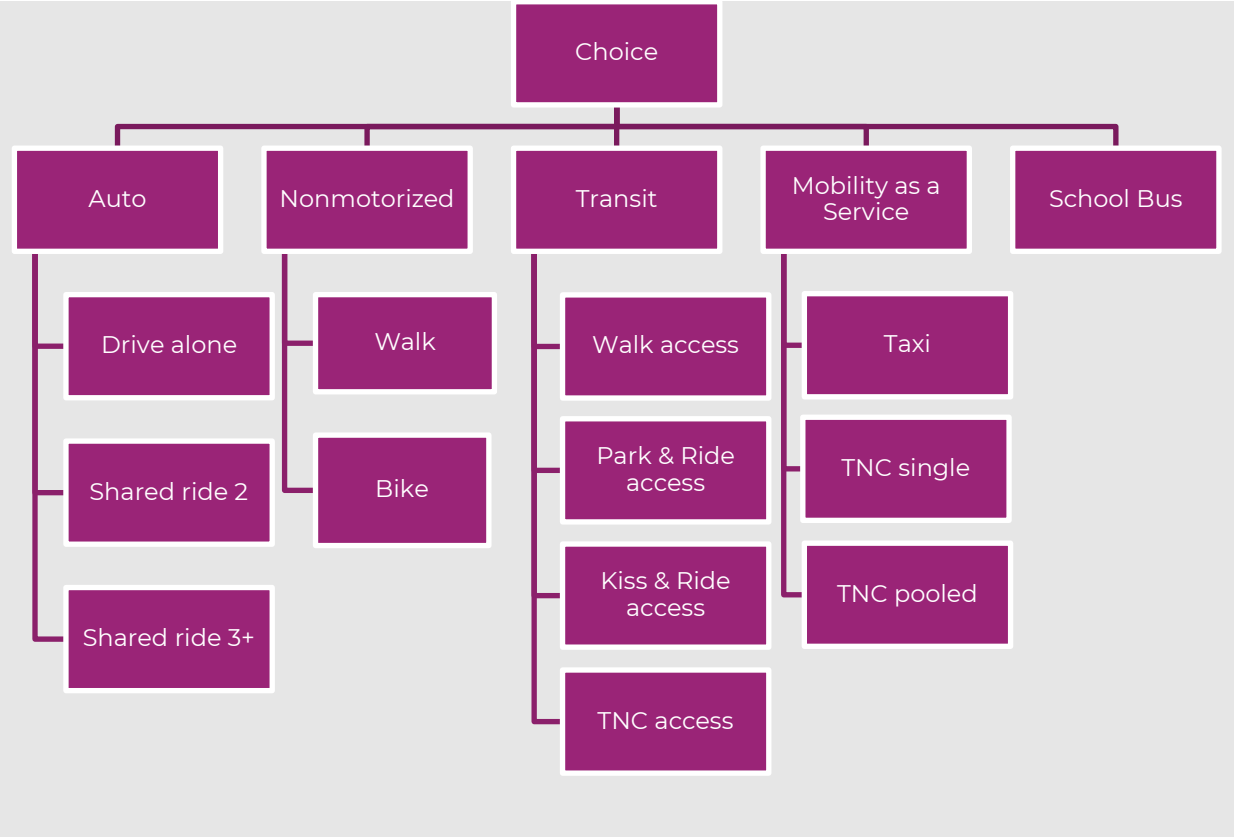
In the time remaining after mandatory tours are scheduled, the submodule determines the number of joint tours to be made for each household. It only schedules joint tours in the time windows that overlap between individuals after it accounts for mandatory activities. After the number and purpose of these joint tours has been determined, the submodule decides which household members will participate in each joint tour and whether the joint tour must involve a combination of children and adults. The submodule then chooses a specific destination for the tour and the specific times when tour participants will depart from and arrive back home together. Next, "nonmandatory" tours are scheduled. For each household, the submodule decides what other tours need to be made for the purpose of household "maintenance" activities such as shopping. These tours are assigned to specific household members to carry out individually. For the person who is assigned each maintenance tour, the model selects a specific destination and schedules the tour to take place in a time window that mandatory tours and joint tours have left open. Finally, in what time remains, the model decides whether each

individual will take non-mandatory “discretionary” tours. These low-priority tours involve activities related to recreation, eating out, and social functions. Discretionary tours can only take place in time windows that remain after all other tours have been scheduled. The submodule chooses a specific destination and departure/arrival combination for each discretionary tour a person makes.

Step 5: Make Tour- and Trip-Level Decisions

The ABM2+ then selects more detailed characteristics of each tour for every traveler. This step fills in travel details after the major aspects of the day have been scheduled. Tour characteristics that need to be determined include: primary mode of the tour, how many times to stop, where to stop, and when to depart from each stop to continue the tour. Figure C.5 includes the available modes and mode hierarchy. After tour characteristics are set, the submodule determines the mode of each trip (conditional upon tour mode). Recall that trips are segments of tours that have a given origin and destination. If the trip mode involves an automobile and the destination is a parking-constrained area, then the model chooses a parking location for the traveler at the trip destination.

Figure C.5: Tour and Trip Modes



The ABM2+ has three access modes to transit (walk, Park & Ride, and Kiss & Ride including TNC to transit) and three transit sets (local bus only, premium transit only, and local bus and premium transit sets), for nine total demand classes by five TOD. These classes are assigned by slices, one at a time, to produce the total transit passenger flows on the network and total transit ridership forecasts.

Special Market Models

Besides the resident travel model, ABM2+ includes a few special market models: crossborder model, San Diego airport ground access model, CBX terminal model, visitor model, external models, commercial vehicle model, and external heavy truck model.

Crossborder Model

The model measures the impact of Mexico resident travel on the San Diego transport network. The model accounts for Mexico resident demand (such as auto volume, transit boarding, and toll usage) for transportation infrastructure in San Diego County. It also forecasts border crossings at each current and potential future border-crossing station. The model is based on the 2010 SANDAG Cross-Border Survey, Mexico resident border crossings into the United States, and their travel patterns within the United States. Data were collected at the three border-crossing stations: San Ysidro, Otay Mesa, and Tecate.

San Diego Airport Ground Access Model

The model captures the demand of airport travel on transportation facilities in San Diego County, a model of travel to and from the airport for arriving and departing passengers. It allows SANDAG to test the impacts of various parking price and supply scenarios at the airport. The model is based on the 2008 San Diego International Airport survey of airport passengers in which data were collected on their travel to the airport prior to their departure.

Cross Border Xpress Terminal Model

The CBX terminal is a unique facility that provides access to Tijuana International Airport from the United States via a pedestrian bridge. The terminal provides a much faster border crossing than is available at either San Ysidro or Otay Mesa, especially for returning passengers. In order to use the facility, each traveler must have a Tijuana International Airport boarding pass and pay a fee to cross each direction. The terminal offers parking, rental car services, airline check-in services, duty-free shopping, and dining. It opened in December 2015.

Visitor Model

The visitor model captures the demand of visitor travel on transportation facilities in San Diego County. The model is estimated based on the 2011 SANDAG Visitor Survey of airport passengers and hotel guests in which data were collected on their travel while visiting San Diego.

External Models

The external travel models predict characteristics of all vehicle trips and selected transit trips crossing the San Diego County border. This includes both trips that travel through the region without stopping and trips that are destined for locations within the region.

The external–external, external–internal, and internal–external trips in San Diego County were segmented into the following trip types:

- **US–US:** External–external trips whose production and attraction are both in the United States, but not in San Diego County
- **US–MX:** External–external trips with one trip end in the United States and the other in Mexico
- **US–SD:** External–internal trips with a production elsewhere in the United States and an attraction in San Diego County
- **MX–SD:** External–internal trips with a production in Mexico and an attraction in San Diego County (covered by the Mexico resident crossborder model)
- **SD–US:** Internal–external trips with a production in San Diego and an attraction elsewhere in the United States
- **SD–MX:** Internal–external trips with a production in San Diego County and an attraction in Mexico

External Heavy Truck Model

The external heavy truck model predicts truck flows into, out of, and through San Diego County. The model is based upon a dataset created by the Bureau of Transportation Statistics and the Federal Highway Administration known as the Freight Analysis Framework (FAF). The FAF integrates data from a variety of sources to create a comprehensive picture of freight movement among states and major metropolitan areas by all modes of transportation. The model utilizes FAF4 data, which is based on the 2012 Commodify Flow Survey, and provides forecasts through 2045.

Commercial Vehicle Model

Commercial vehicle model is a disaggregated tour-based model developed in 2014. This model was based upon a local commercial vehicle survey and replaces the aggregate intraregional Heavy-Duty Truck Model (HDTM) and nonfreight commercial vehicle components of the original aggregate commercial vehicle model. The internal/external component of the HDTM was retained in the new model system but was updated to FAF4 data.

Trip Assignment

The final steps of the SANDAG ABM2+ are to assign the trip demand onto the roadway and transit networks. Assignments are run for the five time periods identified in Table C.3.

Traffic Assignment

The traffic assignment for the ABM2+ is a 15-class assignment with generalized cost by five times of day. Auto vehicle classes are broken out by VOT for low-, medium-, and high-income groups, respectively. The 15 classes are drive-alone non-transponder, drive-alone transponder, shared ride 2, and shared ride 3+ by three VOT bins and heavy truck by three weight classes: light-heavy, medium-heavy, and heavy-heavy.

The traffic assignment model works by finding roads that provide the shortest travel impedance between each zone pair. Trips between zone pairs are then accumulated on road segments making up minimum paths. Highway impedances consider posted speed limits, signal delays, congestion delays, and costs. The model computes congestion delays for each segment based on the ratio of the traffic volume to roadway capacity. Motorists may choose different paths during peak hours, when congestion can be heavy, and off-peak hours, when roadways are typically free flowing. For this reason, traffic is assigned separately for five time periods (as defined in the Spatial and Temporal Resolution section). Vehicle trip tables for each scenario reflect increased trip-making due to population growth and variations in travel patterns due to the alternative transportation facilities/networks proposed. Customized programs process outputs from traffic assignment and generate total VMTs by vehicle class, and percentage of VMTs by speed bin and by vehicle class. This information is input to the EMFAC program to generate emissions summaries.

Transit Assignment

The transit assignment uses a headway-based approach, where the average headway between vehicle arrivals for each transit line is known, but exact schedules are not. Passengers and vehicles arrive at stops randomly, and passengers choose their travel itineraries considering the expected average waiting time.

The Emme extended transit assignment is based on the concept of optimal strategy but extended to support a number of behavioral variants. The optimal strategy is a set of rules that define sequence(s) of walking links and boarding and alighting stops, producing the minimum expected travel time (generalized cost) to a destination. At each boarding point, the strategy may include multiple possible attractive transit lines with different itineraries. A transit strategy will often be a tree of options, not just a single path. A line is considered attractive if it reduces the total expected travel time by its inclusion. The demand is assigned to the attractive lines in proportion to their relative frequencies.

Model Inputs

The SANDAG ABM2+ utilizes a variety of data as inputs. Besides the Series 14 Regional Growth Forecast, SCS land use pattern, inputs (used to provide existing and planned land use and demographic characteristics), there are three major inputs: highway networks used to describe existing and planned roadway facilities, transit networks used to describe existing and planned public transit service, and an active transportation network used to describe nonmotorized bicycle and pedestrian facilities.

The regionally significant projects and the years they are expected to open to traffic for each analysis year are documented in Tables C.11 through C.14. The design concept and scope of projects allow adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership, and land use. The VMT for federal projects that are not regionally significant is also accounted for in the regional emissions analysis.

Highway Networks

The regional highway networks in the 2021 Regional Plan include all roads classified by local jurisdictions in their general plan circulation elements. These roads include freeways, expressways, and the Regional Arterial System (RAS). The RAS consists of all conventional state highways, prime arterials, and selected major streets. In addition, some local streets are included in the networks for connectivity between TAZs.

The route improvements and additions in the 2021 Regional Plan and 2021 RTIP Amendment No. 06 are developed to provide adequate travel service that is compatible with adopted regional policies for land use and population growth. All regionally significant projects are included in the quantitative emissions analysis. These include all state highways, all proposed national highway system routes, all regionally significant arterials, and all “other principal arterials” functionally classified by the Federal Highway Administration. These include both federal and non-federal regionally significant projects.

The networks also account for programs intended to improve the operation of the highway system, including high-occupancy vehicle (HOV) lanes, Managed Lanes, and ramp metering. Existing and proposed toll facilities also are modeled to reflect time, cost, and capacity effects of these facilities.

In addition, several Managed/HOV lanes are included in the 2021 Regional Plan (Tables C.11–C.14, located at the end of this appendix). Managed Lanes offer priority access to people using transit, carpooling, motorcycles, or vanpooling along with emergency vehicles and some low-emission vehicles with appropriate decals. Additionally, one-lane HOV facilities that operate as two-person carpool lanes in the earlier years of the 2021 Regional Plan transition to Managed Lanes by 2035. It is assumed that the excess capacity not utilized by carpools and transit on these facilities would be managed so that single-occupant vehicles could use these lanes under a pricing mechanism. Traffic flows would be managed so that the facility would operate at level of service D (LOS D) or better.

SANDAG maintains a master transportation network from which a specific year network, between the years 2010 and 2050, can be built.

For air quality conformity analyses of the 2021 Regional Plan and 2021 RTIP Amendment No. 06 using emissions budgets from the 2020 SIP, SANDAG built and verified six highway networks (2023, 2026, 2029, 2032, 2040, and 2050) from the master transportation network.

A list of the major highway and near-term regional arterial projects included in the conformity analysis, along with information on phasing for their implementation, are included in Tables C.11 through C.14. Locally funded, regionally significant projects have also been or are included in the air quality conformity analysis. These projects are funded with *TransNet* Extension funds—a 40-year, half-cent local sales tax extension approved by voters in 2004 that expires in 2048—and other local revenue sources.

Transit Networks

SANDAG also maintains transit network datasets for existing and proposed transit systems. Most transit routes run over the same streets, freeways, HOV lanes, and ramps used in the highway networks. The only additional facilities that are added to the master transportation network for transit modeling purposes are as follows:

- Rail lines used by commuter rail, Trolleys, and streetcars
- Streets used by buses that are not part of local general plan circulation elements

Rapid service has stop spacing similar to commuter (Freeway *Rapid*) or light rail (Arterial *Rapid*) rail stations and operating characteristics midway between rail and bus service. *Rapid* service is provided by advanced design buses operating on HOV lanes or Managed Lanes, some at-grade transit ways, and surface streets with priority transit systems.

Bus speeds assumed in the transit networks are derived from modeled highway speeds and reflect the effects of congestion. Higher bus speeds may result for transit vehicles operating on highways with HOV lanes and HOV bypass lanes at ramp meters compared to those routes that operate on highways where these facilities do not exist.

In addition to transit travel times, transit fares are required as input to the mode choice model. A customized procedure using the traffic assignment software replicates the San Diego region's fare policies for riders (seniors, disabled, students), which differ among:

- Local buses, which collect a flat fare of $2.50 (COASTER Connection buses are free, and some future shuttle routes charge $1)
- Trolleys and SPRINTER, which charge $2.50 for all trips
- Commuter rail (COASTER), which has a zone-based fare of between $5 and $6.50 currently and an assumed flat fare (along with a future Tier 1 high-speed commuter rail mode) of $6
- Express Freeway *Rapid* routes, which are assumed to charge $5
- *Rapid* Bus routes, which are assumed to charge $2.50

Transit fares reflect ridership costs at the time the transportation model was developed. Fares are expressed in 2010 dollars and are held constant in inflation-adjusted dollars over the forecast period.

Near-term transit route changes are drawn from the Coordinated Plan, which was produced in cooperation with the region's transit agencies. Longer-range improvements are proposed as a part of the 2021 Regional Plan development and other transit corridor studies. In addition to federal- and state-funded projects, locally funded transit projects that are regionally significant have been included in the air quality conformity analysis of the 2021 Regional Plan and 2021 RTIP Amendment No. 06.

Active Transportation Networks

SANDAG maintains an all-street active transportation network including existing and planned bike projects to support bike project evaluation and impact analysis. Based on the proposed bike projects in the regional bikeway system developed through Riding to 2050: San Diego Regional Bike Plan, SANDAG generates year-specific active transportation networks and uses these networks to create accessibility measures from MGRA to MGRA for walking and biking and from TAZ to TAZ for biking modes. These active transportation accessibility measures are inputs to the SANDAG ABM2+ to simulate people's choice of travel mode and choice of bike routes.

The active transportation network has unique characteristics that account for facility type, bike treatments, and elevation change. The active transportation networks include five classification types for bike facilities in the regional bikeway system: Class I: bike paths,

Class II: bike lanes, Class III: bike routes, Class IV: cycle tracks, and "Class V": bike boulevards. "Class V" is an internal designation and not a California vehicle code facility type.

Once network coding is completed, the ABM2+ is run for the applicable scenarios: 2023, 2026, 2029, 2032, 2040 and 2050 for the 2020 SIP.

Data Sources

Aside from network inputs, SANDAG relies on several survey datasets to estimate and calibrate the model parameters. The most important survey data are household travel survey data. The latest household travel survey conducted for SANDAG was the 2016–2017 Household Travel Behavior Survey (HTS2016) with smartphone-based travel diaries as the primary means of travel data collection. Since 1966, consistent with the state of the practice for the California Household Travel Survey and National Household Travel Survey, SANDAG and Caltrans conduct a comprehensive travel survey of San Diego County every ten years. HTS2016 surveyed 6,139 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center.

As part of a joint survey effort with the Metropolitan Transportation Commission and the Southern California Association of Governments funded by California Senate Bill 1 (Beall, 2017) (SB 1), SANDAG conducted a TNC survey in 2019 to better understand the TNC usage in San Diego region. The TNC survey includes 2,800 complete persons, [6] 17,340 completed person-days, and 1,578 TNC trips. SANDAG used the 2019 TNC survey data to estimate TNC single and pooled use in the mode choice model.

Additional data needed for the mode choice components of the ABM2+ come from a transit on-board survey. The most recent SANDAG survey of this kind is the 2015 Transit On-Board Survey (OBS2015). OBS2015 collected data on transit trip purpose, origin and destination address, access and egress mode to and from transit stops, the on/off stop for surveyed transit routes, number of transit routes used, and demographic information.

Population synthesis requires two types of data: individual household and person Census records from San Diego County and aggregate data pertaining to the sociodemographic characteristics of each zone in the region. The first type of data is available from the Public Use Microdata Sample (PUMS), a representative sample of complete household and person records that is released with the Census and American Communities Survey. The second type of data is from the Census for the base year and from land use forecasts for future years.

[6] A complete person-day is when a person completes all trip surveys and the daily survey for a given travel day. A person is considered complete if they have at least one complete person-day.

Table C.8 lists data sources mentioned above along with other necessary sources of data. Modeling parking location choice and employer reimbursement of parking cost depends on parking survey data collected from 2010 into early 2011 as well as a parking supply inventory. The transponder-ownership sub-model requires data on transponder users. Data needed for model validation and calibration include traffic counts, transit-boarding data, Census Transportation Planning Package (CTPP) data, Caltrans Performance Measurement System (PeMS), and Highway Performance Monitoring System (HPMS) data.

Table C.8: ABM2+ Input Data

ABM2+ Input Data	
SANDAG Surveys	**Outside Data Sources**
• Household Travel Behavior Survey (2016) • Transit On-Board Survey (2015) • SB 1 TNC Survey (2019) • Commute Behavior Survey (2018) • Taxi Passenger Survey (2009) • Parking Inventory Survey (2010) • Parking Behavior Survey (2010) • Border Crossing Survey (2011) • Visitor Survey (2011) • Establishment Survey (2012) • Tijuana Airport Passenger Survey (2017) • Commercial Vehicles Survey (2011) • Vehicle Classification & Occupancy (2006) • Beach Intercept Survey (2017)	• San Diego International Airport Air Passenger Survey (2009) • San Diego International Airport Passenger Forecasts – Airport Development Plan: San Diego International Airport (2013) • Decennial Census Summary File-1 tabulation (2010) • CTPP • PUMS • American Community Survey (2015, 2016, 2017) • Bicycle counts (2011) • Jurisdiction annual traffic counts (2016) • Transponder ownership data (2012) • Caltrans PeMS (2016) • Caltrans HPMS (2016) • FAF 4 (2012)

Motor Vehicle Emissions Modeling

Emissions Model

On August 15, 2019, the U.S. EPA approved EMFAC2017 v1.0.2 for use in conformity determinations and allowed for a two-year grace period for transition from the previous emission model (EMFAC2014) (84 FR 41717). Consistent with 40 CFR 93.111, EMFAC2017 v1.0.2, as the latest emissions model, was used to project the regional emissions for the 2021 Regional Plan conformity determination and 2021 RTIP Amendment No. 06

conformity analysis. To account for changes resulting from Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, CARB released EMFAC Off-Model Adjustment Factors on November 20, 2019. These adjustments modify EMFAC2017 outputs for the vehicle classes affected by the SAFE Vehicles Rule.

Projections of daily regional emissions were prepared for reactive organic gases (ROG) and nitrogen oxides (NOx).

The following process emissions are generated for each pollutant:

- **All pollutants:** Running Exhaust, Idling Exhaust, Starting Exhaust, Total Exhaust
- **ROG and total organic gases:** Diurnal Losses, Hot-Soak Losses, Running Losses, Resting Losses, Total Losses

EMFAC2017 models multiple vehicle categories, including the following:

- Passenger cars
- Motor homes
- Medium-duty trucks
- Medium-heavy-duty trucks
- School buses
- Motor coaches
- Motorcycles
- Light-duty trucks
- Light-heavy-duty trucks
- Heavy-heavy-duty trucks
- Urban buses
- Other bus types

EMFAC2017 includes updated motor vehicle fleet information from the California Department of Motor Vehicles for 2013–2016 and a new module that improves the characterization of activity and emissions from transit buses. Additionally, EMFAC2017 allows users to estimate emissions of natural gas–powered vehicles in addition to gasoline- and diesel-powered vehicles.

Regional Emissions Forecasts

Regional travel demand forecasts were initiated in June 2020. Output from the ABM2+ was then summarized to create EMFAC2017 inputs for emissions modeling.

Beginning in June 2020, SANDAG prepared countywide forecasts of average weekday ROG and NOx emissions for 2023, 2026, 2029, 2032, 2040, and 2050 for the 2020 SIP using the EMFAC2017 v1.0.2 model. ROG and NOx emissions are based upon the summer season.

2008 Eight-Hour Ozone Standard

Effective October 19, 2021, the U.S. EPA found the motor vehicle emissions budgets from the 2008 Eight-Hour Ozone Attainment Plan for San Diego County (2020 SIP) adequate for transportation conformity purposes for the 2008 ozone NAAQS (86 FR 54692).

Severe Nonattainment Area classification established 2026 as the attainment year and 2023 as a reasonable further progress demonstration year for the 2008 Eight-Hour Ozone Standard. The analysis years were selected to comply with 40 CFR 93.106(a)(1) and 93.118(a). According to these sections of the Conformity Rule, analysis years must include reasonable further progress demonstration years (2023), attainment year (2026), the horizon year of the plan's forecast period (2050), and no more than ten years between analysis years (2032, 2040). Additionally, the first horizon year (2023) must be within ten years from the base year used to validate the regional transportation model (2016).

2015 Eight-Hour Ozone Standard

Effective October 19, 2021, the U.S. EPA found the motor vehicle emissions budgets from the 2015 Eight-Hour Ozone Attainment Plan for San Diego County (2020 SIP) adequate for transportation conformity purposes for the 2015 ozone NAAQS (86 FR 54692).

Severe Nonattainment Area classification established 2032 as the attainment year for the 2015 Eight-Hour Ozone Standard. The 2020 SIP established air quality budgets for the 2015 ozone standard. The 2020 SIP included a voluntary Nonattainment Area classification change from Moderate to Severe Nonattainment Area for the 2015 Eight-Hour Ozone Standard. The new classification established 2032 as the attainment year and 2023, 2026, and 2029 as reasonable further progress demonstration years. The analysis years were selected to comply with 40 CFR 93.106(a)(1) and 93.118(a). According to these sections of the Conformity Rule, analysis years must include reasonable further progress demonstration years (2023, 2026, 2029), attainment year (2032), the horizon year of the plan's forecast period (2050), and no more than ten years between analysis years (2040).

Emissions Modeling Results

An emissions budget is the part of the SIP that identifies emissions levels necessary for meeting emissions reduction milestones, attainment, or maintenance demonstrations. To determine conformity of the 2021 Regional Plan and to conduct the conformity analysis of the 2021 RTIP Amendment No. 06 the emission analysis described in the Regional Emissions Forecast section was used.

Table C.9 shows that the projected ROG and NOx emissions from the 2021 Regional Plan and 2021 RTIP Amendment No. 06 are below the ROG and NOx budgets from the 2020 SIP for both the 2008 and 2015 ozone standards.

Table C.9: 2021 Regional Plan and 2021 RTIP Amendment No. 06: Conformity Analysis for the 2008 and 2015 Eight-Hour Ozone Standards (EMFAC2017)

2021 Regional Plan and 2021 RTIP Amendment No. 06: Conformity Analysis for the 2008 and 2015 Eight-Hour Ozone Standards (EMFAC2017)

			ROG		NOx	
Year	Average Weekday Vehicle Starts (1,000s)	Average Weekday Vehicle Miles (1,000s)	SIP Emissions Budget Tons/Day	ROG Emissions Tons/Day	SIP Emissions Budget Tons/Day	NOx Emissions Tons/Day
2023	11,277	85,602	13.6	13.4	19.3	17.3
2026	11,542	85,534	12.1	11.6	17.3	14.9
2029	11,889	86,252	11.0	10.3	15.9	13.6
2032	12,109	86,091	10.0	9.2	15.1	12.6
2040	12,807	87,374	10.0	7.3	15.1	11.6
2050	13,469	88,414	10.0	6.7	15.1	11.9

Note: Emissions budgets from the *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020)* were found adequate for transportation conformity purposes by U.S. EPA, effective October 19, 2021.

Exempt Projects

40 CFR Section 93.126 exempts certain highway and transit projects from the requirement to determine conformity. The categories of exempt projects include safety, mass transit, air quality (ridesharing and bicycle and pedestrian facilities), and other (such as planning studies).

Table C.10 illustrates the exempt projects considered in the Revenue-Constrained 2021 Regional Plan and 2021 RTIP Amendment No. 06. This table shows short-term exempt projects. Additional unidentified projects could be funded with revenues expected to be available from the continuation of existing state and federal programs.

Table C.10: Exempt Projects

Exempt Projects	
Project/Program Description	**Project/Program Description**
Bikeway, Rail Trail, and Pedestrian Projects	
Bayshore Bikeway	San Diego River Trail: Stadium Segment
Bay-to-Ranch Bikeway	I-805 Bicycle Corridor
Border to Bayshore Bikeway	Kearny Mesa - Beaches Bicycle Corridor
Camp Pendleton Trail	Mid-County Bikeway
Carlsbad - San Marcos Bicycle Corridor	Mira Mesa Bicycle Corridor
Central Avenue Bikeway	Uptown Bikeways: Washington Street and Mission Valley Bikeways
Central Coast Bicycle Corridor	National City – Highland Avenue Community Corridor
Central Mobility Bikeway (Coastal Rail Trail: Pacific Highway)	North Park/Mid-City Bikeways
Chula Vista Greenbelt	Oceanside – Bicycle Master Plan
Downtown to Imperial Avenue Bikeway	Otay Mesa Port of Entry Pedestrian/Bicycle Facilities
North Park/Mid-City Bikeway: Howard – Orange Bikeway	Park Boulevard – Downtown Mobility Plan
Clairemont – Centre City Bicycle Corridor	Pershing Bikeway
Coastal Rail Trail	San Diego Regional Bicycle Plan
East County Northern Bicycle Loop	San Diego River Trail
East County Southern Bicycle Loop	San Luis Rey River Trail
El Camino Real Bicycle Corridor	Santee – El Cajon Bicycle Corridor
El Portal Pedestrian and Bicycle Underpass	SR 15 Bikeway
Encinitas – San Marcos Bicycle Corridor	SR 52 Bikeway
Escondido Creek Bike Path Bridge and Bikeway	SR 125 Bicycle Corridor
Coastal Rail Trail: Rose Creek	SR 905 Bicycle Corridor
North Park/Mid-City Bikeways: University Bikeway	Tecate International Border Crossing Pedestrian Facilities
Inland Rail Trail	Vista Way Bicycle Connector

Exempt Projects	
Project/Program Description	**Project/Program Description**
Safety Improvement Program	**Transportation Systems and Demand Management**
Bridge Rehabilitation/Preservation/Retrofit	Traveler Information System
Collision Reduction	Bus on Shoulder Service
Emergency Response	Compass Card
Hazard Elimination/Safe Routes to School	FasTrak®
Highway Maintenance	Freeway Service Patrol
Safety Improvement Program	Vehicle Automation
Roadway/Roadside Preservation	Regional Rideshare Program
Smart Growth Incentive Program	Multimodal Integration and Performance-Based Management
Safe Routes to Transit	Intelligent Transportation System (ITS) for Transit
Safe Routes to School	ITS Operations
Transit Terminals	Joint Transportation Operations Center
Central Mobility Hub/Airport Intermodal Transit Center/Terminal	Trolley Fiber Communication Network
San Ysidro Intermodal Transit Center/Terminal	Electronic Payment Systems and Universal Transportation Account
	Various Traffic Signal Optimization/Prioritization
	Transit Infrastructure Electrification
	Employer Services and Outreach
	Flexible Fleet Pilots
	Regional Electric Vehicle Charging Incentive Program
	Commuter Services and Bike Program
	Mobility Hubs
	Active Traffic and Demand Management
	Shared Mobility Services

Implementation of Transportation Control Measures

There are four federally approved Transportation Control Measures (TCMs) that must be implemented in San Diego, which the SIP refers to as transportation tactics. They include ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs.

These TCMs were established in the 1982 SIP, which identified general objectives and implementing actions for each tactic. The TCMs have been fully implemented. [7] Ridesharing, transit, bicycling, and traffic flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed.

Interagency Consultation Process and Public Input

The consultation process followed to prepare the air quality conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 complies with the San Diego Transportation Conformity Procedures adopted in July 1998. In turn, these procedures comply with federal requirements under 40 CFR Part 93. Interagency consultation involves SANDAG (as the MPO for San Diego County), the SDAPCD, Caltrans, CARB, U.S. DOT, and U.S. EPA.

Consultation is a three-tier process that:

1. Formulates and reviews drafts through a conformity working group
2. Provides local agencies and the public with opportunities for input through existing regional advisory committees and workshops
3. Seeks comments from affected federal and state agencies through participation in the development of draft documents and circulation of supporting materials prior to formal adoption

SANDAG consulted on the development of the air quality conformity analysis of the 2021 Regional Plan and 2021 RTIP Amendment No. 06 at meetings of the CWG, as follows:

- On June 5, 2019, SANDAG staff presented information on the 2021 Regional Plan schedule and initial conformity criteria and procedures, including revenue-constrained financial assumption, regional growth forecast, travel demand model, latest emission model, emission budget, transportation control measures, and public involvement and outreach.
- On November 4, 2020, SANDAG staff presented information and sought feedback on the Regional Vision for the 2021 Regional Plan.
- On January 6, 2021, SANDAG staff presented additional information about the criteria and procedures to be followed. The following conformity criteria and procedures were discussed: the regional growth forecast, SCS land use pattern; latest emission model; emissions budgets; and public involvement and outreach.
- On April 6, 2021, SANDAG distributed the draft conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 to the CWG for interagency consultation. The CWG review period concluded on May 7, 2021.

[7] 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County, San Diego County Air Pollution Control District, October 2020.

- On April 7, 2021, staff presented the list of proposed draft transportation projects, exempt projects, revenue strategies and the regional growth forecast, SCS land use pattern for the 2021 Regional Plan.
- On May 5, 2021, the CWG discussed the conformity analysis for the draft 2021 Regional Plan, conformity determination, and conformity analysis for the 2021 RTIP Amendment No. 06.
- On May 28, 2021, the draft 2021 Regional Plan, including the draft air quality conformity analysis and the SCS, was released for public review and comments. The comment period on the draft 2021 Regional Plan concluded on August 6, 2021.
- Two public hearings were held on the draft 2021 Regional Plan and its conformity determination on July 16, 2021, and July 23, 2021.
- Based on comments received from the public and member agencies, refinements were made to the proposed final 2021 Regional Plan network. On September 24, 2021, SANDAG distributed the final draft conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 to the CWG for interagency consultation.
- On October 6, 2021, the CWG discussed the conformity analysis for the proposed final 2021 Regional Plan, conformity determination, and conformity analysis for the 2021 RTIP Amendment No. 06.
- On December 10, 2021, the Board will be asked to adopt a Resolution adopting the air quality conformity determination, finding that the Revenue Constrained Plan is in conformance with the SIP for air quality; adopting the 2021 Regional Plan and its supporting analyses.
- Members of the public were welcomed to provide comments at meetings of the CWG, and the Board.

2021 Regional Plan Projects

This section contains the capacity-increasing projects included in the 2021 Regional Plan. The tables include the conformity analysis year, project details, and estimated cost ($2020). Tables C.11, C.12, C.13, and C.14 include the projects for the 2021 Regional Plan by 2020 SIP Air Quality Phasing. Table C.11 has the major goods movement, complete corridor, and transit leap projects by each regional corridor. Figure C.6 shows the location of each corridor within the region. Table C.12 lists the significant rural projects. Table C.13 includes the arterial capacity-increasing projects, and Table C.14 lists additional transit projects that did not apply to the prior tables.

Figure C.6: Corridor Geographies

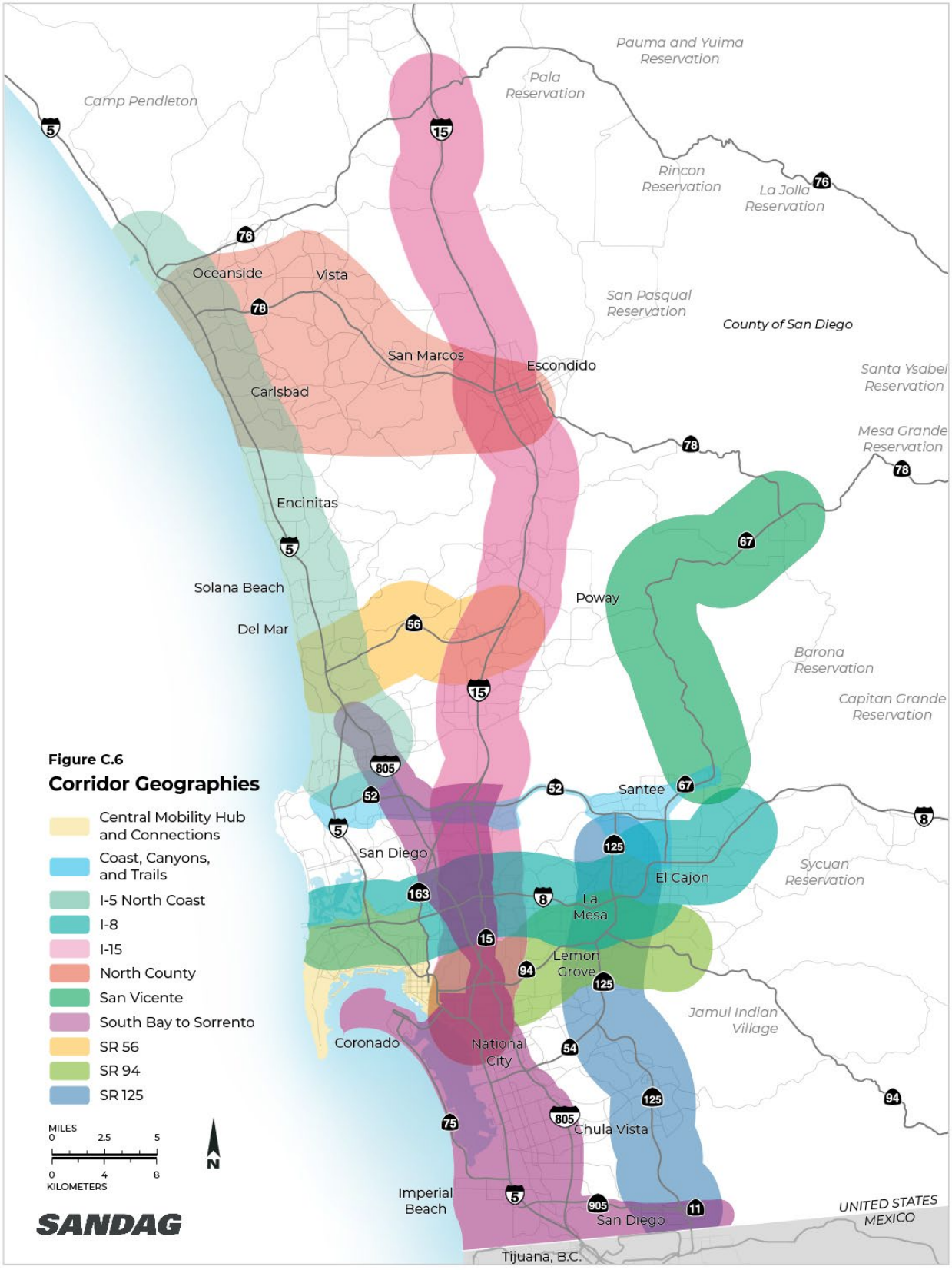


Table C.11: Major Projects by Corridor and Air Quality Phasing

Major Projects by Corridor and Air Quality Phasing						
Conformity Analysis Year	**Project ID**	**Category**	**Project Name**	**Description**	**Connecting Corridor(s)**	**Cost ($2020) Millions**
South Bay to Sorrento (SB2S)						
2023	GM01	Goods Movement: Border	Otay Mesa Port of Entry (POE) Commercial Vehicle Enforcement Facility (CVEF) Modernization	Otay Mesa POE CVEF modernization: Improvements to the CVEF to reflect the U.S. General Services Administration's proposed Otay Mesa POE Modernization Project	N/A	$6
2026	CC045	Complete Corridor: Managed Lane (ML)/ Goods Movement	SR 11/Otay Mesa East (OME) POE (Enrico Fermi to Mexico)	-- to 4 toll lanes (T) + POE	SR 125	$482
2026	GM02	Goods Movement: Border	OME POE Pilot Programs	Pilot programs for streamlining commercial vehicle operations for reducing wait times at OME POE	N/A	$20
2026	GM03	Goods Movement: Border	Otay Mesa Southbound Truck Route	Improvements to the Otay Mesa POE southbound truck route, including Otay Truck Route and La Media Road	N/A	$49
2026	GM07	Goods Movement: Roadways	Regional Border Management System (RBMS) & Tolling Equipment	Border wait times – SR 11 tolling equipment and RBMS	N/A	$35
2026	TL21	Transit Leap	*Rapid* 12 Phase 1	Spring Valley to Downtown via Southeast San Diego (light version of *Rapid*)	I-15, SR 94, SR 125, Central Mobility Hub (CMH)	$18
2026	TL44	Transit Leap	*Rapid* 630	Iris Trolley/Palomar to Kearny Mesa via I-5/SR 163 and City College	I-8; I-15; SR 94; Coast, Canyons, and Trails (CCT); CMH	$36
2026	TL48	Transit Leap	*Rapid* 640	San Ysidro to Central Mobility Hub via I-5 and City College	I-8, I-15, SR 94, CMH	$28
2026	TL53	Transit Leap	*Rapid* 950 Phase 1	Otay Mesa POE to Imperial Beach via SR 905 (light version of *Rapid*)	SR 125	$6
2029	CC001	Complete Corridor: ML/ Goods Movement	I-5 (SR 905 to H Street)	8 freeway lanes (F) to 6F+2ML	N/A	$51
2029	CC002	Complete Corridor: ML/ Goods Movement	I-5 (H Street to Pacific Highway)	8F to 6F+4ML	I-8, I-15, SR 94, CMH	$378
2029	CC038	Complete Corridor: ML	SR 163 (I-8 to I-805)	8F to 6F+2ML	I-8, CMH	$36

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2029	CC039	Complete Corridor: ML	SR 163 (I-805 to SR 52)	8F to 6F+2ML	I-15, CCT	$27
2029	GM06	Goods Movement: Roadways	Harbor Drive 2.0	Designated Freight Route: Dedicated lanes (where feasible) and signal priority for truck freight along Harbor Drive between the Tenth Avenue Marine Terminal/Cesar Chavez Parkway, National City Marine Terminal, and connections to I-5; includes freight signal prioritization, queue jumps, delineators, and signage; generally aligned in the #1 lanes and median	CMH	$32
2029	GM08	Goods Movement: Roadways	I-5 Working Waterfront Access	I-5 Working Waterfront Access Bottleneck Relief between SR 94 and SR 54	N/A	$50
2029	GM09	Goods Movement: Roadways	Vesta Bridge – Phase 1	Vesta Bridge Phase 1 and operational improvements SR 15, Main, Harbor, and 32nd Streets	N/A	$55
2029	TL12	Transit Leap/ Goods Movement	LRT 510	Blue Line (San Ysidro to University Town Center [UTC], grade separations at 28th Street, 32nd Street, E Street, H Street, Palomar Street, and Blue/Orange track connections at 12th/Imperial) [8]	I-8, I-15, SR 94, CCT, CMH	$510
2029	TL22	Transit Leap	*Rapid* 12 Phase 2	Spring Valley to Downtown via Southeast San Diego (full version of *Rapid*)	I-15, SR 94, SR 125, CMH	$73
2029	TL25	Transit Leap	*Rapid* 41	Fashion Valley to UTC/UC San Diego via Linda Vista and Clairemont	I-8, CCT, CMH	$58
2029	TL28	Transit Leap	*Rapid* 120	Kearny Mesa to Downtown via Mission Valley	I-8, I-15, CCT, CMH	$109
2029	TL35	Transit Leap	*Rapid* 295	Spring Valley to Clairemont via La Mesa and Kearny Mesa	I-8, I-15, SR 94, SR 125, CCT	$91
2029	TL43	Transit Leap	*Rapid* 625	San Diego State University (SDSU) to Palomar Station via East San Diego, Southeast San Diego, National City	I-8, I-15, SR 94	$197
2029	TL46	Transit Leap	*Rapid* 637	North Park to 32nd Street Trolley Station via Golden Hill	I-8, I-15, SR 94	$103
2029	TL49	Transit Leap	*Rapid* 709	H Street Trolley Station to Millennia via H Street Corridor, Southwestern College	SR 125	$99
2029	TL59	Transit Leap	*Rapid* 950 Phase 2	Otay Mesa POE to Imperial Beach via SR 905 (full version of *Rapid*)	SR 125	$22
2032	CC005	Complete Corridor: ML/ Goods Movement	I-5 (I-805 to SR 56)	8F/14F+2HOV to 6F/12F+4ML	I-5 North Coast Corridor (NCC), SR 56	$25

[8] SANDAG will conduct a Blue Line Express Feasibility and Conceptual Engineering Study as a Near-Term Implementation Action (included in Appendix B: Implementation Actions).

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2032	CC017	Complete Corridor: ML/ Goods Movement	I-805 (Palm Avenue to H Street)	8F/8F+2ML to 6F+4ML	N/A	$46
2032	CC018	Complete Corridor: ML/ Goods Movement	I-805 (H Street to I-15)	8F+2ML to 6F+4ML	I-15, SR 94	$163
2032	CC019	Complete Corridor: ML/ Goods Movement	I-805 (SR 15 to I-8)	8F to 6F+4ML	I-8, I-15, SR 94	$96
2032	CC020	Complete Corridor: ML/ Goods Movement	I-805 (I-8 to Mesa College Drive)	10F to 6F+4ML	I-8, I-15	$56
2032	CC021	Complete Corridor: ML/ Goods Movement	I-805 (Mesa College Drive to Balboa Avenue)	8F to 6F+4ML	CCT	$58
2032	CC022	Complete Corridor: ML/ Goods Movement	I-805 (Balboa Avenue. to Northbound Bypass Lane)	8F+2ML to 6F+4ML	CCT	$149
2032	CC063	Complete Corridor: Managed Lane Connector (MLC)	I-5 (I-805)	North to North and South to South	N/A	$84
2032	CC085	Complete Corridor: MLC	I-805 (SR 52)	West to North and South to East	CCT	$149
2032	CC114	Complete Corridor: Transit Operational Improvement	I-805 (Nobel Drive)	North and South	CCT	$49
2040	CC069	Complete Corridor: MLC	I-5 (SR 15)	North to North and South to South	I-15, SR 94	$274
2040	CC070	Complete Corridor: MLC	I-5 (SR 15)	South to North and South to North	I-15, SR 94	$274
2040	CC084	Complete Corridor: MLC	I-805 (SR 94)	North to West and East to South	I-15, SR 94	$140
2040	CC087	Complete Corridor: MLC	I-805 (SR 163)	North to North and South to South	N/A	$267
2040	CC090	Complete Corridor: MLC	I-805 (I-8)	North to East and West to South	I-8, I-15	$202
2040	CC092	Complete Corridor: MLC	I-805 (I-8)	South to East and West to North	I-8, I-15	$202
2040	TL02	Transit Leap	Commuter Rail 582	Sorrento Mesa to National City via UTC, Kearny Mesa, and University Heights [9]	I-8, I-15, SR 94, CCT	$12,660

[9] The SB2S Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of the Purple Commuter Rail alignment (Route 582). The analysis is studying an alignment that would include stations in City Heights and at SDSU (west campus).

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2040	TL34	Transit Leap	*Rapid* 293	Imperial Beach to Otay Ranch via Palomar Street	SR 125	$111
2040	TL45	Transit Leap	*Rapid* 635	Eastlake to Palomar Trolley via Main Street Corridor	SR 125	$116
2040	TL47	Transit Leap	*Rapid* 638	Iris Trolley to Otay Mesa via Otay, Airway Drive, SR 905 Corridor	SR 125	$91
2050	CC016	Complete Corridor: ML/ Goods Movement	I-805 (SR 905 to Palm Avenue)	8F to 6F+4ML	N/A	$60
2050	CC040	Complete Corridor: ML	SR 54 (I-805 to SR 125)	6F to 4F+2ML	SR 125	$48
2050	CC041	Complete Corridor: ML/ Goods Movement	SR 905 (I-5 to Border)	6F to 4F+2ML	SR 125	$193
2050	CC071	Complete Corridor: MLC	I-5 (SR 905)	South to East and West to North	N/A	$202
2050	CC086	Complete Corridor: MLC	I-805 (SR 52)	North to West and East to South	CCT	$126
2050	CC089	Complete Corridor: MLC	I-805 (I-8)	North to West and East to South	I-8, I-15	$202
2050	CC091	Complete Corridor: MLC	I-805 (I-8)	South to West and East to North	I-8, I-15	$202
2050	CC093	Complete Corridor: MLC	I-805 (SR 54)	South to East and West to North	N/A	$219
2050	CC094	Complete Corridor: MLC	I-805 (SR 54)	North to East and West to South	N/A	$219
2050	CC095	Complete Corridor: MLC	I-805 (SR 905)	South to West and East to North	N/A	$202
2050	CC096	Complete Corridor: MLC	I-805 (SR 905)	South to East and West to North	N/A	$202
2050	CC115	Complete Corridor: Direct Access Ramp (DAR)	SR 905 (Beyer Boulevard)	East	N/A	$42
2050	CC116	Complete Corridor: DAR	SR 905 (Siempre Viva Road)	North	SR 125	$42
2050	GM04	Goods Movement: Border	Otay Mesa POE Truck Bridge to CVEF	Otay Mesa POE: Bridge between POE and CVEF to coincide with improvements at both facilities	N/A	$50

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2050	GM05	Goods Movement: Roadways	Harbor Drive Multimodal Corridor Improvements	Harbor Drive Multimodal Corridor Improvements, including but not limited to: ITS systems expanding the Designated Freight Route, removing height and weight conflicts along the truck route, improvements at 28th Street and 32nd Street, pedestrian crossings and bridges, various truck improvements, bikeway accommodations, streetscape, safety, and parking improvements	CMH	$192
2050	TL03	Transit Leap	Commuter Rail 582	National City to U.S. Border [10]	I-15, SR 94	$2,977
2050	TL04	Transit Leap	Commuter Rail 583	Central Mobility Hub to U.S. Border via Downtown San Diego	I-8, I-15, SR 94, CMH	$7,581
2050	TL13	Transit Leap	LRT 510	Blue Line (San Ysidro to UTC, grade separations at Taylor/Ash) [11]	I-8, I-15, SR 94, CCT, CMH	$510
Central Mobility Hub (CMH)						
2029	CC003	Complete Corridor: ML/ Goods Movement	I-5 (Pacific Highway to SR 52)	8F to 6F+4ML	I-8, CCT	$353
2029	TL23	Transit Leap	*Rapid* 28	Point Loma to Kearny Mesa via Central Mobility Hub, Linda Vista	I-8, I-15, CCT, SB2S	$105
2029	TL52	Transit Leap	*Rapid* 910	Coronado to Downtown via Coronado Bridge	I-15, SR 94, SB2S	$51
2029	TL56	Transit Leap	Airport Connection Automated People Mover	Central Mobility Hub to Airport via Car Rental Lot and Harbor Island East Basin	I-8	$1,398
2040	CC117	Complete Corridor: AIRC	Complete Corridor Elements	Airport connectivity including Laurel Street airport entrance, Laurel Street modifications (Pacific Highway to I-15), and new I-5 freeway ramps at Laurel Street and Redwood	N/A	$836
2040	MHLA1	Mobility Hubs	Central Mobility Hub	Transit station construction and site acquisition	N/A	$2,420
2040	TL18	Transit Leap	Tram 555	Tram: Downtown to Logan Heights, Golden Hill, South Park, North Park, University Heights, Hillcrest	I-8, I-15, SB2S	$1,175

[10] The SB2S Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of the Purple Commuter Rail alignment (Route 582). The analysis is studying an alignment that would include stations in City Heights and at SDSU (west campus).

[11] SANDAG will conduct a Blue Line Express Feasibility and Conceptual Engineering Study as a Near-Term Implementation Action (included in Appendix B: Implementation Actions).

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
State Route 125 (SR 125)						
2029	CC042	Complete Corridor: ML	SR 125 (SR 54 to Amaya Drive)	6F/8F to 4F/6F+2ML	I-8, SR 94	$59
2029	CC112	Complete Corridor: DAR	SR 125 (Spring Street/ SR 94)	South	I-8, SR 94	$42
2029	TL33	Transit Leap	*Rapid* 292 Phase 2	Pacific Beach to Otay Mesa via Kearny Mesa, El Cajon, Jamacha, and Otay Lakes (full version of *Rapid*)	I-8, I-15, SR 94, CCT, SB2S	$96
2040	CC097	Complete Corridor: MLC	SR 125 (I-8)	North to West and East to South	I-8, SR 94	$202
2040	CC098	Complete Corridor: MLC	SR 125 (I-8)	North to East and West to South	I-8, SR 94	$202
2040	CC099	Complete Corridor: MLC	SR 125 (SR 94)	North to West and East to South	SR 94	$203
2050	CC043	Complete Corridor: ML	SR 125 (Amaya Drive to Mission Gorge Road)	6F to 4F+2ML	I-8, CCT	$40
2050	CC044	Complete Corridor: ML	SR 125 (SR 905 to SR 54)	4T to 4F+2ML	SB2S	$227
2050	CC100	Complete Corridor: MLC	SR 125 (SR 52)	North to West and East to South	CCT	$202
2050	CC101	Complete Corridor: MLC	SR 125 (SR 54)	South to South and North to North	N/A	$202
2050	CC102	Complete Corridor: MLC	SR 125 (SR 54)	North to West and East to South	N/A	$202
2050	CC113	Complete Corridor: DAR	SR 125 (Jamacha Boulevard)	North and South	N/A	$49
Interstate-15 (I-15)						
2029	CC073	Complete Corridor: MLC	I-15 (SR 78)	East to South and North to West	North County Corridor	$147
2032	TL31	Transit Leap	*Rapid* 238	UC San Diego to Rancho Bernardo via Sorrento Valley and Carroll Canyon	SR 56, CCT, SB2S	$78
2040	CC011	Complete Corridor: ML/ Goods Movement	I-15 (I-5 to I-805)	6F to 6F+2ML	SR 94, SB2S	$103
2040	CC012	Complete Corridor: ML/ Goods Movement	I-15 (I-805 to I-8)	8F+2TL to 6F+2TL+2ML	I-8, SR 94, SB2S	$115
2040	CC013	Complete Corridor: ML/ Goods Movement	I-15 (I-8 to SR 163)	8F to 6F+4ML	I-8, CCT, SB2S	$241

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2040	CC074	Complete Corridor: MLC	I-15 (SR 52)	West to North and South to East	CCT, SB2S	$181
2040	CC075	Complete Corridor: MLC	I-15 (SR 52)	North to West and East to South	CCT, SB2S	$196
2040	CC076	Complete Corridor: MLC	I-15 (SR 52)	North to East and West to South	CCT, SB2S	$196
2040	CC077	Complete Corridor: MLC	I-15 (SR 52)	South to West and East to North	CCT, SB2S	$196
2040	CC079	Complete Corridor: MLC	I-15 (I-8)	North to West and East to South	I-8, SB2S	$202
2040	CC080	Complete Corridor: MLC	I-15 (I-8)	North to East and West to South	I-8, SB2S	$202
2040	CC081	Complete Corridor: MLC	I-15 (I-8)	South to West and East to North	I-8, SB2S	$202
2040	CC082	Complete Corridor: MLC	I-15 (I-8)	South to East and West to North	I-8, SB2S	$202
2040	CC083	Complete Corridor: MLC	I-805 (SR 15)	North to North and South to South	SR 94, SB2S	$112
2040	CC110	Complete Corridor: DAR	I-15 (Clairemont Mesa Boulevard)	North and South	N/A	$49
2040	TL29	Transit Leap	*Rapid* 235	Escondido to Downtown San Diego via I-15 (DAR stations)	I-8, SR 56, SR 94, CCT, North County Corridor, SB2S	$34
2040	TL30	Transit Leap	*Rapid* 237	UC San Diego to Rancho Bernardo via Sorrento Valley and Mira Mesa	SR 56, CCT, SB2S	$54
2050	CC014	Complete Corridor: ML/ Goods Movement	I-15 (Valley Parkway to SR 76)	8F to 6F+3ML	N/A	$408
2050	CC015	Complete Corridor: ML/ Goods Movement	I-15 (SR 76 to County Line)	8F to 6F+3ML	North County Corridor	$199
2050	CC072	Complete Corridor: MLC	I-15 (SR 78)	South to West and East to North	North County Corridor	$147
2050	CC078	Complete Corridor: MLC	I-15 (SR 56)	South to West and East to North	SR 56	$239

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
Interstate 5 North Coast Corridor (I-5 NCC)						
2026	CC046	Complete Corridor: ML	I-5 (Manchester to Vandegrift)	8F to 8F+2HOV/high-occupancy toll (HOT) [12]	North County Corridor	$171
2026	TL05	Transit Leap/ Goods Movement	Commuter Rail 398	Oceanside to Downtown San Diego (includes upgrades to Pacific Surfliner/COASTER/Metrolink/ Freight LOSSAN services from Orange County to Downtown San Diego, wooden bridge replacements, add station at Downtown San Diego)	CMH	$1,203
2029	TL40	Transit Leap	*Rapid* 473	Oceanside to Solana Beach to UTC/UC San Diego via Highway 101 Coastal Communities, Carmel Valley	SR 56, CCT, North County Corridor, SB2S	$156
2032	CC004	Complete Corridor: ML/ Goods Movement	I-5 (SR 52 to I-805)	8F to 6F+4ML	CCT, SB2S	$190
2032	CC111	Complete Corridor: DAR	I-5 (Voigt)	North and South	N/A	$49
2040	CC007	Complete Corridor: ML/ Goods Movement	I-5 (Via de La Valle to La Costa)	8F to 6F+4ML	N/A	$316
2040	CC008	Complete Corridor: ML/ Goods Movement	I-5 (La Costa to Cassidy Street)	8F to 6F+4ML	North County Corridor	$302
2040	CC009	Complete Corridor: ML/ Goods Movement	I-5 (Cassidy Street to Harbor Drive)	8F to 6F+4ML	North County Corridor	$121
2040	CC010	Complete Corridor: ML/ Goods Movement	I-5 (Harbor Drive to County Line)	8F to 6F+2ML	N/A	$197
2040	TL06	Transit Leap/ Goods Movement	Commuter Rail 398	Oceanside to Downtown San Diego (build Del Mar tunnel, add stations at Central Mobility Hub and Camp Pendleton, and grade separation at Leucadia Boulevard)	North County Corridor	$2,875
2050	CC104	Complete Corridor: Interchange and Arterial Operational Improvements	I-5 (SR 56)	West to North and South to East	SR 56	$379
2050	TL07	Transit Leap/ Goods Movement	Commuter Rail 398	Oceanside to Downtown San Diego (build Sorrento Mesa and UTC tunnels, add station at Balboa Avenue)	SR 56, CCT	$3,171

[12] Project is consistent with the Caltrans North Coast Corridor (Build NCC) project.

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
State Route 94 (SR 94)						
2026	CC108	Complete Corridor: Interchange and Arterial Operational Improvements	SR 94 (SR 125)	South to East, including auxiliary lane to Lemon Avenue	I-8, SR 125	$137
2040	CC032	Complete Corridor: ML	SR 94 (I-5 to I-15)	8F to 6F+3ML	I-15, SB2S	$39
2040	CC033	Complete Corridor: ML	SR 94 (I-15 to I-805)	8F to 6F+3ML	I-15, SB2S	$23
2040	CC034	Complete Corridor: ML	SR 94 (I-805 to SR 125)	8F to 6F+3ML	I-8, I-15, SR 125, SB2S	$162
2040	TL14	Transit Leap	LRT 520	Orange Line (El Cajon to Downtown, double/third-tracking and grade separations at Euclid Avenue, Broadway/Lemon Grove Avenue, Allison Avenue/ University Avenue, and Severin Drive)	I-8, I-15, SR 125, CMH, SB2S	$274
2050	TL15	Transit Leap	LRT 520	Orange Line (El Cajon to Downtown, double/third-tracking)	I-8, I-15, SR 125, CCT, CMH	$274
Interstate 8 (I-8)						
2023	TL19	Transit Leap	*Rapid* 10 Phase 1	La Mesa to Ocean Beach via Mid-City, Hillcrest, Old Town (light version of *Rapid*)	I-15, SR 94, SR 125, CMH, SB2S	$36
2029	TL20	Transit Leap	*Rapid* 10 Phase 2	La Mesa to Ocean Beach via Mid-City, Hillcrest, Central Mobility Hub (full version of *Rapid*)	I-15, SR 94, SR 125, CMH, S2BS	$146
2040	CC024	Complete Corridor: ML/ Goods Movement	I-8 (I-805 to College Avenue)	8F to 6F+4ML	I-15, SB2S	$161
2040	CC025	Complete Corridor: ML/ Goods Movement	I-8 (College Avenue to Johnson Avenue)	8F to 6F+4ML	SR 94, SR 125	$281
2040	CC026	Complete Corridor: ML/ Goods Movement	I-8 (Johnson Avenue to Mollison Avenue)	6F to 4F+4ML	SR 125, CCT	$48
2040	CC027	Complete Corridor: ML/ Goods Movement	I-8 (Mollison Avenue to Greenfield Drive)	4F/6F to 4F+4ML	N/A	$106
2040	TL16	Transit Leap	LRT 530	Green Line (Santee to Downtown, double/third-tracking and grade separations)	I-15, SR 94, SR 125, CCT, CMH, SB2S	$384
2050	CC023	Complete Corridor: ML/ Goods Movement	I-8 (I-5 to I-805)	8F to 6F+4ML	I-15, SB2S	$179

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2050	CC067	Complete Corridor: MLC	I-5 (I-8)	South to East and West to North	CMH	$202
2050	CC068	Complete Corridor: MLC	I-5 (I-8)	North to East and West to South	CMH	$202
2050	TL01	Transit Leap	Commuter Rail 581	581: Downtown to El Cajon via SDSU and La Mesa 581B: Central Mobility Hub to El Cajon via SDSU and La Mesa	I-15, SR 94, SR 125, CMH, SB2S	$9,774
2050	TL17	Transit Leap	LRT 530	Green Line (Santee to Downtown, double/third-tracking and grade separations)	I-15, SR 94, SR 125, CCT, CMH, SB2S	$384
Coast, Canyons, and Trails (CCT)						
2023	TL32	Transit Leap	*Rapid* 292 Phase 1	Pacific Beach to Kearny Mesa (light version of *Rapid*)	I-15, SB2S	$7
2029	TL24	Transit Leap	*Rapid* 30	Balboa Station to Sorrento Mesa via Pacific Beach, La Jolla, UTC	SB2S	$189
2029	TL50	Transit Leap	*Rapid* 870	El Cajon to UTC via Santee, SR 52, I-805	I-8, I-15, SR 125, SB2S	$62
2029	TL51	Transit Leap	*Rapid* 890	El Cajon to Sorrento Mesa via Santee, SR 52, I-805	I-5 NCC, I-8, I-15, SR 125, SB2S	$107
2032	CC029	Complete Corridor: ML	SR 52 (I-805 to I-15)	6F to 4F+3ML	I-15	$92
2032	CC030	Complete Corridor: ML	SR 52 (I-15 to Mast Boulevard)	6F to 4F+3ML	I-15	$153
2032	CC031	Complete Corridor: ML	SR 52 (Mast Boulevard to SR 125)	4F to 4F+3ML	N/A	$103
2050	CC028	Complete Corridor: ML	SR 52 (I-5 to I-805)	4F to 4F+3ML	SB2S	$214
2050	CC065	Complete Corridor: MLC	I-5 (SR 52)	South to East and West to North	N/A	$202
2050	CC066	Complete Corridor: MLC	I-5 (SR 52)	North to East and West to South	N/A	$202

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
State Route 56 (SR 56)						
2040	CC006	Complete Corridor: ML/ Goods Movement	I-5 (SR 56 to Via de La Valle)	8F/10F+2HOV to 6F/8F+4ML	I-5 NCC	$37
2040	TL26	Transit Leap	*Rapid* 103	Solana Beach to Sabre Springs via Del Mar Heights and SR 56	I-15	$53
2040	TL27	Transit Leap	*Rapid* 104	Sorrento Valley to Sabre Springs via SR 56	I-15, SB2S	$11
2050	CC035	Complete Corridor: ML	SR 56 (I-5 to I-15)	4F to 4F+3ML	I-15	$549
San Vicente						
2040	CC050	Complete Corridor: Rural	SR 67 (Mapleview to Dye Road)	Shoulder widening/straightening	N/A	$206
2050	CC061	Complete Corridor: Rural	SR 78 (Deer Canyon Drive to Santa Ysabel)	Intersection improvements	N/A	$4
North County Corridor						
2023	TL37	Transit Leap	*Rapid* 450 Phase 1	Oceanside to Escondido via Palomar Airport Road and SR 78 (light version of *Rapid*)	I-5 NCC, I-15	$8
2029	CC036	Complete Corridor: ML	SR 78 (I-5 to Twin Oaks)	6F to 4F+4ML+Connectors	N/A	$507
2029	CC037	Complete Corridor: ML	SR 78 (Twin Oaks to I-15)	6F to 4F+4ML	I-15	$145
2029	CC064	Complete Corridor: MLC	I-5 (SR 78)	South to East and West to North, North to East and West to South	N/A	$352
2029	TL36	Transit Leap	*Rapid* 440	Carlsbad to Escondido Transit Center via Palomar Airport Road	I-5 NCC, I-15	$71
2029	TL39	Transit Leap	*Rapid* 471	Downtown Escondido to East Escondido	I-15	$85
2029	TL41	Transit Leap	*Rapid* 474	Oceanside to Vista via Mission Avenue/Santa Fe Road Corridor	I-5 NCC	$71
2029	TL42	Transit Leap	*Rapid* 477	Carlsbad Village to SR 76 via College Boulevard, Plaza Camino Real	I-5 NCC	$108
2040	CC105	Complete Corridor: Interchange and Arterial Operational Improvements	I-5 (SR 78)	South to East and West to South	I-5 NCC	$379

Major Projects by Corridor and Air Quality Phasing

Conformity Analysis Year	Project ID	Category	Project Name	Description	Connecting Corridor(s)	Cost ($2020) Millions
2040	TL10	Transit Leap	LRT 399	SPRINTER (Oceanside to Escondido, double-tracking and grade separations at El Camino Real, Melrose Drive, Vista Village Drive/Main Street, North Drive, Civic Center, Auto Parkway, and Mission Avenue)	I-15	$376
2040	TL38	Transit Leap	*Rapid* 450 Phase 2	Oceanside to Escondido via Palomar Airport Road and SR 78 (full version of *Rapid*)	I-5 NCC, I-15	$31
2050	TL11	Transit Leap	LRT 399	SPRINTER (Oceanside to Escondido, extension to North County Fair)	I-5 NCC, I-15	$376

Table C.12: Rural Corridor Projects Air Quality Phasing

Rural Corridor Projects Air Quality Phasing					
Conformity Analysis Year	Project ID	Category	Project Name	Description	Cost ($2020) Millions
2040	CC047	Complete Corridor: Rural	I-8 (I-8 to West Willows Road)	Interchange improvements	$11
2040	CC049	Complete Corridor: Rural	SR 94 (SR 94 to Melody Road/Daisy Drive)	Intersection improvements	$8
2040	CC052	Complete Corridor: Rural	SR 76 (Rice Canyon Road to Pala Reservation)	Straightening	$60
2040	CC055	Complete Corridor: Rural	SR 76 (SR 76 to Cole Grade Road)	Intersection improvements	$1
2040	CC057	Complete Corridor: Rural	SR 76 (SR 76 to Pauma Reservation Road)	Intersection improvements	$1
2040	CC058	Complete Corridor: Rural	SR 76 (Pala Casino to Rice Canyon Road)	Facility improvements	$1
2040	CC060	Complete Corridor: Rural	SR 79 (SR 79 to Schoolhouse Canyon Road)	Intersection improvements	$1
2050	CC048	Complete Corridor: Rural	I-8 (I-8 to East Willows Road)	Interchange improvements	$11
2050	CC051	Complete Corridor: Rural	SR 76 (SR 79 to Valley Center Road)	Facility improvements	$693
2050	CC053	Complete Corridor: Rural	SR 76 (Harolds Road to Pauma Rancho)	Straightening	$21
2050	CC054	Complete Corridor: Rural	SR 76 (SR 76 to Pala Mission Road)	Intersection improvements	$1
2050	CC056	Complete Corridor: Rural	SR 76 (West Reservation Boundary to East Reservation Boundary)	Shoulder widening	$40
2050	CC059	Complete Corridor: Rural	SR 79 (Deer Canyon Road to San Felipe Road)	Shoulder widening	$226
2050	CC062	Complete Corridor: Rural	SR 94 (Jamul Reservation to Tecate Road)	Shoulder widening/straightening	$252

Table C.13: Arterial Projects Air Quality Phasing

Arterial Projects Air Quality Phasing				
Conformity Analysis Year	TIP ID	Lead Agency	Project Name	Description
2023	CB04B	Carlsbad	El Camino Real and Cannon Road	In Carlsbad, along the east side of El Camino Real just south of Cannon Road, widen to prime arterial standards with three through lanes, a right turn lane, and a sidewalk approaching the intersection.
2023	CB32	Carlsbad	El Camino Real Widening – Poinsettia to Camino Vida Roble	In Carlsbad, widen El Camino Real from 900 feet north of Cassia Road to Camino Vida Roble, along the northbound side of the roadway to provide three travel lanes and a bike lane in accordance with prime arterial standards.
2023	CB59	Carlsbad	El Camino Real Widening – Sunny Creek to Jackspar	In Carlsbad, on El Camino Real from Sunny Creek to Jackspar, widen along the northbound side of the El Camino Real to provide three travel lanes (currently two lanes northbound), sidewalk, and a bike lane.
2023	ESC04	Escondido	Citracado Parkway II	West Valley to Harmony Grove, widen from two to four lanes with raised medians; construct bridge over Escondido Creek.
2023	ESC08	Escondido	Felicita Avenue/Juniper Street	Widen from two to four lanes with left turn pockets, raised medians on Felicita; new traffic signals at Juniper and Chestnut, Juniper and 13th Avenue, Juniper and 15th Avenue; modify traffic signal at Juniper and Felicita.
2023	O22	Oceanside	College Boulevard Improvements from Avenida de la Plata to Waring Road	In Oceanside, widen from the existing four lanes to six lanes with bike lanes and raised median.
2023	SD70	San Diego	West Mission Bay Drive Bridge	In San Diego, replace bridge and increase from four- to six-lane bridge including Class II bike lane (52-643/S00871).
2023	SM19	San Marcos	Grand Avenue Bridge and Street Improvements	From Discovery Street to San Marcos Boulevard, construct four-lane arterial bridge and a six-lane arterial street from Craven to Grand Avenue.
2023	SM31	San Marcos	San Marcos Creek Specific Plan – Discovery Street Widening and Flood Control Improvements #88265	From Via Vera Cruz to Bent Avenue/Craven Road, widen roadway to four-lane secondary arterial.
2023	SM32	San Marcos	Via Vera Cruz Bridge and Street Improvements #88264	From San Marcos Boulevard to Discovery Street, widen to four-lane secondary arterial and construct a bridge at San Marcos Creek.
2023	SM42	San Marcos	Discovery Street from Craven to Twin Oaks #ST007	In the City of San Marcos, on Discovery Street from Craven Road to west of Twin Oaks Valley Road, construct approximately 5,100 lineal feet of a new six-lane roadway.
2023	SM48	San Marcos	San Marcos Creek Specific Plan: Creekside Drive and Pad Grading #88505	Construct approximately 3,000 feet of a two-lane collector road from Via Vera Cruz to Grand Avenue in the City of San Marcos. The road will include two 12-foot lanes, diagonal parking on the north side, and parallel parking on the south side. In addition, the project also will include a 10-foot bike trail meandering along the south side.
2023	SM69	San Marcos	Twin Oaks Valley Road & Barham Drive Improvements #ST008	This project involves surface improvements including asphalt, concrete, medians, sidewalks, signage, and traffic lights. Underground improvements include utility and drainage improvements, relocations and water treatment within the public right of way to accommodate the construction of additional lanes.

Arterial Projects Air Quality Phasing

Conformity Analysis Year	TIP ID	Lead Agency	Project Name	Description
2026	CB22	Carlsbad	Avenida Encinas – Widen from Palomar Airport Road to Embarcadero Lane	In Carlsbad, Avenida Encinas from Palomar Airport Road southerly to existing improvements adjacent to Embarcadero Lane, roadway widening to secondary arterial standards.
2026	CB31	Carlsbad	El Camino Real Widening – La Costa Avenue to Arenal Road	In Carlsbad, along El Camino Real from 700 feet north of La Costa Avenue to Arenal Road, widening along the southbound side of the roadway to provide three travel lanes and a bike lane in accordance with prime arterial standards.
2026	CHV69	Chula Vista	Heritage Road Bridge	Heritage Road from Main Street/Nirvana Avenue to Entertainment Circle, widen and lengthen bridge over Otay River from a four-lane to a six-lane bridge that accommodates shoulders, sidewalk, and median; project is on Heritage Road from the intersection of Main Street and Nirvana Avenue to Entertainment Circle.
2026	CHV87	Chula Vista	E Street Extension from Bay Boulevard to H Street	Extension of E Street and F Street west of Bay Boulevard, and the realignment of Gun Powder Point Drive for Chula Vista Bayfront redevelopment. Project includes construction of a roundabout at E Street, F Street, and Gunpowder Point Drive; Class I and II bike paths; and sidewalks.
2026	CNTY14A	San Diego County	South Santa Fe Avenue South	South Santa Fe from 700 feet south of Woodland Drive to Smilax Road, widening of South Santa Fe Avenue to a five-lane major road with a center left turn lane, curb, gutter, sidewalk, bike lanes, and drainage improvements from 700 feet south of Woodland Drive to Smilax Road.
2026	CNTY21	San Diego County	Bradley Avenue Widening and Overpass at SR 67	Widen Bradley Avenue from Magnolia Avenue to Mollison Avenue; widen from two lanes to four lanes plus sidewalks. Replace two-lane bridge over SR 67 with a six-lane bridge which accommodates turn pockets.
2026	CNTY34	San Diego County	Dye Road Extension	Dye Road to San Vicente Road – in Ramona, study, design, and construct a two-lane community collector road with intermittent turn lanes, bike lanes, curb, gutter, and pathway/walkway.
2026	CNTY98	San Diego County	Otay Lakes Road	Four-lane boulevard with raised median from the city/county boundary to Strada Piazza, and two-lane community collector with intermittent turn lanes to the east.
2026	ESC24	Escondido	Centre City Parkway	Mission Road to SR 78, widen four lanes to six lanes with intersection improvements.
2026	NC01	National City	Plaza Boulevard Widening	Phase II of Plaza Boulevard from Highland Avenue to N Avenue, widen from two to three lanes, including a new traffic lane in each direction, new sidewalks, sidewalk widening, traffic signal upgrades, and interconnection at Plaza Boulevard.
2026	NC01	National City	Plaza Boulevard Widening	Phase III of Plaza Boulevard from I-805 to Euclid Avenue, widen from two to three lanes, including a new traffic lane in each direction, new sidewalks, sidewalk widening, traffic signal upgrades, and interconnection at Plaza Boulevard.
2026	SD102A	San Diego	Otay Truck Route Widening (Phase 4)	Phase II (from Britannia to La Media Road) of Otay Truck Route in San Diego from Drucker Lane to La Media, add one lane (total three lanes) for trucks; from Britannia to La Media, add one lane for trucks and one lane for emergency vehicles (border patrol/fire department access); add one lane for trucks along Britannia from Britannia Court to the Otay Truck Route.

Arterial Projects Air Quality Phasing

Conformity Analysis Year	TIP ID	Lead Agency	Project Name	Description
2026	SD190	San Diego	Palm Avenue/I-805 Interchange	Improvements to the Palm Avenue Bridge over I-805, including repairs to the bridge approaches; a new Project Study Report and Preliminary Environmental Assessment Report. Phase II of the project will include widening of the bridge, realignment of existing ramps, possible addition of northbound looping entrance ramp, restriping of traffic lanes, and signal modifications.
2026	SD250	San Diego	La Media Road Improvements	In San Diego, on La Media Road from SR 905 to Siempre Viva Road, widen La Media Road to a six-lane primary arterial from SR 905 to Airway Road, and to a five-lane major road between Airway Road and Siempre Viva Road with three southbound lanes and two northbound lanes. This project will also improve drainage at the intersection of La Media Road and Airway Road (S-15018).
2026	SD34	San Diego	El Camino Real	In San Diego on El Camino Real from San Dieguito Road to Via de la Valle, reconstruct and widen from two to four lanes and extend transition lane and additional grading to avoid biological impacts (CIP 52-479.0).
2026	SM24	San Marcos	Woodland Parkway Interchange and Barham Drive Widening & Street Improvements #88005	From La Moree Road to Rancheros Drive, modify existing ramps at Woodland Parkway and Barham Drive; widen and realign SR 78 undercrossing and associated work.
2029	CB12	Carlsbad	College Boulevard Reach A	In Carlsbad, from Badger Lane to Cannon Road, construct a new segment of College Boulevard to provide a four-lane roadway with raised median, bike lanes, and sidewalks/trails in accordance with major arterial standards.
2029	CNTY35	San Diego County	Ramona Street Extension	From Boundary Avenue to Warnock Drive – in the community of Ramona, construct new road extension, two lanes with intermittent turn lanes, bike lanes, and walkway/pathway.
2032	SD190	San Diego	Palm Avenue/I-805 Interchange	Improvements to the Palm Avenue Bridge over I-805, including repairs to the bridge approaches; a new Project Study Report and Preliminary Environmental Assessment Report. Phase III will provide the ultimate build-out of the project which will incorporate improvements of Phase II plus the northbound and southbound entrance ramps (CIP 52-640.0).
2032	SM10	San Marcos	SR 78/Smilax Interchange Improvements	Construct new interchange at Smilax Road interchange and SR 78 improvements.

Table C.14: Other Transit Projects Air Quality Phasing

Other Transit Projects Air Quality Phasing				
Conformity Analysis Year	Project ID	Category	Project Name	Cost ($2020) Millions
2026	--	Transit Leap	Systemwide Operations Costs	$2,172
2026	TL60	Transit Leap	Vehicle Purchases and Replacements (including spares)	$395
2026	TL63	Transit Leap	Local Bus Route Enhanced Frequencies – Ten minutes in key corridors	Included with operations costs
2040	--	Transit Leap	Systemwide Operations Costs	$5,433
2040	TL61	Transit Leap	Vehicle Purchases and Replacements (including spares)	$1,033
2040	TL64	Transit Leap	Local Bus Route Enhanced Frequencies – Ten minutes in key corridors	Included with operations costs
2040	TL66	Transit Leap	Transit Fare Subsidies	$982
2050	--	Transit Leap	Systemwide Operations Costs	$12,021
2050	TL62	Transit Leap	Vehicle Purchases and Replacements (including spares)	$2,196
2050	TL65	Transit Leap	Local Bus Route Enhanced Frequencies – Ten minutes in key corridors	Included with operations costs
2050	TL67	Transit Leap	Transit Fare Subsidies	$4,041

Public Comments and Responses Received August 7 to November 24, 2021

San Diego Forward: The Draft 2021 Regional Plan (2021 Regional Plan) was released for public review and comment on May 28, 2021. The public comment period concluded on August 6, 2021. On October 29, 2021, SANDAG provided a copy of the comments received during the public comment period; those comments and responses can be found in Appendix G, Attachment 7 of the final 2021 Regional Plan.

SANDAG continued to accept, record, and respond to comments received via email, voicemail, public meetings, and letters (via email and mail). Between August 7, 2021, and November 24, 2021, SANDAG received 143 public comments.

Comments and corresponding responses are sorted first by source, then by commentor name, if provided, in alphabetical order.

Table 1: Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021				
ID	**Commentor Name**	**Agency**	**Comment**	**Response**
Email				
E293	Andrew M. Leeper		It has come to my attention that the present development plans for the immediate Santee Trolley Station Area may be lacking in crucial foresight that could ultimately weaken the futuristic developmental potential of the Santee/Lakeside area! At stake is the FULL developmental potential of the San Diego River Corridor, which would increase its overall attractiveness, and, ultimately, overall economic value! Extending the San Diego Trolley further along this riverbed property, along with smart development (including affordable housing) along its edges would do just that! And of course, with the control and capture of its river into nice bodies of water, and the addition of attractive pathways to travel (walk) along (kind of like that of Mission Valley), a real asset to this region would be realized!!! (I have also added a PDF Map with this message) Unfortunately, the immediate development around the Current End Santee Trolley Station threatens to "box in" its ability to facilitate this futuristic transformation! Without the Trolley being able to extend itself to the riverbed's edges, I'm afraid none of these most desirable effects can take place. With this in mind, I must advocate that an open corridor be zoned in immediately so that NO NEW IMMEDIATE DEVELOPMENT can jeopardize this overall developmental reality!! Thank you for taking out your time for the consideration of this most desirable idea!!!	Land use authority is reserved to local jurisdictions – the cities and the county. Santee Trolley Station is in the jurisdiction of the City of Santee and subject to the city's zoning and ordinances. Through the land use and housing programs identified in the 2021 Regional Plan, SANDAG will continue to work with local jurisdictions on planning efforts and development opportunities near transit.
E294	Anonymous		Why do we still have no transportation plan for people to be taken to and picked up from our international Airport ? Yet they have put way to much money into Palomar Airport ? We know when the planes are going to and from San Diego , I guess some people know someone in both counties?	The Regional Plan includes creation of a new Central Mobility Hub that will have fast, frequent, and convenient connections between existing and planned transit and the airport. The MTS Route 992 bus will continue to serve the airport from Downtown San Diego. Appendix A includes a grouped collection of priority airport roadways. These improvements include: Converting Laurel Street to Primary Airport Entrance/Exit Roadway, Modifying Laurel Street between Pac Highway and I-5, and installing new I-5 Freeway Ramps at Laurel and Redwood St.
E295	Anonymous		I oppose this Tax, it is unfair and does not consider the needs of the general population and San Dag has not followed the will of the voters.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

ID	Commentor Name	Agency	Comment	Response
				We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E296	Barbara Franklin		Your plan isn't something San Diegans need or want. Also it's antiquated technology. By the time it's built much better options will be available. I didn't vote to raise taxes to pay for this.	The 2021 San Diego Regional Plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies. Appendix G of the 2021 Regional Plan includes the Public Involvement Plan and details the strategies used to consult with the public. Additional engagement will be conducted as elements of the plan move forward to its implementation phases. In addition to more traditional fixed-route transit services, the 2021 Regional Plan incorporates Flexible Fleets. which will offer people a variety of on-demand shared vehicles. Flexible Fleet services may complement fixed-route services, even in more suburban communities. Flexible Fleets use demand-responsive technology to provide on-demand services, real-time arrival times, and optimize routing for the fastest route. With the Next Operating System (Next OS) proposed in the Regional Plan, real-time information from transit and Flexible Fleets will be integrated in the back-end. This data will be used to provide trip planning tools that provide accurate travel information and make planning, booking, and paying for a ride as seamless as possible. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E297	Billie Collins		I have lived in California for well over 60 years, my family is here, and we love our state. However, all the taxation of EVERYTHING here is encouraging us to look elsewhere. Our children cannot afford to live here anymore, everyday there is a new "improvement "plan which requires new "funding", meaning taxing. Plans are never completed, and money is wasted on unrealistic and unrealized dreams. We definitely oppose the proposed new mileage tax by SANDAG.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas

ID	Commentor Name	Agency	Comment	Response
				emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E298	Billie English		So you are going to charge a tax per mile even for those that cannot take public transportation. I drive a van conversion that has a toilet, as I need quick access to a toilet when I have an IBS attack. Now you are going to tax me, just because you can. I'm one of many people that public transportation does not work for us. Besides you can't even keep our roads in reasonable condition. I will never be able to trust that any additional taxes will be used appropriately. You don't have a good track record. Just look at the streets in Mira Mesa. This is not nice. I would like a response to my email.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. The Plan includes Complete Streets improvements to address sidewalks and accessibility accommodation.
E299	Caleb Ng		I oppose the mileage tax because we have already paid for our share in freeway infrastructure. Additionally, this tax would unfairly burden my family because there are no alternative methods of getting to and from my work which is about 23 miles from my house. We are already paying enough taxes. Enough is enough.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E300	Carolyn Batiste		Dear SANDAG Board, I am so disappointed that anyone would think that adding a tax to the mileage that we drive as a matter of our very existence is even a thought in anyone's idea of	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and

ID	Commentor Name	Agency	Comment	Response
			representing the good folks of San Diego County. As your mission statement says: We are the regional agency that connects people, places, and innovative ideas by implementing solutions with our unique and diverse communities. Implementing this idea will create less connections because you add cost to our very existence that will change the way we will navigate across this county. This will not create as your vision statement says: Pursuing a brighter future for all. You will tax generations to come with this burdensome tax. I grew up in the San Francisco-Oakland Bay Area. I know what good public transportation looks like. But the crime on BART is documented and it has loss riders. What you propose is not even close to responsible; and we all must pay for public transit when we use it. Making it free means I don't have an investment in the responsibility to care for the product. If you want to help people that are low income that is a good thing. You give people vouchers that they can apply for and we can verify need. We drive our children to school, daycare, medical and therapy appointments. If we manage to scrimp the money together we drive our kids to their games that cost of money for uniforms or participation to leagues. We drive our elderly parents, or neighbors to their medical appointments and for shopping needs. We drive to maintain our livelihood to and from our place of employment and for some of us driving is integral to our employment. Shipping and delivery companies drive because it is the essence of their business. You tax that, they tax the consumer. No matter how you folks try to slice and dice what you say is fair, It will not be fair to any consumer in San Diego County. Your vision of Equity will not be achieved because even the lowest of income people all drive or have someone drive them in San Diego county. Your idea will create fees between family and friends just to offset the cost of driving. Just say no to any new taxes!!!! We are all trying to recover from the economic pains of the COVID-19 shut down. Please stop the insanity of economic destruction with more new taxes.	state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, safe, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. The plan will also implement safe streets at the local level through Mobility Hubs, which will provide safer and comfortable spaces for people of all ages and abilities get to their destinations
E301	Chad Ciampoli		How do you plan to track the miles driven? Will apartment parking lots and personal driveways be toll roads now? If cars are so fuel efficient that there's not enough gas tax..how is climate one of the biggest issues your using to justify this new tax? Shouldn't you either raise the gas tax or use the new tax to build more roads and further vehicle technology and pushes towards personal electric vehicles...or even hybrids. As a construction worker with a bad back and knees and no interest in tourist attractions....how does this help me? How does this not just burden me? Why aren't you fulfilling the promises under *TransNet*? I saw recently at the Poway town hall the submitted a change to the SANDAG fund they were receiving..instead of new roads or expansion of roads...it's going to go to bike paths and park amenities....in the Poway corridor...I assure you what that is. If even by your own surveys - people want to drive. Why force them...even punish them for driving. Climate and equity....in San Diego. I'd say San Diego is pretty diverse and pretty damn equitable. Please bring up some prime example to the contrary and I'll bring up plenty to show how much San Diego cares about communities. Climate? You said yourself our cars are too fuel efficient now. Not only that but California...San Diego especially, is leaps and bounds in front of other cities when it comes to climate awareness. Why are you hurting San Diegans wallets to push you new vision? We already do more than everyone...and you said your selves our cars are too fuel efficient now. My biggest problem is the tracking. I will not download a tracking app on my phone or in my car.. period. One of my cars is too old..ob1 so good luck. I believe tracking citizens going against civil liberty. I believe charging San Diego drivers more to drive while not giving them more roads to help congestion.... You broke *TransNet* promises. How can we trust you on 160 billion dollars over 30 years? Oh while we still pay for *TransNet* ...which is just ridiculous. You break promises but we still have to pay for it..and pay more for a new deal. Please answer these questions. How will you track miles per	The *TransNet* measure approved by San Diego county voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. Some of the remaining projects in the *TransNet* measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure. The local elected officials of the SANDAG Board of Directors may review the *TransNet* ordinance and list of projects to discuss possible updates. This process is outside of the development the 2021 Regional Plan. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like,

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			person? How can we trust your math or your promises when *TransNet* and *TransNet* 2 were either wrong or completely walked back on?	how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E302	Charles Talcott		Stop the insanity of over taxation. The people of San Diego County, whom you say you serve, do not need nor want another tax. We also do not need politicians dreaming up grandiose schemes, that will only hurt the majority and never benefit the majority. Reconsider your decision.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.The 2021 San Diego Regional Plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies.
E303	Charles Talcott		STOP, the insanity of over taxation. The people of San Diego County, whom you say you serve, do not need nor want another tax. We also do not need politicians dreaming up grandiose schemes, that will only hurt the majority and never benefit the majority. Reconsider your decision.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and

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				sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E304	Chop Chaz		NO,NO,NO,AND NO, on your mileage tax	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E305	Christine Becker		To whom it may concern, San Diegans are opposed to SANDAG's proposed fee per mile driven plan. Here is the letter San Diegans will be receiving as well as some of the major concerns. I am a fourth generation San Diegan, and I cannot stand idly by, while they do this to my city. We are America's finest City, let's all stand together and prove it. The proposal suggests that all highways, in time, become toll roads. So basically, aside from car registration, cost of insurance, vehicle maintenance, your actual car payment, oh yeah, and gas, you will be taxed to oblivion for driving your car. Here are my personal thoughts, mingled with cold hard facts and the words of other concerned San Diegans. Commercial truckers will also be charged the additional cost to transport goods, that increase in fees will be passed along to the price of consumer goods. Groceries, Starbucks, Amazon packages. The price of literally everything will go up. What percentage of the automotive/automotive subsidiaries make up jobs in California , historically 3%, probably much higher now. How many car dealerships are there in San Diego, hundreds and hundreds, and how many does each dealership employ? Then there are Highway Patrolman, Jiffy Lube's, discount tires, stereo installers, car painters, mechanics, wholesalers, window tinter's) Not to mention, the DMV, insurance companies. Trolleys are not policed, there will be an increase in crime. Rape, robbery, murder. Sorry, but I would never allow my 70-year-old mother to ride the trolly to get groceries or run an errand. Nor would I, myself. I'm a young, strong woman, and would still fear rape, robbery or even worse. In nice neighborhoods property value will go down because of a rise in the crime rate. This is a fact, research places where they have put trolley stations. There was just a post on next door about another recent attack: https://nextdoor.com/p/Rn4kh7ZPWNdH?utm_source=share&extras=Njg5NjQyNA%3D%3D Not to mention, it is a great option for a mobile homeless shelter, free, warmer than the street and slightly more comfortable. Who could blame a homeless person. People with pets, what will people with pets do. When they for instance, take them to the vet, or dog park. Immuno compromised people, say getting chemotherapy, exposed to all kinds of germs on a trolley, or being penalized financially for getting treatment. Not to mention we are in the wake of a pandemic. If God forbid this were to ever happen again, are we really willing to expose ourselves to the un-sanitized masses. Average median age of Californians, and amount of people lugging bags up and down the stairs to get to a trolley, not to mention children with sports equipment, backpacks and so on. Not to forget, when you have a sick child or elderly parent, taking them to a doctor, will require other means of transportation. Tourism will go down as a price of rental cars go up, and private used	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally the plan will also implement safe streets at the local level through Mobility Hubs, which will provide safer and comfortable spaces for people of all ages and abilities get to their destinations.

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			cars for rent. Hotels will inflate their prices due to the fact that they are paying an increased rate for delivery of consumer goods. Theme parks will inflate their prices as well, for the same reason. And because not as much labor will be needed from hotels, rental cars and theme parks there will be more layoffs. More!! Because the trolley will now be free, there will be an increase in homeless sleeping on them as well as trolley stations. By the way, who's paying for free transportation?? Oh right the taxpayers. Uber, Lyft prices will go up, because they will also be charged per mile. And they are in the proposal as well in the "Flexible Feet's" after all, some people can't, or aren't willing to walk, to and from trolley stations, so there's your contingency. Paying for another, less convenient form of transportation. But don't worry, you'll have plenty of time to sit and admire the trolley station, that your tax dollars paid for, when waiting for an Uber or Lyft. We haven't even talked about people that commute to work, because housing in SD is more affordable in rural areas. Or people that work out of the ordinary hours, nurses, restaurant workers etc. then there are those who have to drive to LA a couple times a week, like people in sales. California just lost its seat in Congress due to people leaving, for the first time in 170 years. Implementing another tax in California will cause another mass exodus. California's state sales tax is the highest in the nation. California's gasoline tax is the highest in the nation. California's personal income tax is the highest in the nation. California's corporate income tax is the highest in the west. California produces more milk than any other state, yet it costs nearly 50% more here than in Arizona. California is already the third most expensive state to live in. This is a $163 billion proposal, yes billion, with a B , & that was in 2020 money not with any inflated prices. Only 3% of the population in San Diego use public transit and for this expensive plan that they're projecting 10 to 11%. Along with a per-mile fee, SANDAG plans to seek funding from a half-cent sales tax in 2024. This is on top of a half-cent sales tax that voters approved for promised road and highway improvements, back in 2008...these 'improvements' are nowhere near complete. SANDAG's Board of Directors will vote on this entire proposal (not the registered voters of San Diego), on Friday, December 10. In the meantime, tell your neighbors and tell your friends about this preposterous proposal. Contact your local SANDAG representative and speak out. San Diegans don't want to pay an even higher amount to drive on our roads. I can't emphasize enough, that since this is a 'fee' and not a 'tax' it will not be brought to registered voters. Only SANDAG will vote on it. A response is requested.	
E306	Christine Springer		I understand SANDAG is assessing the possibility of charging people per mile driving in California. If you ever want to drive anyone from California this is going to be it. We drive a majority of our time down in Mexico because we have vacation property there and most of our driving is done down there. Are you going to charge us a California tax when we're not even driving in the state of California? Why don't you just charge a gas tax like you already do at an exorbitant rate? It's so frustrating that they continue to raise taxes in California but yet never have enough money.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E307	Christine Wissing		Hello, I wanted to ask about how I can write against the new gas tax that San Diego is proposing. The reason that I am would like to voice my concern is the fact that San Diego has become pretty much impossible to live with the cost of living rising. Also, I am a single mom that does not live near a trolley and getting my son to school and then to work in a timely manner would be a long	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas

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			and arduous task. I would also like to bring up the concern that I live in El Cajon, which is not the safest place to live. I have been harassed by mentally unstable individuals before. To my understanding, San Diego would like everyone to take public transit, however it's not always the safest option. I believe that a lot of the individuals creating these laws aren't familiar with the issues affecting our communities. Thank you for listening to my concern.	they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
E308	Denise Summer		I would like my voice to be heard and wanted to say please do not instill a gas mileage tax in CA. It will cause a financial hardship on so many who are trying to make it in this beautiful state. We already have the highest gas tax in the country and a mileage tax would really create even more problems. Please find another solution. Thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E309	Douglas and Christine Evans		We request the following: 1) A NO VOTE on the SANDAG REGIONAL TRANSPORTATION IMPROVEMENT PLAN (RTIP) as currently proposed. 2) UTILIZE the existing gasoline and diesel fuel tax as approved by the voters for its intended purpose — roads, bridges, etc. infrastructure. DO NOT SIPHON OFF OUR TAX DOLLARS FOR OTHER PROJECTS! 3) COMPLETE past SANDAG projects — roads, bridges, etc. — that were approved, promised and never started / completed before embarking on other new projects. 4) DO NOT IMPLEMENT a "tax-per mile plan" on internal combustion engine (ICE) vehicles	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas

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			without first eliminating all current federal, state, & local fuel taxes. A “tax-per mile plan” could be a replacement — one-for-one but, not an incremental or increased tax / fee. 5) DO IMPLEMENT a “tax-per mile plan” on electrical vehicles (EVs) — full battery electric & hybrid EVs; natural / propane gas vehicles; hydrogen vehicles. Those vehicles use the same roads and infrastructure as other vehicles and need to pay their fair share for use of the infrastructure. 6) DO NOT IMPLEMENT MORE “MANAGED LANES” on San Diego County roads. All taxpayers have the right to use all of the roads, bridges, etc. anytime of the day without paying more taxes / fees to use what they have already paid for. DO NOT DISCRIMINATE! Plus, all lanes should be available to all vehicles anytime of the day to minimize congestion on the roads. 7) SPEND SANDAG monies proportional to usage of infrastructure — a larger percentage for roads, bridges, etc. and very small percentage for public transportation. Public transportation is used by only 2.5% of the San Diego County population. Even if public transportation usage increases to 10%, which is highly unlikely only a maximum spend of 10% of the total spend is justified for public transportation. 8) DO NOT TRY TO FORCE PEOPLE OUT OF THEIR PERSONAL VEHICLES. Current vehicle technology and future technology will reduce greenhouse gases from transportation and clean up the environment. Thank you for voting NO on the current RTIP and developing a plan that is suitable and beneficial to all San Diego County residents — urban, rural, young, old, seniors, working folks, retirees, San Diego proper, North County, East County, South County, etc. — not a plan that benefits just a few residents at the detriment and cost to others.	emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E310	Douglas Evans		We request the following: 1) A NO VOTE on the SANDAG REGIONAL TRANSPORTATION IMPROVEMENT PLAN (RTIP) as currently proposed. 2) UTILIZE the existing gasoline and diesel fuel tax as approved by the voters for its intended purpose — roads, bridges, etc. infrastructure. DO NOT SIPHON OFF OUR TAX DOLLARS FOR OTHER PROJECTS! 3) COMPLETE past SANDAG projects — roads, bridges, etc. — that were approved, promised and never started / completed before embarking on other new projects. 4) DO NOT IMPLEMENT a “tax-per mile plan” on internal combustion engine (ICE) vehicles without first eliminating all current federal, state, & local fuel taxes. A “tax-per mile plan” could be a replacement — one-for-one but, not an incremental or increased tax / fee. 5) DO IMPLEMENT a “tax-per mile plan” on electrical vehicles (EVs) — full battery electric & hybrid EVs; natural / propane gas vehicles; hydrogen vehicles. Those vehicles use the same roads and infrastructure as other vehicles and need to pay their fair share for use of the infrastructure. 6) DO NOT IMPLEMENT MORE “MANAGED LANES” on San Diego County roads. All taxpayers have the right to use all of the roads, bridges, etc. anytime of the day without paying more taxes / fees to use what they have already paid for. DO NOT DISCRIMINATE! Plus, all lanes should be available to all vehicles anytime of the day to minimize congestion on the roads. 7) SPEND SANDAG monies proportional to usage of infrastructure — a larger percentage for roads, bridges, etc. and very small percentage for public transportation. Public transportation is used by only 2.5% of the San Diego County population. Even if public transportation usage increases to 10%, which is highly unlikely only a maximum spend of 10% of the total spend is	The *TransNet* measure approved by San Diego county voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. The remaining projects in the *TransNet* measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure. The local elected officials of the SANDAG Board of Directors may review the *TransNet* ordinance and list of projects to discuss possible updates. This process is outside of the development the 2021 Regional Plan. The federal gas tax was the largest source of maintenance and operation funding for many decades. However, the federal gas tax per gallon has not changed since 1993, that is when the minimum wage in California was $4.25 and the federal gas tax does not grow with inflation. Additionally, the revenue collected per vehicle, by the federal gas tax diminished as vehicle miles per gallon (MPG) improve, but the cost of road maintenance increased. Also, road degradation is a function tied to the weight of the vehicles and multiplied by the amount of vehicle traffic. The average weight of passenger vehicles has largely increased since the 1980s; while gas tax revenues have decreased. Resulting in less revenue, but greater road degradation. Additionally, the per dollar purchasing power of the federal gallon tax has diminished through both inflation and less overall revenue for nearly three decades; while the number of additional

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			justified for public transportation. 8) DO NOT TRY TO FORCE PEOPLE OUT OF THEIR PERSONAL VEHICLES. Current vehicle technology and future technology will reduce greenhouse gases from transportation and clean up the environment. Thank you for voting NO on the current RTIP and developing a plan that is suitable and beneficial to all San Diego County residents — urban, rural, young, old, seniors, working folks, retirees, San Diego proper, North County, East County, South County, etc. — not a plan that benefits just a few residents at the detriment and cost to others.	vehicles on California roadways has increased significantly. Finally, the cost of road maintenance is also a function of the amount of overall paved road surface area; meaning the more paved roads we build the greater the cost, and adding road lanes is also a part of the cost. Paving additionally roads also has the addition effect of increasing miles driven per vehicle, and impacting pre-existing roads through congestion and further deterioration. States like California and other jurisdictions have implemented their own sales and gas tax measures to try and address the maintenance and operation of road networks. However, as vehicles MPG continues to improve, and fossil fuels consumption is phased-out with electric vehicles, a new tax model will be necessary for the ongoing maintenance and operation of our road and highway networks. The revenues necessary for the ongoing maintenance will still need to be collected. The amount of tax collected from federal and state per gallon taxes have never truly reflected the actual cost of road usage, and in fact driving has largely been a subsidized activity through other funding sources such as sales tax. The San Diego Forward 2021 Regional Plan is a federally required long-range planning document with horizon years of 2035 and 2050. It is a federal requirement to provide a reasonable and feasible funding plan. The road usage charge may be phased in as gasoline sales continue to be phased out through emerging technologies.
E311	Ed Nodland		I fully support the concept of free public transit. By free, we are talking about paying for transit by means other than rider per-use fees. I can drive on most roads without paying a per-use fee. Why not extend this to public transportation. I'd like to suggest that the concept of exempting fully electric vehicles from the per-mile fees be examined. The type of person that gets hit by this per-mile fee without the option to use free transit is like my or most independent lawn care, pest control, or appliance repair workers who can't afford to live anywhere near the west side of I-5. They must drive a longer distance with their mowers or other required equipment. I guess the solution to this is our onsite services workforce will have to raise their prices a bit. Unless, they can afford the new all electric F-150 pickups and the electrical vehicle exemption is implemented. Another mobility concept I'd like to explore with SANDAG is an express bike transit network. What percentage of the SD county population both live and work within 4 or 5 miles of a freeway or other major highway? Ya, a bunch. Imagine if bike riders could safely ride a few miles to an express transit stop, easily hop on a bus specifically designed to transport 25 to 30 riders with bikes for a 10 to 30 mile journey with limited stops every 5'ish miles apart, where riders can quickly jump on and off to get near their destination, and complete the commute on their bike. Other than the Coaster, our buses and trolleys are restricted to two bikes per trolley car or bus. The emergence of the electric assist bikes is making them heavier to hoist up onto the buses' front end bike racks, not to mention the added time of using these racks. I've had this vision and bike-bus designs since I lived in the Seattle area 25 years ago. San Diego is a perfect place for a pilot program. We don't have the constant rain here and our network of freeways is not hindered and forced into long parallel corridors by Puget Sound, Lake Washington, and the mountains. There is far more awareness on the need for sustainable mobility options and reduced congestion on our ever-widening highways than there was 25 years ago. The time might be right for this. I am looking forward to the opening of the new trolley line.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. The transportation system is designed to provide convenient travel choices for residents, employees, and visitors. Fast and frequent transit remains the most effective way to move a lot of people and studies indicate that this will continue to be the case well into the future. Commuter rail operating along the region's urban corridors, can serve longer-distance regional trips and providing a remedy for today's congested corridors. Additionally, Flexible Fleets like e-bikes, shuttles, or autonomous ridesharing will be available to serve shorter trips or areas where traditional fixed transit may not work well. Analysis during development of the Plan found that over 90 percent of the county's population is within a 10-minute Flexible Fleet ride to transit. Together, these multimodal services provide greater and more convenient choices than what is available today. SANDAG is planning to start testing and launching Flexible Fleet pilots in 2022. Pilots will be designed to provide affordable and convenient options based on community needs.
E312	Edgar L. Morse III		I am a 50 year + resident of San Diego, and I am OPPOSE the taxation of mileage on motor vehicles. This tax hurts the common working man or woman. San Diego is a large city and	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and

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			county, and with housing costs skyrocketing, many workers must live far from their jobs. This mileage tax is another onerous attempt to wrest money from taxpayers to spend on expensive, poorly conceived projects. Government in this state (including this city and county) is constantly looking for ways to get more money from citizens for projects which are poor ideas, developed by crackpots. San Diego is not a vertical city like Chicago or New York with centralized populations that can easily use mass transit. Bicycles may be a great idea for local transit or exercise, but are NOT MUCH USE for families transporting multiple children to important but separated events. Politicians who continue to MILK the people with taxes that don't solve the problem HAVE LOST MY VOTE! The architect of this mileage scam states that this idea will give citizens "more choices"! HAH! The only real choice will be to get rid of politicians who think the only solution to any problem is to waste the taxpayers' money. NO on mileage taxation.	state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
E313	Edward Alcobia		Every one of the communist b****** that supports a gas tax on mileage needs to go !	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E314	Emad Mirgoli		I am a resident of the City of San Diego and live in the Hillcrest area. The 5 times I have ridden the bus I have had to stand near piss and s*** covered bus stops (take a look at the stop on University & Vermont). Now you want to charge me a per mile fee on top of the gas tax to pay for free fare for your s***** service? F****** enough bullshit from you and your ****** director from LA. Send him back and stop forcing b******* down our throats.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next

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E315	Emily Deibler		I have read the reports that an upcoming vote to increase a fee/tax on miles driven in the state of CA is coming up. I urge you to NOT pass this fee. It will hurt the workers that are struggling already after the last year. I know it isn't for another couple of years- but we need time to adjust from so much closure and new demands of business to keep our customers safe. Imposing another fee or tax to just get to work- will be detrimental to so many and further drive away those that love our beautiful state. It just doesn't make sense.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E316	George Kneeshaw		I am completely against the SANDAG plan. I have been paying *TransNet* taxes since 2004 for promised projects that have not been done. The SANDAG board of directors ordered Hasan to begin the environmental study for widening hwy 67 and he did not comply. He should be terminated. In fact SANDAG should be disbanded and CalTrans handle our highways. More taxes, and mileage meters are more socialist crap we do not need and do not want. In my area there are no reliable mass transit alternatives and likely never will be. Take your buses, trains and bike lanes and let those who use them pay for them. Put the *TransNet* money to the promised upgrades and no new taxes. Remember fire Hasan Ikhrata.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes

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				increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. In conjunction with the Regional Plan, SANDAG and Caltrans are actively preparing the San Vicente Comprehensive Multimodal Corridor Plan, which is a more focused effort to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the SR 67 corridor. The Plan for SR 67 includes safety and operational improvements such as shoulder widening, curve realignments, and technology improvements from Mapleview to Dye Road in the plan phase year 2035.
E317	George Ramirez		Tax me to death!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E318	Gi Gongu		Who do I contact to voice my opposition of the proposed "Track and Tax"?	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E319	Grace Lowenberg		I am a registered independent voter and have voted in every election since I was first eligible to vote. I will NOT vote for any SANDAG proposed tax increase unless and until the promised	The *TransNet* measure approved by San Diego county voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed.

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			improvements to widen State Route 78 and State Route 52 for all cars that we voted for back in 2004 have been constructed. And, I plan to actively campaign against any such tax increase. SANDAG continually overlooks those freeways in favor of the I-5 and I-15 and now in favor of misguided public transit options which will not deliver the unrealistic ridership projections SANDAG forecasts. Moreover, your plan ignores the fact that all-electric vehicles and driverless vehicles are just around the corner. These new technologies will provide greater reduction in greenhouse gases and accidents at far less taxpayer expense. Your plan has been overtaken by these innovations and is already outdated. Californians will not give up, nor should we have to give up, the freedom and convenience of our own vehicles. The SANDAG plan is as misguided as the bike lanes recently installed in Hillcrest, only it will cost far, far more. And, the necessary land acquisition alone is highly likely to result in massive cost overruns not to mention years of litigation and may never be achieved. It will be similar to the state bullet train fiasco all over again. For these and many other reasons, SANDAG should ditch the plan in favor of less costly, realistic options that will actually address the real future needs of San Deigans.	The remaining projects in the *TransNet* measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure. The local elected officials of the SANDAG Board of Directors may review the *TransNet* ordinance and list of projects to discuss possible updates. This process is outside of the development the 2021 Regional Plan. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E320	Grace Lowenberg		We are totally against a road tax and sales tax to fund the misguided and unrealistic public transportation plan SANDAG is promoting. Your estimates of the number of people who will use public transit versus the $160 billion cost of your plan are a joke! Californians do not want to give up the independence of a personal vehicle. Plus, your plan will be outdated before you even break ground on any project. Electric vehicles are the future. They will be here in significant numbers in 5-7 years. That will do far more to reduce greenhouse gasses than your plan to force everyone onto public transport, which is a pipe dream! We rely on our cars. I have to drive from El Cajon to Vista on a regular basis to care for my elderly Mom, who uses a walker. I have to drive her regularly from Vista to Encinitas for doctor visits then back to Vista then I drive back to El Cajon. That can take as long as 3 hours on the road. And you expect me to do that using public transportation? Not only will I have to take an entire day off work, but she simply will be unable to do that. If I use my car to drive her to her doctors appointments, then you're proposing to charge me another tax on top of the gas tax?!?!?! You need to EXPAND the freeway lanes and give us what SANDAG promised in freeway expansions in 2004. We will NOT vote for any taxes to pay for your plan	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and

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E321	Irene Raymundo		My name is Irene Raymundo and I am a resident and registered voter of San Diego. For the record me ,all my family and Neighbors oppose the mileage tax proposal and will vote against any politician that is supports the proposal. Respectfully when does the increased taxation stop. Better use of current taxes is a more responsible solution. The working class are leaving California for this reason. 2 of our neighbors relocated to other states and took their business with them.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E322	J B Alberts		Dear SANDAG, I write in complete opposition to any type of mileage taxation plan. Californians, and San Diegans in particular, already pay ¢79/gal in gasoline taxes. We will NOT pay another wasteful tax that politicians will squander on useless projects that we don't want. Stop the mileage tax.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E323	James Bridgewater		The mileage tax is a very odd tax. It funds San Diego City and pretty much leaves out North County, who are taxed as well. Do electric cars get a break? How about hybrids? Do the gas guzzlers get charged more? The gas tax had specific projects to fund which are now abandoned. San Diego County is big and mass transit for all is not a good thing no matter how much you want it to be. Please do not ruin this county for an impossible dream you have. Take things slow in small steps. The plan that your team has presented seems to be an impossible pipe dream. It will not work. The dream is good but not reachable on the way you are approaching it. Think about the actual people of San Diego for a while and you may get it.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next

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E324	James Mullady		I have never written to a government entity before but the idea you are floating is too much. STOP trying to take away our cars. START spending our money on the roads. How much did the new Trolley line cost and how many people have used it? Enough is enough!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. The Mid-Coast Extension of the UC San Diego Blue Line Trolley is a SANDAG priority project. The $2.1 billion project will add eleven miles to the UC San Diego Blue Line Trolley, extending service from Downtown San Diego to the University Community. The Trolley extension will improve access to growing employment, education, and residential areas in addition to serving major activity centers such as Old Town San Diego, UC San Diego, and University Towne Centre (UTC). Construction for the project began in fall 2016 and service is anticipated to begin in November 2021. Transportation models indicate that the new trolley service will attract 20,000 new transit riders a day to the system.
E325	Jan McNamara		I can't believe SANDAG is even considering a mileage tax!! I live in East County. Do you have any idea how difficult it would be for me to travel? Anyway, forget about taking any trolleys to North County, even though I realize the Blue line will soon be going to La Jolla. This would require me to take a bus to the trolley station, catch a trolley then transferring to another trolley line once I arrived downtown. Then once I reach La Jolla it would require catching a bus to my final destination. Something I could accomplish in 20 minutes by car would take hours! Escondido would be no easier. I would like to know how all the directors of SANDAG travel around? I doubt very seriously it is by bus and trolley. I hope this proposal will be put to rest. It is not in the best interest of the citizens of San Diego.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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E326	Janine Thorp		No No No. We are taxed too much already!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E327	Jeff Zinza		Hello, I'm an avid cycling commuter who heard about the new program on the news this evening. If I'm not using my car to commute, how do I get credits for miles ridden instead of driven, especially if there will be a sales tax? Is there a way to track miles in order to get credits against the sales and mileage tax hikes? Just trying to understand how to avoid new taxing that are intended to promote the values that I already live. Please advise.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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E328	Jeremy and Jennifer Crotinger		SANDAG's proposed per-mile fee is an outrageous proposal to fund your $160 billion transportation plan. Many San Diegans are struggling to make ends meet. Families are moving from California in droves due to the high cost of living and seemingly unending ideas of ways to tax us. Many of the people burdening our roadways don't even live in San Diego County! The high cost of living here has pushed them out to Riverside county. Your proposal to tax San Diegans who live here, pay property taxes, sales taxes, registration taxes, gas taxes, etc. is unacceptable. Furthermore, your proposal to put yet another tax on us in the form of toll lanes is another example of raising the costs to live here so high, people are forced to leave. Aside from the tax, this proposal is an outrageous violation of personal information. The last thing the citizens of this county need is for SANDAG to act as big brother, collecting information about our driving habits. How exactly do you propose to do that? Will you require GPS or some other tracking mechanisms in our vehicles? It is completely out of line to even suggest such things. Tracing and tracking San Diego drivers (workers, tax payers, business owners) is not an acceptable means of funding pie in the sky public transportation ambitions. It is already getting unbearably unaffordable to live in California. Please do not make it more miserable. Thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E329	Joe Coppola		Dear SANDAG Director, Please stop taxing us! This is ridiculous! It will probably cost you more to manage it than the tax revenue you'll gain. Stop!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alterative way of paying for our transportation system.
E330	John Baker		May 2020 you and SDG&E installed a street light at the northeast corner of LANDIS and LOUISIANA streets. It was NEVER turned on. We taxpayers paid for it and got NOTHING in return. NO ONE will tell us why this was done. Why don't you finish your work before you destroy another community?	SANDAG is continuing to work with SDG&E to energize the streetlight before we complete construction of the Landis Bikeway project in spring 2022. Next week, SDG&E crews will be installing pull boxes for the streetlights. Then they will inspect the work, complete the power drop down from the pole, and energize the lights. This work is estimated to be completed within the next few months. We appreciate your patience during construction.
E331	Julia Feliciano		I oppose the proposed per-mile-driven tax. I live in Valley Center. Public transportation is not an option as there is only one bus route that I would need to drive to, but there is no place to park near the bus stops. So no matter where I need to go, groceries, doctor appointments, anything, I have to drive. All your big public transportation plans will not reach into Valley Center. Gasoline is already very expensive. You will be hurting the economy for restaurants and other entertainment	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved

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			venues because I and others like me will stop driving to those non-necessity places in the City of San Diego if there is a per-mile-driven tax. People that live in Valley Center and other inland communities are already disadvantaged by having to drive great distances with high gas prices. You'll be asking us to pay even more without getting any benefit because your plans don't support North County at all. We shouldn't have to subsidize these projects that are all far away from us. Please do not approve this outrageous and unfair tax that will hurt blue collar workers while the wealthy still drive around without a care. Thank you.	populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG is committed to developing a carefully constructed program that will ensure that no group, such as those driving fuel-powered vehicles, low-income individuals, rural residents, or those with long commutes, are paying more than their fair share.
E332	Kelsey Thomas		I live in San Diego County. I'm not sure if I'm contacting the correct person to discuss this, but I'm voicing my concern about the cents per mile tax. It's not right and as high as gas is, it's not right for you guys to do this to citizens of San Diego. There are families out there who can barely afford food and house finances. Along with that, public transportation is not feasible especially families with little kids taking them to school and going to work, taking a bus to work, that's crazy! What about going to the grocer store? Taking a bus? Not possible. How will that work. You guys on SANDAG really need to think more about the citizens then your agenda.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E333	Kurt Hill		Hello, There are a number of very obvious questions that I feel are not being answered (or I cannot find the answer to) regarding the proposed mileage tax. While I understand and support the concept of a user-fee, I also have concerns. Would you please answer these questions, or direct me to the appropriate contact to get those answers? Will the gas-tax be eliminated if I am paying a use-fee, or is this going to be in addition to the existing gas tax? How will various equity issues around this be addressed? In particular, the price of housing forces many lower-income residents to find homes in far-flung communities (Temecula, etc.) and they already have to deal with a huge commute and the expense of driving & maintaining a car. These are exactly the people who will be hardest hit by a use-fee, whereas those who can afford to live close to their workplace will probably save money. Is the intent to force the poor to use public transit? If so, how is the cost of their time being addressed? By this I mean that it can take significantly longer to get anywhere on public transit, so forcing people onto public transit has a very real cost	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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			in the time they have for themselves and their families. Imagine commuting from Temecula to work on public transit -- probably two hours each way IF we build a good system to support that commute... These seem like fairly obvious concerns, so I assume some research has already been done -- can you point me to any informational items that address these inequities? Someone living in Temecula would face a nearly 50 mile commute if they worked in the Claremont area of San Diego. This would cost them ($0.04/mile) an additional $4 per day to commute, or $80/month. That's a significant new bill for many people. These new taxes do not affect everyone the same. When the system is structured so that the poor need to live far from work, and then the system is changed to punish the people that live far from work, how is that equitable?	We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H: Social Equity: Engagement and Analysis.
E334	Laura Vega		As the San Diego County Board of Supervisors drafts the 2021 Regional Plan, I urge you to vote against the 6 cent tax per mile on local drivers. This tax would be unfair and abusive, especially to all the South Bay residents. You should not punish San Diego residents for having to go to work. As it is, San Diego County residents already pay the highest gas prices in the nation. As a resident of the South Bay, you know that this tax would hit especially hard the Hispanic communities. We are the ones driving out of Chula Vista to the City of San Diego to go to work. Many of us are already doing our part by carpooling, working from home when possible, etc. As our elected representatives, I hope you take this matter seriously and vote against the abuse against hard working families. I urge you to vote against the 6 cent tax per mile.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E335	Lee B		Why don't you idiots make the 7 or 8 garbage trucks that visit my neighborhood (and others) EVERY G****** DAY pay for the damage they do to roads? It's a rhetorical question because Republican fools and now Democrats addicted to garbage hauler money have come up with numerous schemes to make people pay for trash hauling services instead of once a week services completed by the Cities which are much less expensive because once a week trucks don't tear up the roads. Tax the "private" tax trucks to compensate for the damages they do and do a "per mile" on them so they don't drive on the streets every damned day. This was all illusory anyway as homes that use City Services for trash hauling pay for that through property taxes, which go up the maximum under Prop 13 every year anyway. You fools can't figure out how to get every penny out of us, can you? I don't see why you can't just tax the per mile big trucks that tear up the roads and put sales taxes on the rest of us. The sales taxes would be good because in this "throw away economy" people would be forced to buy less. I always hear how the sales taxes and plastic bag fees will disproportionately hurt the poor and the poor buy the same useless environmentally unfriendly c*** that everyone else does. President Obama realized that "everyone uses the infrastructure" but not everyone pays. If you're a big company like Microsoft or a trash hauler you can avoid almost any taxes. It's b*******. Don't respond to this email or put me on any lists begging for political donations in f*****g Georgia, either. This is MY email address and not a vehicle for every politician this side of Hell to hit up begging for f****** money. You f****** are paid too much and have retirements and no one outside of government gets pensions for one f****** term in office. Bunch of a*******.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

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				Lastly, SANDAG will create a framework, called the Fix it First Strategy, which aims to repair our region's existing roads and develop long-term maintenance of our transportation network. More detail can be found in Appendix B.
E336	Leland Hamby		Dear SANDAG, Thank you for getting me politically active. I have had enough of your hard nose antics. I will actively seek to remove all of you from this outrageously unproductive board. I oppose a mileage tax and added gas taxes that do not improve our highways. Yes I have used our poor public transit and it leaves me with a long walk. I am disabled and that is a chore.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, safe, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. The Plan includes Complete Streets improvements to address sidewalks and accessibility accommodation.
E337	Lili Feingold		Dear Friends at SANDAG, I am adamantly AGAINST your proposed mileage tax. It is UNTENABLE in San Diego. We are already being nickeled and dimed at every turn. Now you want to tax us for the road usage cost? We're already paying huge gas taxes and high auto registration fees. No. Absolutely not. I am a school teacher and I can only afford to live far from my place of work. I did the math, and your ridiculous mileage tax would add upwards of $200 to my monthly costs. I will do everything in my power to encourage my fellow San Diegans to vote against this nonsense. Do not burden us with more tax hikes.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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E338	Linda Steiner		Please do not support the proposed mileage tax. We are long time residents of San Marcos, living on a senior's income. We cannot afford the taxes you are proposing.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E339	Lindsey Hansen		Dear SANDAG, No more taxes. No more taxes for public transportation. Stop trying to tax us out of our cars. This is a terrible idea. Stop this now.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E340	Matthew Demer	San Diego 350	SANDAG members and staff, Hi, my name is Matthew Demer with San Diego 350. I am writing because I wanted to thank the staff at SANDAG for their progress around transportation in this RTP. However, San Diego needs safe and accessible alternatives to car transportation in order to address climate and equity goals and this plan doesn't move quickly enough to meet the urgency of the climate crisis and give those reliant on transit the relief they need. All of my family members who live and work in San Diego have made the decision to regularly bike to work. This is an important practice which the city???s infrastructure should support, and can do so by constructing universal vertical sight line markers, if not curb protection, for bike lanes to clearly demarcate space and help keep bike commuters safe. I also strongly support the grand central station project and trolley airport extension. The key to getting tourists, the heart of our economy, on foot is by rolling out the full red-trolley-carpet on arrival. The easiest way to arrive in our city should be made sustainable.	Reducing emissions from all sectors is critical for the state to meet its goal of "carbon neutrality" by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. SANDAG follows national and international best practices in bikeway design to create safe facilities for users of all ages and abilities. Multiple studies show that most people feel safer in protected bikeways, and when well designed, they are safer than any other type of bike facility. The focus of our efforts is on people who may be "interested but concerned" in riding a bike alone or with family. For those who do not feel comfortable riding in protected bikeways, the

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				California Vehicle Code allows people to bike in the roadway with traffic. While protected bikeways are a great solution in many cases, we know they are not always the best solution. Every project goes through a detailed and context sensitive design process which results in decisions regarding the best facility, which may include protected bikeways, buffered bikeways, shared use paths, or shared streets with significant traffic calming elements. The Regional Plan also includes funding for upgrading existing bikeways that may not meet current best practices in maintenance or bikeway design.
E341	Michele Winters		Good afternoon, I'm writing in regards to the proposed tax per mile this organization wants to bring to the people of San Diego. First of all, you should all be ashamed of yourselves for even considering another tax. The city and surrounding counties of San Diego are not designed well for public transportation. The area is too spread out and we have a lot of rural areas. There's not even a bus stop close to my house nor would I even have the desire to use public transportation because my commute is over 25 minutes. I couldn't even begin to imagine how long it would take me to get to and from work. We already have the highest gas prices, taxes and cost of living here in California and you want to add more on top of that? That's asinine!! The second most ridiculous idea is putting transponders in our vehicles to track the mileage. That's one of the most invasive and disturbing things I have heard. I don't know how the employees at SANDAG even sleep at night just knowing the kind of garbage they want to throw on the citizen's in San Diego. Do you want more people to move out of this state? Is that what your game plan is? Our city council and mayor have already turned this great city into a hell hole. San Diegans have already dealt with enough since Covid started and to even consider adding a tax per mile is actually like slapping each and every one of them in the face. So I ask this of you all at SANDAG, please DO NOT charge us any more for driving around in this once great city that used to be known as "America's finest city". We simply cannot handle anymore and you are punishing us by doing this. Thank you, a very concerned San Diegan .	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. The transit system envisioned in this Plan responds to updated growth projections and focuses on high-speed services that will connect jobs and offer service with similar travel times as autos. Previous plans focused on access but not necessarily speed of travel and equivalency with other options, thereby making these planned services much more desirable to the traveling public.
E342	Michelle Bales		Hi, I was given this email to voice my concern over the proposed mileage tax. I oppose having the $.04 per mile tax. Not only have the gas prices risen, but everything else has risen as well, including my rent. I finally get a 5% increase a little over a week ago, to then on the first get a 9% rental increase. Definitely behind the curve ball on this one too. This will create a hardship, not only for myself, but I can imagine everyone else. I don't have a solution, but I know this is related to the electric vehicles. Maybe charge more for their yearly registration? I don't know how determination of one's mileage will work, especially when people travel out of the county. How is it going to work when I travel to see my family in AZ or go up to Los Angeles or elsewhere in the States. I only see major problems trying to enforce something like this. And how does it work when a city in the County votes against it? Makes it even harder to calculate. There's got to be another way, people are still having money problems from 2020 and do not need more increases.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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				We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E343	Mike Wagner		I am a native San Diegan, San Diego property owner since 1985, informed, and vote. I use SR-67 daily for my commute to work and have experienced several life-ending events on this highway. Traffic trauma on SR-67 is an ongoing nightmare. As the Comprehensive Multimodal Corridor Plan is in development, I implore Caltrans and the San Diego Association of Governments to fix the dangerous and obsolete corridor between Ramona and Lakeside. As you are aware, San Diego county taxpayers passed the *TransNet* Tax to include widening SR-67 to four lanes. The long-term political neglect of this crucial corridor is unacceptable. The political redirection of improvement funding is happening again with a $177-billion-dollar transportation vision entitled "The Five Big Moves". This vision is ridiculous and the extravagant price tag simply does not economically fit our community. Please use our tax dollars as intended to widen SR-67 to four lanes which will greatly improve safety and provide effective emergency evacuation.	The Regional Plan primarily includes safety improvements to address crashes and evacuation needs in the rural areas, the event of wildfire or other disasters. However, in conjunction with the Regional Plan, SANDAG and Caltrans are actively preparing the San Vicente Comprehensive Multimodal Corridor Plan, which is a more focused effort to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the SR 67 corridor. The Plan for SR67 includes safety and operational improvements such as shoulder widening, curve realignments, and technology improvements from Mapleview to Dye Road in the plan phase year 2035. These additional improvements could help address crashes and evacuation needs in the rural areas, evacuation in the event of wildfire or other disasters. Appendix Q also describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses.
E344	Mikk Cosmikk		SANDAG members and staff, I want to thank the staff at SANDAG for their strides in addressing climate and equity in this Regional Transportation Plan draft, this plan doesn't move quickly enough to meet the urgency of the climate crisis and give those reliant on transit the relief they need. We ask that you move faster in meeting targets for emissions reduction, transit projects, and the hours of service and frequency of transit so that our public transit system can be a meaningful alternative to cars.	The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT, not through the use of zero emission vehicles. Reducing emissions from all sectors is critical for the state to meet its goal of "carbon neutrality" by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
E345	Nancy Shields		Among your various ideas this ranks #1 on the worst ideas list.	Thank you for your comment.
E346	Nina Buenaviaje		Hello. I am strongly voicing my opposition to this proposed amendment. Californians already pay some of the highest taxes in the nation on most everything. We do not need another unfair tax, and especially not this one. I understand that we need to reduce carbon emissions and increase public transportation. California also needs to improve roads, and freeways. However, a per mileage tax will unduly hurt those on fixed incomes, & low income households who are barely making ends meet now. Public transport is great, but not for everyone. California will never be a state that relies heavily on public transportation. Trying to force it on the general public by making it too expensive to drive is wrong. Please do not burden an already overtaxed region with yet another expensive mistake. Thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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E347	Noah Silva		I have a family and I have to drive 24,000 miles a year for work and this would kill me. You guys are truly greedy and have no sense of how this would affect most people. I wish I had something nice to say to you guys but I don't I wish you the worst.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E348	Patricia Borchmann		Public Comment on SANDAG 2021 Regional Plan EIR, Need to expand body of Regional Plan to focus on Appendix AA, Regional Habitat Conservation Vision (May 2021) I join many other stakeholders who want to see Appendix AA, Regional Habitat Conservation Vision (May 2021) be brought forward into the body of the SANDAG Regional Plan, instead of taking a backseat by being concealed in an appendix that is largely unseen. In fact, the Draft EIR is incomplete, since this essential Appendix AA is not even listed in the EIR Table of Contents, or appendices. The important policy priorities identified in Appendix AA need to play a central role in shaping SANDAG policy, and drive transportation options considered by decision makers to make informed choices on SANDAG 2021 Regional Plan. Stakeholders in San Diego highly value the region's biodiversity which makes San Diego the home to the highest diversity of endemic plants and animals found nowhere else in the world, so it is reasonable to demand an EIR which more fully reflects the hotspot resources which are at risk. Additionally, stakeholders demand that the SANDAG 2021 Regional Plan be expanded to analyze a transportation system in San Diego that applies a cohesive policy framework to support a land use pattern that accommodates our region's future employment and housing needs and protects sensitive habitat and resource areas in San Diego for current and future generations. Unless and until the EIR reflects the policy framework necessary to conform with SB 375 (Steinberg, 2008), then it appears that the Draft EIR and SANDAG 2021 Regional Plan (as currently written) fail to meet the Sustainable Communities Strategy (SCS) requirement. On page AA-12 of the Regional Habitat Conservation Plan, the document states: "While several barriers have been identified in implementing the vision for regional habitat conservation, the role of SANDAG as the regional planning agency and it's commitment in its development of of a Sustainable Communities Strategy will provide new opportunities to fulfill the promises made during the adoption of the region's various regional habitat conservation plans. SANDAG will	This comment is responded to in the Final EIR. Please see Comment 3 in Appendix P to the Final EIR.

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			establish a Nature-Based Climate Solutions Program that will provide the natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure …….. There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities." My personal observation is the current SANDAG 2021 Regional Plan fails to meet the promises outlined in Appendix AA, Regional Habitat Conservation Vision, and is unacceptable in it's current form. Please do not allow a substandard Regional Plan by SANDAG diminish the unparalleled biodiversity hotspot characteristics in San Diego that are found nowhere else in the world. We are counting on SANDAG to honor the promises and opportunities identified in Appendix AA to protect and preserve natural resources in San Diego for current, and future generations. . Thank you for thoughtful consideration of my personal comments.	
E349	Paul Wu		Hi, we are living in Carmel Valley more than 10 years but no bus comes. We need bus to UTC or downtown, reasons shown below: First : There are 3 High schools (Torrey Pines, Cathedral, Canyon Crest) and many shopping centers (Beachside Del Mar, One Paseo, Del Mar Highlands, Pacific Highlands Ranch and more) on Del Mar Heights Rd. Government need to provide teens and youth a safe bus to get to school , work , food and shopping. Now there are many walking along DMHS Rd, which is not safe (Carbon unsafe crossing, etc) and many underage teens resorting to use Uber to other ride services which is neither legal nor safe. As a parent, I'd feel much more confident letting my teens ride the bus. Second. Nearly all older Americans live in Carmel Valley say they want to live independently in their homes and communities for as long as possible. People believe older Americans should have that opportunity, and we government have been working to ensure they do. But unless people have safe, convenient and affordable transportation options, they will be stuck at home or will be at greater risk on the roads than they need to be. Having access to transportation is critical to staying connected to family and friends and to pursuing day-to-day activities, both those that are essential and those that enhance the quality of life. We look forward to hearing about a Carmel Valley bus coming from you soon.	Flexible Fleets will offer people a variety of on-demand shared vehicles. Flexible Fleet services may complement fixed-route services, even in more suburban communities. They offer additional convenience, as the on-demand nature of Flexible Fleet services allows people to book a ride almost anywhere and anytime. Proposed Clean Transportation policies will also ensure that Flexible Fleet vehicles transition to zero-emission vehicles to further meet air quality mandates. In addition, the Regional Plan proposes investments in active transportation and Vision Zero policies to create a safer environment for biking. These strategies combined will make it easier to drive around without driving a car. The 2021 Regional Plan aims to improve access to a quality public transportation system for all San Diego residents, especially for seniors and other disadvantaged populations. These improvements include transit fare subsidies for seniors and on demand Flexible Fleet services that are accessible to seniors. The 2021 Regional Plan projects a growth in senior access to parks and recreational facilities via walking, biking, and transit (see Appendix H for more information). In every metric senior access to transit, retail, medical facilities, and parks improves through 2025 and 2050. One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth age 18 and under.
E350	Peter Bryan		The long overdue project to upgrade the Interstate 5 /California 78 needs to be the highest priority in the Regional Plan. The congestion created by this interchange affects more commuters than any other project listed in the plan. It also impacts visitors to San Diego who use the I-5 corridor to get to/from our City. This must be a higher priority, as it affects our health, well-being and economy!!! The 78 Freeway needs to be extended to Coast Highway to enable coastal access for millions of residents of northern San Diego County and Southern Riverside County. Don't let a few selfish residents of Oceanside prevent the region getting to the beach.	The 2021 Regional Plan includes Managed Lanes on SR 78 and construction of a Managed Lane connector for I-5/SR 78 by the year 2035.Additionally, HOV lanes are included on I-5 from Manchester to Vandegrift in 2025.
E351	Randy L. Atkinson		You folks over at SANDAG are crazy!. Only 3% of the population uses mass transit . That means 97% don't use it and probably only 10% of that could use it. Before I retired , I worked at 2 separate hospitals and mass transit was not an option . Now I volunteer 3 days a week in Alpine (from Oceanside) and there is no way I can get there on bus or train !!! Use your brain will you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region.

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E352	Rebecca Neary		I don't drive often as I am retired but I do live in Jamul where I found an affordable rental. I have tried to take public transit, we have a rural bus that runs a very few times a day, no nights and weekends and very few stops. I have used the trolley park and ride to go to downtown San Diego and Balboa Park but other trips take so long due to transfers to local busses that I would spend more time getting places then being at them. With the latest trend of persons randomly attacking people unprovoked the trolley stations are maybe a little shaky. I have talked to MTS and San Dag before and they just said that is how it is for rural folks, so I combine trips when I do take the car but I really cant use bus here. Smaller, hybrid or electric AFFORDABLE cars may be the best solution.	SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, will be added to Appendix A in the proposed final 2021 Regional Plan. SANDAG, MTS, and NCTD believe that more can be done to improve the safety on and near transit and are working to make those improvements now and in the future. For example, funding at MTS for security is being diverted from fare enforcement to safety improvements. SANDAG will be working hard with the help of all of our passengers and representatives to ensure that this plan gets implemented. The planned transit frequency improvements and spans of services for all routes, including existing local service and future regional services, will be added to Appendix A of the proposed Final 2021 Regional Plan and can be currently viewed as part of the Social Equity Working Group agenda from August 5, 2021.
E353	Rebecca Rigaud		Hey guys, as a realtor who has to drive all over without pay… this won't work.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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E354	Renay Johnson		You are delirious if you think taxing roads is the right thing to do. You(SANDAG) will be turning literally every damn road in San Diego into a toll road. What pisses me off is that you know SANDAG executives will not be paying this tax and will find a way around it. Residents of California and San Diego are being taxed to death already. The sad thing is that the taxes that are suppose to be going to roads and transportation are not. What happened to that money? There are people living on the edge already and cannot take another tax. There are people who work two or three jobs just to exist and now you narcissists want to impose a tax per mile on drivers. Not everyone can ride transportation to work, not everyone lives on the bus route and can ride the bus to work. Not everyone makes enough money from one job. I suppose the simple answer is to move to another state. Guess what? People can't even afford to move right now and leave this state and I am one of those people. Residents have gone through a pandemic and lost jobs and income and trying to reboot their lives only to get hit with more taxes. Way to take advantage of a pandemic. This agency should be ashamed of themselves. You (SANDAG) already got your way with the bikes lanes and removing almost 2 miles of parking on 30th St in the City of San Diego. What else the hell does SANDAG want? This agency is crippling this city with the notion that everyone will ride their bikes or public transportation. SANDAG now "promises" free transportation but I bet that won't even happen. You know who will be riding this "free" transportation? The homeless will be riding it with all of their possession, trash, carts and pets. They will get on the transportation because it's free and enjoy the free ride because no one is going to put up with their poor behavior or lack of hygiene. You will have the homeless and underbelly citizens of the city riding the free transportation conducting their illegal activities because no one will want to be on the bus for free. This is by far the dumbest thing I've heard of an agency bringing to the public. You all are playing God with people's lives and just causing problems for people who are trying to make a living. You can rot in hell and go f___ yourselves you greedy bastards.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E355	Rich Robson		Hello, is the proposed mileage tax in addition to gas taxes or is it a replacement for the gas tax?	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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E356	Richard Emmett		My name is Richard Emmett. I am a retired Systems Analyst with a particular interest in the future of city transportation. I am very impressed by SANDAG's Draft Regional Plan and your commitment to addressing climate change, jobs, justice, and improving transportation. But I am concerned this is a very tall order, given our area's projected growth in traffic flows! I realize your deadline for public input has passed, but I believe there is an approach to transportation that could significantly improve the chances of achieving your goals. Specifically Aerial Transportation: Individual vehicles traveling on cables above the city. Modern aerial vehicles can operate much faster than older cable cars and be fully automated to improve safety and reduce operating costs. Lightweight aerial vehicles will use much less electricity than heavy electric cars and greatly help eliminate GHGs. Cables and towers will be much less expensive to build and maintain than roads and intersections. A network of cables and towers with automated switching can provide transportation to an entire city. We can reserve more of the surface area for pedestrians, bicycles, shade trees, etc. People will want to use the system because it is faster, safer, and cheaper than driving. I have summarized this idea in a short video: Available on YouTube at: youtu.be/b-ohqAwo1zU And I have described the idea in more detail in my book: A Practical Aerial Transport System Environmentally Friendly Transportation for the Cities of the World. Available on Amazon at: https://www.amazon.com/s?k=B086MFN2RP I would be happy to provide copies (in electronic form) free of charge to any members of your staff that may be interested and would much appreciate any comments you may have. I am committed to your organization's goals, and if I can be of any further assistance, please do not hesitate to ask.	We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.
E357	Rick and Susan Clifford		Shame on your organization for allowing and voting for yet another tax in San Diego County. This is ridiculous. My husband and I will sell our cars. You'll never get any money out us.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E358	Robert Mickschl		I am not in support of a new tax on driving my car on our public roads. With all of the money that has been appropriated over the past 65 years of my life, enough is enough! We will do everything possible to oppose this and expose those who stand to profit from this. The tax payers are not going to allow this.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region.

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E359	Roger Ramsey		I recently read of various proposals to further tax San Diegans. I am a 20 year resident of San Diego. The cost of living in California is already the highest in the nation. Thanks to the gas tax we pay at least a dollar more a gallon than any other state. How much more money does the County need? The proposal to charge a fee-per-mile is a horrible tax on those who can least afford it. The people who have the lowest paying jobs and live the furthest from their place of employment will suffer the most. They already are punished by high fuel prices. This will drive more and more service and blue collar workers out of the state. Why are we subsidizing the middle-to-upper income buyers of electric cars? Tesla buyers do not need a tax break, they can afford the full price of their cars. We need to remove any subsidy for electric vehicles and give more tax breaks to those making less than $60,000 a year. PLEASE do not institute this punitive fee. California already has the highest percentage of residents living in poverty than any other state.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E360	Shani Reese		We are opposed to the ridiculous mileage tax. We pay enough taxes to drive on poorly maintained roads! Enough is enough!!!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

ID	Commentor Name	Agency	Comment	Response
E361	Shannon Bodnar		To all elected officials on this Board, My name is Shannon Bodnar and I am a 25 yr resident of San Diego County. I am a hard working, dedicated public school teacher who had to settle many, many miles from where I work due to the high cost of housing. The 2017 gas tax has hit people like me and people significantly worse off than myself, very hard. And now you're considering adding a mileage tax?! Whether you tax per mile or tax in lump sum these actions would devastate hard working, middle and lower socioeconomic families. As Californians we already pay more taxes than anyone in any other state (except for NY). Please don't shake us down for more money. The state and the county have already taken more than what's fair and will need to do what so many of us have had to do at each of these "tax shake downs"...look at your budget, cut from one area to pay for something else. California government officials MUST STOP coming to the tax payers demanding more money. We will remember who stood in favor of more shake downs and who stood up for us in future elections.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E362	Stephanie Adams		Good morning, I can't believe we are looking at another tax. This one hurts Californians. I am single mother and the thought of having another tax will hit my pocket book. We already have the highest taxes! I am an educator and what extra money I do have I buy materials for my classroom. This tax will ruin families, family vacations and people who need their vehicles for work. Here are some other issues: Families can take public transportation to drop off/pick up their children at schools. Children's after school activities that are all around at different places. Kids/adult who play sports and travel around California. Family trips/ trips around the state for holiday- this would be an added expense. Like me and so many others we need our car to carry items to work. Everyday I have at least 3 bags that I take into school. How would a person be able to take all of items onto public transportation. Taking public transportation would most likely another 2 hours onto my already 8 hour stressful day. Then it takes away from family time. How would do my errands: Grocery shopping. If I have an appointment I would need to take the whole day off just to get there! Why is the state trying to take over my right to drive my car and then I need to allow you to know where I drive, when I drive and what happens about the mileage outside of the state. This a terrible tax and I believe more people will the state of this passes. There is no way to provide public transportation for the people and for sure families! I have already had so many friends that have left the recently over other mandates. This tax is bad for Californians!	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
E363	SUDCC IV		WHAT WAS THE ENABLING STATE LEGISLATION that created SANDAG? This is the law that WILL GET REPEALED (and SANDAG CEASES TO EXIST!), if you implement a "per mile" road tax! Get ready to be dissolved SANDAG!	SANDAG serves as the forum for regional decision-making for the 18 cities and county government within its jurisdiction. As the San Diego region's primary public planning, transportation, and research agency, it plays a critical role in regional policies about growth, transportation planning, environmental management, housing, open space, energy, public safety, and binational collaboration. As a result of Senate Bill 1703, which consolidated all of the roles and responsibilities of SANDAG with many of the transit functions of the Metropolitan

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				Transit System (MTS) and the North County Transit District (NCTD), SANDAG also is responsible for transit planning, funding allocation, project development, and construction in the San Diego region. SANDAG is governed by a Board of Directors composed of mayors, councilmembers, and county supervisors from each of the region's 19 local governments (with two representatives each from the City of San Diego and the County of San Diego). Voting is based on membership and the population of each jurisdiction. Supplementing these voting members are advisory representatives from Imperial County, Caltrans, MTS, NCTD, the U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E364	Suzette Guillen		Dear Sandag, I am a tax paying property owner in San Diego County. I am writing to you today to inform you that I am very opposed to this ridiculous tax you are considering imposing on the citizens of San Diego. This is not the time to be raising taxes. We have enough on our plate trying to make ends meet. Please table this tax until our economy is not headed into the toilet.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG will be applying a social equity planning framework throughout the implementation of

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				the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H: Social Equity: Engagement and Analysis.
E365	Thomas Weir		How will the per mile tax and increase in sales tax help the residents in the very rural parts of San Diego County? Are you going to build a trolley from Oak Grove/Sunshine Summit/Warner Springs to Escondido? So, each time I have to shop in Temecula and rarely Ramona, you'll tax me $2.40 for the 60 mile round trip as those are the closest places to shop in proximity where I live. And a sales tax increase of 2 cents? You have to be kidding me. And what about the tax we voted in several years ago for " transportation"? Where did it go? Oh, mass transit for urban people. We subsidize urban dwellers? What's up with that. Well, I have the answers: the funds were misappropriated in terms of supporting urban free riders, not the rural citizens of the county. You all just figure that if you spend your allocations, just establish a new tax. I think your positions should be voted in, not appointed. So, how are you going to track my mileage? Can't wait till your biased plan, if you can call it that, goes to the popular vote because it sure isn't a popular plan.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E366	Tim Cheng		I am writing to strongly oppose the $160 billion dollar transportation plan along with the per mile tax to fund public transportation. We have the highest taxes around and for those of us who can't afford to live near work and drive > 70 miles per day, this severely puts a financial strain on us. I urge you to vote no on this plan.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
E367	Ximena Esparza		SANDAG, It's is ridiculous that you would even come up with the idea of taxing people who drive in San Diego county to pay for your agenda of public transit. What part of county do you not understand? It is obvious that we could not all be on public transportation given the size of our county and the population. You already came up with the ridiculous gas tax. Come up with a plan within the budget you get from that. How do you expect anyone to survive living in San Diego county with high taxes, high gas prices, high rent, high house prices, high cost of living and now to top it all off a tax for getting to work and back to pay for all the expenses we have as San Diegans. You have failed the people you	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030

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			"serve" as governments. You should be ashamed of yourselves for even entertaining this idea. Also, don't even try to wash your hands with saying it will help climate change since last I checked many MTS vehicles run on fuel, and they are convenient to NO ONE! Even the poor rather take ride share pools than go on the bus or trolley. I absolutely disagree with this and expect you as our elected government to vote against this idea. Remember how we became an independent country? Because our ancestors became tired of taxation without representation from the ruling government (in that time a monarchy.) How can any people be expected to carry such economic burdens as the ones you are constantly putting on us? This is why so many people are leaving their home state of California because of abusive governments like you!!!! Stop this nonsense! Serve the common good agenda with realistic approaches. Do your jobs correctly. Shame on you!	because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
Official Letter				
L439	Joe LaCava	City of San Diego	October 27, 2021 Honorable Mayor Todd Gloria, I am writing to respectfully request a revision of the Complete Corridor alignment through Marian Bear Memorial Park proposed in SANDAG's Draft 2021 Regional Plan (RP). SANDAG's 2021 RP will guide San Diego's future growth, and I value the hard work and extensive public outreach that have gone into the RP. I support the bold vision of the draft RP in reshaping mobility in our region and achieving our Climate Action Plan goals. The draft Plan proposes a three-lane expansion of State Route 52 between I-5 and I-805 to contribute to the regional Complete Corridors network. This expansion would occur within the 467-acre Marian Bear Memorial Park which is one of the oldest open space parks in the San Diego parks system. The park was created in response to the 1970s construction of SR-52 to preserve the environmental and recreational values of San Clemente Canyon, pushing the alignment of SR-52 to the less sensitive portions of the canyon. Expanding the present-day SR-52 outside of the current improved width would diminish the bold action of the leaders of the day. Further, it would disrupt and threaten wildlife and natural habitat in and around the park, impact the experience of users of the park, and, potentially impact water quality in the San Clemente Creek which flows from the park into Mission Bay. To avoid these impacts and preserve the original vision, I ask that SANDAG pursue a constrained improvement that confines new construction to the existing unimproved median; alternatively, hold the southerly edge of the existing roadway with all new construction located to the north. Either option would eliminate, or at least minimize, impacts to the existing open space park. These options would contribute to the desired transportation connections while protecting the surrounding open space and habitat, maintaining the recreational value, and preserving the park's legacy. I look forward to working with SANDAG on solutions that preserve Marian Bear Memorial Park and achieve the Complete Corridor alignment in SANDAG's Draft 2021 RP. Please do not hesitate to contact Kathleen Ferrier of my office at kferrier@sandiego.gov or 619-236-6611 should you have any questions. Sincerely, Joe LaCava	SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan, as you suggest, will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.
Voicemail				
V4	Catherine Staub		Hi this is Catherine from Escondido, I am calling to say I am greatly opposed to the 4 cent mile tax, whatever you want to call it. That's an infringement on our rights. It's government control and that's absolutely no.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas

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V5	Fred Davis		Yes this a San Diego citizen and I'm very concerned about the proposed 4 cent mile driving tax and I want to get more information about it, we protest it, and believe it is a real threat from SANDAG and contact me at *** *** ****, thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
V6	Glen Gillies		Good afternoon my name is Glenn Gillian, I live in the north county of San Diego. I'm calling to leave some information And thoughts about this proposed mileage tax. I read on a local news website that feedback was being collected through the end of today. My two cents worth is that, If mileage is tax I'm going to cut down The amount of mileage that I actually drive. I'm going to consolidate trips. I'm going to use less gasoline. And that doesn't seem overall like a good way to support the local economy. I'm sure I'm not the only one who will have to rethink running to the store every other day and that kind of thing. I'm a full-time caregiver for my elderly mother. I'm technically unpaid, my small business closed during the pandemic, And I don't feel like taxing.... and we know California and San Diego have high taxes everything....I don't feel like adding a tax, psychologically a good way to go, for San Diego. I'm sure I'm not the only one like I said who will consolidate trips. think twice about going out. and will not actually spend more money on gasoline and so those taxes are collected. So those are my thoughts. Thanks for listening.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the

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				state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
V7	Helen		Hi, I am not sure how to do this. But my name is Helen and I am wanting to very strongly voice my opinion of opposition to the local per- mile fee that SANDAG is considering and I know I'll contact the state as well but when I went on your website I wasn't able to find contact information for how to reach, I live in Rancho Bernardo which is part of San Diego, which I don't know if that means I have to contact the mayor and I don't know who-all. If you could give me a call at *** *** ***,and let me know how to find out who I should contact to voice my opinion, I appreciate it, thank you, again that is *** *** ***.	As requested, SANDAG staff provided a direct response to this individual to provide information on public participation opportunities regarding the Regional Plan. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
V8	Larry Green		I want to voice my opposition to the SANDAG Regional Transportation Plan, the one that is estimated to cost the tax payers $160 billion dollars plus a property tax increase. Could you give me a call back and let me know who the contact person would be for us and the representative for the SANDAG transportation committee would be from the City of Vista, I'd appreciate a call back. Please relay my opposition to the plan both the sales tax increase, the plan in general, as I live in Vista and am familiar with the Coaster plan which leaves empty every 15 minutes going both ways at a tremendous cost to the tax payer. We don't need another plan that includes transportation such as that.	As requested, SANDAG staff called this individual to provide information on SANDAG Transportation Committee representation. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
V9	Rebecca Neary		Hi my name is Rebecca **** my phone is **** *** and my email is *******. I'm calling and I've called before about the proposed usage tax on cars. I make about thirty thousand a year, I'm retired, and I don't drive very often quite honestly my car sits parked a lot but I do have to drive sometimes, I live in Jamul and there's almost nothing as far as public transit here, I guess there is going to be more next April but it's still not going to work for most things and then my friend	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved

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			Dawn is 70 and he lives in El Cajon and there's actually buses there but he still works. He does performances for nursing homes and they're only an hour long and he does 5 or 6 of them a week so they have to go to the nursing home and they have to bring equipment, their musical instruments and sound systems and all that and they have to do it five times a week so obviously he uses gas. Both of us would love to have electric cars but we simply can't afford them, his income is about twenty thousand dollars a year and mine is about thirty and that's just not what you can buy an electric car no matter how many incentives we are given we just can't do it. What I do, I just drive less frequently but you can't do that. And I think it's psychologically important to him to still do these musical events and I think it's psychologically important to the people in the nursing home. And if he didn't do them, he'd be living just on his social security which is just eight thousand a year so that's not good. So, these are the kind of people who might be affected negatively by a usage tax and I think um, we are doing our best, we are not driving SUVs or anything like that, giant trucks but we do have to live, also in Jamul, this is a high fire area so obviously we have to have a vehicle if we have to get out quickly. So I try to do it myself, I don't drive much because I'm retired but Dawn has a special case I told you about, he has to drive, they have to go, even when we do things to go to the beach or something, we carpool so we are doing as asked. Maybe this is not an urban environment, I've lived in Boston and I never had a car there my whole life but out here I had to get one. When I was living in San Diego I still left it parked, I used the bus to get to work but that's it. You can't do this to us right now, thanks.	populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H: Social Equity: Engagement and Analysis. The 2021 Regional Plan considers the needs of east county and prioritizes investments in rural corridors and climate resilience programs to assist with fire safety concerns. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes.
V10	Rebecca Neary		Hi my name is Rebecca Neary and I live in Jamul. And I sent an email at public information at SANDAG.org, But I wanted to tell you about a person, I'm going to have him call you too, But he'll be nervous. You are proposing with other government organizations, a potential gas Usage Tax, And people who are low-income like me, or my friend who makes about $20,000 a year, will be impacted by this. If we lived in town, I used to live in the city of San Diego and used to take buses everywhere, I had a car, but sometimes it'd sit for three or four days, I'd have to go start it, I wasn't driving it enough, I didn't want the battery to run down. My friend Don, he lives in El Cajon, And if he had one job for eight hours a day he could go on public transit. But as it turns out at 70 he's still working, he goes to nursing homes, He puts on entertainment which is psychologically very important. And then he goes from place to place, He's working for about an hour to 4 hours at a time, And he has to travel more than once a day, And sometimes up to North County and so forth. He does carpool with his son, they go together, and they have a minivan, and its very good on mileage, but nevertheless its gonna take a big chunk out of what they make. He just can't afford it, he just can't. And neither of us can upgrade to even hybrid cars. We can't afford it. And that's what happened, there are people that care about the environment. I don't drive everyday. My car is parked, still; because I'm retired. I drive about twice a week, only down to El Cajon, and I combine all my errands, get three or four errands in all at once. And if I do go to the beach areas, Don and I go together, so we carpool. But this new gas cost will be too much. And it's not the right thing to do right now, what you really want to do is give us strong incentives to get electric vehicles if we can. I'll also have Don call for himself, but I'm really better at being a shrill nag. He's a really nice man. So I did the shrill nagging, and I did also write you an email about my own situation.	The San Diego Forward 2021 Regional Plan is a federally required long-range planning document with horizon years of 2035 and 2050. It is a requirement to provide a reasonable and feasible funding plan. The road usage charge may be phased in as gasoline sales continue to be phased out through emerging technologies. SANDAG intends to use emerging technologies to provide a fast, safe, and reliable transportation system to the San Diego region. Personal vehicles will continue to be part of our transportation system, but we also intend to provide competitive transportation methods to the personal vehicle. By providing alternatives to the personal vehicle, we could actually alleviate highway congestion, make our roads and streets safer, and make our whole transportation system operate more efficiently. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

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			No, a gas usage tax, probably not a good idea. Trying to encourage people to have better mileage cars and electric cars, is a very good idea. But you have to help us, because we can't afford them. It just seems like the only way we can do this. When I used to live in Boston, I could go everywhere, I never owned a car. Till like 30 and I moved out here. Owning a car, I still use public transit, but now in this rural area I cannot. And I outlined in my own email reasons a person in these rural areas cannot. Thank you for your help.	
V11	Thomas Lawson		We cannot afford a mileage tax on my car and there is no public transportation that will come and get me or my wife and we are physically limited by the amount that we can walk and we live on Dictionary Hill where it would be impossible with her knees or my lower back issues to walk up and down the hill we live on and unfortunately we cannot move somewhere closer to getting on the transit because of our credit. We have a house and we are in the process of getting the thing redone after the pandemic but we don't have the ability to drop and move anywhere because of that. We are both on a limited income. My wife gets just her social security. I get my social security and my navy pension but by no means are we rich and we are below the poverty level established in the United States so I don't understand how people expect us that don't have any money to spare and are living paycheck to paycheck to be paying 4 cents a mile for transportation and saying that we drive 15,000 miles a year which we don't. In fact, I drive maybe every other day or every two days. We certainly don't drive all the time but the area we live in is not conducive to using public transportation and if public transportation can get you everywhere in an appropriate amount of time, I'd be willing to take it but there is no way to get to it from where I live.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H: Social Equity: Engagement and Analysis.
Public Meeting				
M162	Aaron		Hi, good morning members of the Board and Chair. Thank you so much for hearing my comment. To be honest this is something that kind of freaks me out as someone that's lived in San Diego their whole life. I am 32 and the idea of paying more, I kind of want to ask when does the buck stop? How much is our local trying to squeeze the residents that live in San Diego? I know climate change is the number 1 concern but this generation we can't afford it. This generation, we can barely afford to take care of ourselves, how are we going to be paying for you know. We have the gas tax and it's supposed to be replaced by this and the four cents, when is it going to stop? When is the mismanagement of funds, how much is enough? I'm asking the Board, how much money will suffice? How tight do taxes have to be for you know residents to deal with this? In the presentation, this is a bold new vision for the region but how is it considered being paid for? The idea it actually was written down assume road usage charge began in 2030. So the idea for this giant vision for the region was just going to be assumed to be paid for. I don't like the word "assume" it makes me feel as if this younger generation has to pay for the future. I just don't think that's acceptable. California is the third highest state to live in the United States and I just can't keep up. I don't know how I can make a future for myself in San Diego when I get nickeled and dimed left and right by local government and we just can't pay for it all. Thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and

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				sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M163	Ariana Federico	Mid-City CAN	Hi, good morning. My name is Ariana Federico I am a lead organizer with Mid-City CAN. I currently work for the transportation team. We are requesting that the Board move forward with the commitment to evaluate free transit for all by 2023 and that it commits to funding youth passes 24 and under as soon as possible. We're just also here to appreciate and support the 2021 Regional Plan. It has been an experience in ensuring that our communities are included, especially the 10 transit lifelines. I also want to address that we need to make sure that there are anti-displacement strategies to protect low-income communities of color that are living near the transit corridors. We want to make sure that our communities are here to stay while also participating in these plans that are really changing the region of San Diego. For 24 and under, we really need for that to be funded as soon as possible to increase ridership to ensure that we are supporting our young people that were hit the hardest by the COVID-19 pandemic. It also promotes a reduction of the greenhouse gas emissions. Overall, the road usage charge would replace the gas tax and it is really important to address that this Regional Plan is here to address the climate issues that we are seeing now. If that is what it takes then that is what will need to happen. Thank you for your time.	One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth age 18 and under. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with other SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.
M164	B. Mittermiller	San Diego 350	Good morning Chair Blakespear and members of the Board. My name is B. Mittermiller and I'm with San Diego 350. I would like to talk today about focusing comments in this period. We need to be talking about solutions for fixing our transit system, lowering greenhouse gas emissions, and everything possible to avoid the worst impacts of climate change. Details about the plan can be hashed out later. Today is not a day where anybody will be voting on the plan, it's simply information. It is undeniable that we are in a climate crisis now. This year alone as of Wednesday a total of 2,839 fires have been recorded burning just under 2.5 million acres across the state. We are in a drought that leaves Southern California at risk for more fires before the year is even over. We are out of time to address this climate emergency. Transportation is the source of nearly half of our emissions in the county as a result of over-reliance on private vehicles. This is also an equity issue for those who depend on public transit. We need a world-class transportation system and this plan must be a long lasting investment in our communities, equity, jobs and our future. SANDAG has made a good start but I urge you to do even more to reduce emissions and support transit equity including adopting the San Diego Transportation Equity Working Group's 10 Transit Lifelines. Our communities and our families elected all of you to work together to solve problems. Climate change is a novel existential threat to us all. Please don't waste valuable time by taking your eyes off of our common goal: survival. Thank you.	Reducing emissions from all sectors is critical for the state to meet its goal of "carbon neutrality" by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT, not through the use of zero emission vehicles. Appendix S includes documentation of SANDAG's travel demand model and off-model greenhouse gas reduction calculators. These documents are required to demonstrate to the California Air Resources Board that the 2021 Regional Plan will meet the region's greenhouse gas reduction target. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan's near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (or CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems. For more information, I would like to refer you to Appendix B: Implementation Actions, for more information on the Digital Equity Strategy and Action Plan and Regional Fare Impact Study.
M165	Baylen Hernandez	Mid-City CAN	Good morning members of the Board and staff. I am the policy advocate with Mid-City CAN. First, I want to thank everyone for your incredible work on the Regional Plan. We are looking at a very comprehensive document with ambitious yet necessary and achievable goals. Second, I want to express our support for a change made to the draft. We support the proposal to evaluate free transit for all by 2030 and we also ask that as a step toward that goal you commit to funding youth opportunity passes, meaning no cost transit for youth ages 24 and under as soon as possible. Lastly, related to the land-use and housing aspects of the Plan. We are concerned that there is not enough anti-displacement strategies there and we ask that you please ensure the Regional Plan has strong anti-displacement mechanisms. Thank you.	One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth age 18 and under. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment

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				with other SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.
M166	Bill Tibbetts	Southwest Wetlands Interpretive Association	Bill Tibbetts representing the Southwest Wetlands Interpretive Association. SWIA has advocated for the protection and restoration of our region's natural habitats, particularly wetlands for over 40 years. As other speakers have said, natural habitats are an essential component of our greenhouse gas emissions reduction efforts. It would complement the RTP's transportation and land-use approaches to reduce emissions. So, we support the current plan which would be improved by the proposed changes you've heard about today and it represents a necessary shift from inadequate RTP's, so we support it. In particular, we support the increased plan investments to fully support this region's habitat conservation plans to add to the acquisition and management. We also fully support the idea of a policy that keeps all future transportation system improvements within the existing developed footprint, removing redundant freeway connections and advancing transit and active transportation projects which will need soon. A bond or a sales tax that will help advance those issues including the Vision Zero safety and equity. One thing that's very concerning though is that because of the scope, is timing and inner relationships of all of these complex parts of the plan. And the plan's acknowledgment of zoning and development decisions for specific parcels in development projects are within the local jurisdictions' land authorities. This places a huge burden on SANDAG to effectively monitor, evaluate, report on, and fix any glitches between what's expected and what's being produced. We really want to work with you in the next phase in the EIR to improve the monitoring, managing, and reporting section of the Plan. Let's not let the desire for perfect interfere with getting something done. Thank you.	Appendix AA of the 2021 Regional Plan outlines the Regional Habitat Conservation Vision for the region. The appendix provides a brief history of habitat conservation in the San Diego region; describes how SANDAG, through the Environmental Mitigation Program, has contributed to habitat conservation and presents the goals and objectives of the Regional Habitat Conservation Vision in order to protect sensitive habitats and resources for future generations. As part of the 2021 Regional Plan, SANDAG will establish a Nature-Based Climate Solutions Program that will promote natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure, Comprehensive Multimodal Corridor Plans, and consistent regional planning and implementation of the Sustainable Communities Strategy actions, emphasizing both nature-based and technological climate solutions. There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities. Many of the complete corridor projects in the draft plan utilize existing right-of-way, and in many cases existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts. Land use and zoning authority is reserved to local jurisdictions, however, SANDAG encourages cities to densify where transit is planned. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.
M167	Bob Leiter		Hi, I am Bob Leiter and I am speaking today as a resident of the City of Poway. First of all, I want to congratulate SANDAG staff on preparing an excellent draft Regional Plan. I support the written comments that were submitted by the City of Poway by David Devries, the city planner. I am glad that he suggested that the Scripps-Poway Parkway in the south Poway business park become a designated transit corridor and that multimodal safety improvements be made to State Route 67. I also want to thank SANDAG for including a commitment for adopting a regional framework for climate resilience. My family and I have lived in Inland North County for over 30 years and we have some serious concerns about the impacts of climate change in our communities including the increased frequency and duration of wildfires, increased flood risks, increased health risks from extreme heat, and major impacts on the natural environment. I request that the final Regional Plan include the following specific commitments to climate adaptation. First, provide technical assistance to the cities that have not yet been able to complete the state mandated updates to the safety elements of their general plans and also the new requirement for environmental justice elements pursuant of the SB 1000. I understand that Southern California Association of Governments is already providing this service to their local governments. I'd also like to see SANDAG commit to a leadership role working with the Water Quality Control Board to prepare the necessary updates to the San Diego Basin Plan and the 11 water quality improvement plans and to assist the city in obtaining the necessary funding to make the necessary stormwater improvements and management programs. Thank you for your consideration.	The Regional Plan primarily includes safety improvements to address crashes and evacuation needs in the rural areas, the event of wildfire or other disasters. In conjunction with the Regional Plan, SANDAG and Caltrans are actively preparing the San Vicente Comprehensive Multimodal Corridor Plan, which is a more focused effort to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the SR 67 corridor. For SR 67 safety and operational improvements such as shoulder widening, curve realignments, and technology improvements from Mapleview to Dye Road are included in the plan in phase year 2035. These additional improvements could help address crashes and evacuation in the event of wildfire or other disasters. Appendix Q also describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses. The County Water Authority is the agency responsible for projecting water needs in the region and their projections use the SANDAG Regional Growth Forecast as an input to their modeling effort. SANDAG considers stormwater, or urban runoff during the project development process and partners with regional transportation infrastructure owners and operators to manage stormwater from roads and highways in the region. For more information on stormwater, please see Appendix R of the 2021 Regional Plan.

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				The Regional Plan includes funding for Climate Adaptation and Resilience programs that could be used to assist local jurisdictions with relevant planning efforts.
M168	Carolina	Environmental Health Coalition	Good morning board members and staff. My name is Carolina with the Environmental Health Coalition, we are here to express gratitude but also express concerns over the significant impacts. We really appreciate the staff and all the progress to elevate mass transit as a major solution to a climate crisis to air quality, especially to environmental justice communities. It's the best solution that is actually financially feasible that should be implemented immediately and throughout the implementation of the plans of 2050. The concerns that we do want to elevate are related to the significant impact on substantial air contaminants. So the plan recognizes that there will be significant impacts and we have concerns about that and the draft also recognizes that there will be exposure to sensitive receptors, PM 10 and PM 2.5, and that they are significant. So those two elements are are something want to look close to and we have concerns and it's not acceptable that we see a plan that is assuming that PM 10 and PM 2.5 are going to be elevated to sensitive receptors. We want to address this before we move forward. We look forward to working with staff on that. Thank you.	This comment is responded to in the Final EIR. Please see Comment 32 in Appendix P to the Final EIR.
M169	Carolina Martinez	Environmental Health Coalition	Good morning, I am Carolina Martinez with the Environmental Health Coalition and the San Diego Transportation Equity Working Group. I am here to commend SANDAG for a Regional Plan that has been proactive at including environmental justice communities. I am also here to ask that SANDAG elevate its role in support of jurisdictions in the making of a more affordable housing. We know that the planet is burning and our current transportation heavily contributes to the fire, damaging our lungs and failing the low-income communities of color who depend on it the most. Overall, 93% of San Diego's low-income residents do not have access to fast and frequent transit. The proposed Regional Plan provides critical lifelines to change that. We commend SANDAG for the proposed final Plan changes which include more frequency, 24-hour service, a Blue-line express trolley, bathrooms, a Purple line that serves City Heights, a system that is able to evacuate people to safety during an emergency, free transit by 2030 but we still need free transit for youth 24 and under now. The Plan includes critical lifelines but we cannot ignore the housing. We cannot continue to ignore housing while planning for transit. While anti-displacement study and an incentive program are set forward, the housing emergency calls for all government to lead with an emergency response solution. We request that the Regional Plan include more proactive mechanisms to guarantee that communities of color won't be displaced as a result of transit improvements. For example, the need to build all necessary public infrastructure to alleviate costs for developers so they can build more affordable housing. We can no longer displace the housing responsibility solely to the jurisdictions. Every government agency needs to integrate –(cut for time).	One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth age 18 and under. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, transit agencies, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.
M170	Craig Jones		Hi, thank you! I actually have some questions for clarification, I assume for Mr. Grier. First on the GHG analysis, my question is; are those analysis of project impacts and production of GHG, are the GHG levels from all sectors of the San Diego region, not just transportation, but for energy. Are those analyzed levels of GHG production, from all sectors? That's my first question. My second question would be, in light of the environmentally superior of alternative three in the EIR, what would be the reasons not to go for adoption of alternative three? Hopefully we can get some clarification on this. Thank you.	This comment is responded to in the Final EIR. Please see Comment 21 in Appendix P to the Final EIR.
M171	Craig Jones	Alliance for Regional Solutions	Thank you very much I appreciate it. My name is Craig Jones, I am a representative to the Social Equity Working Group and representing an Alliance for Regional Solutions which represents interest in North County. I appreciate the presentation this morning. It appears that the changes to the draft Regional Transportation Plan are positive. They'll advance our efforts to address climate change and they will be good for equity. I really appreciate that. I have been following the media coverage in the last couple of days. I've got a message for Supervisor Jim Desmond. Jim, if we build this system for this Plan, yes people will use it. They will use public transit more because the system will work and compete with the private car, making it desirable for people to do this. Regarding the vehicle mileage charge, this will replace the current gas tax. Gas taxes which are a per mile that we pay now will phase out. We will need to replace the gas tax, that is what the vehicle mileage tax will do. Again, this is an issue of equity for drivers of electric cars like myself. If we don't have a mileage charge, then we won't be paying our fair share. This is way of ensuring	We appreciate your support and feedback. SANDAG is working on designating pilot programs and near-term projects to begin implementing some of the elements outlined in the proposed final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.

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			equity. There are ways to protect interests and the concerns that have been voiced this morning so please let's move forward and make this positive change. Thank you.	
M172	David Alvarez		Thank you and thank you everybody for the opportunity to share our thoughts. In the 1950's a major piece of transportation entered out county and that was the 5 which had some detrimental effects, like, Barrio Logan, so, as we are looking to the future and how we can undo some of these unjust auctions and in a way that is equitable and is reflected in the real need of community. The climate crisis is impacting communities like Barrio Logan the most and we have the data to show. I propose requesting that SANDAG reconnect Logan or a freeway lid or cap as part of one of the priority projects in order to undo some of the impacts that greenhouse gases have and to increase opportunities to youth. I am glad that there is a lot of space protected in the plan, but there are communities like this one where they don't have access to parks and they don't have that type of amenities and they need. I want to ask if someone could give us clarification from SADGAG staff. Page 277 is where my letter request for this is and the response from SANDAG is not very clear whether our proposal makes it into this plan. I would appreciate that. Thank you so much.	The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. An equity specific project list has been included in the draft 2021 Regional Plan Appendix H. SANDAG will include the projects that benefit environmental justice communities in Appendix A in the proposed Final 2021 Regional Plan. This information was published in Appendix H Attachment 3 of the Draft but will be moved to Appendix A and updated. Caltrans District 11 has also expressed interest in exploring opportunities for freeway caps. In alignment with the 2021 Regional Plan, SANDAG and Caltrans District 11 are currently developing Comprehensive Multimodal Corridor Plans in coordination with agency partners and local city governments. Comprehensive Multimodal Corridor Plans (CMCPs) are data-driven plans to reduce congestion and generate transportation choices while preserving community character and creating opportunities for enhancement projects. Opportunities for freeway caps will be considered in the CMCPs.
M173	David Guerrero		Good morning SANDAG. My name is David Guerrero. I have lived in City Heights since October 1981. I have loved this area and I have seen this area change in many ways sometimes in positive ways and in not many positive ways too. But I truly believe in the positive change happening in City Heights and we need more. First, I would like to thank SANDAG for the Regional Plan. We need a bold plan for the future of San Diego and including projects like the Purple line. It would make a huge impact for City Heights and for connecting the region. One of the downsides of City Heights is seeing so many have been displaced, end up homeless, and out of work. Displacement makes people have to travel farther to work, medical appointments and errands. That is why I believe that the Mid-City corridor plan will be a huge benefit for the transit dependent communities like City Heights residents as well as tourists coming to City Heights and Little Saigon. I want to thank you for including the anti-displacement study and incentive program in the original plan. I cannot emphasize how important it is for San Diegans and its communities to get the support they need going forward. Thank you again.	SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with other SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.
M174	Deborah Knight	Friends of Rose Canyon	Hi, my name is Deborah Knight. I am the Executive Director of Friends of Rose Canyon, which works to preserve the the Rose Creek Watershed- the main fresh water tributary of Mission Bay. That water shed includes Marian Bear Park. Marian Bear Park is adjacent to the 52 between I-5 and the 805 when you head east or west in the 52 in that stretch, the southern boundary there is MSCP protected land and open space park. The EIR proposes to add three lanes to that area and a huge expansion with massive highway connecters to the 52 to the 5 and the 805. This will have a tremendous negative impact on Marian Bear Park and I strongly urge you to reject this option. This will impact the users- people like me. You want people to live in high density community, we want to build up. Yet, you are destroying the local parks that is highly used. It's also core land of the MSCP. It is completely protected and this would obviously build a huge- if you expand a huge highway- along an MSCP, there will be tremendous direct and indirect impacts. It's certainly- and it's a roadway that's listed as four lanes now- it's six lanes for long stretches of it. So please, I strongly oppose the widening of the 52 between the 5 and 805, and hope that you will protect the parks for the people that you want to live in certain areas and that you will protect our core MSCP lands that are gradually being degraded by adjacent development. Thank you.	SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Canyon, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Creek will be a key component of these planning efforts.
M175	Deborah Knight	Friends of Rose Canyon	Good morning my name is Deborah Knight. I am the Executive Director of Friends of Rose Canyon which is part of the Save Marian Bear Park Coalition. I urge the Board today to act to save Marian Bear Park. Marian Bear extends for 3 miles along the south side of the 52 between the 5 and 805. It is one of the City of San Diego's oldest open space parks. Its trails provide an escape to nature for urban residents of all ages. It is also part of the city's MSCP. The Regional Plan proposes to add 3 additional highway lanes to the 52, right next to Marian Bear Park plus multiple new highway connectors in all directions to and from the 5 and 805. Please remove these today from the draft Regional Plan. SANDAG staff has told us to not worry, that they will try to use existing footprint to add this massive amount of new highway in these 3 miles. That is not the point. The point is three more lanes of traffic noise and air pollution along the edge of an open space park. 3	SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Canyon, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Creek will be a key component of these planning efforts.

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			more lanes of highway trash and polluted storm water into San Clemente Creek which flows right into Mission Bay. 3 more lanes of impacts to wildlife and to the wildlife corridors that connect Marian Bear Park to Rose Canyon and MCAS Miramar. You will hear much about the cost of the RTP. I am here to tell you about the high price Marian Bear Park will pay if you add 3 more lanes of highway right next to it. And the high price that San Diegans who love Marian Bear Park will pay. The Regional Plan proposes 406 miles new lane miles of highway. Surely today you can remove these.	
M176	Donald Beyer		Good Morning. Right now, we have a ridership of about three percent of our population on mass transit and a big question is how much ridership is expected after these 168 billion dollars is spent. The other point I'm going to make is with cost overruns there are always cost overruns, especially when we're talking about government agencies, and is that calculated into these costs? The other point is electric use. There's going to be a significant increase in power usage by using these mass transit systems and how is this project going to account for the extra power that's needed to power the system. We are already paying some of the highest taxes in the country here in San Diego County. I just went through my property taxes and paid all those and I found that there was significant increases there. There's significant cost increases in gas which means we're paying more in taxes for because we're paying more money for gas. Just because we're getting a little bit of a break on they're not going to take away all the taxes on fuel right now, And then just adding this in, we're still going to be paying these taxes and I can see that we need to do something, but you know, what more can we do? How much money do we, as citizens, have to pay to contribute to these kinds of systems where, you know, we're going to be lucky if there's 10 or 15 percent usage after all this is done. Thank You.	The 2021 Regional Plan used comprehensive data analytics to establish where people live, where they work, and what activity centers they were traveling to. Based on this analysis, new routes and modes of transportation were developed. Trunk line transit is connected to Mobility Hubs and Flexible Fleets that provide the first and last mile access that has previously been missing. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M177	Dorothy Martin		Good morning Chair and members. I am from Vista, my name is Dorothy Martin and I am glad for this opportunity for public comment. I am new to your public meetings and very nervous right now so I will try to make it short and sweet. I did submit a letter via email and I've submitted my comments to my Mayor, Judy Ritter. I'd like to say I agree with the goal of clean air. I think that is something we can all agree on. I have lived in LA in the 60s and it was not too clean back then. San Diego was a good destination because of the clean air so I think we have something to be thankful for in San Diego County. Even LA is seeing a lot of good progress in that area of clean air. I want to go on to oppose the vehicle mileage tax for various reasons. One, I feel that it is taking a lot of revenue from North County and applying it to projects in other parts of the county that we don't see a direct benefit. I think that's kind of taxation without representation and also there is a lack of accountability there because we don't see where our money is going. Secondly, I feel that it is an invasion of privacy. An earlier comment as talking about this. There are some privacy concerns there that is very different to resolve because of cyber security. Thirdly, I feel that it would punish me for example, as a driver of a personal vehicle for my business, personal, and recreational use of those vehicles. I think that is something that infringes on my freedom. Fourthly, -(cut for time).	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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M178	Elizabeth Chavez Carrasco		Hi good morning everyone, my name is Elizabeth Chavez. I have been living in Barrio Logan for about 11 years. Thank you for including some of the transit lifelines. I am in support of the Regional Plan. I have been a commuter myself since high school. I heavily rely on public transportation for work, school, volunteering and so much more. Most of the places that I do need to go are more than half and hour so having those bathrooms stops will help ease that stress. However I am still concerned about the folks in the community possibly being displaced within their own homes. I have seen families and friends who had a hard time finding those affordable housing and then ended up moving far away from their own homes. I would like to thank you again for the anti-displacement study and the incentive program. Unfortunately there is still more work to be done. Please commit to building the infrastructure so developers can build affordable housing. Thank you.	The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. One of the plan's near-term priority implementation actions includes a Regionwide Displacement Study (Appendix B) in order to ensure our housing efforts do not lead to the displacement of current low-income residents in communities where housing growth occurs. Caltrans District 11 has also expressed interest in exploring opportunities for freeway caps. In alignment with the 2021 Regional Plan, SANDAG and Caltrans District 11 are currently developing Comprehensive Multimodal Corridor Plans in coordination with agency partners and local city governments. Comprehensive Multimodal Corridor Plans (CMCPs) are data-driven plans to reduce congestion and generate transportation choices while preserving community character and creating opportunities for enhancement projects. Opportunities for freeway caps will be considered in the CMCPs.
M179	Eric		I have a couple questions that I would like answered by the Board. First question is, does the Board have a unilateral authority to impose, I don't care what you call it, a road usage charge or a vehicle mileage tax, does the Board have a unilateral authority to impose that without a vote on the people of San Diego? The other part of the comment that I wish to make is, I want to thank the Regional Plan for doing all their hard work. I think it is really great however I think there is one flawed point. The vehicle mileage tax is a punitive. I want to emphasize the word punitive, user and tax that really targets the wrong people. We should be looking at car manufacturers and car sales with low gas mileage usage. I know it might be too late to do that, but it is my personal opinion. It is very short-sighted in terms of who you're going to go after to engage in this punitive measure. The other thing is, there's been several comments about replacing the gas tax. I never voted for the gas tax in the first place so I do not see the need to replace it. I do agree that this is a more equitable solution but I do not agree with doing it. Thank you very much for your work and thank you very much for your time.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M180	Frandy D.		I'm a longtime San Diego resident a homeowner and a property owner, so I pay many taxes. I also have a car and I intentionally bought a car that would be long running so that I would not have to incur, you know, having to buy a new car having to pay a lot maintenance fees. I keep my car tuned up everything that needs to be so it can be as fuel efficient as possible. I appreciate the gentleman and the woman that were talking about the electric cars. To me the bottom line is it seems to me you're concerned that you're not going to get taxes from people that own electric cars. They have a very simple solution, just allot a certain amount of money to when electric cars are bought and or do that to people that already have existing cars. The thing is we don't live in this area that's really central like San Francisco area BART works really well because a lot of people are going into the city. It's too expensive to go in there and you know you can't find parking anywhere. San Diego area is way too spread out for this to work, it's not that we don't want to help the environment. We can do everything we can to help the environment. There are carpools. There's other things, but the reality is very few people actually	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and

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			take public transit because, like so many people have said, it's just way too inconvenient because you have to transfer, you have to wait forever. What if you have a job that you have to go to more than one job site? It's not possible. It's gonna really hurt businesses that have that a lot of in different fields have to go to different job sites once they get to work. So, the idea is to make cars more fuel efficient for those of us that can't afford new cars - keep them tuned up. You now, use the freeway and don't do a lot of stop and go for people that have elect.(cut for time).	businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
M181	Frank Landis	California Native Plant Society	My name is Frank Landis and I'm the conservation chair for the San Diego chapter of the California Native Plant Society. I want to thank the Board and the staff on trying to get this plan together because as everybody knows it's a horribly complicated mess to try and solve. I wanted to make a couple comments. One is just to put this in context for why it's so important to have fully funded conservation plan. As I think we all know if we have been paying attention to the COP26 or IPCC or all these other global efforts, conservations and the extinction crisis and global warming are two ends of the same problem. So you're trying to balance the solution for one on the back of the other, they both fail. We are stuck with a horribly complicated problem and we're trying to solve it for future generations. In San Diego, as far as anybody knows we are the most biodiverse county in the United States. That means we've got 1700 plants in an area about the size of the big island of Hawaii and that is about twice as many plants as in Hawaii. But we've also got 3.3 million people which is 19 times more people than the big island of Hawaii. I am picking on Hawaii in particular because Hawaii is currently the extinction capital of the United States. We really don't want to replace them but when you pack that many people in that small space with that many species, it gets really complicated to solve the problems. One example of how complicated it is, Marian Bear Park issue where you're trying to cram a transportation corridor in next to a wildlife corridor. It also points out that if you expand one you cut the other. So we really have to balance both of those. I want to point out I used to do environmental science and 30 years ago I was talking about climate change at the symposium. We are decades behind. I thought when I was an undergrad everything would be solved by now, but we really have to work. Thank you.	Thank you for your support of habitat conservation efforts in the region. SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the California Native Plant Society, City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.
M182	Gretchen Newsom	IBW 596	Hi, Gretchen Newsom on behalf of IBW 569 and our 3600 union power professionals and electricians. As we have said many times before your Board. We must change our path to preserve the future and quality of life for generations to come. Which is why we are so very pleased to see the 5 Big Moves introduced and now pleased to see a new bold regional transportation developed in alignment with those values. We now have a real plan to expand transit, make more efficient use of our highway system and meet San Diego's climate goals. These smart investments will also create thousands of local jobs and ensure a better quality of life for all. As the Plan outlines, now is the time to make strong, immediate investments in transit like railline build outs and the increase of transit frequency all while expanding our network of mass transit opportunities including those youth opportunity passes. We are pleased to see that the Plan has gotten better and better. We stand united with our partners in urging you to implement strong and immediate investments in transit, climate action, job creation, and lifeline community connections. Thank you.	We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.
M183	Gustavo Dallarda	Caltrans	Thank you, Mayor Gloria. So the Department of Transportation, we sent a four page letter in response to the RTP you can see it in attachment one, on page 345 so I won't go through all of it I'll just mention briefly that we support this plan. This plan is in alignment with state goals and we've been working together collaboratively with SANDAG staff on the development of this plan for the last couple of years so I want to thank Ray and Coleen and the rest of the SANDAG staff for taking our input during that time and incorporating that input as part of the plan. I wanted to	We appreciate the collaboration and partnership with Caltrans throughout the development of the 2021 Regional Plan.

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			make sure that that's known because it almost sounded from one of the earlier comments that Caltrans hasn't been part of this and we have. I wanted to address specifically the issue about the shoulder conversions. There are many parts in our county, as well as other parts of the state where we don't have shoulders and we have lanes in those areas. So this not something new, this is the reality that sometimes, although you would want to have full shoulders in general, sometimes you have to make some trade-offs and utilize that space for something else. And that is the reality that if we want to complete our managed lane network in this county we're going to have to do a lot of shoulder conversions. Shoulder conversions do not require legislation but they do require engineering studies to make sure that we address safety issues, drainage issues, and those considerations have been fully vetted with Caltrans with SANDAG staff and that the investments required to turn those shoulders into lanes are included in the original plan so in the cost of the projects of the shoulder conversions those costs are already addressed in there obviously the details are for each individual project are going to have to be studied further in environmental documents pursuant to CEQA and NEPA but we are fully on board with the plan put forward, particularly for The 5 Big Moves and the complete corridors portions. We are fully aware that in some areas even to complete the managed lane network we may have to convert some general purpose lanes into managed lanes. Now for that, we will require legislation and we will work through those details in the future. Thank you.	
M184	Hon. Councilmember Christopher Rodriguez		I had a lot I want to say but I've been just crossing things out because I want to have respect for time so I'll quickly try to summarize my comments. So the city of Oceanside is extremely concerned with the proposed plan and the draft EIR's failure to identify funding for two desperately needed regional transportation projects. Number one is the I-5 HOV lanes from the 78 to Vandegrift identified and labeled as I-5 HOV lanes and number two the I-5 and SR 78 interchange. I'll start with the I-5 HOV lanes from the 78 to Vandegrift. The draft EIR states that the proposed I-5 HOV lanes project will be implemented by year 2025 however to date SANDAG has yet to allocate funding or support on this major freeway improvement project's design. It is imperative that the proposed project not only remain on the proposed plans list of projects but also receive adequate funding and commitment from SANDAG to bring the project to fruition especially, if the draft EIR analysis relies on it. With the year 2025 nearly three years away it is unrealistic and disingenuous for SANDAG to continue stating that the project will be delivered on time. The next most important project here in North County - I-5 and the SR 78 interchange, the proposed interchange project would establish a much needed connection between the west and east side of I-5 at the 78 interchange under existing conditions there is no safe access for bicyclists and pedestrians across I-5 in this area similar to the I-5 and for the I-5 HOV lanes project the draft EIR identifies and relies on the this projects for the EIR however SANDAG has not formally appropriated the funding needed to implement it by 2025. My staff reiterated these comments from the city to SANDAG and I know you're going to respond to those by November 30th so I don't need a response necessarily right now. I do want to make brief comments because there's a there's a lot of comments and a lot of themes surrounding equity and the environment and that's something that I'm very passionate about and so what I what I'd like to start out by saying is climate change calls for adaptation and balance, not panic and fear. What I mean by that is - let me go over some data and facts and I would love to sit down with some of my colleagues or the public in a productive conversation. During the 30 years that countries have been setting GHG emission reduction targets, global emissions have risen by 60 percent. More recently from 2009 to 2019 emissions rose from 29.7 billion tons to 34.2 billion tons, a 15 increase. During the more recent period the countries of the organization for economic cooperation development the OECD reduced their emissions however non-OECD emissions grew by almost 10 times the reduction in emissions achieved by the OECD countries. So pretty much there are countries that are not participating on efforts to counter global warming and those regions now produce 65 of the world's emissions. The United States with less than 15 of global emissions, because it's a global problem ladies and gentlemen, is a bystander at best, while China accounts for 30 percent. The mistake that many make is to simply say that they don't believe global warming is happening. The overwhelming scientific research	Responses to comments submitted by the City of Oceanside are included in the 10/29/2021 Board report, Item 3, Attachment 1, pages 1E-16-20. The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment (to Harbor/Vandegrift) as part of its project level environmental analysis. While funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Regional Plan. The interchange improvements, including managed lane connectors, between SR 78 and I-5 are included in the 2035 phase of the Regional Plan. The 2021 Regional Plan must meet all federal and state mandates, including the SB 375 regional greenhouse gas (GHG) reduction target set by the state and federal air quality conformity requirements. The City of Oceanside's comment on the Draft EIR is responded to in the Final EIR.

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			confirms that global warming is in fact happening. Climate scientists are just not sure to what extent and estimations and opinions vary widely because of this uncertainty. So to me and to many of the constituents I represent, spending billions of dollars locally to over mitigate a problem that we're merely a bystander on doesn't make sense. At the expense of our region, California is a prime example of short-sighted and unrealistic policy decisions in all major areas of society from public safety, quality of life, housing allocation, schools, business, labor, transportation, and the environment, the policies are all geared toward bigger government, massive spending, massive taxation to fund special interest elites at the expense of hard-working Californians. I want to end with one last item a report most climate change activists do not understand the impossibility of achieving a net zero due to current technologies and limited supplies of green exotic minerals and metals even if it was worth trying to do so I encourage them to review the paper by Cambridge University emeritus professor of technology Michael Kelly which shows that replacing just the United Kingdom's 32 million light duty vehicles of the 1.42 billion cars in operation worldwide with next generation EVs would require incredibly vast quantities of materials that do not exist. Thank you.	
M185	Hon. Garry Bonelli, Commissioner		Speaking on behalf of the Port of San Diego and the Regional Plan we're very supportive of the Harbor Drive 2.0. It's a great example of a multimodal corridor that will benefit not only people movement, but goods movement and really help out the communities of Barrio Logan, National City, Chula Vista, and the South Bay. Also we're very supportive of the goods movement to keep the rail line open, to get it into a tunnel to get more efficiency out of the North-South rail line and that's from the Port's perspective. From my personal perspective, having a little bit of history here with SANDAG and as a member of your Transportation Committee listening to my fellow Board members out there we know that trying to create this plan in a dynamic, complex living environment in sort of a politically charged era, it's very difficult. The point that Mayor Salas makes about change in entrepreneurship and innovation, keep in mind by the year 2050, 30 years from now half the people working out there in their jobs, they'll be working in jobs that don't exist today. It just shows the rapidity of change - how quickly we're changing. I salute SANDAG and their plan for the outstanding work they've done on the equity front and sustainability. They've been very, very transparent. Hasan's been brutally honest about the costs and what this plan will cost however, when it gets right down to it most residents want less traffic congestion. Yes, they're worried about the reality of climate change, sea level rise, but they're looking at less traffic congestion. When I participated in the public workshops I heard a lot of different comments and then you asked posed two questions and the questions are what do you like most about the plan and what do you like least about the plan. I like that it's a plan, if I read the tea leaves right, you're going to have the votes to move this plan flowing forward and it's going to keep federal and state dollars flowing into our region - that's important. What I like least about the plan it's too slow to implement and way, way too costly. And I have all the respect in the world to SANDAG staff having been part of that organization for a number of years, however we're listening to the strongest voices on the Regional Plan people that are bicycling and walking, jobs, environmental advocates and God love them for their passion and being involved in the plan. Just to point out to our fellow directors we've come full circle. Back in 1975 a visionary like Hasan, a guy by the name of Dick Huff, the first Executive Director of SANDAG came up with a plan. A heavy rail plan matrix throughout the County people said a heavy rail plan it's going to cost several billion dollars and didn't support it. How can that be - ridiculous way ahead of his time. But then that the 13 cities and the County that comprised SANDAG refused to modify the land use policies and that several billion-dollar heavy matrix rail system went down the drain and this was even before Peter Calthrop came up with the phrase of transit-oriented development. Yes, SANDAG has delivered hundreds maybe thousands of projects, programs, and services however, during the ensuing 45 years and many subsequent RTPs and billions of dollars spent	The *TransNet* measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. Some of the remaining projects in the *TransNet* measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure.

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			traffic congestion and our living environment has gotten only worse. That's the reality of less hassle-free living now it's up to our 18 cities the county and our tenant advisory agencies who all have land use powers the strength of SANDAG and all these 29 agencies as they have they sit at the same planning table however, the weakness as you hear time and time again, is there is no regional constituency you're involved about your community, your city, maybe your sub-region, but you really have a hard time connecting the dots to provide a regional network. I think picking up on what Mayor Salas to say the future is for men and women entrepreneurs and a good old American ingenuity to look at what we can do with what we have when I look at the alternative analysis, I'm in favor of alternative to working on the system we have getting the most out of it doubling or tripling the ability in our quarters to get people and goods through that. Thank you for your time and my hope is that by the year 2050 if I understand what Ray Major tells me as far as demographics our population is going to slow down enough that we may be able to catch our breath. Thank you. Thank you, Madam Chair.	
M186	Hon. Jack Shu, Councilmember		First I want to give recognition to all the public members who have made comments and I want to give at least my appreciation for participating in this long process. I also want to make note that this RTP is two years behind schedule but this RTP is different from previous ones it's made a significant change in direction and I applaud Hassan and staff for making this change. Going this new direction is I think very significant and important for so many of us in our community and for our future. To make this short I want to ask some quick questions of Ray Major and Coleen and you could keep your answers short if you can. One is who's been paying for our roads in the past and currently are we fully paying for our roads and maybe you have some quick answers for us. Right so this was under the belief that users should pay their way correct, but when did that stop happening in terms of paying its own way. Correct and what one of our main thrusts of this board is to try to address equity. So is that equitable if people that have more fuel-efficient cars or electric cars are not paying as much as those who are paying driving less fuel-efficient cars? Correct so would you say a road usage fee would be more equitable and actually help poor people more than our current system? Correct so that was actually my second question we don't need to go into the methodologies but there are ways to adjust for people who are very poor to have to drive and lastly there's a lot of talk of VMT reduction this plan uses various mechanisms including road use fee as well as high occupancy lanes to reduce vehicle miles traveled so Coleen would do the state that's asking us to reduce vehicle miles traveled per capita correct? How much do we have to reduce? Correct so we're asking the agencies that have land use authority to work with this plan to reduce their vehicle miles traveled. Which means General Plans and Land Use plans have to change at the County and city levels. I think that's a very important point that our Board of Supervisors have that job, our City Councils have that job to change our land use plans to help reduce greenhouse gas emissions to conform with the plan that SANDAG has. I want to just make the point that this plan is it is a change from our past. We need a check on reality - the reality is that widening roads does not work, has not worked - induced demand is a real issue and that's not how we want to go in the future. We need to reduce vehicle miles travelled and that's why this plan I think is really going in the correct direction. I hope it goes faster, I hope that we do have these pilot programs in our mobility hubs and that we make those pilot programs work today and tomorrow so we could implement it within a very short time and make our communities work well so we have a healthier community as well as reduce greenhouse gas emissions. Thank you so much.	A response to these comments was provided at the 10/29/2021 Board Meeting. The gas tax does not fully pay for our infrastructure needs. Overtime, as we move towards a more fuel efficient and electric fleet, we need to find a replacement to the gas tax to maintain roads and invest in new projects. Under the current system with the gas tax, people who are driving more fuel-efficient cars pay less than those who have less fuel-efficient cars. This can be a social equity issue because people who earn lower incomes typically drive less fuel efficient, older model cars. With a road usage charge, these inequities can be overcome by designing the program with adjustments based on income. The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT. Meeting the 19% target will be accomplished through a variety of strategies including land use. The Regional Plan includes an SCS land use pattern that focuses future growth in the mobility hub areas with the goal to get people closer to destinations so that trips are shorter and closer to mobility options such as public transit and flexible fleets.

Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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M187	Hon. Lesa Heebner, Mayor		I'm really supportive of what I'm hearing this a plan that looks forward and most importantly considers the threats that we face from climate change. It's an indisputable fact that fossil fuels are the largest contributors to this threat in our region and to me it's the rationale for thinking differently about our transportation choices so I commend this. I recognize that not everyone is used transit and I mean even in New York City I think it's just 56% of the population uses it so I do have a couple of questions. What is the mode share now and anticipated to be in 2035 and 2050 in the peak and off-peak? If you could also remind us of the greenhouse gas savings with this plan versus doing nothing versus business as usual. Also just to clarify, the road user charge as Mayor Salas was mentioning, will the board have the ability to adjust who is and is not charged depending on equity issues and other considerations that we might have.	A response to these comments was provided at the 10/29/2021 Board Meeting. Analysis of GHG reduction and mode share for all trips, including comparisons to a "No Build" scenario, can be found in the Regional Plan performance measure results in Appendix T, Attachment 6. Equity is at the forefront of everything we are doing. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge.
M188	Hon. Mary Salas, Mayor		Thank you very much and thank you to the staff that has worked so hard on developing this plan so far thank you to all the public that weighed in on this discussion during the different meetings that we've had and also through written communications it's really important for us to hear all those concerns and ideas and suggestions and what I wanted to say is you know this is a bold look at the future and it's a blueprint for the future and that we have to understand that infrastructure and projects take years and years and years to develop and during the time that that's taking to develop there's technologies that are going to develop in ways that we can't even understand right now that will allow us to implement all these different ideas that are incorporated in in the plan right. So a lot of the concerns about tracking how are you going to do this how are you going to keep track of this I think that you know the technology will evolve so that we'll get answers as this plan goes forward. I think that it's imperative that we support this vision you know I have grandchildren I worry about their future I can see the world that how it's changed here the climate regionally in San Diego and we can see it going on all around us from you know the polar ice caps melting just the future doesn't look good unless we get a handle on climate right and we have to act as expeditiously as possible and all of that means a lot of sacrifice and a lot of change in the way that we do things, a lot of change in the way that we think. But we have to do it and we have to do it for the future of our humanity. We have to do it for the future of our economy going forward and so yeah there's going to be a lot of changes within this plan that right now seem like another world. But we can go back a hundred years and look at the way that we're doing things now and you know who would have thought that, you know when they were writing futuristic novels that we would even surpass the ideas, ideas that were presented then. But I do have a concern, and the concern is for the working people that will have to use freeways in in the future and I hope that when we're developing these plans and it's not just going to be the region of San Diego but it's going to be statewide, it's going to be nationwide, that we take a look at the haves and have nots and actually the growing middle class that is becoming rapidly the have-nots and think about the people that can buy electric automobiles, the people that can install solar in their homes, they're people with expendable income. We look at the working class people and they're not the ones that can afford the branded cars and they're even making choices today you know whether to choose a new electric vehicle or you know conventional fossil fuel driven vehicle and you know the difference in the price point is pretty significant so I hope that going forward that not only are we looking at the plans and how they have to evolve nationwide, statewide, but what the state can do to make sure that there's some kind of program where we can encourage	A response to these comments was provided at the 10/29/2021 Board Meeting. States like California and other jurisdictions have implemented their own sales and gas tax measures to try and address the maintenance and operation of road networks. However, as vehicles' fuel efficiency continues to improve, and fossil fuels consumption is phased-out with electric vehicles, a new tax model will be necessary for the ongoing maintenance and operation of our road and highway networks. The revenues necessary for the ongoing maintenance will still need to be collected. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge.

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			people to make those choices about moving to electric vehicles. I fully support this plan I know it's a huge change for people and the people that are concerned about the user tax, you know we're paying for that right now and gas taxes are diminishing and there has to be a way to pay for the roads in the future and so this is what tries to answer right now so those are just my comments. Staff you've worked so hard on this plan it's been a long journey getting to this point and we need to move forward. Thank you.	
M189	Hon. Matt Hall, Mayor		I would just like to start off saying that I think we're all here for the greater good of not only our communities but of our region. And I would just like to take a minute to go back a few years when Todd Gloria and Mayor Salas or Mayor Heebner and Judy Ritter and a whole bunch of us try to reach out on the last time that we try to do a initiative to support this region as a whole and we all worked together to support one another. I feel today is that some areas need different infrastructure than others and some of the infrastructure that perhaps we ask for in North County - if which was passed the Coastal Commission over 12 years ago at 14 lanes with a 100 percent approval by the board which was a powerful statement. So moving forward, and for many years a lot of us have built our infrastructure here in North County knowing that there would be this kind of transportation infrastructure to work upon. I say that because I've always supported in Chula Vista when we wanted to fast track the 125 were all there for it. The border and the border crossing we've always been there in support of including the road infrastructure that's being built there today to get goods movement into this country back and forth. I support Mayor Gloria in the harbor and the increase of tonnage that's going to go through that harbor and I mean it's 350 percent increase in tonnage by 2050 that has to somehow get through this county -and part of that's on I-5 and so it's concerning to me that when we start to have conversations and we're trying to reduce infrastructure that has already been reduced once and trying to make everything work. I say that because we all are promoting bicycling. In Carlsbad we have over two days that are over 2500 cyclists go up and down our coast so it's important to us but if you don't have the right road (highway) infrastructure you start to get vehicles coming off it on to local roads. In Carlsbad we have Coast Highway, El Camino Real, College, Canon, Palomar, Rancho Santa Fe, La Costa. If I-5 isn't at capacity if they're built of what the capacity should be if the 78 and 5 interchanges aren't built, if the 78 isn't widened to four lanes, and we don't build the infrastructure then vehicles start to go off that onto our major arterials which causes major concern. The other thing and this a question, you know we talk about using the shoulders as a lane and who's gonna pick up the liability for that? That's my first question? Is there an answer? So, let me understand this we've been working on this plan how long and how long have we been saying we're going to use the shoulders and we're basing this plan in its capacity on use of shoulders and you don't have the answer to that? So, let me ask the question differently if you're not able to accomplish that, are you going to go ahead and build out that are you going to go ahead and build out the freeway to 12 lanes and all the infrastructure, all the interchanges that go along with that? So, I guess you know just what I'm listening I'm hearing there's a lot of theory but not a lot of reality in what we're doing today. So you know it's concerning I mean we're going out and asking people, asking the region to invest 160 some billion dollars in a plan and a lot of this is based on safety, our local economies, and in North County we've been waiting right now over 12 years since the I-5 passed the Coastal Commission to get that built. How many more years will we be waiting - this has a direct impact on today's economy and the safety on our roads and infrastructure today and you would think we'd have a little bit more certainty here. The other thing that was interesting in just listening to some past comments is that we're proposing to do two sales tax initiatives but yet the SANDAG you're not going to ask for those? I mean help me understand this a little clearer I mean you're wanting one in 2022 and you're wanting one in 2028. Well I would think just from a timing perspective if you want to do it in 2022, there's a certain	The 2021 Regional Plan maximizes our existing roads using technology to manage how lanes are used which reduces traffic congestion and delay. The proposed network of managed lanes also encourages carpooling, vanpooling and taking transit which creates more roadway capacity without adding additional lanes. With respect to shoulder conversion, implementation would require close collaboration with state and federal agencies and possibly legislation. SANDAG has been meeting with Caltrans to discuss the approach to managed lane construction in the proposed 2021 Regional Plan. The 2021 Regional Plan must meet all federal and state mandates, including the SB 375 regional greenhouse gas (GHG) reduction target set by the state and federal air quality conformity requirements. Underlying assumptions are determined based on many factors: ability to meet state and federal requirements, including Title VI and environmental justice considerations, best available research and best practices used by other regional agencies, results of model sensitivity tests (which show the impact of different strategies on variables such as VMT), and alignment with phasing of projects and revenues. The regional road user charge in draft Regional Plan was assumed to be $0.02/mile beginning in 2026; however, in the proposed final 2021 Regional Plan, the state and regional road user charge are planned to begin in 2030. This is a reasonable assumption for the 2021 Regional Plan based on literature and assumptions made by other regional agencies in their regional transportation plans, the impact on ability to reduce GHG emissions and air pollution, and the potential for additional revenues. It is important to note that federal and state governments require the 2021 Regional Plan to include a financial plan that contains cost estimates and revenue sources that are reasonably expected to be available. Please see Appendices U and V in the proposed 2021 Regional Plan for more information about cost estimation and revenue assumptions. The assumptions made in the 2021 Regional Plan should be considered a starting point for future study. Prior to implementing a road user charge, SANDAG would complete more detailed sensitivity analysis, perform an equity analysis, closely coordinate with the state and regional partners on similar efforts, evaluate technology options, and prepare a pricing implementation strategy that considers all pricing elements identified in the 2021 Regional Plan. Responses to the City of Carlsbad's letter are included Attachment 7E to Appendix G of the proposed 2021 Regional Plan.

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			time frame you have to get this done and I would think if we are proposing it you would be well on your way to making that happen. It surprises me that you say that this something we're going to think about the Board's going to come up with and so on and so forth. You would think it'd be part of the plan that we're discussing today so I've got a lot more comments. I would echo mayor Gaasterland, we put in a real detailed letter also and I would like to but I guess I don't have time to go into the Palomar Corridor and some of the deficiencies there and so on and so forth so I will save it for a later date but I just want to leave us with one thought our credibility is at stake at this moment in time and so how we as individuals move forward with this or who we choose to work with there's a lot at stake here. A lot at stake.	
M190	Hon. Mayor Alejandra Sotelo-Solis		Okay thank you again chair now for the opportunity to speak my comments are "companeros". This the time for change. This our vision to help our future, really create a more healthy, a cleaner, more united and connected region. We have to have vision and that's why we were elected in that in these roles. In February 2019 we had the conversations of what we envisioned as a region to make all those things happen. Is it going to cost money? Damn right it is! But it's that investment, we put our money where our mouth is, we make it happen because it matters to us. It matters to have that connectivity, it matters to mother earth that we lower our greenhouse gas emissions. So from the community charettes that I know each one of us has pushed whether it be virtual attending events you know at the various community spaces and creating bilingual, multilingual spaces the community has provided that input. We are very close to creating a plan that we can be proud of but also to leave a legacy for the future generations we can't say we want some things but we can't do this we like this but we don't want this because it should be about how do we get to that yes because ultimately the technology will meet those needs. We don't know everything, true, but we have to think visionary and this RTP is worth doing and worth doing right. I want to thank staff again for helping to really capture all of the ideas from 1000s of people that submitted comments online on the RTP in writing but also too through those community charettes, as well. And thanks for the community for being consistent in the messaging to create accessible mass transit . Is everybody gonna hop on a bus tomorrow - no but we're gonna make it a lot sexier, a lot smoother, a lot faster and more convenient so that it can be that option the better option and again the goal is by 2030 we make it free for everyone lastly I just want to say that as data driven decision makers with this 2021 RTP which will sunset in 2050 so we have quite some time to see it in its lifetime. We want and we said we wanted outcomes that are still works in progress because we're still getting the detail done but we want outcomes that we can point to that are measurable because we each have our climate action plans that we have to achieve we also have you know the equity lens that really takes into account those communities that have been disadvantaged when it's come to mass transit as well as freeways coming through the neighborhoods so this really is an opportunity to make a difference to be bold to be strong and I can't wait till we have the continued conversation of December. Thank you chair.	The 2021 Regional Plan has been developed with equity at the forefront. A better transit system is a fundamental component of this Regional Plan and SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. We appreciate your support and feedback.
M191	Hon. Mayor Todd Gloria	City of San Diego	I see other members of the Board seeking recognition I just want to conclude with expressing my appreciation to staff as well as the members of the public who joined us today. This a massive undertaking. It's taken a couple years now as you saw from the timeline that was in the staff report and we're not done yet. Obviously we'll have the opportunity to continue to discuss this matter through December when this Board will be asked to make a decision. I believe today's conversation will help advance making that decision in part because we're able to spend a fair amount of time discussing important issues, educating the public and fellow board members and I look forward to that conversation. I will just note that this plan presents a grand vision with some extremely large moves and we're changing the way that we've done things in the past. Big changes are understandably difficult and they certainly will have opponents, but I for one am committed to this vision. It is necessary for the protection of our economy, our environment, and our climate. And while there may be details that we'll have to continue to work on, specifically I would like staff to respond in writing	SANDAG staff responded to the letter from Councilmember LaCava regarding SR 52. In the proposed final 2021 Regional Plan, the road usage charge would begin in 2030 to align with efforts at the state and other regions. We understand there are concerns around the privacy and implementation of a road usage charge. Significant additional work, including public involvement, pilot testing, legislation and much more will be necessary to inform implementation of elements of this plan, including the road usage charge. SANDAG would continue to collaborate with other regions, the state, and federal government that are evaluating options for a road usage charge. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system

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			to Councilmember LaCava's concerns about SR 52. I believe you're all aware of that and just appreciate it if you could get back to him and the concerns from the community. In the overall grand scheme of things this plan is headed in the right direction there were a lot of feelings that the previous Regional Transportation Plan didn't embrace the future. This one clearly does. There are questions specifically about the road user charge. I would remind folks that the road user charge was in the existing Regional Transportation Plan, and it's a part of this Regional Transportation Plan. Unlike some of the news reports I've seen it is not happening today tomorrow or next year, the earliest could be 2030. Staff can correct me, but I believe that this may require an act of Congress and the State Legislature before we could actually even do this. And no one is proposing doing this without robust transportation alternatives, so this isn't solely doing it for the sake of doing it, this to provide actual options to folks. And lastly, as many people have said, and something I would be very supportive of, is that it would be done while removing the gas tax, because it's quickly becoming an ineffective means of financing our infrastructure. Transportation financing will always be a conversation, and we should have that conversation. I think a lot of times folks here and in other settings like to have their cake and eat it too. Well we have to pay for stuff and that's fiscally responsible. To pass a plan of this magnitude without identifying reasonable solutions, even if they don't come to pass, that would be irresponsible. And the days of irresponsible financing at SANDAG are over. So let us be clear with the public of what we're trying to accomplish. Let's be honest when explaining to people what we're talking about. But most importantly, let's make sure that we get the change that San Diegans are demanding. I think Gary Bonnelli mentioned it exactly right. People hate traffic. The fact of the matter is that's not going to get any better with if we continue to persist with the status quo. Rejecting a 20th century vision and embracing a 21st century vision will help address traffic congestion, will help meet our obligations under state and federal law, will help improve quality of life and I think for everyone here and there is a divide on this Board, I want to acknowledge that. I think everyone on this Board can appreciate and embrace the fact that we need to grow our economy and create jobs for San Diegans - good paying jobs that can support themselves and their families. I believe this plan is capable of doing that and that's why I'm supportive of it. I look forward to additional conversation and for the members of the public who ran out of time today, please submit your comments in writing. They'll be made a part of the official record of today's discussion.	and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.
M192	Hon. Racquel Vasquez, Mayor		First, I want to take this opportunity to thank staff for the tremendous amount of work that has gone into the Regional Plan but also many community members who took time out to participate in this process, your input is invaluable and also each and every board member who has been along every step of the way in this journey the one thing that I can say is that I'm really excited to hear about the changes described by staff and excited because this is exactly the direction we asked staff to go in as a member of the audit committee I value transparency which has been the focal point in SANDAG's development of the Regional Plan now we know that staff has published the raw data, worked closely with the audit committee and staff and work to get public input from people that live in all parts of the county. In fact early on I attended the East County regional in-person meeting to hear the candid conversations that came forward from the community and in May of this year welcomed the public to the East County virtual meeting and introduced the draft plan for the community to give input also prioritizing equality in the Regional Plan and including free transit is setting the stage for the region we all contributed to this plan and I think that it reflects what the region wants and this is what I want my two daughters and their friends to inherit. Lastly a renewed commitment on flexible fleet pilot projects and learning and leaning on technology and the private sector will help the Regional Plan deliver projects better and faster as the Regional Plan moves forward I would like to ask staff to work with me and my team to get a pilot project in my city that would be the city of Lemon Grove so consider that as we move	Thank you for your comment. The deployment of Flexible Fleets such as e-bikes, shuttles, or ridesharing is envisioned as part of the 2021 Regional Plan to provide convenient and affordable options in different communities. SANDAG is developing a Flexible Fleet Implementation Strategic Plan to identify near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals. We appreciate your support.

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			forward now we all know that this work was not easy but I am confident we will not let fear steer us away from making good decisions. So let's move forward with the plans and again I'd like to say thank you to everyone involved.	
M193	Hon. Rebecca Jones, Mayor		Thank you Chair Blakespear. So I wanted to talk just a little bit about the history of SANDAG. We've always worked together to fill the needs of all the unique needs within the county our unique needs have always been discussed and there's always been collaboration that has happened to address those needs. The hostility and complete callous ignoring of many of our mobility needs these days is not only unprofessional but it's not how a regional agency should conduct itself and run business. The voices of many of our communities are left out these days and our needs are not being met San Diego county residents need to pay attention to what's going on and they deserve more and it just it makes me really sad to see how many of these upgrades and these mobility issues are being addressed in San Diego city but North County is being left out and East County is being left out and it just really is unfair and it's not equitable in any sense of the and the ideas that that are happening It just It really saddens me that this where we're at today and so I do have some questions so there's been a lot of discussion about citizens initiatives and SANDAG initiatives and us meeting two half cent sales tax initiatives coming forward on top of VMT that's for everyone not just for electric drivers and the gas tax does remain it's right in the funding strategy and by the way I would like personally and I'm sure all of the other board members would like an updated version of that I think it was attachment x or v in the original regional transportation plan we really need an updated version of that so we can have all the information that we need to move forward with that but anyway there's been discussion about two half cent sales taxes the VMT and then the new manage lanes by repurposing 819 miles of current lanes which is it's a huge burden for our residents but my questions are has staff actually worked for and started to draft a hashtag sales tax for the 2022 ballot well if we're if we're depending on that as part of our funding we should be having a measure ready for the board to review and I would like to know when that deadline would be for us to approve something at the board level for a 22 election? So I guess my next question happened what happened before you add up the plan so I guess my next question would be has anyone from staff had any communications with member of the public including representatives from labor unions regarding a half cent measure as part of a citizen initiative? Have any board members had any communications with union representatives about introducing a citizens initiative? Well, I would like to go on the record and I think everyone should that I have not been approached by any union representatives or any union members to put a citizen's initiative on the ballot or just to discuss something like that so anyway I guess that would be all the comments for now. Thanks.	A response to these comments was provided at the 10/29/2021 Board Meeting. The Regional Plan considers the current and future needs of the whole region, including communities in north county and east county. The reimagined transportation system offers benefits that extend through the region as residents and visitors travel outside their communities for work, recreation, school, entertainment, and accessing basic needs. Appendix A describes the proposed projects organized by corridor area, including the following corridors that serve north county and east county communities: North County, San Vicente, I-5 North Coast, I-15, I-8, SR-94, SR 125, and Coast, Canyons, and Trails. In the proposed final Regional Plan, corridor-level maps have been added to better communicate the proposed projects in each area. In addition, the investments in Next OS, Flexible Fleets, Mobility Hubs, and programs are presented as regional investments and SANDAG intends to work collaboratively with each jurisdiction to implement the Regional Plan and customize mobility solutions for the unique needs of each community.The regional road user charge in the draft Regional Plan was assumed to be $0.02/mile beginning in 2026; however, in the proposed final 2021 Regional Plan, the state and regional road user charge are planned to begin in 2030. This is a reasonable assumption for the 2021 Regional Plan based on literature and assumptions made by other regional agencies in their regional transportation plans, the impact on ability to reduce GHG emissions and air pollution, and the potential for additional revenues. It is important to note that federal and state governments require the 2021 Regional Plan to include a financial plan that contains estimates of costs and revenue sources that are reasonably expected to be available. Please see Appendices U and V of the proposed final 2021 Regional Plan for details about cost estimation and revenue assumptions for the Plan. The assumptions made in the 2021 Regional Plan should be considered a starting point for future study. Prior to implementing a road user charge, SANDAG would complete more detailed sensitivity analysis, perform an equity analysis, closely coordinate with the state and regional partners on similar efforts, evaluate technology options, and prepare a pricing implementation strategy that considers all pricing elements identified in the 2021 Regional Plan.Although the referenced ballot initiative is neither sponsored nor promoted by SANDAG, the proposed 2021 Regional Plan presumes some measure of funding from a number of potential future sales tax measures. SANDAG staff have not communicated with union representatives regarding a half cent sales tax measure. With respect to board member communications, SANDAG does not have authority over individualboard members' interactions with their stakeholders or constituents.
M194	Hon. Steve Vaus, Mayor		You know there's been a sense for quite a while that SANDAG wants to make driving so pricey and painful that folks are forced out of their cars whether gas or electric and onto public transit now comes the promise of free transit paid for with a mileage tax a tax which is going to increase everybody's cost to living whether they drive or not. The irony is if you do force drivers to take transit you won't collect enough mileage tax to cover the cost of the free transit and a new tax scheme is going to be required. I have great respect for Hasan and staff and I appreciate their hard work but this seems an awful lot like a SANDAG shell game making promises that are impossible to keep and I just can't support it. Thank you.	Equity is at the forefront of everything we are doing. SANDAG will not put out a plan that hurts working class San Diegans. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more

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				than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge. Any program we put in front of you will outline a process where no one will be worse off.
M195	Hon. Terry Gaasterland, Mayor		I want to really echo so much of what I've heard from Mayor Jones, from Mayor Salas there's so much here for us to as a group to think through together and I want to add another element to this. The City of Del Mar submitted a 32-page detailed commentary on the draft environmental impact report for the Regional Transportation Plan. That 32-page letter has my name on it but it was put together in close consultation and analysis with our Director of Planning in the Planning Department and a few points from that letter really inform us here and I'll give these examples. So for example, having details on the mobility hub boundaries. Is Del Mar part of this hub or is it not? To really understand the greenhouse gas impacts, what are the assumptions on emissions reductions with rail traffic? Does it include assuming the railroad transportation will double twice the number of trains? And it also assumes that tier 4 engines will be on all the trains by the year 2025. However, the RTP has no requirement for operators to convert, so we need to be careful about our assumptions and really understand the greenhouse gas accomplishments and trade-offs and details on that are in our commentary. Third point, incompleteness in any study impact, really understanding whether something is feasible. Small example, both of Del Mar's lagoons are missing entirely from the draft EIR that's the San Dieguito lagoon and the Peninsula's lagoon. Also missing are things like Del Mar's bluff overlay zone that protects the bluffs and the lagoon sea level rise adaptation plan, our land conservation ordinance, and since I know those are missing from Del Mar and have not informed the EIR which means we don't have a complete analysis of greenhouse gas emissions reductions. What about other cities, do other cities have important policies that haven't been included in this? And then I'd like to draw attention to the Del Mar tunnel which is missing from the draft EIR it's not there in the geology and soils, the air quality, the land use, the project description, the biological resources, the noise, the greenhouse gas, we have a shoreline protection act line, we have an lCP that's certified by the Coastal Commission and those aren't yet in the draft EIR, so I want to draw attention to that because in this RTP there is a lot here that is good, it really steps back and asks the questions what do each of us need and what do we need together. Listening to Mayor Jones I'd like to really emphasize that we need to ask about each region and interconnecting the different regions. We're a community but we're a community of communities, so we also need to ask why do we need it, and then once we've understood need, what do we want, and then how do we pay for it. So I want to say a little something about how to pay. Coming from a computer science background and coming from a biomedical background I know that it's possible to do double-blinded identifiers and to track entities where an entity is a car and with really clever AI algorithms (and yes, my background's AI), we can without identifying individuals and by looking at aggregate behaviors have suggestions for personalized driving plans. These are underway, these are in research and it can be done in a way that doesn't violate privacy. So for example, electric vehicle cars, we can track for a given car where is it charged, is it local or is it not local, and given the locale how many charges, and then you extrapolate numbers of miles traveled from charges. However, we have to remember that sometimes if you drive a little further you may get there faster so we need to think hard about a blanket four cent a mile tax on vehicle miles traveled and think differently about how to replace the declining gas taxes. I would encourage that this regional transportation plan be crystal clear that as revenues decline from gas taxes, how do we pay for what we need and what we want together as a community and as individual communities - let's be creative. And I want to echo what Mayor Salas says - the concern for working people who must use the roads and highways for their work and have excessive miles compared to someone who's going to commute to and from a place of work we really have to	The City of Del Mar's comment on the Draft EIR has been responded to in the Final EIR.

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			think about how to balance this and that's a social question so I want to put these questions out there and I'll draw your attention to our 32-page letter and please read for yourself page 30.	
M196	Jesus Gallegos Munoz		As mentioned by almost all commentators and standing, staff climate change is a very pressing issue that has affected all residents in San Diego County. As for myself I can speak for the ever-increasing exposure to gas emissions in the communities of Barrio Logan and Logan Heights communities, that besides being divided by the interstate 5 freeway in the 1950s, we're still feeling the repercussions through their exposure to gas emissions. With that being said, there are needed changes to the draft plan and for that I would like to highlight and advocate for the incorporation of Reconnect Logan into the final draft. Reconnect Logan is asking for a freeway lid over the interstate 5 freeway to connect Barrio Logan and Logan Heights in order to reduce the exposure to greenhouse gas emissions, as well as for allowing to create new parts and open spaces for the possibility of affordable housing on top of the freeway lid. Our community has been affected long enough and for that I really urge for the incorporation of Reconnect Logan to the final drafts plan. Thank you very very much.	The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. An equity specific project list has been included in the draft 2021 Regional Plan Appendix H. SANDAG will include the projects that benefit environmental justice communities in Appendix A in the proposed Final 2021 Regional Plan. This information was published in Appendix H Attachment 3 of the Draft but will be moved to Appendix A and updated. Caltrans District 11 has also expressed interest in exploring opportunities for freeway caps. In alignment with the 2021 Regional Plan, SANDAG and Caltrans District 11 are currently developing Comprehensive Multimodal Corridor Plans in coordination with agency partners and local city governments. Comprehensive Multimodal Corridor Plans (CMCPs) are data-driven plans to reduce congestion and generate transportation choices while preserving community character and creating opportunities for enhancement projects. Opportunities for freeway caps will be considered in the CMCPs.
M197	Joe LaCava	Councilmember of City of San Diego	Good morning, Joe LaCava, Councilmember City of San Diego. Chair Blakespear, members of the Board, thank you for allowing me to make a brief comment this morning. I want to start by expressing my appreciation for the work that has gone into the Regional Plan and the transformative measures included in this draft, and how it aligns with our shared vision of climate action, decarbonization, good jobs, and social equity. I want to thank Mr. Ikhrata for making this the basis of the Regional Plan. In concert with the decarbonization of our transportation system, and planning improvements to overall mobility, thank you for your commitment to maintaining the region's open space and preserving our natural environment. In the tri-canyon area, the City of San Diego has preserved natural habitats, offers an urban escape and protects our watershed. As I've discussed in my two letters to the Board, there are minor modifications to the Regional Plan that can preserve this valuable open space and reduce cost. The first is to pursue the north-south alignment of the Coastal Railtrail adopted by the City of San Diego and already partially funded. And remove the draft east-west alignment through Rose Canyon. No longer should we be looking so something akin to the Pacific Coast Trail which is scenic and impressive but will be hardly used. Every dollar for bicycle lanes has to be focused on commuters and daily trips. The other is to constrain proposed improvements to State Route 52 between the 5 and 805 to its current footprint and protect Marian Bear Memorial open space park. While these two requests within my district may be small compared to the scope of the Regional Plan, they speak to the balance of creating a world-class transportation system that preserves the unique and natural aspects of the San Diego region. Thank you again for your time this morning and thank you for all your work to advance this plan.	The Coastal Rail Trail segments requested for removal from the transportation network represent 6.2 miles of regional bikeways connecting to the existing Sorrento Valley Coaster Station, as well as future Transit Leap services. These projects and this alignment were first identified in the 2000 Coastal Rail Trail Project Study Report, included in Riding to 2050: The San Diego Regional Bike Plan (2010), and identified as a priority project in the Bike Early Action Program (EAP). SANDAG will not be removing these projects from the 2021 Regional Plan since they represent important connections. SANDAG will continue to work with the City to address concerns and align with local planning as these projects progress. SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the proposed final 2021 Regional Plan, as you suggest, will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.
M198	John Alvarado	The Good Neighborhood Project	I'm really concerned. My name once again is John Alvarado and I run a non-profit organization called The Good Neighbor Project San Diego. We work with about 3,500 kids and their families here in Barrio Logan next to the freeway. This last year when the schools were not open, the kids who would have ordinarily would have taken the bus and would have gotten their food, they couldn't. So the school called me up representing about seven different schools and I would pick up the food and deliver it to homes and in the worst case scenario to a street corner for homeless delivering all this food. Now I was spending over a thousand dollars of my own money just to fuel each month. How is it that a non-profit is going to have to absorb a 4% or 4 cent fee? Is there some other way we can do it for non-profit organizations? There's going to be a huge impact on families who have no other option than to drive from the different communities that they're from because there is no mass transit right where they're at. Please take this into consideration there's got to be some way through the state or whatever that we can go ahead and somehow not penalize non-profits or for that matter the folks who HAVE to drive. Thank you so much and I appreciate what you're doing, and I understand why you're doing it but there's got to be some kind of accommodation for us that worked so hard to make a difference. My family's been here in Barrio Logan for over 100 years, and I have been here 71 of those years. Thank you.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the

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				Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M199	Karen Zerk	Friends of Rose Creek	Good morning Chair Blakespear and members of the Board. My name is Dr. Karen Zerk and I'm a resident of the City of San Diego and the Executive Director of the Friends of Rose Creek which is part of the Save Marian Bear Park Coalition. San Clemente Creek runs through Marian Bear Park and flows into Rose Creek and then into Mission Bay Park. Rose Creek is already on the 303D list for heavy metals and other pollutants. At this time I would like to request the removal of additional travel lanes and connectors on State Route 52 between Interstate 5 and 805. While staff indicates they will stay within existing right-of-way additional traffic trash and noise will negatively impact Marian Bear Park for urban residents and wildlife. Marian Bear Park has already suffered degradation and loss of habitat due to the Mid-Coast Trolley Extensions that removed oak trees that were over hundreds of years old because they were in the railroad right-of-way. Once the Blue Line opens, the noise of the Trolley will further degrade the experience of recreating at the west end of Marian Bear Park. Please remove the 3 additional lanes and new connectors to protect the habitat wildlife and recreational experiences the MSCP lands of Marian Bear Park. We have an ongoing issue in the City of San Diego where open space is degraded by SANDAG projects. Habitat restoration occurs outside the City of San Diego which means that city residents who want to experience nature have to drive outside their communities to reach open space. City residents who don't have vehicles just are shut out of recreating and open space. We need to stop degrading our MSCP lands and other open spaces within the city of San Diego, protect them for the amazing resource that they are. They provide places to cool off, get away from concrete infrastructure, give our children -(cut for time).	SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Creek, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.
M200	Katie Meyer	San Diego 350	Hello, good morning Board. My name Katie Meyer and I am with San Diego 350. I want to thank the Board and SANDAG staff for their hard work on their Regional Plan and for advancing their boldest plan yet and for these changes. I think it is really important that we focus on the scale of the issues at hand rather than how we will pay for the solutions. Right now we are facing a climate emergency. We are already experiencing severe weather, the worse drought in a century, fires, deadly heat waves, and this is just the beginning of a laundry list of catastrophic consequences for not acting sooner. As a 20 something I am terrified of my future. I am even more terrified of our inactions that future generations will face who will not be able to have normal childhoods that are not impacted by devastating effects of this crisis. Right now we are at a moment where we have a chance to mitigate some of these worst effects. Nearly half of carbon emissions in San Diego county are transportation related. Our public transportation system in its current state will not reduce emissions to the point needed. It will not adequately alleviate equity concerns we must improve San Diego's public transit system so it is a real alternative to private cars. SANDAG needs to do everything in its power to combat this crisis in this Plan. Our lives and our planet depend on it. This Plan is a great start but SANDAG needs to do better in reducing emissions and supporting transit equity and that includes incorporating the community-generated 10 transit lifelines in the Plan to improve our transit system and prioritize environmental justice communities. I think it is especially important that we look at anti-displacement measures in our plan. Thank you so much.	The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG will be implementing a social equity planning framework throughout the entirety of the Regional Plan. For more information on how the plan will benefit our region's most underserved communities, please refer to Appendix H to find comparative analyses of projected social equity performance measure outcomes (such as PM2.5 emissions exposures) through Build vs. No-Build scenarios. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. SANDAG recognizes the urgent need for reduction of GHG emissions, especially in our most marginalized communities, as a key aspect in an equitable and sustainable future for the region. Attachment 2 of Appendix A includes a list of transportation projects aimed to reduce pollution exposure in our region's disadvantaged communities in accordance to AB805 and CalEnviroScreen 3.0.
M201	Laura Hunter		Good morning and thank you so much for taking my comment. I did file a letter but I just wanted to add my voice and thank the staff for your responsiveness. It's not everyday that we get real	We appreciate your support and feedback. SANDAG is working on designating pilot programs and near-term projects to begin implementing some of the elements outlined in the proposed

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			significant changes like this in response to public comment and I really appreciate it. I wanted to just voice my support for the revisions that are proposed. Particularly, I'd like to focus on the bike and pedestrian safety measures. We really want to help and encourage the kind of behavior asking everybody to engage in plus the free transit. I think that's wonderful. Obviously I am very involved with habitat plans and they're a very important part of allowing our region to plan in the best and most effective way for infrastructure development, sustainable agriculture and habitat preservation. We know now after the pandemic how important access to open space is for people. It's important for the species and now we know that it's important for climate sequestration. I understand is not perfectly understood and there is still more dialogue that needs to happen. I really hope that you will support these measures so that the dialogue can continue. I just want to end with just one short comment. COP 26 opens next week and the President Alok Sharma says there is no viable pathway to net zero emissions that involve protecting and restoring nature. I think this plan and these revisions will really help us get to that point. Thank you very much.	final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.
M202	Mary		Good morning Board members. VMT violates citizens constitutional rights to privacy and places undue burden on your constituents who can least afford a mileage tax. Bike lanes have been horrible for the environment. Now in the East Village, at any given intersections' cars are stopped in four directions while bike lanes have a green light. Car exhaust is spewing in the air while no one is using the bike lanes. Cars now have to circle the block 10 times before finding a parking spot using more fossil fuels and adding exhaust fumes into the environment. Ironically, your presentation depicted the corner of Fifth and Juniper. I recently sat in a parking spot nearby while by daughter was in a local business. During the 45 minutes that I was there, not a single bike rode up the Fifth Avenue bike lane. Kevin Costner was wrong. Just because you build it doesn't mean they will come. Congratulations to Hasan Ikhrata and the Board for your misguided waste of taxpayer money while adding to environmental problems. Thank you for your attention.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M203	Megan Flaherty	San Diego Audubon Society	Hello, my name is Megan Flaherty. I am with the San Diego Audubon Society. First, I want to echo some of the comments by Laura and Michael Beck regarding the many benefits for natural habitat and wildlife that is going to come out of this plan. Especially the funding for the implementation of the MSCP and protection of our natural lands that's a really big win and we really appreciate that. We do have some concerns however about some of the additional lanes especially Marian Bear Memorial Park. Similar to what Debbie said, any increase in traffic there is definitely going to impact that park as well as wildlife and the water quality and air quality that all ends up in the bay. We want to have as clean water as possible in that watershed. There is a little bit of confusion because the additional lanes will be within the existing footprint but there will be the construction of new connectors, concrete connectors. We're very concerned about how those are going impact the already extremely squeezed wildlife corridors on either ends of Marian Bear Park. That speaks to another concern that we have which is that we should be making this Regional Plan, is protecting, and not negatively impacting our network of wildlife corridors throughout the county. Because wildlife already have a pretty difficult time getting from point A to point B. So, if the staff could look into removing those additional lanes alongside Marian Bear, we would really appreciate it. We are also looking at other alternatives that are not going to negatively impact that wildlife corridor. But overall, we really appreciate all the hard work and thank you for being able to comment today.	Thank you for your support of habitat conservation efforts in the region. SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the San Diego Audubon Society, California Native Plant Society, City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.

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M204	Michael Beck	Endangered Habitats League	Michael Beck, San Diego Director of Endangered Habitats League. I'd like to thank in particular the staff for their hard work and engagement in particular, your Executive Directors and upper management that have created a culture of responsiveness as reflected in the changes in front of you today. As Laura Hunter said, this is not common experience of ours to see this kind of responsiveness so much appreciation. We strongly support the changes that are proposed and they're making critical improvements including the full funding for the habitat plans which will have a significant impact. Not just on the biodiversity related issues but on climate change built on this permanent green belt that is developing within even the urban or suburban areas of San Diego county. Assuming the responsibility of protecting our amazing biodiversity and perpetuity. This funding would build on previous SANDAG commitments and efforts towards these habitat plans. You'll see an example of this on your December 10th, Board meeting agenda. This natural open space is vital to maintaining a high quality of life as the region grows and develops. This is not something you see in many places in Southern California. It's our hope that 50 years from now that kids will be able to look out of whatever window of the type of transportation system they're in. And as they're going down the I-5 and still be able to see mule deer in the green spaces along this corridor. Thank you very much.	To assist the region to meet its habitat conservation goals, the proposed final 2021 Regional Plan has identified $2,087 million for an enhanced habitat conservation, management, and monitoring program. These funds are complemented with a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (See Climate Adaptation and Resilience programs). In addition, future mitigation of the transportation projects included in the 2021 Regional Plan will result in an additional $300-$500 million of land acquisition and restoration for habitat mitigation (incorporated in project costs presented in Appendix A). SANDAG is committed to working with its regional partners to identify funding to fulfill this commitment.
M205	Mike Bullock		Honorable Board, Chair, and Members. Mike Bullock, Oceanside. I support the 5 Big Moves. There are changes I would like. One is to adopt a strategy to get a parking system that stops discriminating economically against those that don't drive. I am a member of the Oceanside Bike Pedestrian Committee. I am not authorized to speak for them. However, I fully support their letter requesting specific projects in Oceanside. I would like to highlight the two that are in Oceanside's Mobility Hub. The first is the Coast Highway Road Diet and incentive zone to expand from state Route 76 to Morris Street. The incentive zone has more density, more height, and less parking. I thank Councilman Rodriguez for his strong support of this project when it was approved by the City Council. The corridor is what's cool about Oceanside. It has a Sprinter station and is only 2 blocks from the transit center and it goes by the City Hall. The City may become the first employer in the world to operate their employee car parking for the financial gain of its employees. The second project is to connect the coast neighborhoods to a high trip count destination shopping center with a bicycle pedestrian bridge over I-5 in the Vista way and Kelly Street area. Again, these projects are in the middle of Oceanside's bicycle hub. Thank you.	We have reviewed and responded to the Oceanside Bicycle and Pedestrian Committee via Tom Lichterman and appreciate your specific recommendations for projects. SANDAG includes bike racks and secure parking in conjunction with our transportation projects and have also provided grant funding for the City of Oceanside to set up a secure bike parking area near their City Hall. We will continue to work with local agency jurisdictions though our Smart Growth and Active Transportation Grant programs to increase the number of secure parking areas for bikes and personal micromobility devices.
M206	Noah Harris	Climate Action Campaign	Good morning Chair and Board, this is Noah Harris with Climate Action Campaign calling in support of the 2021 Regional Plan. Transportation accounts for more greenhouse gas emissions than any other sector in the region by far. If we are to achieve zero carbon as soon as possible, which the most up-to-date climate science says is necessary to save us the worse impacts of the climate crisis, we have to shift people out of their fossil fuel cars and into more sustainable modes of travel such as biking, walking, transit. This is a key strategy for climate action and transportation gesture. One item of discussion has been the road usage charge and we want to urge the Board to consider the following. First, the RUC would be meant to replace the gas tax which will decline sharply with the transition to electric vehicles would still be a crucial funding source for future transportation projects. Also, it would be deeply inequitable to continue relying on the gas tax with the transition to EVs. Working class communities tend to drive older, less fuel-efficient cars while EVs are expensive and inaccessible for many especially for transit-dependent riders. EVs will not address congestion and they will cause pollution and wear and tear on our roads. The 2021 Regional Plan is a critical step towards a more equitable climate, just transportation future. We urge your support. Thank you.	We appreciate your support and feedback. SANDAG is working on designating pilot programs and near-term projects to begin implementing some of the elements outlined in the proposed final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.
M207	Pamela Hetherington	Environmental Center of San Diego	Good morning Chair Blakespear and Board members. My name is Pam Hetherington, I'm on the Board of Directors of the Environmental Center of San Diego. We strongly support the revision staff has proposed for 2021 Regional Plan. In addition to our support for the visions laid out in the Regional Plan, we realize that full funding for our regional habitat plans is foundational to its success. This is our last best chance to address the climate crisis. The environment is the foundation for all living things. The bold vision before you becomes whole with these new changes. It allows San Diegans to act locally while thinking globally before it's too late. Thank you kindly.	We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.

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M208	Paul Jameson		This is Paul Jameson from San Diego. I support this plan and the recent modifications. I'm incredibly excited to see free transit as part of the updated plan. I'm also thrilled about the additional emphasis on Vision Zero. I want to second the earlier comments about bicyclists being killed. You know these are folks who are doing the right thing on transportation, reducing emissions, reducing the number of cars on the road and they're being killed for some time. So thank you for that additional emphasis. I support the plan's emphasis on alternative transit you know the state's requiring reductions in the VMT, vehicle miles traveled. But right now, San Diego has a transportation system that really kind of forces people system to drive which is why transportation is the largest contributor to greenhouse gas emissions in California. I know the road mileage fee is controversial but it addresses the challenges of climate change by funding transportation alternatives. I'm estimating maybe $500 a year for the average driver that's less than a dollar fifty a day. So when you consider the incredible cost of climate change, we are already seeing the impact of...aren't our kids worth spending less than spending a dollar a day to prevent these massive costs down the road? I understand that an additional cost and burden on us but think beyond ourselves to think about future generations and the impact and the changes we can make now. Finally there's just been a huge increase nationwide for actions to address climate change the biggest part of the new federal spending bill is on climate so this plan is a bold step that I think we will see repeated nationwide. It's really in line with this increased importance being focused on addressing climate change. So I credit SANDAG and their Executive Director Hasan Ikhrata for their leadership and I reiterate my support for this plan in addressing climate change. Thank you.	Thank you for your comment and support for the 2021 Regional Plan.
M209	Paula Steger	Artistic Laser Productions	Hello Paula Steger, Artistic Laser Productions. Based on what I've heard so far, my comments have actually changed a bit. I was dead set against the transportation tax based on the fact that our business goes from anywhere 40 to 200 miles each way to do our work and often that requires twice, one-two site survey and one to do the show. However, I was unaware that this tax will be replacing the gas tax so that makes sense. However, I am still against it because the ability to enforce it is going to be a nightmare. I don't think that's going to work. As a consequence, we're actually going to lose funding money. Now one gentleman who drives an electric car made a very good point that it will allow them to be a more equitable share so here's what I propose: leave the gas tax, we pay for what we use and then you can probably calculate what would be a fair amount based on you know, miles driven. Everybody knows that you can check with insurance companies to find out how many miles whatever you can find a way and then come up with a fair price, one-time charge added to the registration of electric vehicles, I think that's an approach that would make a lot more sense because trust me people will disobey. They will not get the monitors in there and not to mention the monitors are going to be again another one more thing that's hackable. I deal with that a lot in my business trying to prevent hacking.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
M210	Phil Petri	Interfaith Coalition for Earth Justice	Great, thank you. My name is Phil Petri. I'm with the Interfaith Coalition for Earth Justice. I want to thank the Board and SANDAG staff for their hard work on this Regional Plan. I believe it is the best Regional Plan, transportation plan we've ever had to come before us. I also want to encourage SANDAG to take further steps to reduce emissions and to support transit equity. We need to do everything we can about climate change, meeting our climate action goals and so forth. I want to address something very specific which is the issue of bike lanes. My wife teaches at USD, and she bikes to work whenever she teaches so she has to go down to the valley and back up again. She is very aware of how much safer she feels when she is in a protected lane. Of course, in some places there are no bike lanes at all, let alone protected lane. She passes everyday by the ghost bike that is right now down on Camino Del Rio south. For the cyclist who was killed there, I think about 2 months ago. So we do not want any more cyclists killed on the road. They are doing the right thing by biking and having 0 emissions getting to and from places. A lot of	SANDAG follows national and international best practices in bikeway design to create safe facilities for users of all ages and abilities. Multiple studies show that most people feel safer in protected bikeways, and when well designed, they are safer than any other type of bike facility. The focus of our efforts is on people who may be "interested but concerned" in riding a bike alone or with family. For those who do not feel comfortable riding in protected bikeways, the California Vehicle Code allows people to bike in the roadway with traffic. While protected bikeways are a great solution in many cases, we know they are not always the best solution. Every project goes through a detailed and context sensitive design process which results in decisions regarding the best facility, which may include protected bikeways, buffered bikeways, shared use paths, or shared streets with significant traffic calming elements. The Regional Plan also includes funding for upgrading existing bikeways that may not meet current best practices in maintenance or bikeway design.

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			people will want to bike safer and we can make it. So I would urge you to make it as safe as possible and to really prioritize that for all of us. The last is to a big picture point about change. Small changes like fees of using the road and I know those can still be punitive, are nothing compared to the kind of change that we will see with climate change that we are seeing. This is the kind of radical change that we face right now. If we do not get this tackled, we are going to be in the soup. So we need to do everything we can on that. Thank you very much.	We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.
M211	Rody Jerome		Good Morning board members. My name is Roddy Jerome. I'm a resident of City Heights. We want to thank you for the funding of the pilot program that was passed last week regarding bus frequency and extended service hours for daily trans users like me that work with senior citizens that can't drive. Shorter commutes help cut travel time and eases the challenge of carrying medical equipment like limited oxygen supply. The pilot program is only a reflection of what is needed in our communities and the Regional Plan, which we fully support, if included will help with bus frequencies anticipated to name a few things. We hope you include in the Regional Plan City Heights is a diverse community with good people, different foods and cultures. Many refugee groups displacement is a concern for our community because the people that live there are who create the community we need to protect transit dependent community members that currently live there. We don't want people to have to move further out of transit service areas and to be burdened with long commutes to get to and from work. Everyone has to do their part to address the housing crisis. I understand that the anti-displacement study incentive program that is included in the regional planning is a good starting place, but I feel we need to do more to protect our communities. We're asking to commit to building the necessary infrastructure so developers can build more affordable housing. Again, thank you for all the hard work appreciate your time and opportunity to be heard.	The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan's near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (or CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems. An equity specific project list has been included in the draft 2021 Regional Plan Appendix H. SANDAG will include the projects that benefit environmental justice communities in Appendix A in the proposed Final 2021 Regional Plan. This information was published in Appendix H Attachment 3 of the Draft but will be moved to Appendix A and updated. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. The Mid-City Trolley Line (Purple Line) is included as the first major new rail project in the Plan and will serve the north-south travel needs in Sorrento Mesa, National City, Kearny Mesa, and University Heights. The South Bay to Sorrento Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of this route. The analysis is studying an alignment that would include stations in City Heights and at San Diego State University (west campus). Also, transit subsidies are a component of the proposed Final Plan and implementation of those subsidies would include a consideration of low-income and youth populations.
M212	Steve Galb		Hello, thank you so much. I am a grandfather concerned for my grandchildren. The climate crisis doesn't care about politics. Without a major course correction, some or even much of the earth will become unhabitable in the future because of extreme heat, severe weather events, crop failure, and inadequate access to water. That future is a hellscape we must avoid. I urge the Board to adopt and quickly build upon the 2021 Regional Transportation Plan. I take transit in San Diego as much as possible and experience how frustrating the current system is. There is a bus that can take me take me near my home but the connection at the Fashion Valley trolley station often requires a 20- or 25-minute wait. I walk the mile home up a steep hill instead of waiting, but most people can't or won't do that. A friend visiting from Germany wanted to go to the beach and took him hours to get there by transit. Please continue to elevate the 10 transit lifelines which were developed by climate justice communities. In particular, be sure to include anti-displacement strategies in future transportation plans to maintain the character of these communities as their transit is improved. Thank you.	Thank you for your comments. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the 2021 Regional Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, will be added to Appendix A in the proposed final 2021 Regional Plan. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG's housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with other SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.
M213	Tim Bilish		Thank you so much for this. I just want to extend the concern for the PM 10 PM 2.5. The staff has described the further attempts to reduce the particular sizes. I would suggest looking at the impact of the wildfires contribution to that as well as the concern for respiratory diseases contributing to the pandemic diseases. Appreciate the time.	This comment is responded to in the Final EIR. Please see Comment 2 in Appendix P to the Final EIR.

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M214	Toshi Ishihara		My name is Toshi Ishihara and I'm over with San Diego City 50 and also a member transportation equity working group. I support the RP and I believe that main objective of RP is transform regional transportation justice and equity. Fight climate change and prepare this region for the future and for the worst impact of climate change and to reduce pollution and greenhouse gas emissions. We should include road-usage fees or in other words. I can say with confidence that 10 years from now most of the vehicles will be better emission vehicles. That we won't use a drop of gasoline. Many of us use public use public transit, but many of us will continue to drive. We have to come up with a means to pay for that. We will need to continue to maintain freeways and streets. The price of climate change is far greater than fees to maintain. For that, we would need a strategy to pay. And the road-usage charge should be considered. I urge all the members support the RP for our bright future. Thank you.	Thank you for your comment and support for the 2021 Regional Plan.
Website				
W562	Debbie Levy		Have you all lost your minds or decided that San Diego has transformed into a county of multi-millionaires? I understand it's to fund transportation but every time I see a bus it is empty and every time I see a trolley it's also barely filled. Not the point-point is that this is a senseless, poorly thought out idea once again by this board. The logistics alone are beyond your reach. Please come to your senses people.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
W563	Gary Lewis Evans		I don't like the new mileage tax - we pay enough gas tax.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

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W564	Gregg Parker		How exactly does SANDAG expect to know how many miles people are driving, and how often will this tax be paid, daily, weekly, monthly, annually? This is an awful idea, and I really think the public outrage is going to be something you have never seen before.	Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.
W565	J Vazquez		Hello - I heard on the radio today that the regional plan is being updated to reflect the infrastructure dollars coming to our region. I'd like to know if the expansion of I-5 between Vista Way & HWY 76 is being prioritized in this update. Thank you.	The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment (to Harbor/Vandegrift) as part of its project level environmental analysis. While funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Regional Plan.
W566	NA		Estaran mas economicas las tarifas del transporte? ******* Will public transportation fares be cheaper/more affordable?	Se enviará un artículo al Comité de Transporte de SANDAG y a la Junta Directiva para enmendar el presupuesto de la agencia y actuar ahora para invertir en tránsito que beneficie a las comunidades de justicia ambiental. Esta acción busca aumentar los servicios en las líneas de tránsito que tienen un servicio poco frecuente en las tardes y hasta altas horas de la noche, y / o proporcionar subsidios a las tarifas para los pasajeros jóvenes. Además, se agregarán más aclaraciones sobre las mejoras planificadas a la red de autobuses, incluidas las mejoras en la frecuencia y el alcance del servicio, al Apéndice A en el Plan Regional propuesto final para 2021. ********** Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, will be added to Appendix A in the proposed final 2021 Regional Plan.